

# **IMPERIAL IRRIGATION DISTRICT**

## **ID 2020 WILDFIRE MITIGATION PLAN PROGRESS REPORT**

*April 6, 2021*

# Imperial Irrigation District 2020 SB 901 Wildfire Mitigation Plan Progress Summary Report

## Introduction

The Imperial Irrigation District SB 901 Wildfire Mitigation Plan meets requirements identified applicable to publicly owned electric utilities, of California Senate Bill 901 Wildfires, and California Assembly Bill 1054 Public Utilities Wildfires and Employee Protection.

The Imperial Irrigation District 2020 Wildfire Mitigation Plan Progress Summary Report presents a summary of the IID efforts for calendar year 2020.

This report consists of several sections:

- 1) IID 2020 Wildfire Mitigation Plan Progress Summary Report
- 2) Attachment – IID 2020 Wildfire Safety Board Supplemental Information
- 3) Attachment – IID 2020 Service Territory Survey Report
- 4) Attachment – 2020 Independent Evaluator Recommendations

Although the Imperial Irrigation District does not have infrastructure located in CAL FIRE designated High Fire Threat or Very High Fire Threat areas, the Imperial Irrigation District is submitting this summary of efforts with components which may assist to reduce fire ignition risk caused by Imperial Irrigation District power infrastructure.

## Executive Summary

Table below provides an overview of the progress made as of December 31, 2020, in each of the 42 efforts identified in the IID WF Mitigation Plan.

Each block in the overview represents an effort. Each block includes a number corresponding to the IID WF Mitigation Plan section describing the effort.

Items that are complete or are meeting goals are identified in green. Items that need improvement are identified in yellow. Items that need management intervention are identified in red and items that are cancelled are identified in grey.

Overall, efforts are progressing despite 2020 operational and budget challenges due to the pandemic.

Improvements are needed in the Vegetation Management, Inspection, System Operations, Emergency Management, and Performance Metric areas.

Although improvements are needed, efforts in these areas are expected to be successful by the end of this wildfire mitigation plan period ending December 2022.

At this time there are no efforts requiring specific management intervention, and there are no efforts that have been cancelled.

# Imperial Irrigation District 2020 SB 901 Wildfire Mitigation Plan Progress Summary Report

Details of the progress made a for each effort are detailed later in this document.

## IID SB901 Plan Progress Overview

Complete or Meeting Goals	Needs Improvement	Management Action Required	Cancelled
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Vegetation Management			Inspections		System Hardening	
9.3 Vegetation Management: Power Lines 200 kV and Below Not Subject to FERC Jurisdiction	9.3 Vegetation Management: Power Lines 200 kV and Below Subject to FERC Jurisdiction		9.5 Power Line Inspections - WECC	9.5 Power line Inspections - GO95	9.1 Power Line and Substation Design, Engineering and Construction	9.2 Relay Protection
9.4 Transmission System Vegetation Management Program	9.6 Power Line Corridor Clearance Regulation	9.12 Vegetation Management Website	10.8 Monitor and Audit the Effectiveness of Power Line Inspections - Inspection Tool	10.8 Monitor and Audit the Effectiveness of Power Line Inspections - Inspection Guide	10.1 No New Power Lines in High/Extreme Fire Threat Areas	10.10 Distribution Power Line Bird Deterrents
10.3 New Vegetation Management Program - Certification and CPAT	10.3 New Vegetation Management Program - Implement		9.13 Monitor and Audit the Effectiveness of Power Equipment Inspections: Substations			10.2 Relay Modernization Program
10.4 Community Outreach and Public Awareness: Vegetation Management	10.5 Vegetation Management Internal Imperial Irrigation District Training		<b>Construction and Maintenance</b>	<b>System Operations</b>	<b>Emergency Management</b>	
<b>Qualified Independent Evaluator</b>			<b>Biomass</b>		9.7 Emergency Event - Procedures	9.9 Standardized Emergency Management System
11.2 Qualified Independent Evaluator Plan Review - Contract	11.2 Qualified Independent Evaluator Plan Review - Plan	10.9 Addressing SB 901 Section 43 Biomass Power Purchase Requirement	9.10 Utility Mutual Aide Agreements	9.8 Service Restoration After Major Events	10.7 Public Safety Power Shutoff (PSPS)	
11.2 Qualified Independent Evaluator Plan Review - Metrics	11.2 Qualified Independent Evaluator Plan Review - Alignment		<b>Wild Fire Mitigation Plan</b>		<b>Performance Metrics</b>	
11.2 Qualified Independent Evaluator Plan Review - Annual Survey			11.1 Plan Submissions	11.3 Imperial Irrigation District Management Plan Submission - Evaluation Result Presentation	11.8 Performance Metrics - Encroachments	11.8 Performance Metrics - Imminent Threats
		11.3 Imperial Irrigation District Management Plan Submission - Annual Submittal	11.6 Wild Fire Plan Performance Monitoring – Quarterly Review		11.8 Performance Metrics - Fire Incidents	11.8 Performance Metrics – New Developments
		11.6 Wild Fire Plan Performance Monitoring – Annual Review	11.8 Performance Metrics – Lines Down			

# Imperial Irrigation District 2020 SB 901 Wildfire Mitigation Plan Progress Summary Report

## Imperial Irrigation District Overview

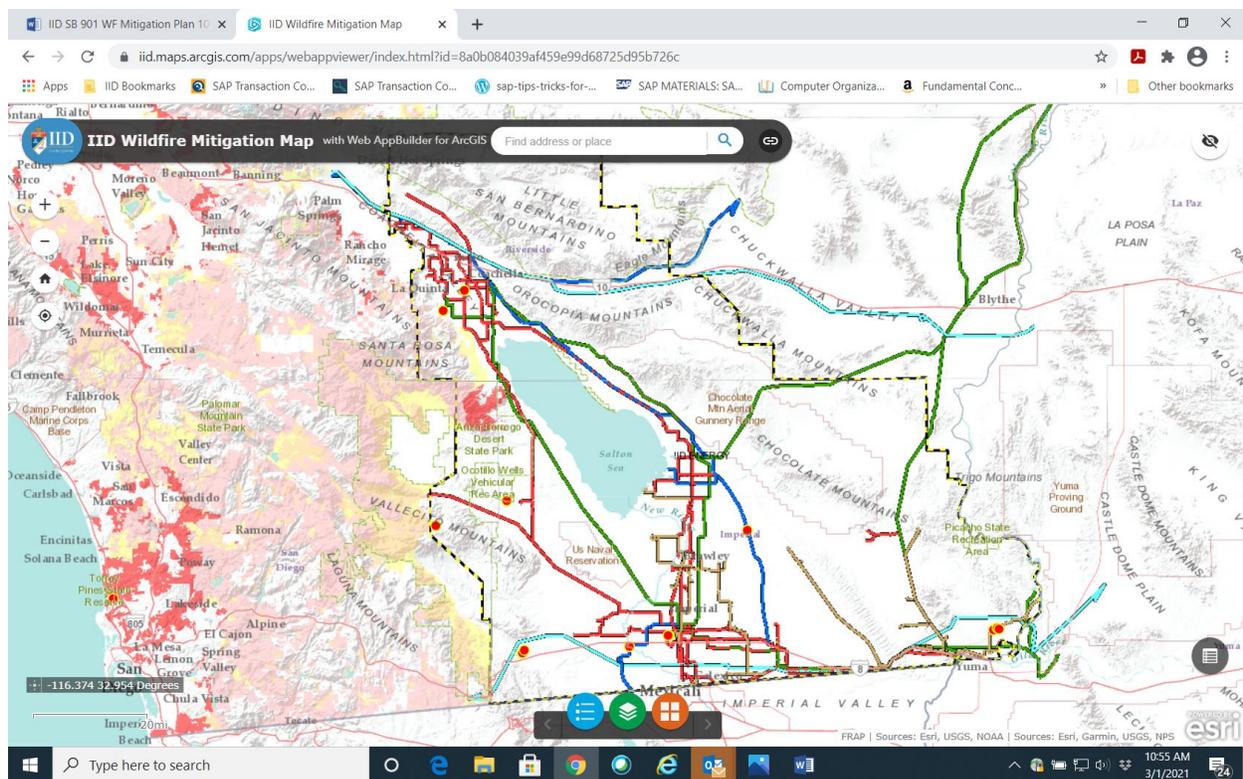
Irrigation District (IID) is an irrigation special district established under Division 11 of the California Water Code, Sections 20500, which provides non-potable water, farm drainage and power services to the lower southeastern portion of California's desert.

Imperial Irrigation District is a transmission, distribution, and generation, energy utility. The utility operates over 1,800 miles of overhead energy transmission lines, and over 4,400 miles of power distribution lines throughout its service territory.

## Description of the Service Territory

The Imperial Irrigation District Service Territory is located in the southeastern corner of California. The Service Territory covers 6,471 square miles, including all of Imperial County, the Coachella Valley in Riverside County, and a very small part of San Diego county. The service territory is outlined with a dashed black and yellow line on the map below.

Imperial Irrigation District provides electric service to approximately 150,000 electric customers.



There is one CAL FIRE designated High Fire Threat area of approximately 43 square miles, or 0.66% of the service territory, located on the West side of the Imperial Irrigation District Service Territory, near the Imperial-Riverside County line. Part of this High Fire

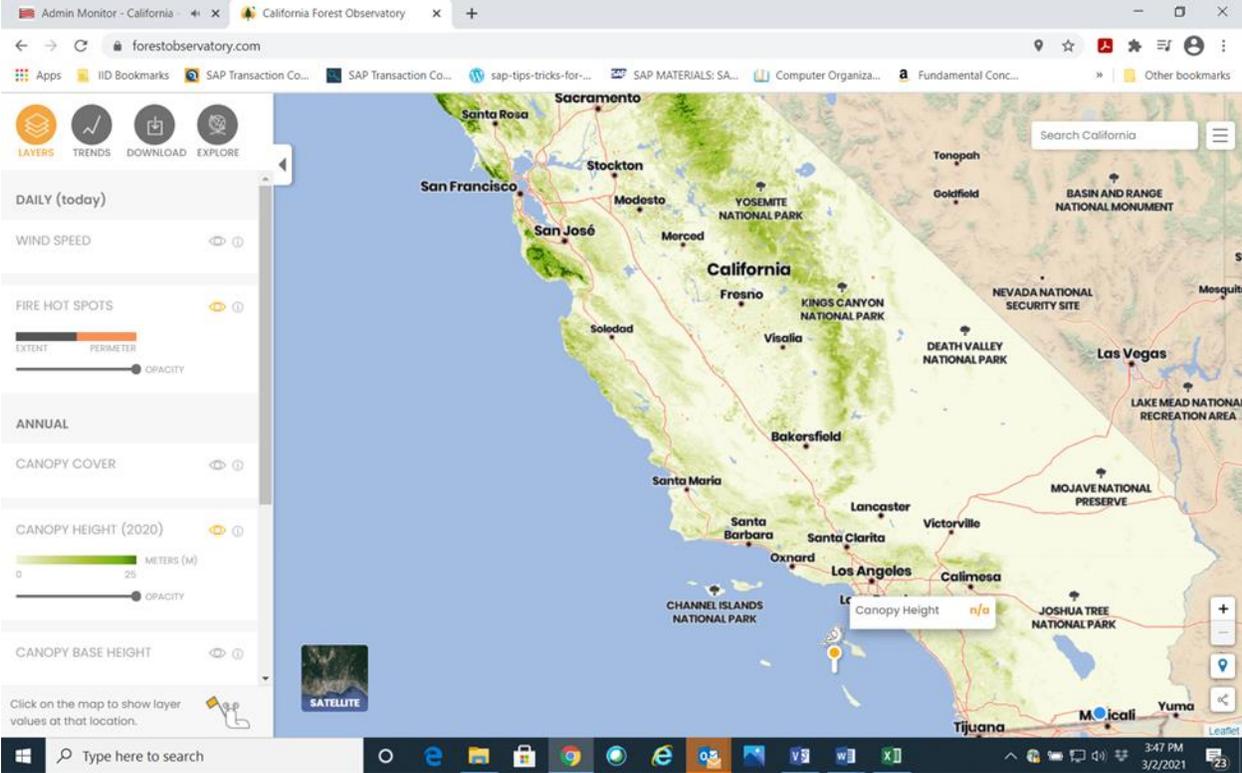
# Imperial Irrigation District 2020 SB 901 Wildfire Mitigation Plan Progress Summary Report

Threat area is located in the northern section of the Anza Borrego Desert State Park, continuing north, in a desert mountainous area.

There are no Imperial Irrigation District power infrastructure elements, power lines, or generation facilities, located inside a CAL FIRE designated High Fire Threat area, or a CAL FIRE Very High Fire Threat area.

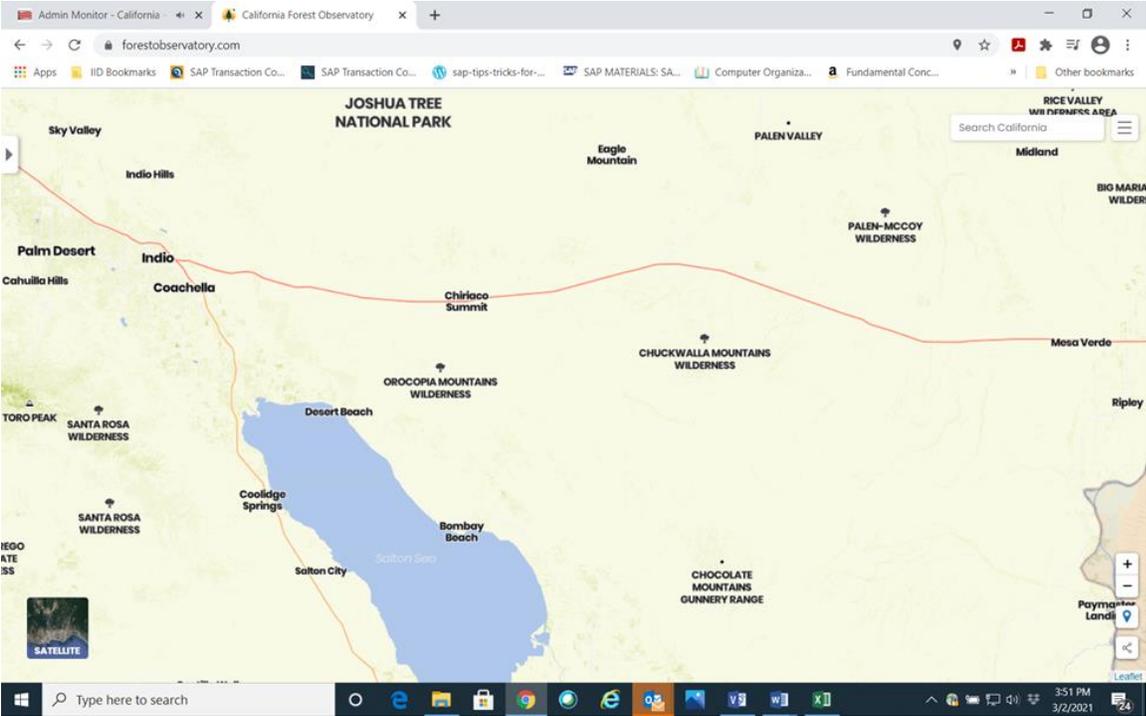
The Service Territory is mostly uninhabited desert with irrigated farmland areas in Coachella, Imperial, and Winterhaven, with urban areas in Imperial Valley and Coachella Valley.

The California Forest Observatory map shows relatively little forest canopy and no fire hot spots in the IID service territory as shown below.

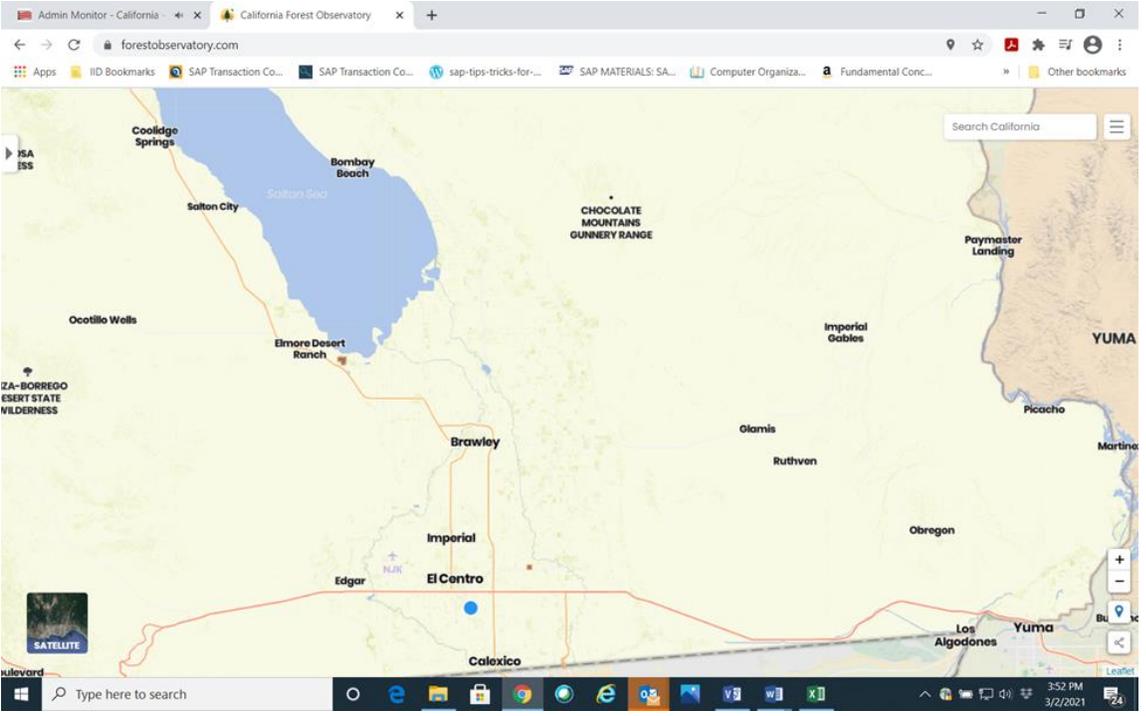


California Forest Observatory map of Southern California with Fire Hot Spots, and Canopy Height, layers displayed, 03-02-2021.

# Imperial Irrigation District 2020 SB 901 Wildfire Mitigation Plan Progress Summary Report



California Forest Observatory map containing Imperial Irrigation District Service Territory, Coachella Division with Fire Hot Spots, and Canopy Height, layers displayed, 03-02-2021



California Forest Observatory map containing Imperial Irrigation District Service Territory, Imperial Division with Fire Hot Spots, and Canopy Height, layers displayed, 03-02-2021

# Imperial Irrigation District 2020 SB 901 Wildfire Mitigation Plan Progress Summary Report

## Persons Responsible for Executing the IID Wildfire Mitigation Plan

Name	Title	Plan Section Responsibility
Marilyn Gilbert Del Bosque Gilbert	Manager Energy Department	All
Dan DeVoy	Manager Human Resources Department	9.7, 9.9, 10.7
Matt MacDonald	Assistant Manager Power Line Construction and Maintenance	9.3, 9.4, 9.5, 9.6, 9.10, 9.11, 9.12, 10.1, 10.3, 10.4, 10.5, 10.8, 11.1, 11.2, 11.3, 11.6, 11.8
Constance Bergmark	Manager of Planning and Engineering/Chief Electrical Engineer	9.1, 9.2
Sabrina Barber	Manager Regulatory and Strategic Marketing	10.9
Matthew Smelser	Assistant Manager Energy Department System Operations	9.8, 10.6
Jesse Medina	Assistant Manager Energy Department Substation Construction and Maintenance	9.1, 9.2, 9.13, 10.2, 10.10
Gary Hatfield	Supervisor Emergency Management, Human Resources	9.7, 9.9, 10.7
Angel Marcial	Program Planning and Development Manager	Plan development

## **Imperial Irrigation District 2020 SB 901 Wildfire Mitigation Plan Progress Summary Report**

### **Verification**

I am an officer of the Imperial Irrigation District, and am authorized to make this verification on its behalf. The statements in the foregoing document are true of my own knowledge.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on June 16, 2021, at Imperial, California.

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Marilyn Del Bosque Gilbert  
Manager – Energy Department Imperial Irrigation District

# Imperial Irrigation District 2020 SB 901 Wildfire Mitigation Plan Progress Summary Report

## Effort Summary

The following includes progress summaries for each of the efforts identified in the IID Wildfire Mitigation Plan for the calendar year 2020. The summary is organized following the IID plan sections.

## IID Plan Section 9

### Existing Efforts with Elements Expected to Reduce Fire Risk

#### Item 1, Section 9.1

##### Power Line and Substation Design, Engineering and Construction

Requirement: *Ensure that IID electric facilities are designed and constructed meeting or exceeding relevant federal, state, and industry standards such as National Electrical Safety Code, IEEE Standards, and industry best practices such as CPUC General Order 95.*

Status: 5 Projects approved in Q1 2020, 3 Projects approved in Q2 2020  
Of the 8 projects, one is substantially complete (K line) and 7 are active  
IID continues to adhere to federal, state and industry standards in all designs.

#### Item 2, Section 9.2

##### Relay Protection

Requirement: *Review all system disturbances for correct operation. In the event of an incorrect operation, disturbance analysis is performed on the protection settings, relay protective devices, and or associated hardware and equipment until root cause of event is identified. and corrective measures are implemented.*

Status: IID continues reviewing all the disturbances and analyzing all events that occur in the IID generation, transmission and distribution system  
Where the protection scheme does operate properly, an investigation of the event is performed to identify the element that caused the erroneous operation.

The protection scheme is composed of five elements; 1.-current transformers and potential transformers, 2.-protection relays, 3.-communications systems, 4.-direct current systems (battery bank and battery charger, and 5.-controls (direct current "DC" systems).

## Imperial Irrigation District 2020 SB 901 Wildfire Mitigation Plan Progress Summary Report

In case of erroneous operation, the protection element that did not operate as expected is identified, the element is analyzed, the root cause of the event is identified and corrected.

### Item 3, Section 9.3

#### Vegetation Management: Power Lines 200 kV and Below Not Subject to FERC Jurisdiction

Requirement: *Ensure work procedures to identify responsible parties, inspection cycles, clearance distance for overhead, and ground mounted & underground infrastructure are followed to address inspection findings*

Status: The Vegetation Management Program identifying responsible parties, inspection cycles, vegetation clearance distance standards for overhead, ground mounted and underground infrastructure was approved 5/2020.

### Item 4, Section 9.3

#### Vegetation Management: Power Lines 200 kV and Below Not Subject to FERC Jurisdiction

Requirement: *Ensure the Distribution System Vegetation Management practice contains and effectively implements the following components per the WMP and IID schedules/standards:*

- *Inspection Patrols,*
- *Regulatory Requirements and Standards,*
- *Pruning Best Practices,*
- *Safety,*
- *Vegetation Control, and*
- *Customer Service*

Status: IID completed the IID Vegetation Management Program guide and is currently implementing the program. The guide includes several components including regulatory requirements, ANSI A/300 pruning standard, Safety, and vegetation clearance requirements, among others.

As part of the implementation effort, a project to integrate ESRI GIS inspection information with the SAP system is under way. The vegetation management inspection mobile application is currently under test and is expected to be ready during 2021.

## Imperial Irrigation District 2020 SB 901 Wildfire Mitigation Plan Progress Summary Report

The current vegetation management contractor has been instructed and follows the IID vegetation clearance requirements, and ANSI A300 industry best practices.

### Item 5, Section 9.4

#### Transmission System Vegetation Management Program

Requirement: *Ensure the Transmission System Vegetation Management program adheres to Western Electricity Coordinating Council (WECC) requirements and NERC FAC-003-4, where applicable*

Status: IID has a dedicated compliance administrator responsible for oversight of NERC/WECC vegetation management requirements.

IID complies with the NERC Vegetation Management Standard FAC-003 by performing annual inspections on the applicable transmission lines and by completing any work derived from inspections before the next annual inspection.

IID submits quarterly reports to WECC for vegetation caused outages.

There have been no vegetation-caused outages for calendar year 2020.

### Item 6, Section 9.5

#### Power Line Inspections WECC

Requirement: Ensure IID follows Western Electricity Coordinating Council (WECC) requirements for Bulk Electric System inspections

Status: IID has a dedicated compliance administrator responsible for oversight of NERC/WECC vegetation management requirements for BES power lines.

IID complies with the NERC Vegetation Management Standard FAC-003 by performing annual inspections on the applicable transmission lines and completing any work derived from inspections before the next annual inspection.

IID submits quarterly reports to WECC for vegetation caused outages. There have been no vegetation-caused outages for calendar year 2020.

# Imperial Irrigation District 2020 SB 901 Wildfire Mitigation Plan Progress Summary Report

## Item 7, Section 9.5

### Power line inspections GO95

Requirement: *For distribution circuits, Ensure IID follows industry best practices such as California Public Utilities*

- *Commission General Order 95 for construction standards and General Order 165 for inspection frequency requirements.*
- *Ensure the program performs periodic Patrol Inspections, Detailed Inspections, and Intrusive Inspections to assess the condition of field equipment.*
- *Ensure inspections assess power line physical condition, identify safety issues, identify deviations from construction design, and detect imminent failures*

Status: The current IID Developer Guide is based on NESC and G.O. 95 construction practices.

Major development efforts on the IID Distribution Pole Inspection Guide are complete. The guide was completed on 05/2020 and is currently under management review; expected to be approved Q2 2021. This guide includes patrol, detailed, and intrusive inspection requirements, the condition assessment rubric.

The power line inspection mobile application is complete and in service. The application is used to record inspection assessment results, and is used to record equipment defects.

A wood pole intrusive inspection contractor is currently working on transmission and distribution wood pole intrusive inspections, and an internal IID program is in place to replace severely defective poles.

## Item 8 Section 9.6

### Power Line Corridor Clearance Regulation

Requirement: *Enforce the Power Line Corridor Clearance Regulation 23, and the corresponding standard work procedure to manage power line clearance incidents*

Status: The IID Board of Directors recently approved Regulation 23, providing IID staff with a mechanism to address power line encroachments. The regulation identifies the process and provides the authority to remove encroachments along power line corridors.

## Imperial Irrigation District 2020 SB 901 Wildfire Mitigation Plan Progress Summary Report

Staff training is complete and the draft standard work procedure is currently being field tested. Management is expected to approve the Regulation 23 standard work procedure during Q2 2021

Development of the mobile application used for processing Regulation 23 incidents is complete. Integration of the application with the SAP system is expected to complete Q1 2021

### Item 9 Section 9.7 Emergency Events

Requirement: *Ensure the Emergency Management Unit applies all procedures in place to address emergencies, including Email alerts to employees as required for heat advisories, energy conservation Flex Alerts, major road closures, cell telephone service outages, flash flood warnings, Red Flag Warnings, and other major weather events*

Status: The IID HR Emergency Operations Unit is actively working on the IID PSPS standard operating procedure. IID expects to complete the final procedure version Q1 2021.

IID included an overview of the proposed procedure in the IID Wildfire Mitigation Plan.

### Item 10, Section 9.8 Service Restoration After Major Events

Requirement: *Ensure the System Operations Center restores service after major events following the latest version of the IID System Restoration and Black-Start Plan*

Status: IID performed an Operator log search for black start, islanded, and partially islanded incidents as per IID's System Restoration Plan. No incidents occurred during calendar year 2020.

### Item 11, Section 9.9 Standardized Emergency Management System

Requirement: *Ensure IID follows planning, communication, and coordination obligations pursuant to the California Office of Emergency Services' Standardized Emergency Management System ("SEMS")*

## Imperial Irrigation District 2020 SB 901 Wildfire Mitigation Plan Progress Summary Report

*Ensure applicable standard operating procedures roles, responsibilities, and communication for field response, local government, operational area, regional, and state are followed*

Status: IID HR Emergency Management Unit is currently developing the standard operating procedure.

### Item 12, Section 9.10

#### Utility Mutual Aide Agreements

Requirement: *Ensure IID fulfills mutual aid agreements in place with neighboring utilities*

Status: IID has a mutual aid agreement in place and has provided mutual aid in support of 2019 wildfires in northern California.

### Item 13, Section 9.11

#### Power Lineman Training Program

Requirement: *Ensure IID implements and adheres to the Power Lineman apprenticeship program in partnership with the local community college as outlined in the WMP*

Status: An apprenticeship program in place in coordination with Imperial Valley College. The Fall 2020 Course Schedule includes several courses.

- APLN 106 Power Lineman VI
- APLN 108 Power Lineman VIII

### Item 14, Section 9.12

#### Vegetation Management Website

Requirement: *Ensure the Vegetation Management site is updated annually per any changes in Vegetation Management policies or procedures*

Status: • IID completed a major update to the IID.com vegetation management area Q4 2019. In Q4 2020 IID completed the annual review and Identified several areas of improvement, in particular updating frequently asked questions. Expect to complete adjustments Q4 2020

# Imperial Irrigation District 2020 SB 901 Wildfire Mitigation Plan Progress Summary Report

## Item 15, Section 9.13

### Monitor and Audit the Effectiveness of Power Equipment Inspections:

#### Substations

Requirement: *Ensure IID performs monthly substation inspections according to policies and procedures*

Status: All substations are inspected on a monthly basis. Primary equipment, facilities, and structures are examined for existing, or incipient faults. Any issues found are dealt with using a notification process originating with the field inspector and ending in a work order that can then be scheduled to carry out repairs.

Inspector notifications have already originated equipment repairs such as insulator replacement where broken ceramic was reported.

Additionally, a monthly report is generated to ensure every substation on the inspection list has been visited.

# Imperial Irrigation District 2020 SB 901 Wildfire Mitigation Plan Progress Summary Report

## IID Plan Section 10

### Planned Efforts with Elements Expected to Reduce Fire Risk

#### Item 16, Section 10.1

##### No New Power Lines in High or Very High Fire Threat Areas

Requirement: *Beginning in 2020, ensure that IID will work with city and county planning departments to prevent land use changes in high fire threat areas where changes require building power infrastructure in CAL FIRE designated High or Very High Fire hazard areas (as needed only)*

Status: As part of SB901 plan review, met with CAL Fire during Fall 2019 to discuss vacant lot issues in Mecca CA.

As part of SB901 plan review, met with Imperial County Fire during Fall 2019 to discuss brush fires near IID infrastructure

Upon review of CAL Fire map for the 2020 Service Territory Survey, discovered CAL FIRE reclassified areas adjacent to IID service territory, and areas where existing IID infrastructure is located from no classification to MODERATE fire risk.

CAL Fire also reclassified the Ocotillo Wells area from MODERATE to NO CLASSIFICATION.

IID has no new power lines or existing power lines in CAL FIRE High or Very High Fire Threat areas.

#### Item 17, Section 10.2

##### Relay Modernization Program

Requirement: *Ensure IID implements plans to replace existing electromechanical and solid-state relays with Microprocessor relays, per Board of Directors approved scope, schedule and funding*

Status: Q2 2020 Replacements:  
U-Line Transmission relays at Euclid and Terminal Substations. SEL 411L, 311L and 751A at both locations.

429 Distribution relays at Ormesa II Substation SEL 351S and 751.

Q3 2020 Replacements:

## Imperial Irrigation District 2020 SB 901 Wildfire Mitigation Plan Progress Summary Report

LB-Line Transmission relays at ECSS L-33 and Brawley Diesel Substations. SEL 411L and SEL 311L relays were installed at both locations.

Q4 2020 Replacements  
E-Line Mall substation to Calexico substation SEL 411L, 311L and 751A

Ave 42 Substation Bank #1 and #2 SEL 487E

Aten Substation L135 SEL 351S and 751A

Frances Way Substation V911, V912, V913 and V914 SEL 351S and 751A

### Item 18, Section 10.3

#### New Vegetation Management Program Implement

Requirement: *Ensure IID implements new Vegetation Management Program*

Status: Program document approved 4/2020  
ITEM COMPLETE  
Plan to perform a review and update fall 2021

### Item 19, Section 10.3

#### New Vegetation Management Program Certification and CPAT Training

Requirement: *Ensure Contractor personnel receive certification in tree pruning best practices and complete IID Competent Person Awareness Training (CPAT) to access substation sites*

Status: Vegetation Management request for proposals as of 07/2020 include requirements for A/300 certification, Competent Person Awareness Training, and Qualified Power Line Clearance Trimmers

IID has elected to transition away from line clearance contract services to an internally staffed program. The power line trimming component transition is expected to complete in late 2021. The power line trimming employee training plan includes pruning best practices and Competent Person Awareness Training.

# Imperial Irrigation District 2020 SB 901 Wildfire Mitigation Plan Progress Summary Report

## Item 20, Section 10.4

### Community Outreach and Public Awareness: Vegetation Management

Requirement: *Beginning in 2020, Ensure the new Vegetation Management Program implements outreach activities targeting the general public, public agencies, commercial developers, housing developers, local tree trimming Contractors and landscape Contractors as outlined in the WMP*

Status: As part of SB901 plan review, IID met with CAL Fire during the fall of 2019 to present the proposed IID WF Mitigation Plan and to discuss vacant lot issues in Mecca CA.

As part of SB901 plan review, IID met with Imperial County Fire during the fall of 2019 to present the proposed IID WF Mitigation Plan and to discuss brush fires near IID infrastructure in the Imperial Valley.

## Item 21, Section 10.5

### Vegetation Management Internal Imperial Irrigation District Training

Requirement: *Ensure the new Vegetation Management Program conducts at least one internal outreach/training session per year for internal IID Employees for the La Quinta and Imperial Areas*

Status: Completed first internal training for Imperial power trouble shooters in Imperial Valley and Coachella Valley in 6/2020.

## Item 22, Section 10.6

### Disabling Re-Closer Procedure

Requirement: Ensure that IID develops a Disabling Re-Closer procedure as needed.

Status: Due to the low wildfire threat in the Imperial Irrigation District Service territory, Imperial Irrigation District does not disable re-closers due to anticipated Wildfires. Imperial Irrigation District does not have a formal procedure identified for disabling re-closers. Imperial Irrigation District will continue to assess the Wildfire threat and will develop a procedure as needed.

## Item 23, Section 10.7

# Imperial Irrigation District 2020 SB 901 Wildfire Mitigation Plan Progress Summary Report

## Public Safety Power Shutoff (PSPS)

Requirement: *Develop and approve a standard PSPS operation procedure and associated standard work procedure by Q1 2021*

Status: • HR EOC unit working on PSPS operating procedure, working from the outline included in the 2019 IID Wildfire Mitigation Plan. Expect to complete Q1 2021.

## Item 24, Section 10.8

### Monitor and Audit the Effectiveness of Power Line Inspections - Inspection Tool

Requirement: *Make progress on current technology initiatives to facilitate the capture of field inspection information for pole inspections and for vegetation management inspections, including integration with the Imperial Irrigation District Geographic Information System and the ERP system of record*

Status: • Work to integrate SAP and ESRI in progress, C&M inspection tool expected to complete Q2 2020.

• The mobile power line inspection application tool is complete. The vegetation line clearance mobile application is currently under development and is expected to complete soon.

## Item 25, Section 10.8

### Monitor and Audit the Effectiveness of Power Line Inspections - Inspection Guide

Requirement: *Complete the Power Line Inspection Guide in Q1 2020*

Status: The Power Line Inspection Guide final draft was completed on 5/2020 and is currently under management review for final approval.

Worked with the service territory survey consultant to spot check power pole installations in the field to assess the effectiveness of power line inspections. The check was performed during January 2021. Findings are enclosed in the service territory report enclosed with this submission.

## Item 26, Section 10.9

### Addressing SB 901 Section 43 Biomass Power Purchase Requirement

## Imperial Irrigation District 2020 SB 901 Wildfire Mitigation Plan Progress Summary Report

Requirement: *Continue participating in procurement activities with other member agencies through the Southern California Public Power Authority with regard to requirements established by Public Utilities Code §8388*

Status: SB 901 Section 43 requires utilities with existing biomass procurement contracts that meet certain criteria, to amend or establish a new contract. Statute requires that the generating facility of the existing contract be operative at any time in 2018 with a contract expiration date on or before December 2023.

Pursuant to Section 43, these requirements do not apply to facilities located in federal severe or extreme nonattainment areas for particulate matter or ozone.

The figure below shows that the majority of the Imperial Irrigation District Service Territory is in the federally classified nonattainment areas of Imperial County and the Coachella Valley in Riverside County. Therefore, Imperial Irrigation District is exempt from Section 43 biomass generation procurement requirements.

Reference: EPA Ozone Designations 2015 Standards, California State Recommendations and EPA Response, California State Recommendation, California Air Resources Board Air Quality Planning and Science Division, Air Quality Analysis Section, Recommended Area Designations for the 0.070 PPM Federal 8-Hour Ozone Standard  
<https://www.epa.gov/sites/production/files/2016-11/documents/ca-rec-enclosures.pdf>

Notwithstanding the above requirements, IID is participating in procurement activities with other member agencies through the Southern California Public Power Authority with regard to requirements established by Public Utilities Code §8388.

**Imperial Irrigation District 2020 SB 901 Wildfire Mitigation Plan Progress Summary Report**

**Figure 1  
Recommended Area Designations for the 0.070 ppm Federal  
8-Hour Ozone Standard**



**Item 27, Section 10.10  
Distribution Power Line Bird Deterrents**

Requirement: *In 2020, begin investigating additional bird deterrent options to address power line outages due to bird strikes (currently installed on as-needed basis), by 2021, identify additional options*

# Imperial Irrigation District 2020 SB 901 Wildfire Mitigation Plan Progress Summary Report

Status: The Distribution System Planning sections in coordination with the Standards and Troubleshooting groups are in the process of coordinating presentations with vendors of bird deterrents during Q4 to start identifying additional options. The IID Distribution Reliability Report identifies circuits with outages caused by bird contacts, as a result circuits/locations with high recurrent bird contacts will be identified for assessment for a potential bird deterrent mitigation if required/recommended

## **IID Plan Section 11 Managing the Plan**

### **Item 28, Section 11.1 Plan Submissions**

Requirement: *Ensure that IID submits a comprehensive plan to the Imperial Irrigation District Board of Directors and the California Wildfire Safety Advisory Board every three years, with an annual Plan performance update*

Status: Initial IID SB 901 WF Mitigation plan submitted and approved by the IID Board of directors fall 2019.

IID SB 901 WF Mitigation Plan submitted to CA WF Safety Board February 28, 2020.

Next annual performance update due July 1, 2021  
Comprehensive plan update due July 1, 2022

CA WF Safety Board is requesting supplemental information. Available supplemental information is enclosed with this submission as a separate document.

### **Item 29, Section 11.2 Qualified Independent Evaluator Plan Review Contract**

Requirement: *Ensure IID contracts with a qualified independent evaluator to review and assess the comprehensiveness of the IID Wildfire Mitigation Plan*

Status: Independent review of the IID WF Mitigation Plan was completed in 2019, prior to plan submission.

## **Imperial Irrigation District 2020 SB 901 Wildfire Mitigation Plan Progress Summary Report**

Engaged qualified independent evaluator to review IID Progress report. Expect complete review April 2021.

### **Item 30, Section 11.2**

#### **Qualified Independent Evaluator Plan Review - Review Plan**

Requirement: *Ensure the independent evaluator reviews the draft Imperial Irrigation District Wildfire Mitigation plan to assess the comprehensiveness of the plan and to assure the plan meets California SB 901, AB 1054, and AB 111 requirements*

Status: IID engaged qualified independent evaluator to review the proposed IID SB 901 WF Mitigation Plan. The plan includes a section where plan contents are compared to regulatory requirements.

Same contractor is expected to review the 2021 plan progress report.

### **Item 31, Section 11.2**

#### **Qualified Independent Evaluator Plan Review**

Requirement: *Ensure the independent evaluator annually performs an IID Service Territory Fire Hazard Survey*

Status: 2019 annual service territory survey complete  
2020 annual service territory survey complete January 2021

### **Item 32, Section 11.2**

#### **Qualified Independent Evaluator Plan Review-Metric Review**

Requirement: *Ensure the independent evaluator performs a metrics performance review making recommendations to achieve metric improvements*

*Ensure the independent evaluator performs a review and assessment of the IID plan progress*

Status: Independent evaluator is expected to complete the 2020 metric review Q2 2021.

### **Item 33, Section 11.2**

#### **Qualified Independent Evaluator Plan Review-Alignment**

## **Imperial Irrigation District 2020 SB 901 Wildfire Mitigation Plan Progress Summary Report**

Requirement: *Ensure the independent evaluator reviews the IID Wildfire Mitigation Plan to assure there are no conflicts, and there is alignment with other regulatory requirements such as FAC-003, California PRC 4292, California PRC 4293, and other Wildfire regulations*

Status: • Review of initial plan by independent evaluator is complete, and submitted as part of the IID WF Mitigation Plan

Next comprehensive plan review by independent evaluator due 2022

### **Item 34, Section 11.3**

#### **Imperial Irrigation District Management Plan Submission-Evaluation Result Presentation**

Requirement: *Ensure the evaluation results, including improvement suggestions, and deficiencies, are presented to the Assistant Energy Manager, Power Line Construction, and Maintenance*

Status: The Consultant plan evaluation results submitted to Assistant Energy Manager in 2019 prior to submission.

Next comprehensive plan review by independent evaluator due 2022.

### **Item 35, Section 11.3**

#### **Imperial Irrigation District Management Plan Submission - Annual, submission**

Requirement: *Ensure that once the final assessment is complete, the Wildfire Mitigation Plan, Independent Evaluator Assessment Report, and Service Territory Survey Report, are posted on the Imperial Irrigation District web site for public review and comment, presented to the Energy Consumers Advisory Committee (ECAC), and presented to the Imperial Irrigation District Board of Directors for approval*

Status: IID SB901 WF Mitigation Plan approved by the IID Board of directors 2019.

Plan document including independent evaluation posted on IID website 2019.

ECAC and public comment meetings complete 2019.

# Imperial Irrigation District 2020 SB 901 Wildfire Mitigation Plan Progress Summary Report

Next comprehensive plan review by independent evaluator due 2022

## Item 36, Section 11.6

### Wildfire Plan Performance Monitoring – Quarterly Performance

Requirement: *Planned Efforts – Ensure that each calendar quarter the Assistant Energy Manager, Power Line Construction and Maintenance reviews business area reports to identify schedule and deliverable performance*

Status: • Q1 2020 report complete, delivered for review 5/2020  
Q2 2020 report complete, delivered for review 8/2020  
Q3 2020 report complete, delivered for review 11/2020  
Q4 2020 report complete, delivered for review 1/2021

## Item 37, Section 11.6

### Wildfire

### Plan Performance Monitoring – Annual Performance

Requirement: *Plan Performance – ensure that the first quarter of each year, the Assistant Energy Manager, Power Line Construction and Maintenance conducts a review of the program performance metrics to identify deviations from desired results*

Status: Q4 2020 report complete, delivered for review 1/2021. Quarterly reports are cumulative showing year to quarter progress

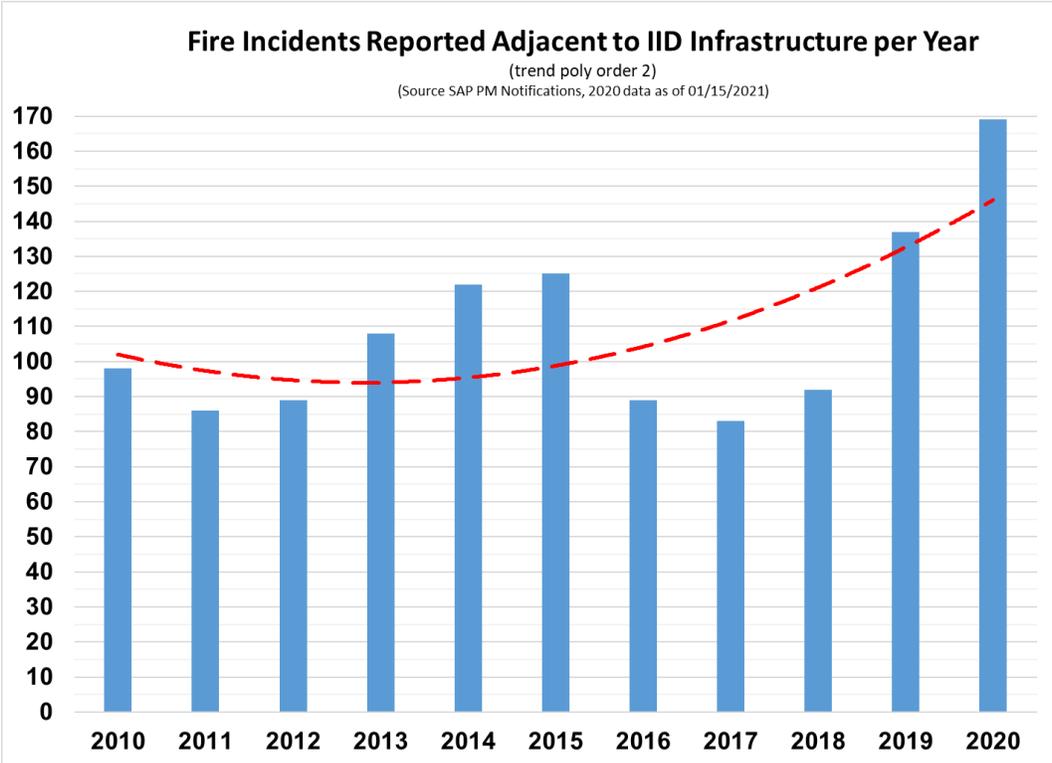
## Item 38, Section 11.8

### Performance Metrics-Fire Incidents

Requirement: *Track the Number of Fire Ignitions – The metric is the total number of fire ignitions caused by Imperial Irrigation District power infrastructure located in the IID Service Territory for the calendar year; Goal is zero incidents*

Status:

# Imperial Irrigation District 2020 SB 901 Wildfire Mitigation Plan Progress Summary Report



Source SAP Notifications

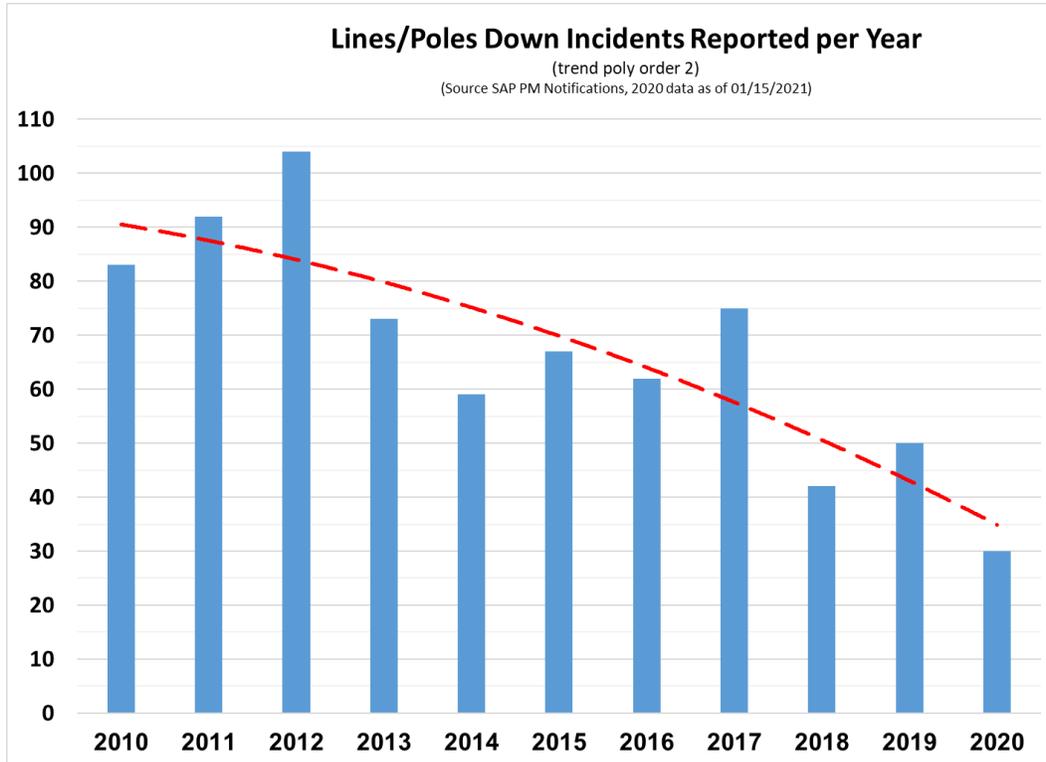
NOTE: Report includes all fire incidents reported, the report does not separate incidents caused by IID infrastructure.

**Item 39, Section 11.8**  
**Performance Metrics – Lines Down**

Requirement: *Track the Number of Lines Down Incidents – The metric is the total number of line down, incidents reported for the calendar year; The intermediate goal is a declining rate with a final goal of zero*

Status:

# Imperial Irrigation District 2020 SB 901 Wildfire Mitigation Plan Progress Summary Report



NOTE: Report shows the number of pole down incidents, not the total number of poles down.

Source IID SAP Notifications

IW29

Sel #Lines DWN

Layout /Lines Down

## Item 40, Section 11.8

### Performance Metrics-Imminent Threats

Requirement: *Track the Number of Imminent Threat Violations – The metric is the total number of Imminent Threat Violations reported for the calendar year. The goal is zero (0) Imminent Threat Violations for the calendar year*

Status: Regulation 23 procedure is currently under management review for approval. Approval of Regulation 23 procedure is expected Q2 2021.

As of 12/31/2020 the Imminent Threat Violation metric report is not available. Staff is working to complete work in 2021.

## Item 41, Section 11.8

### Performance Metrics- Encroachments

## Imperial Irrigation District 2020 SB 901 Wildfire Mitigation Plan Progress Summary Report

Requirement: *Track the Number of Encroachment Violations – The metric is the total number of Encroachment Violations reported for the calendar year; The number of Encroachment Violations metric goal is zero.*

Status: Regulation 23 procedure is currently under management review for approval. Approval of Regulation 23 procedure is expected Q2 2021.

As of 12/31/2020, the Imminent Threat Violation metric report is not available. Staff is working to complete work in 2021.

### Item 42, Section 11.8

#### Performance Metrics- New Developments

Requirement: *Track the Number of Power Infrastructure developments in High Fire Threat Areas – The metric is the number of new power infrastructure developments constructed during the calendar year, located in CAL FIRE Designated High Fire Threat or Very High Fire Threat areas, in the IID Service Territory; The goal is Zero Power Infrastructure Developments in High Fire Threat Areas*

Status:

IID has no infrastructure located in High Fire Threat Areas. Source: IID GIS w/CAL FIRE, Fire Threat layer 07/27/2020  
IID is meeting goal of zero new power infrastructure developments in CAL FIRE High Fire Threat Areas.

#### Conclusion

Imperial Irrigation District is committed to providing safe and reliable power to the customers we serve. We continue to pursue operational and infrastructure improvements with components that help reduce fire ignition. IID welcomes comments and improvement suggestions from the California Wildfire Safety Advisory Board.