

VERNON PUBLIC UTILITIES WILDFIRE MITIGATION PLAN 2021 INFORMATIONAL RESPONSE

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

June 29, 2021

I. PURPOSE OF THIS 2021 INFORMATIONAL RESPONSE

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

II. CONTEXT SETTING INFORMATION

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

Table 1: Context-Setting Information

Utility Name	VPU	
Service Territory Size	5.2 square miles	
Owned Assets	<input type="checkbox"/> Transmission <input checked="" type="checkbox"/> Distribution <input checked="" type="checkbox"/> Generation	
Number of Customers Served	2,000 customer accounts	
Population Within Service Territory	150 people	
Customer Class Makeup	<i>Number of Accounts</i>	<i>Share of Total Load (MWh)</i>
	4% Residential; 5% Government; 0% Agricultural; 64% Small/Medium Business, Commercial; 26% Industrial	3% Residential; 5% Government; 0% Agricultural; 64% Small/Medium Business, Commercial; 28% Industrial
Service Territory Location/Topography¹	0% Agriculture 0% Barren/Other 0% Conifer Forest 0% Conifer Woodland	

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>.

	0% Desert 0% Hardwood Forest 0% Hardwood Woodland 0% Herbaceous 0% Shrub 100% Urban 0% Water
Service Territory Wildland Urban Interface² (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)	Tier 2: 0% Tier 3: 0%
Prevailing Wind Directions & Speeds by Season	<p>The windier part of the year lasts for 6 months, from November to May, with average wind speeds of more than 6.9 miles per hour. The windiest day of the year is December 31, with an average hourly wind speed of 8.6 miles per hour.</p> <p>The calmer time of year lasts for 6 months, from May to November. The calmest day of the year is August 10, with an average hourly wind speed of 5.3 miles per hour.</p> <p>The wind is most often from the west for 5 months, from February to July, with a peak percentage of 47% on May 23. The wind is most often from the north for 4 months, from October to February, with a peak percentage of 36% on January 1.</p>
Miles of Owned Lines Underground and/or Overhead	Overhead Dist.: 95 miles Overhead Trans.: 0 miles Underground Dist.: 24 miles Underground Trans.: 0 miles Explanatory Note 1 - Methodology for Measuring "Miles": measured in line miles
Percent of Owned Lines in CPUC High Fire Threat Districts	<i>Overhead Distribution Lines as % of Total Distribution System (Inside and Outside Service Territory)</i>
	Tier 2: 0% Tier 3: 0%
	<i>Overhead Transmission Lines as % of Total Transmission System (Inside and Outside Service Territory)</i>
	Tier 2: 0% Tier 3: 0%
Customers have ever lost service due to an IOU PSPS event?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

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.

Customers have ever been notified of a potential loss of service to due to a forecasted IOU PSPS event?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Has developed protocols to pre-emptively shut off electricity in response to elevated wildfire risks?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Has previously pre-emptively shut off electricity in response to elevated wildfire risk?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

III. CROSS REFERENCE TO STATUTORY REQUIREMENTS

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

Table 2: Cross References to Statutory Requirements

Requirement	Statutory Language	Location in WMP
Persons Responsible	PUC § 8387(b)(2)(A): An accounting of the responsibilities of persons responsible for executing the plan.	Section 4 Page 4 - 5
Objectives of the Plan	PUC § 8387(b)(2)(B): The objectives of the wildfire mitigation plan.	Section 3 Page: 4
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 7 Page 7
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 13 Page 11
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 14 Page 12
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	Section 10 Page 10

	those protocols, including impacts on critical first responders and on health and communication infrastructure.	
Customer Notification Procedures	PUC § 8387(b)(2)(G): Appropriate and feasible procedures for notifying a customer who may be impacted by the deenergizing of electrical lines. The procedures shall consider the need to notify, as a priority, critical first responders, health care facilities, and operators of telecommunications infrastructure.	Section 11 Page 10-11
Vegetation Management	PUC § 8387(b)(2)(H): Plans for vegetation management.	Section 8 Page 7-8
Inspections	PUC § 8387(b)(2)(I): Plans for inspections of the local publicly owned electric utility's or electrical cooperative's electrical infrastructure.	Section 9 Page 9-10
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 5 Page 6
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 2.3 Page 2; Section 2.6 Page 3-4
Enterprisewide Risks	PUC § 8387(b)(2)(L): A methodology for identifying and presenting enterprisewide safety risk and wildfire-related risk.	Section 6 Page 6
Restoration of Service	PUC § 8387(b)(2)(M): A statement of how the local publicly owned electric utility or electrical cooperative will restore service after a wildfire.	Section 12 Page 11
Monitor and Audit	PUC § 8387(b)(2)(N): A description of the processes and procedures the local publicly owned electric utility or electrical cooperative shall use to do all of the following (i) Monitor and audit the implementation of the wildfire mitigation plan.	Section 15 Page 13

	<p>(ii) Identify any deficiencies in the wildfire mitigation plan or its implementation, and correct those deficiencies.</p> <p>(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.</p>	
Qualified Independent Evaluator	<p>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.</p>	<p>Section 16 Page 13</p>

IV. WSAB GUIDANCE ADVISORY OPINION RECOMMENDATIONS

The WSAB Guidance Advisory Opinion identifies 14 specific recommendations that POU’s 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 POU’s will be updating their WMPs based on the direction of their local governing boards within this 3-year cycle. Because the WSAB’s recommendations have been provided after the initial WMP submission, the POU’s will have varying capacities to fully address each recommendation in their 2021 WMP. This Section IV restates each of the WSAB recommendations and provides an opportunity for each POU to do one or more of the following: (1) provide a narrative response to the recommendation; (2) provide a cross 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.

POU Response:

See Tables 1 and 2 above.

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

POU Response:

The 2020 Vernon Public Utilities Wildfire Mitigation Plan was presented to Vernon City Council on January 21, 2020. City Council adopted Resolution 2020-02 adopting Vernon Public Utilities 2020 Wildfire Mitigation Plan. The 2021 Vernon Public Utilities Wildfire Mitigation Plan was presented to the Vernon City Council on May 18, 2021, and was adopted in Resolution No. 2021-12. Subsequent annual updates and triennial comprehensive revisions shall be publicly presented and approved by minute order of the City Council. At this time, due to Vernon's low wildfire threat profile, the costs of meeting the state requirements are limited to the staff time required to prepare and annually review the Wildfire Mitigation Plan.

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

POU Response:

The independent evaluator's report is posted to the City of Vernon's website and has been presented to Vernon's City Council at a noticed public meeting.

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.

POU Response:

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 the POU industry associations to further the development of a template to respond to the WSAB's Guidance Advisory Opinion in a future reporting WMP cycle.

B. Customer Impacts

WSAB Recommendation #5: Describe the potential impact investor-owned utilities (IOU) public safety power shutoff (PSPS) events could have on POU customers and how the POU manages these impacts. For 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.

POU Response:

VPU's electric system includes generation and distribution facilities that are completely located within VPU's electric service territory in the LA Basin. VPU does not own or operate any transmission facilities. VPU has two generation facilities that are located within VPU service territory. No overhead distribution lines span over naturally vegetated open space areas. Therefore, there is no potential for electrical equipment igniting a wildfire. The generation and distribution facilities are located entirely within the CAISO balancing area and are connected to the CAISO through five 66kV Southern California Edison (SCE) source lines. Under a double contingency (N-2) situation, where two 66 kV transmission lines are out of service, the VPU electric system reliability will most likely not be compromised with the support of Vernon's local generation. Thus, it is unlikely that VPU's customers will be directly impacted by an IOU PSPS.

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

POU Response:

While VPU has a low risk of igniting a wildfire, VPU and its customer may be subject to a wildfire threat to transmission line(s) that impacts the statewide grid or parts of it, creating a resource shortage.

In such a situation, VPU proactively communicates to customers and key stakeholders through multiple channels about preparing for potential curtailments, and the power restoration process. VPU recognizes that many entities and individuals are particularly vulnerable during extended power outages and makes every effort to provide up-to-date information to these populations prior to, during, and after an event.

VPU's Customer Service Center, Key Accounts staff, social media and CityofVernon.org will provide ongoing and available resources for communication and education for the overall customer base.

Key stakeholders, federal, state, and local elected officials, City and County executive staff and first responders are also contacted via a variety of channels and personnel.

VPU has specific personnel assigned to elected officials and agencies, and to critical customers including water and telecommunications utilities, potentially affected by an outage to a major shared transmission line.

C. The Grid

WSAB Recommendation #7: Provide details on each POU's system hardening and grid design programs, including: (1) the goals of the programs and the risk any particular program is designed to mitigate; (2) approach to PSPS mitigation and prevention; and (3) identify any resource shortages.

POU Response:

Due to the unique characteristics of VPU's service territory and operations including lack of wildfire fuel sources and distance from any designated elevated fire-threat areas, VPU has determined that it is not necessary to describe system hardening and grid design programs in relation to Wildfire Prevention.

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

POU Response:

VPU meets or exceeds the minimum inspection requirements provided in CPUC GO 165 and CPUC GO 95, Rule 18. Pursuant to these rules, utilities inspect electric facilities in the High Fire-Threat District more frequently than the other areas of its service territory. VPU currently does not have any overhead powerlines located within, or near the High Fire-Threat District within the CPUC's Fire-Threat Map but still maintains compliance with the inspection requirements as a best business practice. VPU performs intrusive pole inspections and has a pole replacement priority and schedule program to remove potential pole failure hazards, even though there is no significant native vegetation below VPU's overhead distribution lines.

VPU staff uses their knowledge of the specific environmental and geographical conditions of VPU's service territory to determine if any particular areas require more frequent inspections.

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

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

POU Response:

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

D. Risk Assessment

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

POU Response:

VPU's service area is not within or near any wildland-urban interface zones and more than ten miles from the nearest wildland-urban interface area. Thus, VPU has determined that it is not necessary to describe wildfire risks associated with system design and construction such as topography and location near the HFTD areas of another utility's service territory.

E. SITUATIONAL AWARENESS TECHNOLOGY

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

POU Response:

See Table 1 above for wind information.

VPU does not have any overhead powerlines located within, or near the High Fire-Threat District within HFTD or Fire Threat Zones. Furthermore, VPU's service area is not within or near any wildland-urban interface zones and more than ten miles from the nearest wild-land urban interface area. Due to these unique characteristics of VPU's service territory, VPU has not installed meteorological situational awareness technology.

F. VEGETATION MANAGEMENT

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

POU Response:

VPU's vegetation management program is discussed in Section 8 of VPU's WMP. Due to the industrial natural of the City of Vernon, there is minimal risk of vegetation igniting a wildfire.

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

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

POU Response: *City of Vernon Urban Forest is composed of approximately 1200 trees, which are maintained and pruned annually by a contracted Urban Forest Management Service Company*

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

POU Response: *VPU's service territory neither contains nor is adjacent to identified fire threat areas.*

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

POU Response: *Substations require bare ground for the safe operation of high voltage equipment. Electric Operators monitor substations, switchyard, and other electric facilities on a daily basis and remove invasive weeds and other vegetation as necessary.*

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

POU Response:

In 2018, then Vernon Fire Department Fire Chief performed an evaluation of VPU's electric system in accordance with Senate Bill 1028 section 8387 b. The Fire Chief included California Office of the State Fire Marshal's "Community at Risk" as well as the Wildfire Hazard Potential developed by the U.S. Forest Service's Fire Modeling Institute in his considerations. Finally, based on the Fire Chief's expertise, historical fire data, geographic location and local conditions, the Vernon Fire Department Fire Chief concluded that VPU's operations do not pose a risk of igniting a fire that could cause any significant or catastrophic wildfire condition.

VPU meets or exceeds the minimum inspection requirements provided in CPUC GO 165 CPUC GO 95, Rule 18, and National Electric Safety Codes. Contractors performing electric infrastructure maintenance are required to adhere to safety rules, regulations, and operating procedures per their services agreement. Pursuant to these rules, utilities and contractors inspect electric facilities in the High Fire-Threat District more frequently than the other areas of its service territory. VPU currently does not have any overhead powerlines located within, or near the High Fire-Threat District within the CPUC's Fire-Threat Map but still maintains compliance with the inspection requirements as a best business practice. VPU and its contractors perform intrusive pole inspections and maintain a pole replacement priority and schedule program to remove potential pole

failure hazards, even though there is no significant native vegetation below VPU's overhead distribution lines.

VPU staff uses their knowledge of the specific environmental and geographical conditions of VPU's service territory to determine if any particular areas require more frequent patrols and inspections.

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

Finally, VPU contracted with Dudek & Associates, a qualified independent evaluator with experience in assessing the safe operation of electrical infrastructure. Dudek conducted an evaluation of the VPU WMP, as required under California Public Utilities Code (CPUC) Section 8387(b).

Dudek conducted an initial review of VPU's Draft WMP on December 19, 2019 and provided a summary letter for suggested Draft WMP modifications. The focus of the evaluation was to determine whether the Draft WMP addressed all required elements under CPUC Section 8387(b) (2) (included in Attachment A) that were applicable to VPU.

Subsequently, VPU elected to modify its Draft WMP and incorporated Dudek's recommended modifications to the Plan. The revised WMP was provided to Dudek on December 30, 2019. Dudek reviewed the revised WMP and determined that VPU's WMP is deemed comprehensive and appropriate for the very low risk fire environment within their service territory. Additionally, VPU's WMP approach appropriately addresses all applicable elements required under CPUC Section 8387(b) (2).

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

POU Response: *Due to the unique characteristics of VPU's service territory and operations including lack of wildfire fuel sources and distance from any designated elevated fire-threat areas, VPU has not adopted any innovative or alternative approaches to vegetation management.*