CITY OF RANCHO CUCAMONGA MUNICIPAL UTILITY'S WILDFIRE MITIGATION PLAN

Risk Category: Low

VERSION 1.1 – FINAL

Attachment 1

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I. OVERVIEW

A. POLICY STATEMENT

The City of Rancho Cucamonga Municipal Utility's (RCMU's) overarching goal is to provide safe, reliable, clean and economic electric service to its local community. In order to meet this goal, RCMU constructs, maintains, and operates its underground electrical lines and equipment in a manner that minimizes the risk of catastrophic wildfire posed by its electrical lines and equipment.

B. PURPOSE OF THE WILDFIRE MITIGATION PLAN

RCMU's entire electric supply system is located underground in conduit and vaults. Historically, undergrounded electric lines have not been associated with catastrophic wildfires. The undergrounding of electric lines serves as an effective mitigation measure to reduce the potential of power-line ignited wildfires. Based on a review of local conditions and historical fires, RCMU has determined that its electrical lines and equipment do not pose a significant risk of catastrophic wildfire.

Despite this low risk, RCMU has taken appropriate actions to help its region prevent and respond to the increasing risk of devastating wildfires. In its role as a public agency, the Rancho Cucamonga Fire Protection District (Fire District) closely coordinates with other local safety and emergency officials to help protect against fires and respond to emergencies. In its role as a utility, RCMU follows all applicable design, construction, operation, and maintenance requirements that reduce safety risks associated with its electric system. This Wildfire Mitigation Plan describes the safety-related measures that RCMU follows to reduce its risk of causing wildfires.

C. ORGANIZATION OF THE WILDFIRE MITIGATION PLAN

This Wildfire Mitigation Plan included the following elements:

- Objectives of the plan
- Roles and responsibilities for carrying out the plan
- Identification of key wildfire risks and risk drivers
- Description of wildfire prevention, mitigation, and response strategies and programs
- Metrics for evaluating the performance of the plan and identifying areas for improvement
- Review and validation of the plan
- Timelines

D. UTILITY FACTS AND INFORMATION

Utility Name	City of Rancho Cucamonga	
Service Territory Size	4 square miles	
Owned Assets	31 circuit miles of Underground Electric Distribution 42 miles of Underground Fiber Optics	
Number of Customers Served	2,000 electric customer accounts	
Population Within Service Territory	6,000 people (est.)	
Customer Class Makeup	*Number of Accounts*	*Share of Total Load (MWh)*
	59% Residential 40% Small/Medium Business 1% Commercial/Industrial	6% Residential 59% Small/Medium Business 35% Commercial/Industrial
Service Territory Location/Topography[1]	99% Urban 1% Shrub	
Service Territory Wildland Urban Interface[2] **(based on total area)**	0% Wildland Urban Interface 0% Wildland Urban Intermix	
Percent of Service Territory in CPUC High Fire Threat Districts (based on total area)	X Includes maps Tier 2: 0% Tier 3: 0%	
Prevailing Wind Directions & Speeds by Season	The Santa Ana winds typically peaks in October and concludes in the Spring. Wind speed varies, but the wind directions are typically aligned in a northeast to southwest direction.	
Miles of Owned Lines Underground and/or Overhead	Overhead Dist.: 0 miles Overhead Trans.: 0 miles Underground Dist.: 31 miles Underground Trans.: 0 miles	
	Explanatory Note 1 - Methodology for measuring miles is based on RCMU's final as-built distribution circuit maps.	
Percent of Owned Lines in CPUC High Fire Threat Districts	*Overhead Distribution Lines as % of Total Distribution System (Inside and Outside Service Territory)*	
	Tier 2: 0% Tier 3: 0%	

[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=b7ec5d68d8114b1fb2bfbf4665989eb3.

[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.

	Overhead Transmission Lines as % of Total Transmission System (Inside and Outside Service Territory)
	Tier 2: 0% Tier 3: 0%
	Explanatory Note 1 – RCMU does not own any overhead lines inside or outside its service territory.
Customers have ever lost service due to an IOU PSPS event?	☐ Yes X No
Customers have ever been notified of a potential loss of service to due to a forecasted IOU PSPS event?	☐ Yes X No
Has developed protocols to pre-emptively shut off electricity in response to elevated wildfire risks?	☐ Yes X No
Has previously pre-emptively shut off electricity in response to elevated wildfire risk?	☐ Yes X No If yes, then provide the following data for calendar year 2020: *Number of shut-off events*: 0 *Customer Accounts that lost service for >10 minutes:* 0 *For prior response, average duration before service restored:* N/A

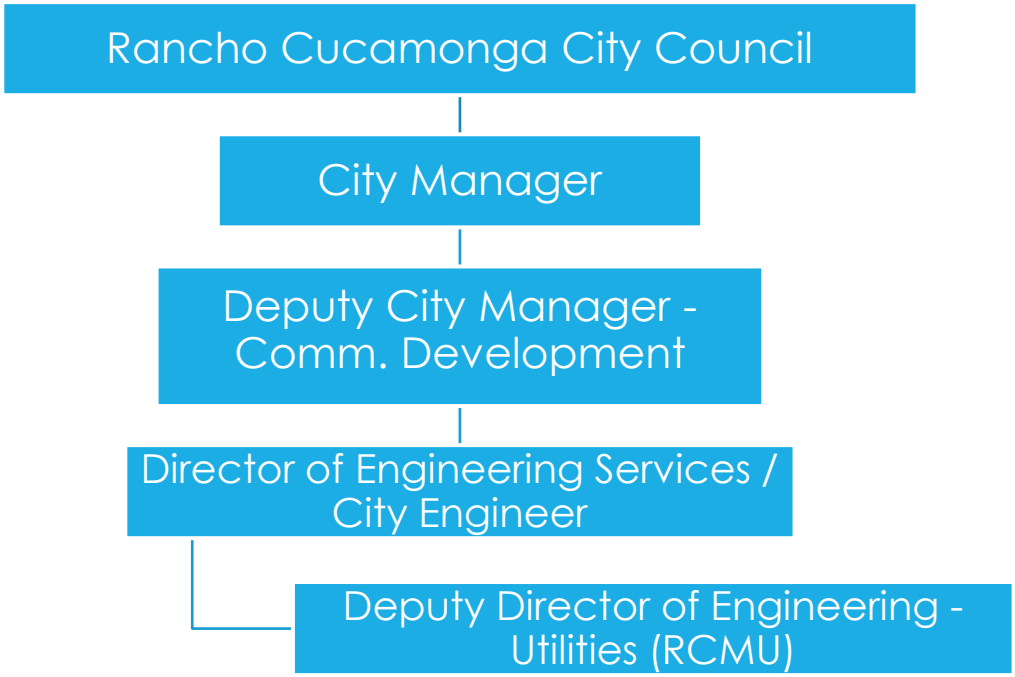
II. OBJECTIVES OF THE WILDFIRE MITIGATION PLAN

The primary goal of this Wildfire Mitigation Plan is to describe RCMU's existing programs, practices, and measures that effectively reduce the probability that RCMU's electric supply system could be the origin or contributing source for the ignition of a wildfire. To support this goal, RCMU regularly evaluates the prudent and cost-effective improvements to its physical assets, operations, and training that can help reduce the risk of equipment-related fires.

The secondary goal of this Wildfire Mitigation Plan is to improve the resiliency of the electric grid. As part of the development of this plan, RCMU assesses new industry practices and technologies that will reduce the likelihood of an interruption (frequency) in service and improve the restoration (duration) of service.

III. ROLES AND RESPONSIBILITIES

A. UTILITY GOVERNANCE STRUCTURE



B. WILDFIRE PREVENTION

RCMU's staff and contractor's roles and responsibilities for (1) electric facility design, maintenance, and inspection; and (2) vegetation management.

- Operate system in a manner that will minimize potential wildfire risks.
- Take all reasonable and practicable actions to minimize the risk of a catastrophic wildfire caused by RCMU's electric facilities.

- Coordinate with federal, state, and local fire management personnel as necessary or appropriate to implement RCMU's Wildfire Mitigation Plan.
- Immediately report fires, pursuant to existing RCMU practices and the requirements of this Wildfire Mitigation Plan.
- Take corrective action when the staff witnesses or is notified that fire protection measures have not been properly installed or maintained.

Comply with relevant federal, state, and industry standard requirements, including the industry standards established by the California Public Utilities Commission.

C. WILDFIRE RESPONSE AND RECOVERY

For the City and the Fire District, relevant lines of communication during emergencies include Landline, cell phone, text messaging and radio. During emergency scenes: same as above, plus radio communication via the 800 and VHF radios. In addition, during emergencies we can activate our Auxiliary Communications Service (ham radio) team to assist with first responders and the EOC during a wildfire incident

Regarding the utility's staff roles regarding fire prevention, response and investigation, other than providing an agency representative during an emergency involving RCMU facilities there are no other roles needed since RCMU's service area is outside of the wildfire threat area.

D. STANDARDIZED EMERGENCY MANAGEMENT SYSTEM

As a local governmental agency,[3] the City of Rancho Cucamonga has planning, communication, and coordination obligations pursuant to the California Office of Emergency Services' Standardized Emergency Management System ("SEMS") Regulations,[4] 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.[5] Pursuant to this structure, the City of

[3] As defined in Cal. Gov. Code § 8680.2.
[4] 19 CCR § 2407.
[5] Cal. Gov. Code § 2403(b):

> (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.

Rancho Cucamonga annually coordinates and communicates with the relevant safety agencies as well as other relevant local and state agencies. During emergencies, RCMU has a key role in ensuring utility operations at the field, local government and operational area levels.

Under the SEMS structure, a significant amount of preparation is done through advanced planning at the local level, including the coordination of effort of public, private, and nonprofit organizations. San Bernardino serves as the Operational Area and is guided by the San Bernardino County Operational Area Coordinating Council that is made up of representatives of all 24 Cities and Town's. The Operational Area includes local and regional organizations that bring relevant expertise to the wildfire prevention and recovery planning process. These participants include local school districts, utilities, first responder agencies, non-profits (such as the United Way and/or the American Red Cross), all regional Hospitals, special districts, communications providers, and other similar organizations.

Pursuant to the SEMS structure, the City of Rancho Cucamonga also participates in annual emergency training exercises. In September of 2019, the Fire District hosted a table top exercise with all City Department Directors including RCMU on a wildfire in our front country area. At a minimum, exercises will be provided on an annual basis by either the Rancho Cucamonga Fire Protection District or by invitation from another supporting agency such as the County Operational Area.

RCMU is a member of the California Utility Emergency Association, which is a State agency that plays a key role in ensuring communication and mutual aid between utilities during emergencies.

(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.

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

Within RCMU's service territory and the surrounding areas, the primary risk drivers for wildfire are the following:

- High Temperature
- Low Humidity
- Hillside Terrain
- Fire Weather Conditions
- Prolonged Drought
- Climate Change
- Fire History

B. ENTERPRISEWIDE SAFETY RISKS

Fire risks due to topographical and climatological factors are determined to be "Low" (Tier 1 (i.e. low risk)) within RCMU's service area. The description of tiered fire threat zones is shown in Table 1 below.

Table 1

Description of tiered fire threat zones

Zone	Category	Description
Tier 3	Extreme	Wildland areas where exposure to overhead power lines, the availability of water resources, and emergency responder circulation routes affect response times to combat wildland fires.
Tier 2	Elevated	Elevated risk due to vegetation, high voltage regional transmission lines crossing the area, and adjacency to Tier 3 fire threat zones.
Tier 1	Low	Well developed areas, typically with underground high voltage circuitry.

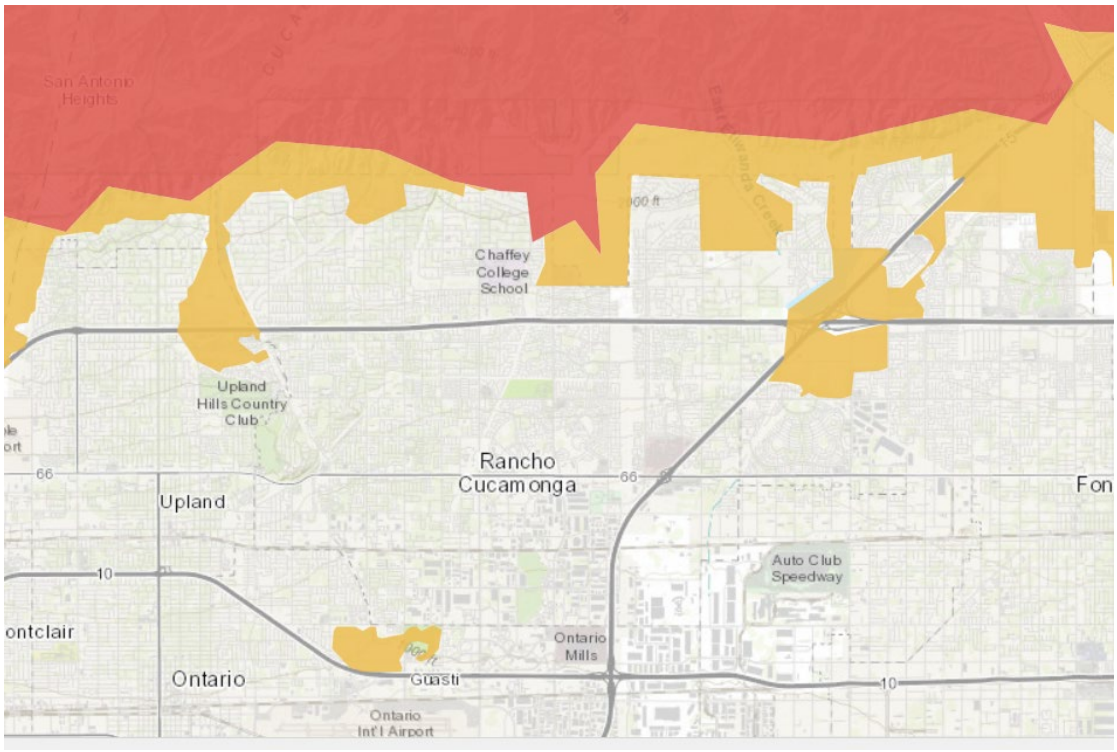
On September 19, 2018, the Rancho Cucamonga City Council adopted Resolution No. 18-103 which made a determination that RCMU's current service area is not located in an area that is considered an elevated or extreme risk of electric line wildfires; has 0 percent overhead electric lines and equipment and does not pose a significant risk of causing wildfires.

V. WILDFIRE PREVENTATIVE STRATEGIES

A. HIGH FIRE THREAT DISTRICT

RCMU, as a member of the California Municipal Utilities Association participated in the development of the CPUC's Fire-Threat Map,[6] which designates a High-Fire Threat District. In the CPUC Fire-Threat map development process, RCMU coordinated with Southern California Edison Company (SCE) and determined that because RCMU's system is entirely undergrounded, that SCE would serve as territory lead for the region served by RCMU. RCMU has incorporated the High Fire Threat District into its construction, inspection, maintenance, repair, and clearance practices, where applicable.

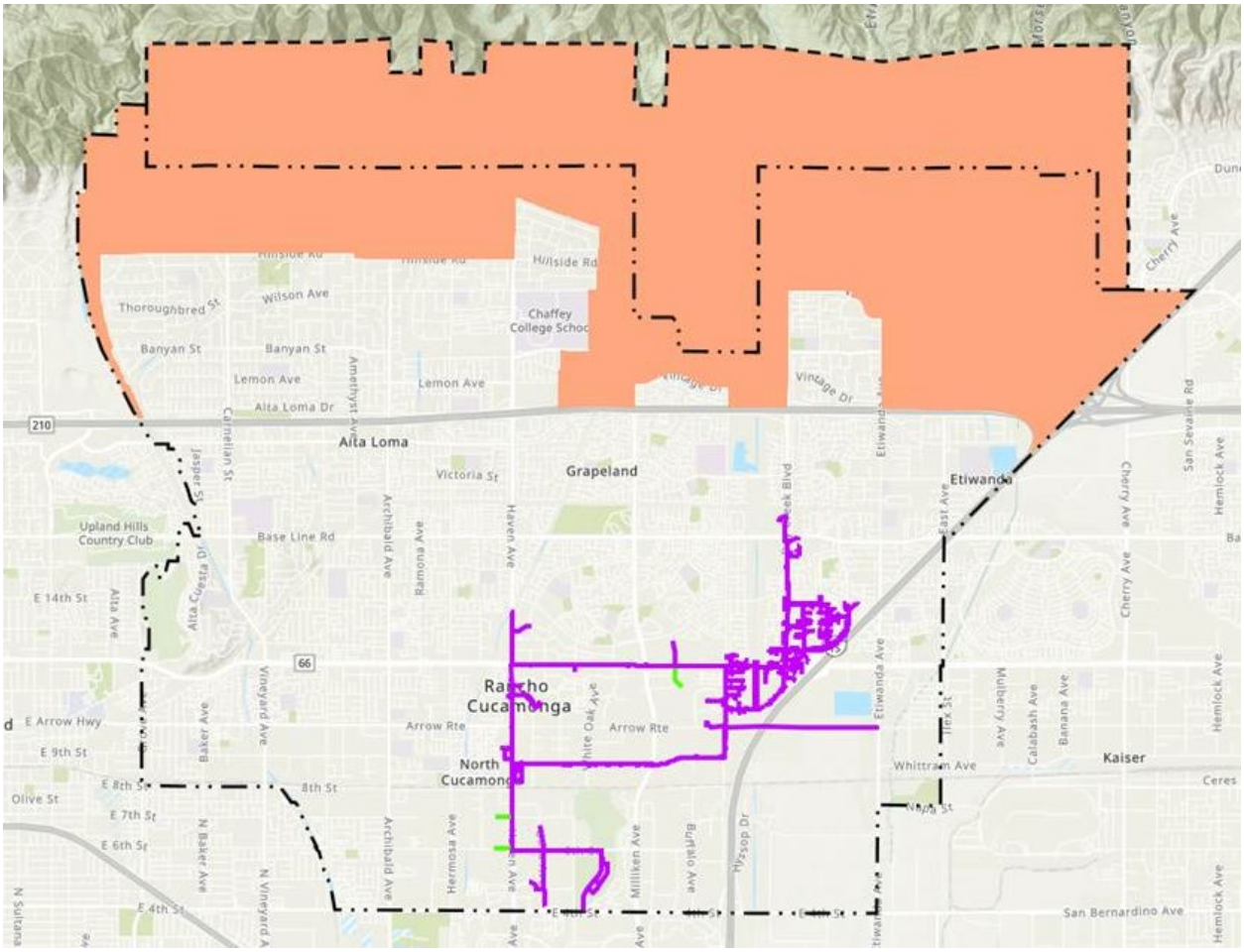
CPUC's Fire Threat Map



Additionally, the Rancho Cucamonga City Council, acting as the Board of Directors of the Fire District also adopted a Wildland Urban Interface Fire Area Map for the City (see the map below), referring to the zone where undeveloped, wildland vegetation transitions to developed land such as residential neighborhoods which are at risk of wildfires.

[6] Adopted by CPUC Decision 17-12-024.

Rancho Cucamonga Fire District's Wildland Urban Interface
Fire Area Map with RCMU Electrical Circuits



The Fire District's fire area map matches closely to the CPUC's Fire-Threat Map and the existing RCMU underground electrical circuits (shown in purple) are all located in the low-risk category.

B. DESIGN AND CONSTRUCTION STANDARDS

RCMU's electric facilities are designed and constructed to meet or exceed the relevant federal, state, or industry standard. RCMU treats CPUC General Orders (GO) 128 as a key industry standard for design and construction standards for underground electrical facilities. RCMU meets or exceeds all standards in GO 128. Additionally, RCMU monitors and follows, as appropriate, the National Electric Safety Code.

C. VEGETATION MANAGEMENT

RCMU has a 100% underground electric system, so the standard vegetation management practices do not apply to RCMU

D. INSPECTIONS

RCMU meets or exceeds the minimum inspection requirements provided in the CPUC's GO 165 (Inspection Requirements for Electric Distribution Facilities) by annually patrolling all pad mounted Transformers, Switches and Capacitors, with a detailed inspection every 5 years. Pursuant to these rules, utilities inspect electric facilities in the High Fire Threat District more frequently than the other areas of its service territory. As described above, RCMU currently does not have any overhead powerlines located within or near the High-Fire Threat District within the CPUC's Fire Threat Map. However, RCMU staff uses their knowledge of the specific environmental and geographical conditions of RCMU's service territory to determine if any particular areas require more frequent inspections if necessary.

If RCMU staff discovers a facility in need of repair that is owned by an entity other than RCMU, RCMU will issue a notice to repair to the facility owner and work to ensure that necessary repairs are completed promptly.

E. RECLOSING POLICY

RCMU does not have any automatic reclosers deployed downstream of RCMU's Arbors substation. All of RCMU's circuit breakers have reclosing functionality which is conducted manually by a lineman in the field. RCMU's system currently does not have this capability to be controlled by SCADA or other remote controls. RCMU has the capability, should it be deemed necessary, to change the relay or reclosing settings during adverse conditions.

F. DEENERGIZATION

RCMU has the authority to preemptively shut off power due to fire-threat conditions, however, this option will only be used in extraordinary emergency circumstances. Due to the minimal risk of RCMU's electrical supply facilities causing a power-line ignited wildfire, RCMU is not adopting specific protocols for de-energizing any portions of its electric distribution system. RCMU will re-evaluate this determination in future updates to this Wildfire Mitigation Plan.

VI. RESTORATION OF SERVICE

In the unlikely event of a wildfire or other emergency event caused by or affecting RCMU's electric system, that would require a public safety power shutoff, the City of Rancho Cucamonga will maintain a proactive plan to communicate with the community during high fire threat periods and disasters.

- Coordinate with the Fire District and the Rancho Cucamonga Police through the City's EOC during emergencies or large-scale outages.
- Expand social media for the public to see current outages and estimated restoration times in coordination with the City's Communications Team.
- Communication plans through the City's EOC will allow RCMU to coordinate with applicable emergency service personnel along with maintaining open lines of communication with customers, media and internal City staff.

RCMU will work as quickly as possible to restore power safely, following an event, in cooperation with the City's Fire District, Police, and Public Works Departments. RCMU will also engage its on-call high voltage contractors as-needed.

RCMU staff and its contractors will ensure which circuits are to be brought up safely and that any vital loads are restored first followed by non-vital loads. In most cases, the following restoration priorities will be followed depending on the specific incident and available resources:

- Public safety in the affected areas
- Worker safety in performing the restoration work
- Life-support or critical customers
- Critical infrastructure (Key City facilities, City Police and Fire Departments, other key utility facilities (e.g., fiber communications)
- Major commercial activities/accounts critical to continuity of community services (e.g., gas stations, food stores, home supply stores, repair shops, eateries and lodging facilities, financial institutions, etc.)
- To reduce the total number of customers affected
- To reduce the length of time customers have been without power.

In directing restoration efforts to best achieve the above priorities, RCMU Staff will generally find it most efficient to dedicate restoration resources to the following types of facilities in the following order of priority to optimally restore electric services:

- Arbors Substation located on Rochester Ave and Stadium Way
- All Distribution circuits (12 kV)
- Distribution feeders
- Distribution transformers
- Service lines

VII. EVALUATING OF THE PLAN

A. METRICS AND ASSUMPTIONS FOR MEASURING PLAN PERFORMANCE

RCMU will track two metrics to measure the performance of this Wildfire Mitigation Plan: (1) number of fire ignitions; and (2) wires down causing fires within the service territory.

METRIC 1: FIRE IGNITIONS

For purposes of this metric, a fire ignition is defined as follows:

- RCMU facility was associated with the fire
- The fire was self-propagating and of a material other than electrical and/or communication facilities
- The resulting fire traveled greater than one linear meter from the ignition point; and
- RCMU has knowledge that the fire occurred

In future Wildfire Mitigation Plans, RCMU will provide the number of fires that occurred that were less than 10 acres in size. Any fires greater than 10 acres will be individually described.

METRIC 2: WIRES DOWN

The second metric is the number of distribution and transmission wires downed within RCMU's service territory. For purposes of this metric, a "wires down" event includes any instance where an electric transmission or primary distribution conductor falls to the ground or on to a foreign object. RCMU will divide the wires down metric between wires down inside and outside of the High Fire Threat District.

RCMU will not normalize this metric by excluding unusual events, such as severe storms. Instead, RCMU will supplement this metric with a qualitative description of any such unusual events.

B. IMPACT OF METRICS ON PLAN

RCMU Performance Metrics:

Metric 1: Fire Ignitions	**CY 2020**
# of Fire Ignition in RCMU Service Area	0
# of wildfires in City boundaries NOT in RCMU Service Area (<10 acres)	1 (~2 acres)
# of wildfires in City boundaries NOT in RCMU Service Area (> 10 acres)	0
Metric 2: Wires Down	
# of "Wires Down" events in RCMU Service Area	0
# of Red Flag warnings issued	9

C. MONITORING AND AUDITING THE PLAN

This Wildfire Mitigation Plan will be presented to the Rancho Cucamonga City Council and RCMU staff will present updates to this plan on an annual basis. Additionally, a qualified independent evaluator will review this plan and determine its compliance to the Rancho Cucamonga City Council.

D. IDENTIFYING AND CORRECTING DEFICIENCIES IN THE PLAN

Based on the recommendations of the Rancho Cucamonga City Council, RCMU will correct any identified deficiencies.

E. MONITORING THE EFFECTIVENESS OF INSPECTIONS

A key mitigation measure against wildfires is vegetation management. Since RCMU has a 100% underground electric system, the standard vegetation management inspections do not apply to RCMU.

VIII. INDEPENDENT AUDITOR

Public Utilities Code section 8387(c) requires RCMU 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. The independent evaluator must issue a report that is posted to the City's website. This report must also be presented to the Rancho Cucamonga City Council at a public meeting.

In evaluating and selecting an independent evaluator as required in PUC Section 8387(c), the City determined that the Fire District is the most qualified independent evaluator who understand the local conditions and fire risks for the City of Rancho Cucamonga and is aware that RCMU's service area is located in a low-risk fire threat zone with 100% underground electric wire equipment.

The City believes that the Fire District is qualified to review the comprehensiveness of the RCMU Wildfire Mitigation Plan.

IX. WSAB GUIDANCE ADVISORY OPINION RECOMMENDATIONS (2021 UPDATE)

On December 9, 2020, the Wildfire Safety Advisory Board (WSAB) issued its Guidance Advisory Opinion identifying 14 specific recommendations that Publicly Owned Utilities (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 RCMU will be updating their WMPs based on the direction of their local governing boards within this 3-year cycle. However, because the WSAB's recommendations was provided after the RCMU's initial WMP submission, RCMU decided that it would fully address each of the WASB's recommendation in its 2021 WMP update. This Section IX. restates each of the WSAB recommendations where RCMU provides one or more of the

following responses: (1) provide a narrative response to the recommendation; (2) provide a cross reference 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.**

RCMU's Response: See Section I-D and Section X.

***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.**

RCMU's Response: RCMU's public review of its WMP, updates and any associated approvals will be made available for public review on the City Council's agenda located on the City's website, as well as the City's Council agenda posting located for viewing at Rancho Cucamonga City Hall.

***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.**

RCMU's Response: RCMU's most recent IE Report and existing WMP are included in RCMU's website located at https://www.cityofrc.us/rcmu . No discussion has occurred on whether or not any enhancements to future IE reports will be needed.

***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.**

RCMU's Response: This document is intended to include, as appropriate, RCMU's responses to the recommendations in the WSAB's Guidance Advisory Opinion for its 2021 WMP update. 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 future reporting WMP cycles.

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.

> ***RCMU's Response:*** RCMU's relationship with SCE during PSPS events is only at the Transmission and Sub-Transmission levels. It is important to note that SCE provides electricity to almost 85% of the City. For those residents, the City receives advanced email notifications that SCE will be exploring a possible PSPS event or has begun PSPS events at the Distribution circuit level. Any SCE PSPS outages occurring at the Distribution level will still affect a large majority of City residents and businesses served by SCE, but not RCMU powered customers or businesses.
>
> RCMU's customers will only be impacted by the PSPS events ordered by SCE, if the SCE Transmission and Sub-Transmission level lines are ordered to be de-energized. To date, SCE has informed RCMU that it does not intend to de-energize any of its Transmission and Sub-Transmission circuits, therefore, RCMU has not implemented a mitigation strategy for SCE's PSPS, nor have we deenergized our own lines when a wildfire threat is looming. RCMU also does not have a distribution level generator allowing the utility to withstand a SCE Transmission and Sub-Transmission PSPS event should that ever occur.

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.

> ***RCMU's Response:*** RCMU relies on the City's Communication Team to help disseminate key information including any outage information, wildfire and PSPS information to all City residents and the general public. This is done via the City's social media channels including Facebook, Twitter and Nextdoor. For the communication to the City's most vulnerable customers, this is an area that the City's Communication Team is currently working on improving by creating a Community Engagement Policy that ensures citywide implementation of equitable community engagement practices. This recommendation will be better addressed at RCMU's next comprehensive revision.

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.

> ***RCMU's Response:*** RCMU's approach to grid hardening is discussed in Section V. subsections B, D and E of RCMU's WMP. RCMU's 100% underground design and construction standards and field inspections of critical electrical equipment are some of its key grid hardening programs. Historically, undergrounded electric lines have not been

associated with catastrophic wildfires. The undergrounding of electric lines serves as an effective grid hardening measure that reduces the potential of power-line ignited wildfires. The goal of RCMU's program is prevention and mitigation response versus reaction in its system hardening and grid design. RCMU is also providing the following responses to specific questions included in the WSAB's 2021 Guidance Advisory Opinion under this sub-section:

- ***Does the POU perform a circuit-by-circuit analysis to identify essential facilities (and whether they have backup power) like hospitals, communication centers, and community resource centers?***

  RCMU's Response: Yes, RCMU does have a circuit by circuit analysis which identifies essential facilities within its service area. The analysis does not identify whether those facilities have their own backup power.

- ***Does the POU assess system hardening measures that could be installed to prevent PSPS for those facilities?***

  RCMU's Response: N/A. RCMU's system is already designed to be 100% underground.

- ***In what way does the POU prepare these facilities for a PSPS or another wildfire related de-energization event?***

  RCMU's Response: N/A. RCMU is not affected by the IOU's PSPS de-energization event and its facilities are not located in a wildfire area.

- ***For POUs that power water utilities or supply water themselves, if that water is used for drinking and firefighting, are certain projects being undertaken to harden the system for water delivery purposes?***

  RCMU's Response: N/A. RCMU does not serve sites that power any water utilities or water conveyance.

- ***Are pump stations self-contained or have some level of fire protection? Is the supply to sewage treatment plants hardened?***

  RCMU's Response: N/A. RCMU does not serve any pump stations or sewage treatment plants.

- ***Is supplemental generation available such as backup batteries or backup power facilities?***

  RCMU's Response: No, RCMU does not provide supplemental generation.

- ***Are the majority installed by the customers themselves or the utility?***

  RCMU's Response: Unknown: If any supplemental generation is installed, it is done by the customers and not installed by the utility.

- ***Can the utility open and close taps? Can the utility back-feed?***

  RCMU's Response: No, RCMU cannot control the taps of the customer's backup / supplemental generation.

- ***Are there wildfire related circumstances wherein either of these tactics would be useful?***

  RCMU's Response: N/A

- ***Can the utility sectionalize in a localized fashion?***

  RCMU's Response: N/A

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.

RCMU's Response: RCMU's inspection standard is described in Section V-D of the WMP.

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.

RCMU's Response: RCMU continues to be actively involved in the California Municipal Utilities Association's (CMUA's) Wildfire Preparedness and Response Working Group to help identify any unidentified risks. This fall, the Working Group will be focused on risk drivers for powerline 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. RCMU's staff will participate in CMUA's meeting and will discuss any changes that RCMU has made to its operations in response to the conclusions and recommendations of the Working Group in a future WMP. Additionally, RCMU will continue to actively communicate with its Fire District staff to review any wildfire risks and risks drivers identified in Section IV-B in its 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.

RCMU's Response: RCMU's assessment of wildfire risk is discussed in Section IV of RCMU's WMP. As discussed in its WMP, RCMU has a 100% underground system, so the CPUC's G.O. 95 overhead constructions standards do not apply. The following provides

responses to specific questions included in the WSAB's 2021 WSAB Guidance Advisory Opinion under this sub-section:

- ***Are there design or construction issues related to the utility's specific topography or geographic location that the Board should be aware of?***
  RCMU's Response: N/A: No new information to provide.

- ***How will the utility address risks associated with facilities requiring power that abut a Tier 2 or Tier 3 HFTD?***
  RCMU's Response: N/A: No RCMU facilities abut Tier 2 or Tier 3 HFTD.

- **How does the utility assess its risks associated with system design and construction?**
  RCMU's Response: RCMU's design and construction standard continues to be a 100% underground system, which significantly lowers all wildfire risks.

- ***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?***
  RCMU's Response: N/A; As previously stated, G.O. 95 does not apply to RCMU.

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.

RCMU's Response: RCMU does not have any real-time wind direction and weather condition technology equipment installed that is able to track this information being requested by the WSAB. The lack of funds and budget to sustain staffing and qualified professionals to monitor this data is challenging in that neither the utility or other City Departments have the additional time or resources to track and monitor this information. However, the Emergency Management Division within the Rancho Cucamonga Fire District does receive consistent briefing reports from the National Weather Service (NWS) San Diego Office, which covers our City and County. This briefing provides an overview of significant weather that may impact our area. These reports allow our team to increase our awareness and preparedness for upcoming events. If an event has the potential for severe implications including wind and weather conditions, NWS – San Diego will host conference calls leading up to the event so the affected jurisdictions can gather additional data in order to make critical decisions on how to manage any potential damage and disruption in services. Emergency Management will coordinate this information with our internal city stakeholders such as RCMU so collectively decisions

can be made to preserve safety for our residents, especially during the high Santa Ana wind season.

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.

RCMU's Response: RCMU's vegetation management program is discussed in Section V-C of RCMU's WMP, basically summarizing that RCMU has a 100% underground electric system, so the standard vegetation management practices do not apply to RCMU. The following provides responses to specific questions included in the WSAB's 2021 WSAB Guidance Advisory Opinion under this sub-section:

- ***Describe the reasoning behind each treatment plan and the ecological impact of the treatment options chosen.***

  RCMU's Response: N/A

- ***Describe how vegetation management in the HFTD or Fire Threat Zones differs from other areas, including within private property and urban landscaping.***

  RCMU's Response: N/A

- **Describe any enhanced vegetation management that goes beyond the minimum G.O. 95 standard.**

  RCMU's Response: N/A

- ***A list of native and non-native species in the POU's Service Territory and describe how treatment methods vary.***

  RCMU's Response: N/A

- ***Describe how the POU tracks new vegetation growth that occurs in areas that has previously been cleared or treated.***

  RCMU's 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).

RCMU's Response: N/A: RCMU has a 100% underground electric system, so the standard vegetation management practices do not apply to RCMU.

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

RCMU's Response: N/A: RCMU has a 100% underground electric system, so the standard vegetation management practices do not apply to RCMU.

X. CROSS REFERENCE TO STATUTORY REQUIREMENTS

WSAB requested that RCMU provide a clear roadmap as to where each statutory requirement is addressed within RCMU's WMP.

Table 2: Cross References to Statutory Requirements

Requirement	Statutory Language	Location in WMP
Persons Responsible	**PUC § 8387(b)(2)(A):** An accounting of the **responsibilities of persons** responsible for executing the plan.	Section III A
Objectives of the Plan	**PUC § 8387(b)(2)(B):** The **objectives** of the wildfire mitigation plan.	Section II
Preventive Strategies	**PUC § 8387(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.	Section IIIB
Evaluation Metrics	**PUC § 8387(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.	Section VII
Impact of Metrics	**PUC § 8387(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.	Section VII
Deenergization Protocols	**PUC § 8387(b)(2)(F): Protocols for disabling reclosers and deenergizing 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.	Section V.F
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 VI. Section IX.B
Vegetation Management	**PUC § 8387(b)(2)(H):** Plans for vegetation management.	Section V.C
Inspections	**PUC § 8387(b)(2)(I): Plans for inspections** of the local publicly owned electric utility's or electrical cooperative's electrical infrastructure.	Section V.D

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 IV.A
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.A
Enterprise wide Risks	**PUC § 8387(b)(2)(L):** A methodology for identifying and presenting **enterprise wide** safety risk and wildfire-related risk.	Section IV.B
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
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. (ii) **Identify any deficiencies** in the wildfire mitigation plan or in its implementation and correct those deficiencies. (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.	Section VII.C

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

REVISION HISTORY

VERSION	REVISED BY	APPROVAL DATE	SECTION(S) REVISED
1.0	N/A	Dec. 18, 2019	NEW
1.1	F. LYN	Jun. 2, 2021	I-D, VII-B, IX, X