

EXHIBIT B

IPU Wildfire Mitigation Plan 2021 Informational Response, dated July 8, 2021

[Attached]

**INDUSTRY PUBLIC UTILITIES
WILDFIRE MITIGATION PLAN
2021 INFORMATIONAL RESPONSE**

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

July 8, 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. Industry Public Utilities (IPU) provides this document to the WSAB in order to respond to each of the recommendations included in the 2021 WSAB Guidance Advisory Opinion. IPU will provide a narrative response and/or a cross reference to the location in IPU's Wildfire Mitigation Plan (WMP) where the topic is addressed. Where the recommendation is not applicable to IPU, 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	Industry Public Utilities	
Service Territory Size	2 square miles	
Owned Assets	<input type="checkbox"/> Transmission <input checked="" type="checkbox"/> Distribution <input type="checkbox"/> Generation	
Number of Customers Served	114 customer accounts	
Population Within Service Territory	15 residential customer accounts	
Customer Class Makeup	<i>Number of Accounts</i>	<i>Share of Total Load (MWh)</i>
	15 Residential; 30 Small/Medium Business; 69 Commercial/Industrial	0.4 % Residential; 1.5 % Small/Medium Business; 98.1 % Commercial/Industrial
Service Territory Location/Topography ¹	100 % Urban	
Service Territory Wildland Urban Interface ² (based on total area)	See attached map.	

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.

Percent of Service Territory in CPUC High Fire Threat Districts (based on total area)	Includes maps not applicable Tier 2: [0]% Tier 3: [0]%
Prevailing Wind Directions & Speeds by Season	<input type="checkbox"/> Includes maps Santa Ana wind conditions usually happen during summer months from May to October but can happen outside summer months. Santa Ana winds are strong gusty winds with speeds which can range from 30 miles per hour as much as 90 miles per hour.
Miles of Owned Lines Underground and/or Overhead	Overhead Dist.: 0 miles Overhead Trans.: 0 miles Underground Dist.: 15 circuit miles Underground Trans.: 0 miles
	Explanatory Note 1 - Methodology for Measuring "Miles": 15 circuit miles with multiple circuits in the same duct bank.
	Explanatory Note 2 – Description of Unique Ownership Circumstances: [None]
	Explanatory Note 3 – Additional Relevant Context: all IPU's electric infrastructure is within the IPU service territory
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
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. All IPU distribution circuits are underground with minimal opportunity for any wildfire originating from IPU distribution system. IPU has three interconnections with Southern California Edison (SCE). One interconnection connects to SCE's 66,000-Volts overhead sub transmission lines. The other two connect to SCE's 12,000 Volts overhead distribution lines.
Has previously pre-emptively shut off electricity in response to elevated wildfire risk?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If yes, then provide the following data for calendar year 2020:

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-B Page 4
Objectives of the Plan	PUC § 8387(b)(2)(B): The objectives of the wildfire mitigation plan.	Section II Page: 2
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 Pages 8 to 11
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-A Page 12
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-B Pages 12-13
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-D,F Page 9-10
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 V-G] Page 10-11
Vegetation Management	PUC § 8387(b)(2)(H): Plans for vegetation management.	Section IV-C Page 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 V-C Page 9

<p>Prioritization of Wildfire Risks</p>	<p>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:</p> <p>(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.</p> <p>(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.</p>	<p>Section IV-B&C Pages 7-8</p>
<p>CPUC Fire Threat Map Adjustments</p>	<p>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.</p>	<p>Section 1-B Page 1 Section V-A Pages 8-9</p>
<p>Enterprisewide Risks</p>	<p>PUC § 8387(b)(2)(L): A methodology for identifying and presenting enterprisewide safety risk and wildfire-related risk.</p>	<p>Section V-F Page 10</p>
<p>Restoration of Service</p>	<p>PUC § 8387(b)(2)(M): A statement of how the local publicly owned electric utility or electrical cooperative will restore service after a wildfire.</p>	<p>Section VI Pages 11-12</p>
<p>Monitor and Audit</p>	<p>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</p> <p>(i) Monitor and audit the implementation of the wildfire mitigation plan.</p> <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>	<p>Section VII-C & VII-D Page 13</p>

<p style="text-align: center;">Qualified Independent Evaluator</p>	<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 style="text-align: center;">Section [VIII] Pages [13 to 14]</p>
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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 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 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.

POU Response: The IPU WMP and the qualified independent evaluator's report was presented to the Industry Public Utilities Commission (IPUC) at the duly noticed regular public meeting on

December 12, 2019. The IPUC approved the WMP at that meeting. Funding for additional wildfire mitigation efforts will be addressed in the IPU annual budgeting process.

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 WMP and the qualified independent evaluator’s report is available on the IPU website (www.cityofindustry.org/city-hall/departments/industry-public-utilities/electric).

WSAB Recommendation #4: Develop, in collaboration with POU industry associations, WMP guidelines for future WMPs, and understanding that it may take multiple cycles for POU 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 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.

IPU has three interconnections with Southern California Edison (SCE). IPU customers may be impacted by PSPS events ordered by SCE that impact one or all these three interconnections. The following provides responses to specific questions included in the WSAB’s 2021 WSAB Guidance Advisory Opinion:

-
- What is the relationship between the SCE and IPU POU during PSPS events?
SCE’s Dispatch Center and Grid Management staff would initiate direct communication with IPU and/or IPU’s contractor.
-
- Does the IPU receive advance notification?
Yes, for planned outages, IPU’s contractor receives direct notification from SCE.
-
- Is IPU affected at the transmission or distribution level?
-

SCE's distribution facilities deliver power to IPU's three points of interconnection and a PSPS that impacts these SCE distribution facilities would impact IPU customers.

- Does the IPU have its own permanent or temporary generation, (or customer provision of same) allowing it to withstand an SCE PSPS?
Neither IPU nor its customers have on-site generation to provide power during an SCE PSPS.
-

- Does IPU deenergize their own lines when a wildfire threat looms, even if it is not labelled a PSPS?
In IPU's existence a potential wildfire that would require IPU to deenergize its distribution facilities has not occurred.
-

- In the above instance, what customer communication takes place?
IPU's contractor would notify customers for the need and duration to shutoff power.
-

- Is IPU a Balancing Authority Area?
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.

IPU serves 15 residential customers. None are currently AFN or medical baseline customers, and all speak English. IPU does not currently provide electric service to water or telecommunication providers.

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.

IPU does not currently provide electric service to essential facilities like hospitals, water or telecommunication providers, police or fire stations, or community resource centers. There are no plans to “harden” IPU electric system as it has little or no exposure to wildfire ignitions and the current practices are in place to provide adequate system reliability.

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.

IPU has no overhead lines to patrol and inspect after the Red Flag Warning with Strong winds. All underground lines inspection comply with G.O. 165.

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.

The California Municipal Utilities Association (CMUA) Wildfire Preparedness, Response, and Recovery Working Group will meet again this fall. 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. The working group will discuss unidentified wildfire risk rivers and mitigation measures that could address these risks. CMUA will produce a publicly-available, post-meeting report that summarizes the group’s conclusions and recommendations. IPU staff will participate in CMUA’s meeting and will describe in a future WMP applicable changes it has implemented in response to the conclusions and recommendations of the working group.

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.

As describe in Section I of IPU’s WMP, IPU’s service territory is not located near the HFTD 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.

As described in Section IV-C & E of IPU's WMP, the combination of hot and dry weather conditions in the summer months combined with strong Santa Ana Winds can create extreme fire conditions. IPU staff monitors weather reports and will delay any field work that is not critical during high fire threat conditions.

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.

As described in Section IV-C of IPU's WMP, all IPU distribution circuits are underground which significantly reduces the need for vegetation management. IPU will expand its inspection to include the vegetation around existing pad-mounted equipment.



Tier 2

Esri, HERE, City of West Covina, County of Los Angeles, Bureau of Land Management