PITTSBURG POWER COMPANY
WILDFIRE MITIGATION PLAN

PITTSBURG POWER COMPANY
IS A
CALIFORNIA JOINT POWERS AUTHORITY
PROVIDING ELECTRIC AND GAS UTILITY
SERVICES ON MARE ISLAND VALLEJO, CA;
OPERATING UNDER THE NAME OF
"ISLAND ENERGY"

2021 INFORMATIONAL RESPONSE

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

May 5, 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. Pittsburg Power Company (PPC) provides this document to the WSAB to respond to each of the recommendations included in the 2021 WSAB Guidance Advisory Opinion. PPC will provide a narrative response and/or a cross reference to the location in PPC's Wildfire Mitigation Plan (WMP) where the topic is addressed. Where the recommendation is not applicable to PPC, the response will provide a brief description supporting this conclusion.

II. CONTEXT SETTING INFORMATION

WSAB requested that Publicly Owned Utilities (POU's) 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	PPC	
Service Territory Size	2.1 square miles	
Owned Assets	☐ Transmission **X** Distribution ☐ Generation	
Number of Customers Served	584 customer accounts	
Population Within Service Territory	1056 people	
Customer Class Makeup	*Number of Accounts*	*Share of Total Load (MWh)*
	64.5 % Residential; 6.8 % Government; 0 % Agricultural; 10.3 % Small/Medium Business; 18.3 % Commercial/Industrial	8.8 % Residential; 7.9 % Government; 0 % Agricultural; 10.4 % Small/Medium Business; 72.9 % Commercial/Industrial
Service Territory Location/Topography[1]	0 % Agriculture 0 % Barren/Other 0 % Conifer Forest 0 % Conifer Woodland 0 % Desert 0 % Hardwood Forest 5 % Hardwood 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.

	10 % Herbaceous 0 % Shrub 85 % Urban 0 % Water
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)	☐Includes maps Tier 2: 0 % Tier 3: 0 %
Prevailing Wind Directions & Speeds by Season	☐ Includes maps Winter: N-NW Spring: S-SW Summer: S-SW Fall: SW, N
Miles of Owned Lines Underground and/or Overhead	Overhead Dist.: 10,480 feet Overhead Trans.: 0 miles Underground Dist.: 11 miles (approx.) Underground Trans.: 0 miles
	Explanatory Note 1 - *Methodology for Measuring "Miles":* Measurement of ductbank miles, x2 circuits on average
	Explanatory Note 2 – *Description of Unique Ownership Circumstances:* n/a
	Explanatory Note 3 – *Additional Relevant Context:* n/a
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 %
	Overhead Transmission Lines as % of Total Transmission System (Inside and Outside Service Territory)
	Tier 2: 0 % Tier 3: 0 %
	Explanatory Note 4 – *Additional Relevant Context:* [e.g., explain any difference from data reported in WMP due to different numerator used for this form]
Customers have ever lost service due to an IOU PSPS event?	X Yes ☐ No
Customers have ever been notified of a potential loss of service due to a	X Yes ☐ 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.

forecasted IOU PSPS event?	
Has developed protocols to pre-emptively shut off electricity in response to elevated wildfire risks?	X Yes ☐ 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*: n/a *Customer Accounts that lost service for >10 minutes:* n/a *For prior response, average duration before service restored:* n/a

III. CROSS REFERENCE TO STATUTORY REQUIREMENTS

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

Table 2: Cross References to Statutory Requirements

Requirement	Statutory Language	Location in WMP
Persons Responsible	**PUC § 8387(b)(2)(A):** An accounting of the **responsibilities of persons** responsible for executing the plan.	Section III. Page 7
Objectives of the Plan	**PUC § 8387(b)(2)(B):** The **objectives** of the wildfire mitigation plan.	Section II. Page: 6
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 V. Page 12
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 VIII. Page 18
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 VIII.D Page 20
De-energization 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.G Page 16

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. Page 18
Vegetation Management	**PUC § 8387(b)(2)(H):** Plans for vegetation management.	Section V.D Page 13
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.E Page 15
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. Page 11
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.	IV.A Page 11 Exhibit 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 Page 11
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 VII. Page 18
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 its implementation, and correct those deficiencies.	Section VIII.C Page 19

	(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.	
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 IX. Page 20

IV. WSAB GUIDANCE ADVISORY OPINION RECOMMENDATIONS

The WSAB Guidance Advisory Opinion identifies 14 specific recommendations that POUs are requested to address in their 2021 WMPs. As specified in Public Utilities Code § 8387(b)(1), each POU is required to perform a comprehensive revision to the POU's WMP at least once every three years. Pursuant to this guidance, the POUs will be updating their WMPs based on the direction of their local governing boards within this 3-year cycle. Because the WSAB's recommendations have been provided after the initial WMP submission, the POUs will have varying capacities to fully address each recommendation in their 2021 WMP.

This Section IV restates each of the WSAB recommendations and provides an opportunity for each POU to do one or more of the following: (1) provide a narrative response to the recommendation; (2) provide a cross refence to where in the POU's WMP this topic is addressed; (3) describe why the recommendation is not applicable to the POU; or (4) inform the WSAB of the POU's intent to address the recommendation at the point of the POU's next comprehensive revision, occurring in either the 2022 or 2023 WMP.

A. Plan Structure

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

PPC Response: See Sections II and III above.

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

> ***PPC Response:*** PPC has conducted a Public Hearing for the review and approval of the WMP. The hearing is noticed and conducted by the PPC Board of Directors. Public comments and comments from Board members are considered, and the Board then votes to adopt the WMP via Board Resolution. The PPC Board of Directors has previously adopted the WMP. Funding for wildfire mitigation efforts is through PPC's annual operating budget and rate case processes.

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.

> ***PPC Response:*** The Independent Evaluator report is posted on PPC's "Island Energy" website.

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.

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

B. Customer Impacts

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

> ***PPC Response:*** PPC is wholly dependent on PG&E's 115kV transmission system. PPC's transmission service point of origin is the Ignacio Local Area Capacity Substation in Novato. A PG&E PSPS event affecting transmission in Marin, Sonoma and Napa counties can affect service to PPC distribution customers.

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

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

  POU Response: There continues to be no formal relationship between PPC and PG&E. PG&E has been unable to identify a single point of contact or account manager for PPC in advance of or during a PSPS event.

Does the POU receive advance notification?

PPC Response: No

- Is the POU affected at the transmission or distribution level?

  PPC Response: Distribution level.

- Is the POU implementing a mitigation strategy for IOU PSPS?

  PPC Response: No mitigation budget or strategy – only notification.

- Does the POU have its own permanent or temporary generation, (or customer provision of same) allowing it to withstand an IOU PSPS?

  PPC Response: No

- Does the POU distribute back-up generators to customers?

  PPC Response: No

- Does the POU deenergize their own lines when a wildfire threat looms, even if it is not labelled a PSPS?

  PPC Response: No

- In the above instance, what customer communication takes place?

  POU Response: "Everbridge" phone/email/text notification system.

- Is the POU a Balancing Authority Area? If yes, describe any applicable criteria for wildfire related de-energization.

  POU Response: No

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

POU Response: PPC uses the "Everbridge" email, telephone, and text messaging alert system. This is a subscription service. PPC performs periodic community outreach to make both residential and commercial customers aware of the notification service.

PPC will notify customers via Everbridge when PG&E has made media postings that a local or regional area could be affected by a PSPS.

PPC offers rebates for the purchase of portable generators to qualified Medical Baseline customers.

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

- 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?

  POU Response: PPC communicates directly with specific sensitive-facility customers regarding their potential need for backup power.

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

  POU Response: PPC works directly with specific sensitive-facility customers regarding their potential need for backup power.

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

  POU Response: Via Everbridge and direct customer notification (phone, email).

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

  POU Response: Yes

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

  POU Response: Yes

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

  POU Response: Customer

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

  POU Response: No

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

  POU Response: n/a

- Can the utility sectionalize in a localized fashion?

  POU Response: No

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: Please refer to WMP Section V.D-F

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 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. [POU]'s staff will participate in CMUA's meeting and will discuss any changes that [POU] 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: PPC's assessment of wildfire risks is discussed in Section IV. of PPC's WMP. In general, PPC performs its risk assessment through regular inspections and patrols of utility equipment, proximity and condition of vegetation and trees or other potential ignitions sources.

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

- Are there design or construction issues related to the utility's specific topography or geographic location that the Board should be aware of?

  POU Response: No – PPC's service territory is "Mare Island. Vallejo" – surrounded by the Napa River and San Pablo Bay.

- How will the utility address risks associated with facilities requiring power that abut a Tier 2 or Tier 3 HFTD?

  POU Response: n/a

E. SITUATIONAL AWARENESS TECHNOLOGY

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

POU Response: PPC does not currently employ, nor plan to employ, 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: PPC's vegetation management program is discussed in Section V.D of PPC's WMP. PPC performs regular ground-based vegetation management around poles and distribution substations. Vegetation management is performed by mechanical means – physical removal cutting or hoeing. Tree trimming is performed where necessary to prevent branches from impacting wires.

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: PPC employs mechanical vegetation management treatments – no herbicide or other chemical applications.

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

  POU Response: Periodic patrols and inspections.

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: PPC does not rely on scientific experts in the implementation of its WMP. PPC self-performs and does not employ contractors for vegetation management. Regarding MAD, each Utility Technician participates in the AVO 3rd-party AVO "Safety for Utilities" training where Minimum Approach Distances are covered. This is part of PPC Utility Technician certification program. PPC staff verifies compliance with Department of Industrial Relations "MAD" requirements.

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

> ***POU Response:*** PPC has not considered methods beyond the mechanical removal of vegetation and tree trimming from the utility's power poles, distribution substations and related equipment.