

**Wildfire Mitigation Plan
Independent Evaluation
KIRKWOOD MEADOWS PUBLIC UTILITIES DISTRICT**

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2501 Liberty Pkwy, Ste 176
Midwest City, OK 73110
+1 877 245 6382
chloeta.com
info@chloeta.com

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Executive Summary

The Kirkwood Meadows Public Utilities District (KMPUD) Wildfire Mitigation Plan (WMP) was prepared by KMPUD employees for publication in April 2021. In accordance with California Public Utilities Code Section 8387(c), this plan was reviewed and assessed by an independent evaluator to establish its comprehensiveness as legally defined. Chloeta Fire, LLC is providing the independent evaluation of this WMP prior to publication. Chloeta Fire, LLC is completely independent of KMPUD.

Analysis

This WMP was reviewed for compliance with California Public Utilities Code Section 8387, which establishes the guidelines for the comprehensiveness of a utility's wildfire mitigation plan. Section 8387 delineates multiple criteria for establishing comprehensiveness. This independent evaluation will review each criteria established in Section 8387 and determine if they are met by the WMP provided by KMPUD.

A. Responsibilities of Persons Responsible for Executing Plan

Section 8387 Requirement: *An accounting of the responsibilities of persons responsible for executing the plan.*

Plan Section Number: III

The WMP identifies KMPUD's management responsibilities regarding the implementation of the activities discussed in the WMP. Table 2 on page 10 identifies action items outlined in the WMP and the responsible department and workgroup in KMPUD responsible for implementation.

The Personnel Flow Chart on page 9 is small and hard to read. It is also not numbered. Recommend adding Figure number and enlarging for easier viewing, especially when printed out.

B. Objectives of FMP

Section 8387 Requirement: *The objectives of the wildfire mitigation plan.*

Plan Section Number: II

The WMP establishes an overarching purpose in Section II and clearly states primary and secondary objectives in Section II. A. through II. C.

C. Preventative Strategies and Programs

Section 8387 Requirement: *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.

Plan Section Number: IV, V

Section V of the WMP lists wildfire preventative strategies and activities that KMPUD will undertake to minimize wildfire risk. Impacts of climate change are briefly discussed in Section IV. B.

The plan considers dynamic climate change risks in relation to wildfire risk, though is not specific in describing the increased risk. Specific impacts of climate change described in the fourth California Climate Change Assessment, such as a 50% increase in fires over 25,000 acres in size and 77% increase in average acres burned, would be helpful additions to the plan.

D. Metrics

Section 8387 Requirement: *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.*

Plan Section Number: VII

Metrics and assumptions for measuring WMP performance are summarized in section VII. A. and VII. B. Goals outlined in the WMP will be monitored by the GM and Board of Directors.

E. Application of Previously Identified Metrics

Section 8387 Requirement: *A discussion of how the application of previously identified metrics to previous wildfire mitigation plan performances has informed the wildfire mitigation plan.*

Plan Section Number: VII

As noted in Section VII B, the WMP is in its initial implementation and existing data is limited. The WMP establishes that as metrics are analyzed in subsequent years the WMP will be updated based on data collected.

F. Public Safety Protocols

Section 8387 Requirement: *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.

Plan Section Number: V

Protocols for disabling reclosers and de-energization are described in Sections V. D. and V. E., respectively. Public safety impacts are not discussed in this WMP due to the ability to restore power to all customers using the emergency generators.

G. Notification of Customers

Section 8387 Requirement: *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.*

Plan Section Number: V. E. 2

KMPUD has a small customer base of 752 people with stakeholder assets of cell towers and telecommunications facilities, local volunteer fire department, and water/wastewaters facilities. No schools, medical facilities, or law enforcement facilities exists within KMPUD's territory. KMPUD customers have access to an emergency notification system that notifies them of customer outages or other impacts. They also use the company website and social media accounts.

H. Vegetation Management

Section 8387 Requirement: *Plans for vegetation management.*

Plan Section Number: V. B

The WMP establishes vegetation management goals and procedures to reduce wildfire risk. The 2 tables on page 15 describe required clearances.

The tables are not named or numbered. We recommend naming and numbering the tables for easier referencing and navigation. Annual compliance metrics (typically 95-100%) should be added to aid in goal setting and operations planning.

I. Inspection Plan

Section 8387 Requirement: *Plans for inspections of the local publicly owned electric utility's or electrical cooperative's electrical infrastructure.*

Plan Section Number: V. C

The WMP includes a dedicated section on infrastructure inspections and maintenance. Inspection protocols call for more frequent inspections during high fire danger and for notifying other utility companies if their facilities need repair.

J. Identification of Risks

Section 8387 Requirement: *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.

Plan Section Number: IV. A, IV. B

Risks faced by KMPUD are discussed in Section IV of the WMP.

We recommend adding an Enterprise Risk Management strategy to identify, assess, respond and control, monitor, and report risk.

We recommend adding a legend, scale bar, and north arrow to Figure 1.

K. Identification of Higher Threat Areas

Section 8387 Requirement: *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.*

Plan Section Number: IV

KMPUD has lines located in Tier 1 and Tier 2 areas. Most of their lines are underground but the 1.7 miles of overhead lines are in a Tier 2 elevated risk area. Figure 1 within the WMP shows KMPUD overhead lines.

We recommend adding a legend, scale bar, and north arrow to Figure 1.

L. Wildfire Risk Methodology

Section 8387 Requirement: *A methodology for identifying and presenting enterprise wide safety risk and wildfire-related risk.*

Plan Section Number: IV. C

KMPUD has no history of starting wildfires with their equipment. Table 4 on page 13 identifies potential risks, outcomes, and consequences associated with wildfires.

M. Restoration of Service

Section 8387 Requirement: *A statement of how the local publicly owned electric utility or electrical cooperative will restore service after a wildfire.*

Plan Section Number: VI

Since the emergency generation facility and distribution facilities are not located in an elevated fire-threat area, KMPUD does not have a PSPS operational practice. If an emergency management agency does request a power shut off, restoration of services is described in this WMP in Section VI.

N. Processes and Procedures

Section 8387 Requirement: *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.

(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.

Plan Section Number: VII. C, VII. D, VII. E

WMP efforts will be monitored and reported to the Board of Directors annually. A CPUC approved evaluator will annually review and assess KMPUD's compliance with the WMP.

The KMPUD Operations Manager will ensure that the WMP is reviewed annually and that any deficiencies identified are corrected.

Conclusion

The KMPUD WMP prepared by company employees is comprehensive and meets all requirements set forth by California Public Utilities Code Section 8387. Following review of the WMP we recommend the following concerns be implemented in future WMP updates:

- Recommend adding Figure number and enlarging personnel flow chart.
- Recommend expanding climate change portion of the plan.
- Recommend naming and numbering the tables on page 15.
- Recommend adding a metrics column to the vegetation table with a goal of 95-100% compliance annually.
- Recommend adding an Enterprise Risk Management strategy to identify, assess, respond and control, monitor, and report risk.
- Recommend adding a legend, scale bar, and north arrow to Figure 1.