

IMPERIAL IRRIGATION DISTRICT

ID 2020 WILDFIRE MITIGATION PLAN PROGRESS REPORT

SUPPLEMENTAL INFORMATION:

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

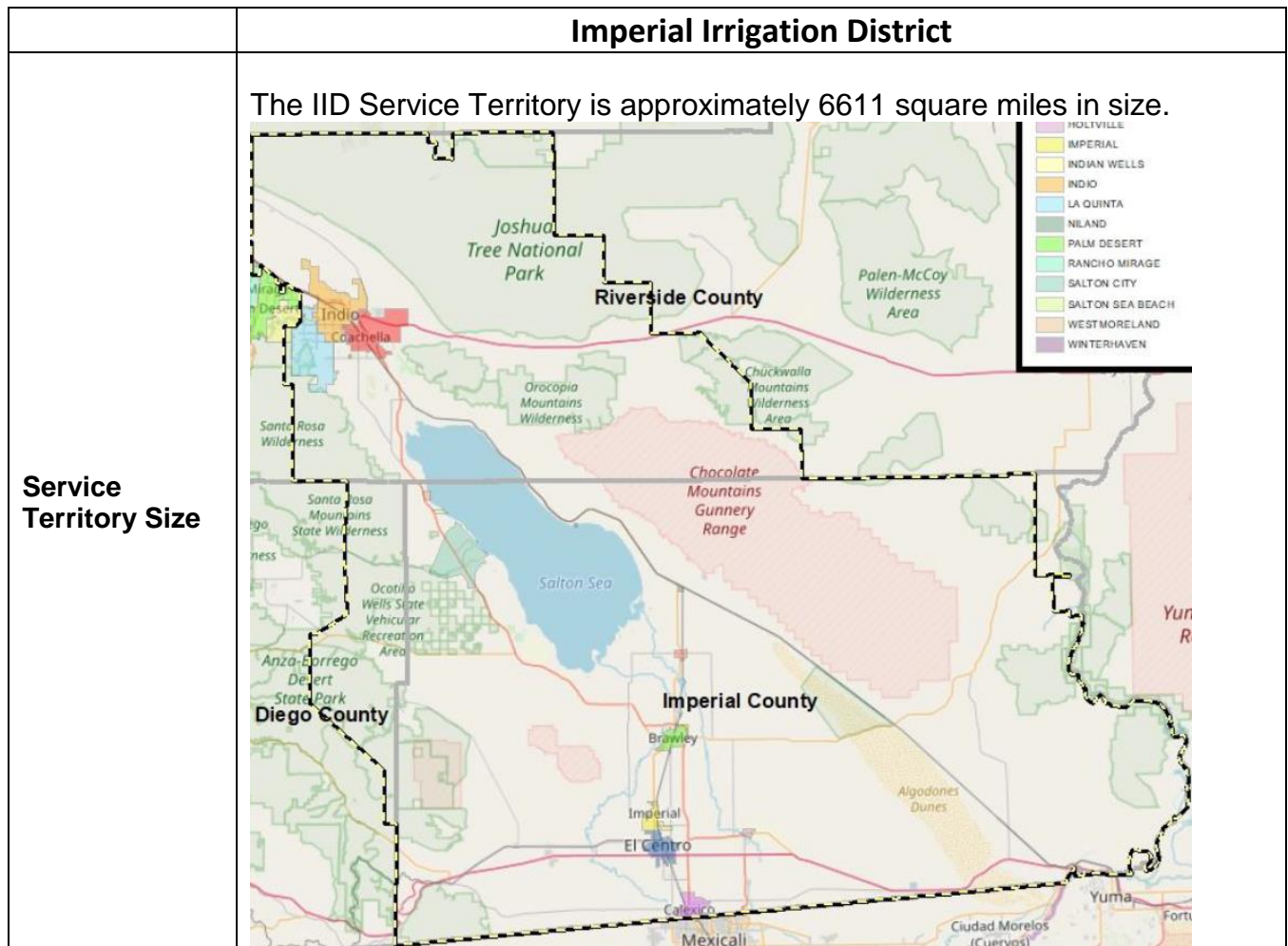
April 6, 2021

1. Purpose of This 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. Imperial Irrigation District provides this document to the WSAB in order to respond to each of the recommendations included in the 2021 WSAB Guidance Advisory Opinion. Imperial Irrigation District will provide a narrative response and/or a cross reference to the location in Imperial Irrigation District’s Wildfire Mitigation Plan (WMP) where the topic is addressed. Where the recommendation is not applicable to Imperial Irrigation District, the response will provide a brief description supporting this conclusion.

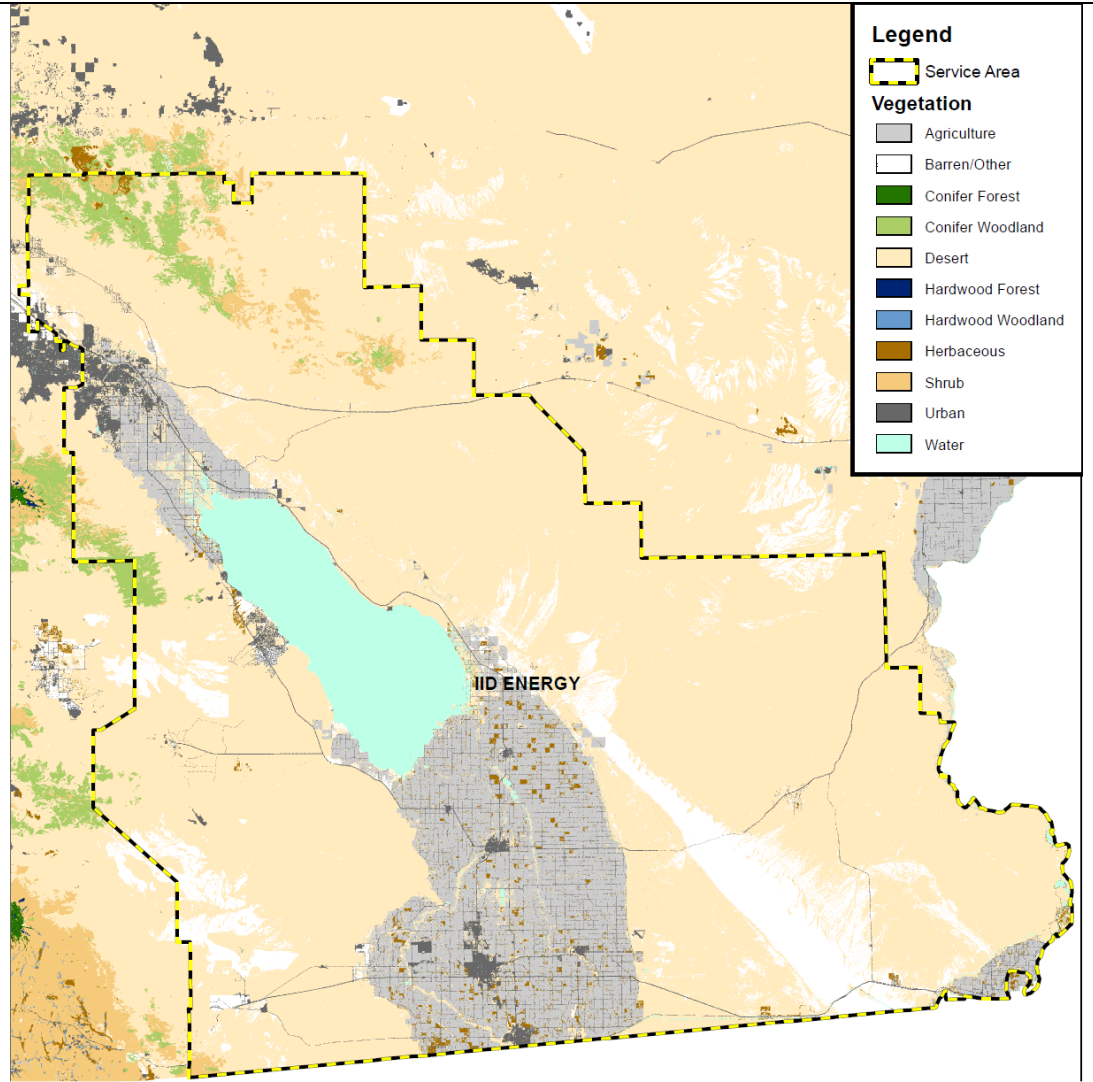
2. General Utility Information

WSAB requested that publically owned utilities provide an informational table to assist the Staff and Board members in understanding the unique characteristics of each publically owned utility. Enclosed below is general Imperial Irrigation District information.



Owned Assets	IID is a vertically integrated load balancing electric utility with transmission, distribution and generation assets.																										
Number of Customers Served	IID serves approximately 158,000 power contract accounts																										
Population Within Service Territory	<table border="1"> <thead> <tr> <th>Year</th> <th>Imperial County Projected Population</th> <th>Coachella Valley Projected Population</th> <th>Total Service Area Projected Population</th> </tr> </thead> <tbody> <tr> <td>2020</td> <td>214,590</td> <td>252,388</td> <td>468,998</td> </tr> <tr> <td>2025</td> <td>232,998</td> <td>288,867</td> <td>523,890</td> </tr> <tr> <td>2030</td> <td>251,611</td> <td>330,619</td> <td>584,260</td> </tr> <tr> <td>2035</td> <td>263,309</td> <td>378,405</td> <td>643,749</td> </tr> <tr> <td>2040</td> <td>293,889</td> <td>433,099</td> <td>729,028</td> </tr> </tbody> </table>			Year	Imperial County Projected Population	Coachella Valley Projected Population	Total Service Area Projected Population	2020	214,590	252,388	468,998	2025	232,998	288,867	523,890	2030	251,611	330,619	584,260	2035	263,309	378,405	643,749	2040	293,889	433,099	729,028
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2040	293,889	433,099	729,028																								
Customer Class Makeup	<i>Number of Accounts</i>		<i>Share of Total Load (MWh)</i>																								
	86.0 % Residential; 3.4 % Commercial 0.6 % Industrial		47% Residential; 50% Commercial 3% Industrial																								

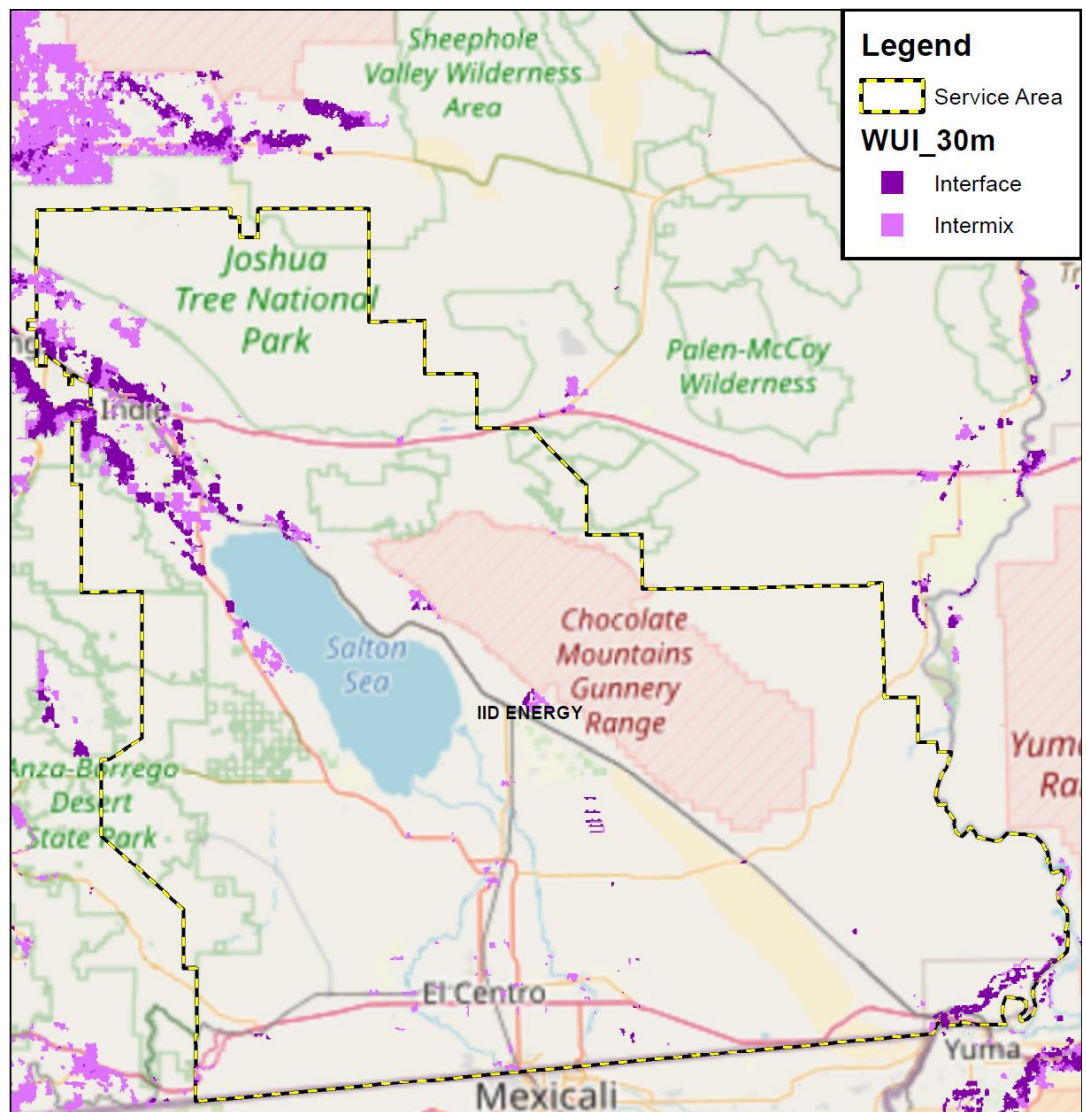
Service Territory Location /Topography¹



Note: Vegetation area percentage of Service Territory area is not available at this time. (IID GIS 3/27)

¹ 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: <https://www.arcgis.com/home/item.html?id=b7ec5d68d8114b1fb2bfb4665989eb3>.

Service Territory
Wildland
Urban
Interface²
(based on total
area)

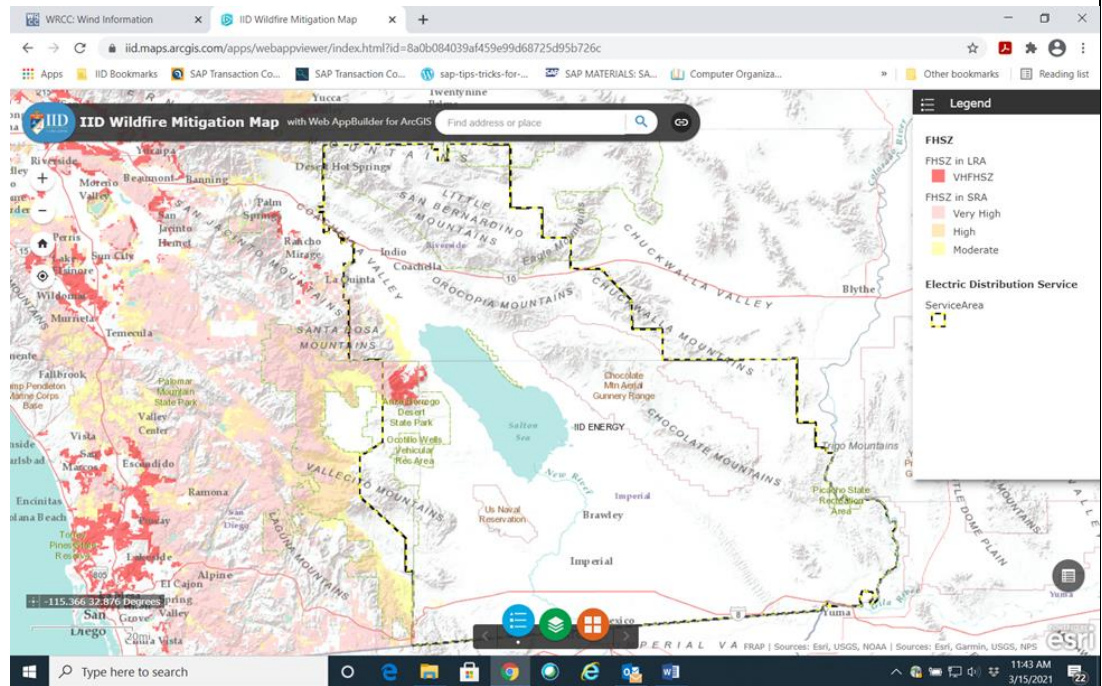


Note: Note: Woodland interface area percentage of Service Territory area is not available at this time. (IID GIS 3/27)

² 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 https://www.fs.fed.us/nrs/pubs/rmap/rmap_nrs8.pdf.

HIGH: approx. 0.5%
VERY HIGH: approx. 0.6 %

Percent of Service Territory in CAL FIRE High or VERY HIGH Fire Threat Areas (based on total area)



Prevailing Wind Directions & Speeds by Season

Prevailing Wind Direction 1992-2002

Prevailing wind direction is based on the hourly data from 1992-2002 and is defined as the direction with the highest percent of frequency.

Station	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC	ANN
El Centro NAF	W	W	W	W	W	W	W	SE	W	W	W	W	W
Imperial Airport	W	W	W	W	W	W	W	ESE	W	W	W	W	W
Thermal Airport	N	N	NNW	NNW	NW	NW	NW	NW	NN	NNW	NW	NW	NW

Average Wind Speed 1996-2006

Average wind speeds are based on the hourly data from 1996-2006 from automated stations at reporting airports (ASOS) unless otherwise noted.

Station	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SE P	OCT	NOV	DEC	ANN
EL CENTRO NAF	5.7	6.7	8.2	10.7	8.7	8.9	7.5	6.7	7.1	6.9	5.4	5.4	7.3
IMPERIAL AIRPORT	5.8	7.0	8.4	10.5	9.3	9.4	8.3	7.6	7.0	6.6	5.8	5.5	7.5
THERMAL AIRPORT	5.1	5.7	7.6	9.2	9.3	9.0	7.4	6.6	6.8	6.2	5.2	4.9	6.8

Source: Western Regional Climate Center
<https://wrcc.dri.edu/Climate/wind.php>

<p>Miles of Owned Lines Underground and/or Overhead</p>	<ul style="list-style-type: none"> ○ 3971 miles of distribution overhead and underground circuits, <ul style="list-style-type: none"> ▪ 974 miles of distribution overhead ▪ 2997 miles of distribution underground ○ 563 miles of transmission circuits, ○ 129 substations, generation stations, switching stations, and mini-substations, ○ 10,703 distribution pad mount transformers, ○ 4,520 vaults, ○ 21,080 underground pull boxes, ○ 1,048 switch cabinets, ○ 38,102 steel poles and towers, ○ 98.299 wood poles ○ 15,669 overhead service drops, ○ 18 miles of All Dielectric Self-Supporting (ADSS) overhead communication cable, ○ 2,603 IID owned streetlights, ○ 5,316 customer owned streetlights. <p>Notes</p> <ol style="list-style-type: none"> 1. Miles are measured as conductor length in miles 2. Customer Owned facilities are facilities owned by others 3. Sections of F line to Blythe and A line to Yucca Generation Station are outside service territory maintained by IID, other lines outside service territory operated by others
<p>Percent of Owned Lines in CAL FIRE High or VERY HIGH Fire Threat Areas</p>	<p><i>Overhead Distribution Lines as % of Total Distribution System (Inside and Outside Service Territory)</i> HIGH: 0% VERY HIGH: 0%</p> <hr/> <p><i>Overhead Transmission Lines as % of Total Transmission System (Inside and Outside Service Territory)</i> HIGH: 0% VERY HIGH: 0%</p>
<p>Customers have ever lost service due to an IOU PSPS event?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>IID is at a low risk of being impacted by IOUs responding to PSPS events. IID customer load is contained within the IID BA and external customer load being interrupted by neighboring BAs or TOPs has little overall impacts to IID customers.</p>

Customers have ever been notified of a potential loss of service to due to a forecasted IOU PSPS event?	<input type="checkbox"/> Yes X No Customers have not been notified of a potential loss of service to due to a forecasted IOU PSPS event since IID’s customers are located within the IID BA.
Has developed protocols to pre-emptively shut off electricity in response to elevated wildfire risks?	<input type="checkbox"/> Yes X No IID has not previously pre-emptively shut off electricity in response to elevated wildfire risk as it is not in the high risk area.
Has previously pre-emptively shut off electricity in response to elevated wildfire risk?	<input type="checkbox"/> Yes X No IID has not previously pre-emptively shut off electricity in response to elevated wildfire risk as it is not in the high risk area.

3. Cross Reference to Statutory Requirements

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

The following table lists the Public Owned Utility, SB 901 Wildfire Mitigation Plan Requirements and identifies Imperial Irrigation District SB 901 Wildfire Mitigation Plan section(s) where the requirements are addressed.

SB901 POU WF Plan Requirements vs IID SB901 Wildfire Mitigation Plan Sections.

	SB901 – POU WF Plan Requirements	IID SB 901 WF Mitigation Plan Sections
1	SB 901 Section 42 (b) (2) (A) An accounting of the responsibilities of persons responsible for executing the plan.	<ul style="list-style-type: none"> Section 12: Wildfire Mitigation Plan Roles and Responsibilities
2	SB 901 Section 42(b) (2) (B) The objectives of the wildfire mitigation plan.	<ul style="list-style-type: none"> Section 5: Objectives of the Imperial Irrigation District Wildfire Mitigation Plan

	SB901 – POU WF Plan Requirements	IID SB 901 WF Mitigation Plan Sections
3	SB 901 Section 42(b)(2)(C) A description of the preventive strategies and programs to be adopted by the local publicly owned electric utility or electrical cooperative to minimize the risk of its electrical lines and equipment causing catastrophic wildfires, including consideration of dynamic climate change risks.	<ul style="list-style-type: none"> • Section 9: Existing Efforts with Elements Expected to Reduce Fire Risk (various subsections) • Section 10: Planned Efforts with Elements Expected to Reduce Fire Risk (various sections) • Section 7: Future Fire Risk Due to Climate Change
4	SB 901 Section 42(b)(2)(D) A description of the metrics the local publicly owned electric utility or electrical cooperative plans to use to evaluate the wildfire mitigation plan's performance and the assumptions that underlie the use of those metrics.	<ul style="list-style-type: none"> • Subsection 11.8: Performance Metrics
5	SB 901 Section 42(b) (2) (E) A discussion of how the application of previously identified metrics to previous wildfire mitigation plan performances has informed the wildfire mitigation plan.	<ul style="list-style-type: none"> • Subsection 11.6: Wildfire Plan Performance Monitoring • Subsection 11.7: Continuous Improvement
6	SB 901 Section 42(b)(2)(F) Protocols for disabling re-closers and de-energizing portions of the electrical distribution system that consider the associated impacts on public safety, as well as protocols related to mitigating the public safety impacts of those protocols, including impacts on critical first responders and on health and communication infrastructure.	<ul style="list-style-type: none"> • Subsection 10.6: Disabling Re-Closer Procedure • Subsection 10.7: Public Safety Power Shutoff
7	SB 901 Section 42(b) (2) (G) Appropriate and feasible procedures for notifying a customer who may be impacted by the de-energizing 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.	<ul style="list-style-type: none"> • Subsection 10.7: Public Safety Power Shutoff
8	SB 901 Section 42(b) (2) (H) Plans for vegetation management.	<ul style="list-style-type: none"> • Subsection 9.3: Vegetation Management Power lines 200kV and Below Not Subject to FERC Jurisdiction • Subsection 9.4: Transmission Vegetation Management Program • Subsection 9.12: Redesign of Vegetation Management Website

	SB901 – POU WF Plan Requirements	IID SB 901 WF Mitigation Plan Sections
9	SB 901 Section 42(b) (2) (I) Plans for inspections of the local publicly owned electric utility’s or electrical-cooperative’s electrical infrastructure.	<ul style="list-style-type: none"> • Subsection 9.5: Imperial Irrigation District Power Line Inspection Program
10	<p>SB 901 Section 42(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:</p> <ul style="list-style-type: none"> - SB 901 Section 42(b) (2) (J) (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. - SB 901 Section 42(b)(2)(J)(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. 	<ul style="list-style-type: none"> • Section 6: Present Fire Ignition Risks (various subsections) • Section 7: Future Fire Risk Due to Climate Change
11	SB 901 Section 42(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.	<ul style="list-style-type: none"> • Section 8: Service Territory Survey Findings – Changes to CPUC Fire Threat Map
12	SB 901 Section 42(b) (2) (L) A methodology for identifying and presenting enterprise wide safety risk and wildfire-related risk.	<ul style="list-style-type: none"> • Section 6: Present Fire Ignition Risks (all subsections)
13	SB 901 Section 42(b) (2) (M) A statement of how the local publicly owned electric utility or electrical cooperative will restore service after a wildfire.	<ul style="list-style-type: none"> • Section 9.8: Service Restoration After Major Events

	SB901 – POU WF Plan Requirements	IID SB 901 WF Mitigation Plan Sections
14	<p>SB 901 Section 42(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:</p> <ul style="list-style-type: none"> - SB 901 Section 42(b) (2) (N) (i) Monitor and audit the implementation of the wildfire mitigation plan. - SB 901 Section 42(b) (2) (N) (ii) Identify any deficiencies in the wildfire mitigation plan or its implementation, and correct those deficiencies. - SB 901 Section 42(b)(2)(N)(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. 	<ul style="list-style-type: none"> • Section 11: Managing the Plan (All subsections)
15	<p>SB 901 Section 42(b) (3) The local publicly owned electric utility or electrical cooperative shall present each wildfire mitigation plan in an appropriately noticed public meeting. The local publicly owned electric utility or electrical cooperative shall accept comments on its wildfire mitigation plan from the public, other local and state agencies, and interested parties, and shall verify that the wildfire mitigation plan complies with all applicable rules, regulations, and standards, as appropriate.</p>	<ul style="list-style-type: none"> • Subsection 11.5: Comprehensive Wildfire Mitigation Plan Public Comments
16	<p>SB 901 Section 42(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.</p>	<ul style="list-style-type: none"> • Subsection 11.2: Qualified Independent Evaluator Review

	SB901 – POU WF Plan Requirements	IID SB 901 WF Mitigation Plan Sections
17	SB 901 Section 43 An electrical corporation, local publicly owned electric utility, or community choice aggregator with a contract to procure electricity generated from biomass pursuant to subdivision (b) of Section 399.20.3, commission Resolution E-4770 (March 17, 2016), or commission Resolution E-4805 (October 13, 2016), or with a contract that is operative at any time in 2018, and expires or expired on or before December 31, 2023, shall seek to amend the contract to include, or seek approval for a new contract that includes, an expiration date five years later than the expiration date in the contract that was operative in 2018, so long as the contract extension follows the feedstock requirement of subdivision (b) of Section 399.20.3. This section shall not apply to facilities located in federal severe or extreme nonattainment areas for particulate matter or ozone.	<ul style="list-style-type: none"> • Subsection 10.9: Addressing SB 901 Section 43 Requirements (Biomass)

4. IID Responses to 2021 WSAB Guidance Advisory Opinion Recommendations

The 2021 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.

Below are the IID responses to WSAB recommendations:

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.

Response:

1. See Section 2 above
2. See Section 3 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.

Response:

1. See IID SB 901 Wildfire Mitigation Plan Sections 11.1-11.5.
2. Efforts are funded by each operational unit as either operation and maintenance, or capital projects.

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.

Response:

1. The initial independent evaluator report is included in the IID SB 901 Wildfire Mitigation Plan. The plan can be found on the IID.com public website: <https://www.iid.com/customer-service/safety/wildfire-mitigation>
2. IID expects to perform a comprehensive review and update of the wildfire plan prior to July 1 2022 submittal.

WSAB Recommendation #4:

Develop, in collaboration with POU industry associations, WMP guidelines for future WMPs, understanding that it may take multiple cycles for POU's to integrate these recommendations into the WMPs.

Response:

1. This document is intended to include, as appropriate, responses to the recommendations in the WSAB's Guidance Advisory Opinion for the POU's 2021 WMP. This document also represents the combined effort of 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.

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 POU's 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.

Response:

IID Customers have not lost service due to an IOU PSPS event. Customers have not been notified of a potential loss of service due to a forecasted IOU PSPS event since IID's customers are located within the IID BA. IID has not previously pre-emptively shut off electricity in response to elevated wildfire risk as it is not in the high risk area. IID is at a low risk of being impacted by IOUs responding to PSPS events. IID customer load is contained within the IID BA and external customer load being interrupted by neighboring BAs or TOPs has little overall impacts to IID customers.

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.

Response:

1. The IID HR Emergency Management Unit is currently developing the standard operating procedure.

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.

Response:

1. See the following IID SB 901 Wildfire Mitigation Plan Sections for system hardening and grid design information:
 9. Existing Efforts with Elements Expected to Reduce Fire Risk
 - 9.1. Power Line and Substation Design, Engineering and Construction
 - 9.2. Relay Protection
 10. Planned Efforts with Elements Expected to Reduce Fire Risk
 - 10.2. Relay Modernization Program
 - 10.6. Disabling Re-Closer Procedure

10.7. Public Safety Power Shutoff

10.10. Distribution Power Line Bird Deterrents

2. IID Customers have not lost service due to an IOU PSPS event. Customers have not been notified of a potential loss of service due to a forecasted IOU PSPS event since IID's customers are located within the IID BA. IID has not previously pre-emptively shut off electricity in response to elevated wildfire risk as it is not in the high risk area. IID is at a low risk of being impacted by IOUs responding to PSPS events. IID customer load is contained within the IID BA and external customer load being interrupted by neighboring BAs or TOPs has little overall impacts to IID customers.

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.

Response:

1. See IID SB 901 Wildfire Mitigation Plan Sections for description on inspection approach:
 9. *Existing Efforts with Elements Expected to Reduce Fire Risk*
 - 9.3. *Vegetation Management Power Lines 200 kV and Below Not Subject to FERC Jurisdiction*
 - 9.4. *Transmission Vegetation Management Program*
 - 9.5. *Imperial Irrigation District Power Line Inspection*
 10. *Planned Efforts with Elements Expected to Reduce Fire Risk*
 - 10.3. *New Vegetation Management Program*
 - 10.6. *Disabling Re-Closer Procedure*
 - 10.7. *Public Safety Power Shutoff*
 - 10.8. *Monitor and Audit Effectiveness of Power Line Inspections*

2. Inspection defects are recorded on the IID system of record where work scheduler personnel create work orders according to the urgency of the repair required. Priority of work follows G.O. practices.
3. IID Power Restoration and Troubleshooting patrolman and troubleshooters will patrol lines when Red Flag warnings and high winds are expected locally or at the request of neighboring utilities. If power is shut off, lines shall be patrolled during daylight hours as operations may be limited during overnight hours and prior to re-energizing. In the event of a critical fire, staff shall inspect conductors affected and/or summon help from line construction crew for conductors out of reach or range.

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.

Response:

1. As part of the 2020 IID Service Territory Survey the Independent Consultant performed a spot check of distribution power pole installations to identify possible fire ignition issues present in the IID system. Consultant findings are included as a separate document included in the IID 2020 WF Plan Update. IID operational units are expected to review findings and address issues as required.

The plan for the next service territory survey is to perform a possible fire ignition spot check for cranking path and IID generation pole lines.

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.

Response:

1. The system is built to G.O. 95 standards. If equipment is found during modification that is not to G.O. standards, it is brought up to those standards during construction.

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.

Response:

1. See Section 2 Above for Prevailing Wind Directions & Speeds by Season
2. Situational Awareness equipment and technology is continuously added to the system as budgets and personnel are available. This includes distribution and transmission line monitoring equipment and SCADA installations.

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.

Response:

1. See IID SB 901 Wildfire Mitigation Plan Sections:
 9. Existing Efforts with Elements Expected to Reduce Fire Risk
 - 9.3. Vegetation Management Power Lines 200 kV and Below Not Subject to FERC Jurisdiction
 - 9.4. Transmission Vegetation Management Program
 10. Planned Efforts with Elements Expected to Reduce Fire Risk
 - 10.3. New Vegetation Management Program
 - 10.5. Vegetation Management Internal IID Training

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).

Response:

1. IID does not hire ecology, fire ecology, fire behavior, geology or meteorology experts for wildfire mitigation work.
2. IID is transitioning from contract services to internal employee vegetation management crews. Supervisors are expected to be experienced qualified power line clearance personnel.
3. All newly hired vegetation management personnel go through electrical safety and substation safety courses which include power line and energized equipment minimum approach distances. Training also includes IID Regulation 23 policy that covers power corridor encroachment incident procedures.

WSAB Recommendation #14:

Describe whether the POU has considered innovative and alternative approaches to vegetation management.

Response:

1. Yes. This consideration resulted in transitioning from a contract service to IID internal crew labor force. IID is continuing to evaluate the herbicide application practice to decide if the herbicide practice will also transition away from contract services to an internal IID workforce.