#### CITY OF CERRITOS

#### **RESOLUTION NO. 2021-07**

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF CERRITOS ADOPTING THE CERRITOS ELECTRIC UTILITY ANNUAL WILDFIRE MITIGATION PLAN AND AN INFORMATIONAL RESPONSE TO THE WILDFIRE SAFETY ADVISORY BOARD'S 2021 GUIDANCE ADVISORY OPINION

WHEREAS, Cerritos Electric Utility is authorized under Public Utilities Code section 366.1 to serve as a community aggregator on behalf of retail end use customers in its jurisdiction; and

WHEREAS, the City of Cerritos operates as a community aggregator; and

WHEREAS, Cerritos Electric Utility is generally subject to the legislative and regulatory requirements applicable to local publicly owned electric utilities (POUs); and

WHEREAS, Senate Bill (SB) 1028 (stats. 2016), adding California Public Utilities Code, Section 8387, requires each POU to construct, maintain, and operate its electrical lines and equipment in a manner that will minimize the risk of wildfire posed by those electrical lines and equipment; and

WHEREAS, SB 901 (stats. 2018), amending California Public Utilities Code Section 8387, requires all POUs to prepare a Wildfire Mitigation Plan before January 1, 2020, and annually thereafter; and

WHEREAS, California Public Utilities Code Section 8387(b)(2) specifies the content that must be included in each POU's Wildfire Mitigation Plan; and

WHEREAS, California Public Utilities Code Section 8387(c) requires each POU to have a qualified independent evaluator review its Wildfire Mitigation Plan to assess the comprehensiveness of its plan and to issue a report that is made available on the POU's website and presented at a public meeting; and

WHEREAS, California Public Utilities Code Section 8387(b)(3) requires each POU to present its Wildfire Mitigation Plan at an appropriately noticed public meeting and to verify that its plan complies with all applicable rules, regulations, and standards, as appropriate; and

WHEREAS, AB 111 (stats. 2019), adding California Public Utilities Code Section 326.1, established the Wildfire Safety Advisory Board; and

WHEREAS, AB 1054 (stats. 2019), amending California Public Utilities Code Section 8387, requires each POU to submit its Wildfire Mitigation Plan to the Wildfire Safety Advisory Board by July 1 of each year, starting in the year 2020; and

WHEREAS, pursuant to California Public Utilities Code Section 326.2, the Wildfire Safety Advisory Board will review each POU's Wildfire Mitigation Plan and will provide comments and advisory opinions on the content and sufficiency of each plan; and

WHEREAS, the Wildfire Safety Advisory Board issued the "Guidance Advisory Opinion for the 2021 Wildfire Mitigation Plans of Electric Publicly Owned Utilities and Cooperatives" on December 15, 2020, which directed publicly owned electric utilities to submit an Informational Response by July 1, 2021, responding to a list of specified recommendations; and

WHEREAS, Cerritos Electric Utility staff prepared a Wildfire Mitigation Plan for calendar year 2020, addressing all statutory criteria; and

WHEREAS, Pursuant to the direction of the Wildfire Safety Advisory Board, Cerritos Electric Utility staff completed the Informational Response to the recommendations of the Wildfire Safety Advisory Board; and

WHEREAS, Cerritos Electric Utility verified that the Wildfire Mitigation Plan complies with all applicable rules, regulations, and standards; and

WHEREAS, Cerritos Electric Utility staff will submit its Wildfire Mitigation Plan, and Informational Response adopted today by Cerritos Electric Utility's governing board, to the California Wildfire Safety Advisory Board before July 1, 2021.

### NOW, THEREFORE, THE CITY OF CERRITOS CITY COUNCIL DOES FIND, DETERMINE AND DECLARE AS FOLLOWS:

**Section 1.** The Cerritos City Council, pursuant to California Public Utilities Code Section 8387, adopts Cerritos Electric Utility's Wildfire Mitigation Plan dated May 27, 2021, attached to this Resolution as Exhibit 1.

**Section 2.** The Cerritos City Council, pursuant to California Wildfire Safety Advisory Board (WSAB) Guidance Advisory Opinion, adopts Cerritos Electric Utility's Informational Response dated May 27, 2021, attached to this Resolution as Exhibit 2.

PASSED, APPROVED and ADOPTED this 27th day of May 2021.

Vida Barone, City Clerk





# CERRITOS ELECTRIC UTILITY WILDFIRE MITIGATION PLAN

**VERSION 2.0** 

May 27, 2021

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#### I. OVERVIEW

#### A. POLICY STATEMENT

Cerritos Electric Utility (CEC) overarching goal is to provide safe, reliable, and economic electric service to its local community. In order to meet this goal, CEU uses Southern California Edison (SCE) to deliver the power that is generated by CEU resources. Electric utilities that own electrical infrastructure are required by California Public Utilities Code 8386 (a) to construct, maintain, and operate its electrical lines and equipment in a manner that minimizes the risk of catastrophic wildfire posed by its electrical lines and equipment.<sup>1</sup>

#### B. PURPOSE OF THE WILDFIRE MITIGATION PLAN

CEU does not own any electrical lines or equipment in the City of Cerritos or in any other area of the state. CEU is located in a region of the state with a very low wildfire risk. No part of CEU's service territory is located in or near the High Fire Threat District designated in the California Public Utilities Commission's (CPUC) Fire Threat Map and all of CEU's service territory is designated as "non-fuel" or "moderate" in the California Department of Forestry and Fire Protection's (CALFIRE) Fire and Resource Assessment Program (FRAP) Fire Threat Map.

Despite this low risk, CEU takes appropriate actions to help its region prevent and respond to the increasing risk of wildfires. In its role as a public agency, CEU closely coordinates with other local safety and emergency officials to help protect against fires and respond to emergencies. This Wildfire Mitigation Plan describes the safety-related measures that CEU follows to reduce its risk of causing wildfires.

#### C. ORGANIZATION OF THE WILDFIRE MITIGATION PLAN

CEU does not own any electrical lines, supply system or equipment and CEU is located in a region of the state with a very low wildfire risk. SCE owns and operates the electrical delivery system within the City of Cerritos. Therefore, CEU's Wildfire Mitigation Plan included the following elements:

- CEU does not own any electrical system infrastructure in City of Cerritos. SCE owns and
  maintains the electrical system infrastructure with in City of Cerritos territory and delivers
  power to CEU customers. Therefore, CEU will depend on SCE Wildfire mitigation plan to
  Cover Public safety power shutoff (PSPS);
- CEU has shared City of Cerritos emergency contact information with SCE as part of SCE PSPS.

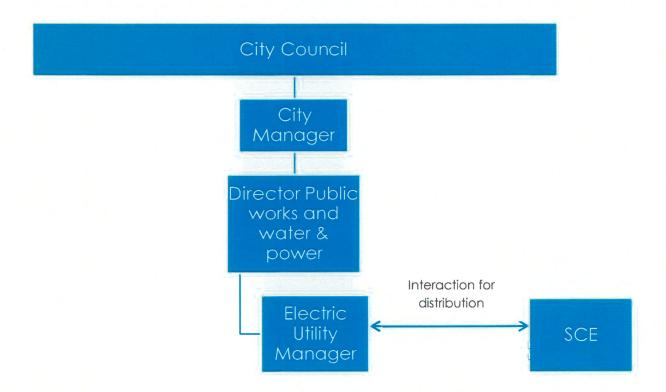
<sup>&</sup>lt;sup>1</sup> Cal. Pub. Util. Code § 8386(a).

#### II. OBJECTIVES OF THE WILDFIRE MITIGATION PLAN

The primary goal of this Wildfire Mitigation Plan is to describe CEU's unique status of not possessing any electrical system infrastructure and to bring attention to SCE's existing programs, practices, and measures that effectively reduce the probability that SCE electric supply system could be the origin or contributing source for the ignition of a wildfire. To support this goal, CEU will regularly contact SCE to evaluate its physical assets, operations, and training that can help reduce the risk of SCE's equipment-related fires.

#### III. ROLES AND RESPONSIBILITIES

#### A. UTILITY GOVERNANCE STRUCTURE



The Cerritos City Council is the governing board for Cerritos Electric Utility.

#### B. WILDFIRE PREVENTION

CEU does not own any electrical system infrastructure in the City of Cerritos. Because SCE owns and maintains the electrical system infrastructure that delivers electricity to CEU's customers, SCE is responsible for complying with applicable standards and regulations, including General Orders (GO) 95, 128, 165, and 174. SCE in the past several years has done clearance trims on trees to maintain a safe distance from the power lines on its own.

The City of Cerritos General Plan 2004 contains guidelines and policies that serve as the City's vision for future planning and development. Mitigation projects defined in the Hazard Mitigation Plan will be required to align with the objectives outlined in the Safety Element of the General Plan.<sup>2</sup>

The City of Cerritos adopted its original Natural Hazards Mitigation Plan in 2004 and updated the plan in October 2016 where it includes City of Cerritos Fire Hazards.

#### C. WILDFIRE RESPONSE AND RECOVERY

Large wildfire response and recovery will be managed according to City of Cerritos Emergency Operation Plan (EOP). During a Wildfire emergency, the City Manager leads the City's response as the Director of Emergency Services. The City of Cerritos is a part of the Los Angeles County Operational Area (OA), which includes the County and its political subdivisions (e.g., cities and special districts). In accordance with Standard Emergency Management System (SEMS) and the National Incident Management System (NIMS), the City of Cerritos sends requests for additional support through the OA and its designated emergency management organization, which is under the Los Angeles County's Office of Emergency Management. In the event that the OA cannot meet the needs of the City, requests are then sent to the Region, State and Federal levels in accordance with SEMS/NIMS.

<sup>&</sup>lt;sup>2</sup> City of Cerritos, Hazard Mitigation Plan

#### D. STANDARDIZED EMERGENCY MANAGEMENT SYSTEM

As a local governmental agency,<sup>3</sup> City of Cerritos has planning, communication, and coordination obligations pursuant to the California Office of Emergency Services' Standardized Emergency Management System ("SEMS") Regulations,<sup>4</sup> adopted in accordance with Government Code section 8607. The SEMS Regulations specify roles, responsibilities, and structures of communications at five different levels: field response, local government, operational area, regional, and state.<sup>5</sup> Pursuant to this structure, City of Cerritos annually coordinates and communicates with the relevant safety agencies as well as other relevant local and state agencies. CEU's role is to coordinate with SCE on PSPS program during fire-treat conditions.

Under the SEMS structure, a significant amount of preparation is done through advanced planning at the county level, including the coordination of effort of public, private, and nonprofit organizations. Los Angeles County serves as the Operational Area and is guided by the Los Angeles County Office of Emergency Management that is made up of County and its political subdivisions. The Operational Area includes local and regional organizations that bring relevant expertise to the wildfire prevention and recovery planning process.

Pursuant to the SEMS structure, CEU participates in annual training exercises. To simulate actual emergencies. They typically involve complete emergency management staffs and are designed not only to exercise procedures, but to also test the readiness of personnel, communications, and facilities. EOC Functional Exercises are typically conducted at least once per year in the City of Cerritos.

- (1) "Field response level" commands emergency response personnel and resources to carry out tactical decisions and activities in direct response to an incident or threat.
- (2) "Local government level" manages and coordinates the overall emergency response and recovery activities within their jurisdiction.
- (3) "Operational area level" manages and/or coordinates information, resources, and priorities among local governments within the operational area and serves as the coordination and communication link between the local government level and the regional level.
- (4) "Regional level" manages and coordinates information and resources among operational areas within the mutual aid region designated pursuant to Government Code §8600 and between the operational areas and the state level. This level along with the state level coordinates overall state agency support for emergency response activities.
- (5) "State level" manages state resources in response to the emergency needs of the other levels, manages and coordinates mutual aid among the mutual aid regions and between the regional level and state level, and serves as the coordination and communication link with the federal disaster response system.

<sup>&</sup>lt;sup>3</sup> As defined in Cal. Gov. Code § 8680.2.

<sup>4 19</sup> CCR § 2407.

<sup>&</sup>lt;sup>5</sup> Cal. Gov. Code § 2403(b):

Planning alone will not achieve preparedness or build and maintain resilience. Training and exercising are essential to make emergency operations personnel, and their support systems operationally ready.

As a member of the Operational Area (OA), all agency and department staff who have designated roles in an emergency (e.g., field and EOC responders) in the OA EOC must receive appropriate SEMS, NIMS, and other specialized training as required by SEMS regulations, NIMS policy, or their job function, respectively. CEU Staff participate in City of Cerritos Emergency Services Coordinator coordinated training.<sup>6</sup>

# IV. WILDFIRE RISKS AND DRIVERS ASSOCIATED WITH DESIGN, CONSTRUCTION, OPERATION, AND MAINTENANCE

## A. PARTICULAR RISKS AND RISK DRIVERS ASSOCIATED WITH TOPOGRAPHIC AND CLIMATOLOGICAL RISK FACTORS

While the City of Cerritos and its surrounding cities are urbanized, it is possible for brush fires to spread and pose a threat to the area. Since the City of Cerritos consists of urban terrain, the expected type of fire is an urban fire. Urban fires often consume buildings with the potential to spread to adjoining buildings; According to City of Cerritos Hazzard Mitigation Plan major urban fires are highly unlikely.

#### B. ENTERPRISEWIDE SAFETY RISKS

According to the City of Cerritos Hazard Mitigation Plan, wildfire risk assessment consists of four steps: Hazard Identification, Hazard Profiling, Asset Inventory, and Loss Estimates. The Risk Assessment provides a foundation for the evaluation of wildfire mitigation measures that can help reduce the impacts of a potential wildfire hazard event.

The first step was to identify all the natural and man-made hazards that might affect the City and then narrow the list to the hazards that are most likely to occur. These hazards included natural, technical, and human-caused events with an emphasis on the effect of natural disasters on critical facilities, services, and roadways (e.g., government buildings, schools, and public services including police and fire). The Steering Committee participated in a Hazard Identification Workshop during the first Steering Committee Meeting to identify and rank the potential hazards within the City of Cerritos.

The second step was to Profile Hazard Events the hazard event profiles consist of either a map indicating the area impacted by each hazard or key information regarding the characteristics of hazard events within the planning area. To develop detailed hazard profiles, relevant open-source hazard studies and mapping projects were reviewed and documented within this report. In addition, the City of Cerritos supplied historical accounts of man-made hazard events (e.g.

<sup>&</sup>lt;sup>6</sup> City of Cerritos, Emergency Operation Plan.

transportation incidents, etc.) that included specific hazard and emergency information. This planning step also determined the magnitude, frequency, and location characteristics of relevant natural hazards (urban fire, fault locations, flood plains, etc.) that were utilized as the design-basis for the loss estimates.

The third step is to Inventory Assets. The purpose of this step is to determine the quantity of buildings, people, and assets in the City of Cerritos that lie in the different hazard areas and what proportion of the City this represents. The asset inventory was completed utilizing spatial Geographic information Systems (GIS) asset locations and specifications for the following assets, General Buildings (City well sites, Civic Buildings, Parks, etc.) Critical Facilities (Hazmat Facilities, Schools, etc.) The development of the comprehensive inventory facilitated the development of loss estimates for all hazard scenarios.

The final step was Loss Estimates. The loss estimate step relied on detailed information regarding the hazard probability and maps that were completed as part of the hazard profiles. This information was utilized to apply the hazard probabilities and recurrence intervals to the City's assets and inventory (buildings and infrastructure). This step was critical in determining which assets were subject to the greatest potential damages and which hazard event was likely to produce the greatest potential losses. The HAZUS-MH software package, which implements the FEMA-developed methodology and runs on a GIS platform, was utilized to map and display earthquake hazard data, as well as the results of damage and economic loss estimates for buildings and infrastructure within the City. To estimate potential losses for the remaining hazards, detailed spreadsheets, including the asset inventory and potential hazards, were used to find the monetary impact of each hazard to the City of Cerritos. In estimating losses, HAZUS-MH and the spreadsheets take into account various impacts of a hazard event such as, Physical damage (damage to public buildings, schools, critical facilities, and infrastructure); Economic loss (lost jobs, business interruptions, repair and reconstruction costs); and Social impacts (impacts to people, including requirements for shelters and medical aid).

The conclusion of this step precipitated a comprehensive loss estimate (vulnerability assessment) for each identified hazard for each specific asset in terms of damages, economic loss, and the associated consequences for the City of Cerritos.

#### V. WILDFIRE PREVENTATIVE STRATEGIES

#### A. HIGH FIRE THREAT DISTRICT

No part of CEU service territory is located in or near the High Fire Threat District designed in the California Public Utilities Commission's (CPUC) Fire Threat Map and all of CEU service territory is designated as "non-fuel" or "moderate" in the California Department of Forestry and Fire Protection's (CALFIRE) Fire and Resource Assessment Program (FRAP) Fire Threat Map.

CEU directly participated in the development of the CPUC's Fire-Threat Map.<sup>7</sup> In the map development process, CEU coordinated with Southern California Edison Company (SCE) and determined that because CEU does not own any electrical system infrastructure, SCE would serve as the territory lead for the region served by CEU.<sup>8</sup>

#### B. DEENERGIZATION

De energization will be covered under SCE's Public Safety Power Shutoff (PSPS) program, which is described in more detail in SCE's Wildfire Mitigation Plan. SCE has the authority to preemptively shut off power due to fire-threat conditions. This option will only be used in extraordinary circumstances.

While a PSPS event is in effect, City of Cerritos will be alerted by SCE via email and phone. SCE will contact the City Manager, Public Works/Water & Power Director, General Maintenance Manager, and Electric Utility Manager.

CEU will then notify customers using the City's emergency notification system as well as regular communication methods. These other notification methods include Alert LA County system, media alerts sent to news wire services for distribution to broadcast and print news media, announcements on the Cerritos TV3, the City's government access cable television channel, email and text message to emergency news subscribers, City's Facebook group and posting the emergency alert on City's website.

Impact to public safety is minimal. The City's 911 center is equipped with backup generation. CEU will continue to collaborate with SCE to revise the Wildfire Mitigation Plan and keep it current.

#### VI. RESTORATION OF SERVICE

Because CEU does not own any electrical system infrastructure in the City of Cerritos, SCE is responsible for any restoration of service after a PSPS event or other outage.

#### VII. EVALUATING OF THE PLAN

#### A. METRICS AND ASSUMPTIONS FOR MEASURING PLAN PERFORMANCE

Because CEU does not own any electrical system infrastructure, CEU cannot use a wires down or ignition based metric. CEU will evaluate alternative options for measuring the effectiveness of this Wildfire Mitigation Plan in future years.

<sup>&</sup>lt;sup>7</sup> Adopted by CPUC Decision 17-12-024.

<sup>&</sup>lt;sup>8</sup> SCE Wildfire Mitigation Plans, February 6, 2019

#### B. MONITORING AND AUDITING THE PLAN

This Wildfire Mitigation Plan will be presented to Cerritos City Council and CEU will present updates to this plan to Cerritos City Council on an annual basis. Additionally, a qualified independent evaluator will present a report on this plan to the Cerritos City Council at a future date.

#### C. IDENTIFYING AND CORRECTING DEFICIENCIES IN THE PLAN

Based on the recommendations of Cerritos City Council CEU will correct any identified deficiencies.

#### D. MONITORING THE EFFECTIVENESS OF INSPECTIONS

Because CEU does not own any electrical system infrastructure, there are no relevant inspections on CEU facilities to describe in this section.

#### I. INDEPENDENT AUDITOR

Public Utilities Code section 8387(c) requires CEU to contract with a qualified independent evaluator with experience in assessing the safe operation of electrical infrastructure to review and assess the comprehensiveness of this Wildfire Mitigation Plan.

CEU engaged Fuentes Consulting LLC as the independent evaluator to complete an evaluation of the CEU Wildfire Mitigation Plan. Fuentes Consulting LLC issued a report of their evaluation.

# CERRITOS ELECTRIC UTILITY WILDFIRE MITIGATION PLAN 2021 INFORMATIONAL RESPONSE

RESPONSES TO WILDFIRE SAFETY ADVISORY
BOARD'S 2021 GUIDANCE ADVISORY OPINION

May 27, 2021

#### PURPOSE OF THIS 2021 INFORMATIONAL RESPONSE

The California Wildfire Safety Advisory Board (WSAB) issued the *Guidance Advisory Opinion for the 2021 Wildfire Mitigation Plans of Electric Publicly Owned Utilities and Cooperatives* ("2021 WSAB Guidance Advisory Opinion") on December 15, 2020. Cerritos Electric Utility (CEU) provides this document to the WSAB in order to respond to each of the recommendations included in the 2021 WSAB Guidance Advisory Opinion. POUs will provide a narrative response and/or a cross reference to the location in CEU's Wildfire Mitigation Plan (WMP) where the topic is addressed. Where the recommendation is not applicable to CEU, the response will provide a brief description supporting this conclusion.

#### II. CONTEXT SETTING INFORMATION

**WSAB** requested that POUs provide an informational table to assist the Staff and Board members in understanding the unique characteristics of each POU.

**Table 1: Context-Setting Information** 

Utility Name		CEU	
Service Territory Size	8.9 square miles		
Owned Assets	☐ Transmission ☐ Distribution ☐ Generation		
Number of Customers Served	300 customer accounts		
Population Within Service Territory	50,143 people		
	Number of Accounts	Share of Total Load (MWh)	
	0% Residential;	0% Residential;	
Customer Class Makeup	50% Government;	35% Government;	
Customer Class Wakeup	0% Agricultural;	0% Agricultural;	
	20% Small/Medium Business;	20% Small/Medium Business;	
	30% Commercial/Industrial	45% Commercial/Industrial	
	0% Agriculture	antigrafia na giudia gia dia gia di	
	0% Barren/Other		
Comico Tomitom	0% Conifer Forest		
Service Territory	0% Conifer Woodland		
Location/Topography <sup>1</sup>	0% Desert		
	0% Hardwood Forest		
	0% Hardwood Woodland		

<sup>&</sup>lt;sup>1</sup> This data shall be based on the California Department of Forestry and Fire Protection, California Multi-Source Vegetation Layer Map, depicting WHR13 Types (Wildlife Habitat Relationship classes grouped into 13 major land cover types) available at: <a href="https://www.arcgis.com/home/item.html?id=b7ec5d68d8114b1fb2bfbf4665989eb3">https://www.arcgis.com/home/item.html?id=b7ec5d68d8114b1fb2bfbf4665989eb3</a>.

CONTRACTOR CONTRACTOR	0% Herbaceous
	0% Shrub
	100% Urban
	0% Water
Service Territory	0% Wildland Urban Interface;
Wildland Urban Interface <sup>2</sup>	0% Wildland Urban Intermix;
(based on total area)	
Percent of Service	□Includes maps
Territory in CPUC High Fire	Tier 2: 0%
Threat Districts (based on	Tier 3: 0%
total area)	
Jan A. A.	□ Includes maps
Prevailing Wind Directions & Speeds by Season	"During the autumn and winter months, high-pressure weather systems develop over the Great Basin and upper Mojave Deserts, heating up the air. These systems often produce strong offshore winds, known as the Santa Ana winds by the National Weather Service, and are described as having strong down slope winds blowing through Southern California mountain passes. Relative air humidity is further decreased as it travels from the high desert to the coast. These hot dry winds blow through valleys and canyons, pre-heating and dropping fuel moisture and relative humidities in all areas of Los Angeles County. This condition produces a high frequency of wildland fires where temperatures are high, while fuel moistures are extremely low, and winds blow at 30-70 miles per hour." <sup>3</sup>
Miles of Owned Lines	
Underground and/or	Overhead Trans.: 0 miles
Overhead	Underground Dist.: 0 miles
	Underground Trans.: 0 miles
	Overhead Distribution Lines as % of Total Distribution System
	(Inside and Outside Service Territory)
Percent of Owned Lines in	Tier 2: 0%
CPUC High Fire Threat	Tier 3: 0%
Districts	Overhead Transmission Lines as % of Total Transmission System
	(Inside and Outside Service Territory)
	Tier 2: 0%
	Tier 3: 0%
Customers have ever lost	☐ Yes ⊠ No
service due to an IOU PSPS event?	
Customers have ever been	☐ Yes ⊠ No
notified of a potential loss	

<sup>&</sup>lt;sup>2</sup> This data shall be based on the definitions and maps maintained by the United States Department of Agriculture, as most recently assembled in *The 2010 Wildland-Urban Interface of the Conterminous United States, available at* <a href="https://www.fs.fed.us/nrs/pubs/rmap/rmap">https://www.fs.fed.us/nrs/pubs/rmap/rmap</a> <a href="https://www.fs.fed.us/nrs/pubs/rmap/rmap">nrs8.pdf</a>.

<sup>&</sup>lt;sup>3</sup> Los Angeles County Fire Department 2020 Strategic Fire Plan, at t 11, *available at:* https://osfm.fire.ca.gov/media/uf5joh2s/2020-lac-fire-plan.pdf.

of service to due to a forecasted IOU PSPS event?	
Has developed protocols	☐ Yes ⊠ No
to pre-emptively shut off	
electricity in response to	
elevated wildfire risks?	
	☐ Yes ☒ No
Has previously pre-	If yes, then provide the following data for calendar year 2020:
emptively shut off	
electricity in response to	Number of shut-off events: none
elevated wildfire risk?	Customer Accounts that lost service for >10 minutes: none
	For prior response, average duration before service restored: N/A

#### III. CROSS REFERENCE TO STATUTORY REQUIREMENTS

**WSAB** requested that POUs provide a clear roadmap as to where each statutory requirement is addressed within the POU WMP.

**Table 2: Cross References to Statutory Requirements** 

Requirement	Statutory Language	Location in WMP
Persons	PUC § 8387(b)(2)(A): An accounting of the responsibilities of	Section III (A)
Responsible	persons responsible for executing the plan.	Page 2
Objectives of	PUC § 8387(b)(2)(B): The objectives of the wildfire mitigation	Section II
the Plan	plan.	Page: 2
	PUC § 8387(b)(2)(C): A description of the preventive strategies	
	and programs to be adopted by the local publicly owned	Section III (B)
Preventive	electric utility or electrical cooperative to minimize the risk of	Page 3
Strategies	its electrical lines and equipment causing catastrophic wildfires,	rage 3
	including consideration of dynamic climate change risks.	
	PUC § 8387(b)(2)(D): A description of the metrics the local	
Evaluation	publicly owned electric utility or electrical cooperative plans	Section N/A
Metrics	to use to evaluate the wildfire mitigation plan's performance	Page N/A
	and the assumptions that underlie the use of those metrics.	
	PUC § 8387(b)(2)(E): A discussion of how the application of	Section VII
Impact of	previously identified metrics to previous wildfire mitigation	Page N/A
Metrics	plan performances has informed the wildfire mitigation plan.	rage N/A
	PUC § 8387(b)(2)(F): Protocols for disabling reclosers and	
Deenergization	deenergizing portions of the electrical distribution system that	Section V (B)
Protocols	consider the associated impacts on public safety, as well as	Page 7
	protocols related to mitigating the public safety impacts of	

	· · · · · · · · · · · · · · · · · · ·	
	those protocols, including impacts on critical first responders and on health and communication infrastructure.	
Customer Notification Procedures	PUC § 8387(b)(2)(G): Appropriate and feasible procedures for notifying a customer who may be impacted by the deenergizing of electrical lines. The procedures shall consider the need to notify, as a priority, critical first responders, health care facilities, and operators of telecommunications infrastructure.	Section V (B) Page 7
Vegetation Management	PUC § 8387(b)(2)(H): Plans for vegetation management.	Section N/A Page N/A
Inspections	PUC § 8387(b)(2)(I): Plans for inspections of the local publicly owned electric utility's or electrical cooperative's electrical infrastructure.	Section N/A Page N/A
Prioritization of Wildfire Risks	PUC § 8387(b)(2)(J): A list that identifies, describes, and prioritizes all wildfire risks, and drivers for those risks, throughout the local publicly owned electric utility's or electrical cooperative's service territory. The list shall include, but not be limited to, both of the following:  (i) Risks and risk drivers associated with design, construction, operation, and maintenance of the local publicly owned electric utility's or electrical cooperative's equipment and facilities.  (ii) Particular risks and risk drivers associated with topographic and climatological risk factors throughout the different parts of the local publicly owned electric utility's or electrical cooperative's service territory.	Section VI Page 5
CPUC Fire Threat Map Adjustments	PUC § 8387(b)(2)(K): Identification of any geographic area in the local publicly owned electric utility's or electrical cooperative's service territory that is a higher wildfire threat than is identified in a commission fire threat map, and identification of where the commission should expand a high fire threat district based on new information or changes to the environment.	Section V Page 6
Enterprisewide Risks	PUC § 8387(b)(2)(L): A methodology for identifying and presenting enterprisewide safety risk and wildfire-related risk.	Section VI (B) Page 5-6
Restoration of Service	PUC § 8387(b)(2)(M): A statement of how the local publicly owned electric utility or electrical cooperative will restore service after a wildfire.	Section VI Page 7
Monitor and Audit	PUC § 8387(b)(2)(N): A description of the processes and procedures the local publicly owned electric utility or electrical cooperative shall use to do all of the following  (i) Monitor and audit the implementation of the wildfire mitigation plan.	Section VII (B) Page 7-8

	<ul> <li>(ii) Identify any deficiencies in the wildfire mitigation plan or its implementation, and correct those deficiencies.</li> <li>(iii) Monitor and audit the effectiveness of electrical line and equipment inspections, including inspections performed by contractors, that are carried out under the plan, other applicable statutes, or commission rules.</li> </ul>	
Qualified Independent Evaluator	PUC § 8387(c): The local publicly owned electric utility or electrical cooperative shall contract with a qualified independent evaluator with experience in assessing the safe operation of electrical infrastructure to review and assess the comprehensiveness of its wildfire mitigation plan. The independent evaluator shall issue a report that shall be made available on the Internet Web site of the local publicly owned electric utility or electrical cooperative, and shall present the report at a public meeting of the local publicly owned electric utility's or electrical cooperative's governing board.	Section VIII Page 8

#### IV. WSAB GUIDANCE ADVISORY OPINION RECOMMENDATIONS

The WSAB Guidance Advisory Opinion identifies 14 specific recommendations that POUs are requested to address in their 2021 WMPs. As specified in Public Utilities Code § 8387(b)(1), each POU is required to perform a comprehensive revision to the POU's WMP at least once every three years. Pursuant to this guidance, the POUs will be updating their WMPs based on the direction of their local governing boards within this 3-year cycle. Because the WSAB's recommendations have been provided after the initial WMP submission, the POUs will have varying capacities to fully address each recommendation in their 2021 WMP. This Section IV restates each of the WSAB recommendations and provides an opportunity for each POU to do one or more of the following: (1) provide a narrative response to the recommendation; (2) provide a cross refence to where in the POU's WMP this topic is addressed; (3) describe why the recommendation is not applicable to the POU; or (4) inform the WSAB of the POU's intent to address the recommendation at the point of the POU's next comprehensive revision, occurring in either the 2022 or 2023 WMP.

#### A. Plan Structure

**WSAB Recommendation #1:** Provide context-setting information about the POU and provide a simple guide to where the statutory requirements are addressed within the WMP.

POU Response: See Sections II and III above.

**WSAB Recommendation #2:** Provide a short description of the POU's public review and approval (if required) for the WMP. This description may also include a brief explanation of the funding mechanisms for wildfire mitigation efforts.

POU Response: Adopted at a City Council Public Meeting.

**WSAB Recommendation #3:** Identify where the POU has posted the most recent Independent Evaluator (IE) Report and if your POU plans to enhance future IE reports, please summarize in what ways.

POU Response: City of Cerritos website

http://www.cerritos.us/GOVERNMENT/\_pdfs/ceu\_wildfire\_mitigation\_plan.pdf

**WSAB Recommendation #4:** Develop, in collaboration with POU industry associations, WMP guidelines for future WMPs, understanding that it may take multiple cycles for POUs to integrate these recommendations into the WMPs.

**POU Response:** This document is intended to include, as appropriate, responses to the recommendations in the WSAB's Guidance Advisory Opinion for the POUs' 2021 WMP. This document also represents the combined effort of the POU industry associations to further the development of a template to respond to the WSAB's Guidance Advisory Opinion in a future reporting WMP cycle.

#### B. Customer Impacts

**WSAB Recommendation #5:** Describe the potential impact investor-owned utilities (IOU) public safety power shutoff (PSPS) events could have on POU customers and how the POU manages these impacts. For POUs that are also balancing authorities, describe the criteria for wildfire related de-energizations. Responses shall only provide aggregated information that does not provide customer-specific information or other potentially sensitive data.

#### **POU Response:**

CEU's customers may be impacted by the PSPS events ordered by SCE.CEU uses Southern California Edison (SCE) to deliver the power that is generated by CEU resources.

The following provides responses to specific questions included in the WSAB's 2021 WSAB Guidance Advisory Opinion:

• What is the relationship between the IOU and the POU during PSPS events?

POU Response: See Sections V (B) CEU WMP.

#### Does the POU receive advance notification?

POU Response: See Sections V (B) CEU WMP

- Is the POU affected at the transmission or distribution level? POU Response: Distribution level
- Is the POU implementing a mitigation strategy for IOU PSPS?
   POU Response: N/A
- Does the POU have its own permanent or temporary generation, (or customer provision of same) allowing it to withstand an IOU PSPS?
   POU Response: See Sections V (B) CEU WMP
- Does the POU distribute back-up generators to customers?
   POU Response: NO
- Does the POU deenergize their own lines when a wildfire threat looms, even if it is not labelled a PSPS?

POU Response: NO

- In the above instance, what customer communication takes place?
   POU Response: See Sections V (B) CEU WMP
- Is the POU a Balancing Authority Area? If yes, describe any applicable criteria for wildfire related de-energization.

POU Response: NO

WSAB Recommendation #6: Describe the utility customer communication plans with respect to wildfires and PSPS, and in particular describe the methods, content and timing used to communicate with the most vulnerable customers, such as Access and Functional Needs (AFN) customers, medical baseline customers, non-English speakers, and those at risk of losing water or telecommunications service.

POU Response: See Sections V (B) CEU WMP

#### C. The Grid

WSAB Recommendation #7: Provide details on each POU's system hardening and grid design programs, including: (1) the goals of the programs and the risk any particular program is

designed to mitigate; (2) approach to PSPS mitigation and prevention; and (3) identify any resource shortages.

POU Response: See Sections V (B) CEU WMP

WSAB Recommendation #8: Describe annual visual patrols on potentially impacted circuits and the risks the POU is inspecting for. Describe whether and how system inspections lead to system improvements. Describe line patrols before, during, and/or after a critical fire weather event, such as a Red Flag Warning with strong winds, or following a fire that burned in areas where electric facilities are or could have been impacted.

#### POU Response: N/A

**WSAB Recommendation #9:** Describe options considered by POU (including through the joint efforts of the POU associations) to identify previously unidentified risks that could lead to catastrophic wildfires.

POU Response: The California Municipal Utilities Association (CMUA) will be holding a special meeting of its Wildfire Preparedness, Response, and Recovery Working Group this fall, which will be focused on risk drivers for power-line caused catastrophic wildfires and innovative mitigation options. CMUA plans to invite a broad range of utility staff, state agency staff (including the WSAB), industry experts, and academics to participate in this discussion. As part of this meeting, the working group will discuss unidentified wildfire risk drivers and mitigation measures that could address these risks. Based on the input provided during this meeting, CMUA will produce a publicly-available, post-meeting report that summarizes the group's conclusions and recommendations. CEU's staff will participate in CMUA's meeting and will discuss any changes that CEU has made to its operations in response to the conclusions and recommendations of the working group in a future WMP.

#### D. Risk Assessment

**WSAB Recommendation #10:** Describe the particular wildfire risks associated with system design and construction such as topography and location near the HFTD areas of another utility's service territory. Describe any G.O. 95 exempt assets and possible updates to G.O. 95 that could facilitate more resilient utility transmission and distribution assets.

**POU Response:** CEU's assessment of wildfire risks is discussed in Section IV (B) of CEU's WMP. According City of Cerritos Hazard Mitigation Plan wildfire risk assessment consists of four steps: Hazard Identification, Hazard Profiling, Asset Inventory, and Loss Estimates. The Risk Assessment provides a foundation for the evaluation of wildfire mitigation measures that can help reduce the impacts of a potential wildfire hazard event.

The following provides responses to specific questions included in the WSAB's 2021 WSAB Guidance Advisory Opinion:

- Are there design or construction issues related to the utility's specific topography or geographic location that the Board should be aware of?
   POU Response: See Sections IV (B) CEU WMP
- How will the utility address risks associated with facilities requiring power that abut a Tier 2 or Tier 3 HFTD?
   POU Response: N/A
- How does the utility assess its risks associated with system design and construction?
   POU Response: N/A
- What design and construction standards has the POU implemented that go beyond G.O. 95 or other General Order standards related to design and construction?
   POU Response: N/A

#### E. SITUATIONAL AWARENESS TECHNOLOGY

WSAB Recommendation #11: Provide context-setting information about the prevailing wind directions and speeds, differentiated by season, along with average weather conditions by season. Describe how and why situational awareness technology is installed, and where on the system. Describe the decision-making process regarding the installation of situational awareness technology, including constraints such as budgets, availability of equipment, knowledge to effectively deploy, or qualified personnel to install and monitor effectively. Identify any other agencies, utilities, or fire professionals that the data from these devices is shared with.

POU Response: N/A

#### F. VEGETATION MANAGEMENT

WSAB Recommendation #12: Describe treatment plans for all types of vegetation associated with utility infrastructure, from the ground to the sky, which includes vegetation above and below electrical lines.

POU Response: N/A

WSAB Recommendation #13: List the qualifications of any experts relied upon, such as scientific experts in ecology, fire ecology, fire behavior, geology, and meteorology. Specify the level of expertise of the POU staff that manages the contractors performing vegetation management. Describe measures each POU takes to ensure that POU staff and contractors comply with or verify compliance with Cal/OSHA standards on Minimum Approach Distances (MAD).

POU Response: N/A

WSAB Recommendation #14: Describe whether the POU has considered innovative and alternative approaches to vegetation management.

POU Response: N/A

STATE OF CALIFORNIA	)	
COUNTY OF LOS ANGELES	)	SS
CITY OF CERRITOS	)	

I, Vida Barone, City Clerk of the City of Cerritos, California, DO HEREBY CERTIFY that the foregoing **Resolution No. 2021-07** was duly approved and adopted by the City Council of the City of Cerritos at a Regular Meeting held on the 27th day of May, 2021, and that it was so adopted as follows:

AYES:

Councilmembers -

Barrows, Solanki, Yokoyama, Vo, Hu

NOES: ABSENT: Councilmembers – Councilmembers –

None None

ABSTAIN:

Councilmembers -

None

DATED: May 27, 2021

Vida Barone, City Clerk/Treasurer