



Redding Electric Utility

WILDFIRE MITIGATION PLAN

*Revised
December 7, 2021*



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1. OVERVIEW

A. POLICY STATEMENT

REU has been operating its electric system for one-hundred years. System protection for both public and asset safety has been paramount. Given the recent increase of catastrophic wildfires in California, the state passed Senate Bill (SB) 901 in September 2018. The law requires utilities to prepare wildfire mitigation measures if the utility's overhead electrical lines and equipment are located in an area that has a significant risk of wildfire resulting from those electrical lines and equipment. The law requires the wildfire mitigation measures to incorporate specified information and procedures and requires the local publicly owned electric utility, before January 1, 2020, and annually thereafter, to prepare a wildfire mitigation plan. Portions of Redding Electric Utility's (REU) electrical infrastructure is located in and adjacent to both California Public Utilities Commission (CPUC) designated Tier 2 and 3 wildfire threat areas.

REU's overarching goal is to provide safe, reliable, and economic electric service to its local community. In order to meet this goal, REU constructs, maintains, and operates its 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

This Wildfire Mitigation Plan (Plan) describes the range of activities that REU is taking or considering, to mitigate the threat of power-line ignited wildfires, including its various programs, policies, and procedures. This plan complies with the requirements of Public Utilities Code section 8387. The Plan is iterative, promotes continuous improvement year-over-year, and represents our best efforts to implement industry best practices in a prudent and reasonable manner.

REU is a department within the City of Redding. For wildfire prevention and response, REU is subordinate to the City of Redding (COR) Fire Department and COR Police Department.

The City of Redding adopted a Local Hazard Mitigation Plan in 2015. The REU Wildfire Mitigation Plan supports the aspirational goals of that plan in the area of Wildland Fire especially in the wildland urban interface (WUI) described in Section 7.4. The objectives of the Local Hazard Mitigation Plan specifically supported by this REU Wildfire Mitigation Plan are as follows:

1. **City Objective 5.B:** Educate the public about wildland fire dangers and the steps that can be taken to prevent or minimize their effects.
2. **City Objective 5.C:** Reduce the probability of fire ignitions.
3. **City Objective 5.D:** Maintain Emergency Operations Center for coordination of information and resources.
4. **City Objective 5.E:** Reduce the potential for destructive actions of the fire once ignition occurs, utilizing fire pre-plans, ensuring a properly trained, staffed, and equipped emergency response capability, and timely response to prevent the spread of the fire, minimizing risks to humans and property.

- a. **Action 5.E.1:** Ensure that adequate resources are available to pre-plan for incidents that may occur in the very high fire hazard severity zones within the City of Redding.
- b. **Action 5.E.4:** Increase staffing of current two-person companies to three-person companies to improve capabilities and initial actions at fire incidences within the community as additional funding becomes available.

The City of Redding has been working with the non-profit organization, Community Planning Assistance for Wildfire (CPAW) on a land use planning solution to better manage the City's wildland-urban interface (WUI) and enhance the City of Redding's resiliency to wildfire. The Redding Electric Utility Wildfire Mitigation Plan will assist in linking the recommendations from CPAW and reducing the impacts of wildfires to our community.

C. ORGANIZATION OF THE WILDFIRE MITIGATION PLAN

This Wildfire Mitigation Plan includes the following elements:

Section 2 - Objectives of the Plan;

Section 3 - Roles and responsibilities for carrying out the Plan;

Section 4 - Identification of key wildfire risks and risk drivers;

Section 5 - Description of wildfire prevention, mitigation, and response strategies and programs;

Section 6 - Community outreach and education;

Section 7 - Restoration of service following a wildfire;

Section 8 - Metrics for evaluating the performance of the Plan and identifying areas for improvement;

Section 9 - Independent audit of the Plan;

Section 10 - Plan revision history.

2. OBJECTIVES OF THE WILDFIRE MITIGATION PLAN

A. MINIMIZING SOURCES OF IGNITION

The primary goal of this Wildfire Mitigation Plan is to minimize the probability that REU's transmission and distribution system may be the origin or contributing source for the ignition of a fire as well as to protect the system from wildfire damage.

REU is in the process of evaluating prudent and cost-effective improvements to its physical assets, operations, and training to help meet this objective. REU will implement those changes consistent with this Plan as staffing and budget allows.

B. RESILIENCY OF THE ELECTRIC GRID

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

Other resiliency efforts include mitigating fire fuels located in the WUI and greenbelts likely to be a threat to our facilities and equipment. Additionally, improved fire response will improve resiliency and help avoid the need for public safety power shut off protocols during high fire threat weather. Fire fuels reduction and improved fire response are addressed in the *REU Wildfire Prevention and Improved Response Program* described in Section 5.

C. WILDFIRE PREVENTION STRATEGIES AND PROGRAMS

1. Strategies

The following strategies are part of this Plan and described in more detail in Section 5.

- **VEGETATION MANAGEMENT**
These strategies help to control vegetation near REU overhead sub-transmission and distribution lines so they better adhere to clearance specifications. They also include fire fuels mitigation and other work in order to prevent our system from causing a fire and to protect our system from fire.
- **ENHANCED INSPECTIONS**
These strategies consist of assessment and diagnostic activities as well as associated corrective actions. The practices in this category aim to ensure all infrastructure is in working condition and vegetation adheres to defined minimum distance specifications.
- **SITUATIONAL AWARENESS**
These strategies consist of methods to improve system visualization and awareness of environmental conditions. The practices in this category aim to provide tools to improve

the other components of the plan. For example, camera installation will improve system and vegetation inspection and maintenance practices.

- **OPERATIONAL PRACTICES**
These strategies consist of proactive, day-to-day actions taken to mitigate wildfire risks. The practices in this category aim to ensure REU is prepared in high-risk situations, such as dry, windy environmental conditions.
- **SYSTEM HARDENING**
These strategies consist of system, equipment, and structure design and technical upgrades. The practices in this category aim to improve system hardening to prevent contact between infrastructure and fuel sources, such as vegetation and animals. It also includes making the system more resilient to wildfire and other disasters.
- **PUBLIC SAFETY AND NOTIFICATION**
These strategies will focus on ways to engage the community as partners in preventing and identifying wildfire risk. They include improving outage notification and other items in the interest of public safety.
- **RECLOSING AND DEENERGIZATION**
These strategies include discussion of deenergization as well as automatic circuit reclosing.
- **WILDFIRE RESPONSE AND RECOVERY**
These strategies consist of procedures to react to wildfire or other related emergency conditions. The practices aim to formalize protocols for these situations, so REU can provide an adequate response and recovery.

2. Programs

The strategies above will, as budgetary constraints and staffing permit, be developed and implemented through the following programs as part of this Plan and are described in more detail in Section 5.

- REU Wildfire Prevention and Improved Response Program
- REU Technology Solutions Program
- REU Distribution 10-year Capital Improvement Program
- REU Emergency Operations Program

REU Wildfire Prevention Strategies and Program Matrix

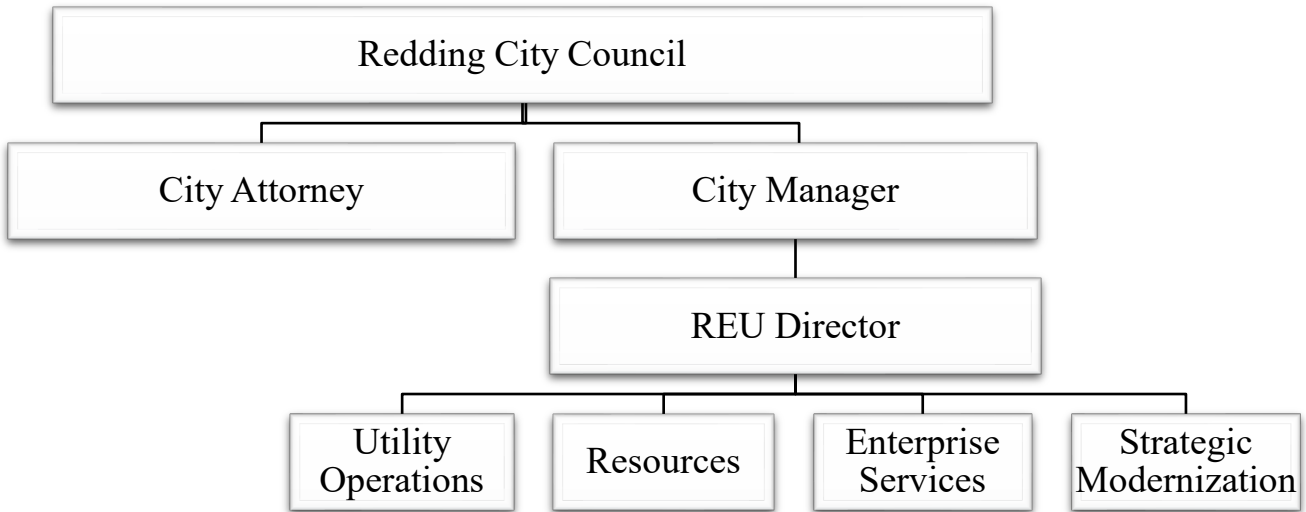
	Wildfire Prevention & Improved Response	Technology Solutions	Distribution 10-year Capital Improvements	REU Emergency Operations
Vegetation Management	x	x		
Enhanced Inspections	x	x	x	
Situational Awareness		x	x	x
Operational Practices	x	x	x	x
System Hardening	x	x	x	x
Public Safety & Notification	x	x		x
Reclosing & Deenergization	x	x	x	x
Wildfire Response & Recovery	x	x		x

D. IDENTIFYING UNNECESSARY OR INEFFECTIVE ACTIONS

The final goal for this Wildfire Mitigation Plan is to measure the effectiveness of specific wildfire mitigation strategies. REU will assess the merits of modifications. This plan will also help determine if more cost-effective measures would produce the same or improved results.

3. **ROLES AND RESPONSIBILITIES**

A. **REU GOVERNANCE STRUCTURE**



This plan is subject to the direct supervision by the Redding City Council (Council), and will be implemented by the REU Director (“Director”). The City of Redding is operated by a council-manager form of governance. The City Council is the Utility Commission for REU.

B. **ROLES AND RESPONSIBILITIES FOR PLAN EXECUTION**

Executive Level Responsibility: The Director will oversee implementation and ensure that staff follow procedures and protocols. The Assistant Director over Utility Operations will manage the execution of performance monitoring. This includes providing guidance to staff and leading the development of reports. The staff responsible for each metric area will aggregate relevant metrics at the direction of the Assistant Director – Utility Operations.

1. **Program Owners:** The table below outlines the current assignments and are subject to change.

Program	Owner
REU Wildfire Prevention and Improved Response Program	COR Fire Marshal’s Office and REU Director
REU Technology Solutions Program	REU Assistant Director – Enterprise Services
REU Distribution 10-year Capital Improvement Program	REU Assistant Director - Operations
REU Emergency Operations Program	REU Assistant Director - Resources

2. **Strategy Leads:** The table below outlines the proposed assignments and are subject to change.

Strategy	Lead Personnel	Key Technical Personnel
Vegetation Management	Electric Manager - Line	Program Supervisor - Arborist
Enhanced Inspections	Assistant Director – Strategic Modernization	Program Supervisor - Line
Situational Awareness	Director	Program Supervisor - Admin
Operational Practices	Assistant Director - Operations	Electric Program Supervisor – Transmission & Distribution Electric Manager - Line
System Hardening	Assistant Director – Strategic Modernization	Senior Electrical Engineer
Public Safety & Notification	Electric Manager - Customer Service	Program Supervisor - Admin
Reclosing & Deenergization	Assistant Director – Strategic Modernization	Senior System Operator- Distribution
Wildfire Response & Recovery	Assistant Director - Operations	COR Fire Chief Electric Manager - Line Senior System Operator - Distribution

C. COORDINATION WITH JOINT POLE INFRASTRUCTURE PROVIDERS

For joint pole fire prevention, REU takes the lead role and informs the subordinate providers when REU identifies any compromised poles due to third-party attachments. REU coordinates with communication and electric infrastructure providers throughout the year when work on our system effects their equipment and identifies safety issues. If REU staff discovers a facility in need of repair owned by an entity, REU may issue a notice to repair to the facility owner and work to ensure that necessary repairs are promptly completed. During emergencies, REU assumes the primary role and informs providers when there is damage or risk to their equipment.

D. COORDINATION WITH CITY OF REDDING DEPARTMENTS

Redding Fire Department

The COR Fire Department is the lead agency in cooperation with REU for implementation of the REU Wildfire Prevention and Improved Response Program. RFD, as the City’s lead for emergency operations, directs REU regarding public safety priorities.

Redding Police Department

REU coordinates with RPD and is subordinate for emergency and public safety issues. REU will work closely with the RPD for situational awareness and other public safety issues related to this Plan.

Redding Public Works Department

REU is investigating opportunities to harden the electrical system and increase survivability for critical water and wastewater infrastructure. During wildfires and other public safety events, REU works with Public Works to ensure power to water-pumping stations, wastewater plants, and other critical infrastructure. These facilities are not only critical for defending the City from wildfire, but are essential for safe repopulation following any disaster. Additionally, the Redding Area Bus Authority (RABA) is a critical operation for evacuations during emergencies and will be part of the infrastructure considered for reliability improvements.

Redding Community Services Department

REU is partnered with the COR Community Services Department as part of the REU Wildfire Prevention and Improved Response Program for fire fuels mitigation as well as other programs and projects.

Other COR Departments and Administration

REU as a member of the City of Redding Team will work to ensure information regarding warnings, alerts, and widespread outages are shared with other departments. The City Communications Team will be an integral part of getting information out to the media and public and will coordinate with either and/or both the City's EOC or REU's DOC as well as any Incident Command in place.

E. CAL OES STANDARDIZED EMERGENCY MANAGEMENT SYSTEM

As a utility department of the COR located in Shasta County, REU may participate in various emergency operation centers depending on the situation and lead agency. As a local governmental agency, COR has planning, communication, and coordination obligations pursuant to the California Office of Emergency Services' Standardized Emergency Management System ("SEMS") Regulations, 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. The COR (via Redding Fire Department) maintains an All Hazards Emergency Operations Plan that includes REU. The COR works closely with Shasta County to coordinate emergency operations, including the Shasta County Sheriff's Office of Emergency Services (OES).

The Shasta County Sheriff's Office of Emergency Services (OES) coordinates with Federal, State, and local agencies to prepare, respond, and recover from emergencies and natural disasters.

- OES is responsible for maintaining and updating the County Emergency Operation Plan (EOP), which is an all hazards plan for Shasta County.
- OES also coordinates and maintains the county Emergency Operation Center (EOC). The EOC can be used during a major incident to carry out the principles of emergency preparedness and emergency management between multiple agencies.
- The Office of Emergency Services provides technical advice to the Sheriff on local emergency declarations and his direct link to the California Governor's Office of Emergency Services during disasters or any other critical incidents. In the event of a major incident OES can work with CAL OES to obtain a Presidential proclamation.

- OES works closely with other local agencies assisting them in preparing emergency plans and in disaster training. OES works as a point of contact for local agencies to the California Governor's Office of Emergency Services.

Pursuant to this structure, REU coordinates and communicates with the relevant local, state and Federal agencies. This includes participating in City and County EOC exercises as well as providing annual safety meetings. Pursuant to the Emergency Operations Program, an REU EOC Liaison will participate in the City or County EOC using the standardized Incident Command System (ICS).

4. WILDFIRE RISK AND RISK DRIVERS

A. BACKGROUND

Redding typically experiences cool, wet winters and hot, dry summers creating extreme fire weather conditions especially from May through September. Daily temperatures during fire seasons (June-October) are usually above 90° Fahrenheit with a relative humidity of less than 30%. Typical vegetation within wildland-urban interface areas includes blue oak, valley oak, gray pine, and annual grasses. Areas of dense brush and annual grasses are common, and result in high fire danger and significant fires especially during north wind events. These conditions combine to create extreme fire danger, with the city facing one of the highest wildfire threats in the state. The risk of catastrophic wildfire in the area rises as the recent trend of drought conditions increases.

While Redding experiences more than 100 fires annually, the summer of 2018 was historically damaging when California's seventh most destructive fire moved into city limits. The Carr Fire of July 2018 resulted in the deaths of eight people and destroyed over 2,000 structures in Shasta County including 270 homes within Redding.

B. ENTERPRISE SAFETY AND WILDFIRE RISK METHODOLOGY

In order to ascertain the level of risk to our system, REU looked at our historic outages caused by animals, birds, vegetation, car-pole accidents, and overhead equipment failures as a way to assess wildfire risk. Over the past four years, the combined number of sustained outages from the above list were down each year. Additionally, REU will review historic fire records to see if there are other areas of risk that should be addressed.

C. SYSTEM AND OPERATIONAL RISK

REU designs and constructs its electric facilities to meet or exceed the relevant federal, state, or industry standard. REU treats CPUC General Order (GO) 95 as a key industry standard for design and construction standards for overhead electrical facilities and, as such, meets or exceeds all applicable standards in GO 95. Additionally, REU monitors and follows as appropriate the National Electric Safety Code.

Risk drivers associated with design, construction, operations, and maintenance, within our 60 square mile service territory include approximately 50% of territory that is CPUC Tier 2 and 3 high fire threat areas; including 18,000 acres adjacent to REU equipment and facilities, and 120 miles of overhead power lines.

REU has conducted multiple operational risk inventories to determine the appropriate methodology when assessing risk. The following criteria were identified when assessing risk; severity; probability of occurrence; mitigation to be done; and speed of onset. Framework for an Operational Risk Committee was developed as a result of the analysis with the primary goal of managing all operational risks. This includes identifying, analyzing and prioritizing risks associated with catastrophic events, such as wildfires.

D. GEOGRAPHICAL AND CLIMATE RISK

Within REU's service territory and the surrounding areas, the primary risk drivers associated with geography and climate for wildfire are the following:

- a) Extended drought
- b) Vegetation type
- c) Vegetation density (especially the West side and greenbelts)
- d) Weather
- e) High winds
- f) Terrain
- g) Low humidity
- h) Changing weather patterns
- i) Communities at risk
- j) Fire history

E. CPUC HIGH FIRE THREAT DISTRICTS

REU directly participated in the development of the California Public Utilities Commission's (CPUC) Fire-Threat Map, which designates a High-Fire Threat District. REU will incorporate the High Fire Threat District into its construction, inspection, maintenance, repair, and clearance practices, where applicable.

REU reviews CPUC Fire Threat Map annually to identify needed adjustments to hazard threat levels due to changes in urban development and/or vegetation conditions. When adjustments are identified, REU collaborates with Redding Fire Department and CAL FIRE to update the CPUC Fire Threat Map data and REU's Fire Threat Map accordingly. There have not been any additional recommended areas to be added to the Tier 2 or 3 areas as of December 2020.

5. WILDFIRE PREVENTION STRATEGIES AND PROGRAMS

A. STRATEGY – VEGETATION MANAGEMENT

REU meets or exceeds the minimum industry standard vegetation management practices. For transmission-level facilities, REU complies with North American Electric Reliability Corporation (NERC) Standard FAC-003-4, where applicable. For both transmission and distribution level facilities, REU meets: (1) Public Resources Code section 4292; (2) Public Resources Code section 4293; (3) GO 95 Rule 35; and (4) the GO 95 Appendix E Guidelines to Rule 35. These standards require significantly increased clearances in the High Fire Threat District. The recommended time-of-trim guidelines do not establish a mandatory standard, but instead provide useful guidance to utilities. REU will use specific knowledge of growing conditions and tree species to determine the appropriate time of trim clearance in each circumstance. REU performs this work with nine arborists.

GO 95, RULE 35, TABLE 1					
Case	Type of Clearance	Trolley Contact, Feeder and Span Wires, 0-5kv	Supply Conductors and Supply Cables, 750 - 22,500 Volts	Supply Conductors and Supply Cables, 22.5 - 300 kV	
13	Radial clearance of bare line conductors from tree branches or foliage	18 inches	18 inches	¼ Pin Spacing	
14	Radial clearance of bare line conductors from vegetation in the Fire-Threat District	18 inches	48 inches	48 inches	

GO 95 APPENDIX E GUIDELINES TO RULE 35
The radial clearances shown below are recommended minimum clearances that should be established, at time of trimming, between the vegetation and the energized conductors and associated live parts where practicable. Reasonable vegetation management practices may make it advantageous for the purposes of public safety or service reliability to obtain greater clearances than those listed below to ensure compliance until the next scheduled maintenance. Each utility may determine and apply additional appropriate clearances beyond clearances listed below, which take into consideration various factors, including: line operating voltage, length of span, line sag, planned maintenance cycles, location of vegetation within the span, species type, experience with particular species, vegetation growth rate and characteristics, vegetation management standards and best practices, local climate, elevation, fire risk, and vegetation trimming requirements that are applicable to State Responsibility Area lands pursuant to Public Resource Code Sections 4102 and 4293.

Voltage of Lines	Case 13	Case 14
Radial clearances for any conductor of a line operating at 2,400 or more volts, but less than 72,000 volts	4 feet	12 feet
Radial clearances for any conductor of a line operating at 72,000 or more volts, but less than 110,000 volts	6 feet	20 feet
Radial clearances for any conductor of a line operating at 110,000 or more volts, but less than 300,000 volts	10 feet	30 feet
Radial clearances for any conductor of a line operating at 300,000 or more volts	15 feet	30 feet

In addition to adopting the *REU Wildfire Mitigation and Improved Response Program* described below, enhancements to our traditional vegetation management described above are recommended to include:

- No vertical coverage allowed above REU sub-transmission lines;
- Provide vegetation control in a 30-foot perimeter around the Power Plant and substations as property lines and easements allow.
- For public land, greenbelts provide easement clear from ground to sky adjacent to REU facilities;
- Customers not allowing clearing (refusing treatment) must sign form to refuse and that information becomes part of the customer’s file in the customer information system (CIS) database.
- Work with adjacent customers to get approval for wider clearance on their land. This could include tall, diseased, leaning trees that appear to be at risk of falling into our lines. Coordinate with police and fire if necessary clearing is refused (forced trim);
- Perform additional vegetation removal for fuels reduction in the easement on an annual rotation to ensure CPUC recommended clearances are maintained based on the fire hazard zone where each transmission and distribution line is located.

B. STRATEGY - ENHANCED INSPECTIONS

Inspection plays an important role in wildfire prevention. REU currently patrols its system regularly and plans to increase inspections. REU’s current inspection activities includes several components including annual infrared (IR) patrol of overhead lines and substations, intrusive inspection of wood poles, 115 KV lines inspected annually by helicopter or unmanned aerial vehicles (UAVs) with IR , aerial LIDAR (light detection and ranging), and GIS data collection and sharing.

The frequency of inspections will be increased in the high fire threat areas and when storms or other disasters have significantly impacted our system such as the 2019 50-year snow event. The

equipment and labor needed for enhanced inspections will be augmented by contract inspection personnel as well as the REU Technology Program.

C. STRATEGY - SITUATIONAL AWARENESS

Presently, REU is working to install a new automated outage management system that has the ability to track customers affected by circuit outages (not individual customers until Automated Meter Infrastructure is approved in the future) and provide customer notification through outage mapping and interactive voice response (IVR).

Other efforts will include the following technology in collaboration with RFD, RPD, and the City's Information Technology (IT) Department:

- Install strategically located surveillance cameras for early detection of fires, fire weather monitoring, or suspicious activity; This is also part of REU's SB699 Physical Security Plan;
- Expanded use of Automatic Vehicle Locators (AVL) for response and recovery for REU, RFD, and RPD;
- Use unmanned aerial vehicles during high fire threat days for early detection, infrared inspection of hard to reach areas, and other uses in the interest of public safety;
- Common communication system for REU, RFD, and RPD for wildfire and disaster response and recovery;
- Provide human resources for implementation, operation, and maintenance of technologies;
- Customer reporting tools for safety issues;
- Install the IQ FireWatch System providing early fire detection with advanced smoke analytics and artificial intelligence;
- Building a state of the art Department Operations Center to integrate and disseminate situational data.

Other enhancement to public notification during high fire threat, actual fire, or other disaster events will be explored.

D. STRATEGY - OPERATIONAL PRACTICES

REU will operate the system in a manner that will minimize potential wildfire risks including taking all reasonable and practicable actions to minimize the risk of a catastrophic wildfire caused by REU electric facilities. REU will take corrective action for deficiencies when staff discover or are notified of improperly installed or maintained fire protection measures. In addition to those general principles, several new operational practices will help reduce the risk of wildfire and improve the response time in the event of a fire including:

- During high wildfire threat periods (red flag warnings) perform work as described in SOP-35. All personnel in contact with RFD and RPD reporting anything hazardous. REU Emergency Operations Program (EOP) on Level 1 status;
- REU performs bi-annual system drills for the REU EOP in conjunction with summer and winter preparation meetings. Summer drills performed no later than May 31 of each year;

winter drills performed no later than November 30 of each year. If an actual alert level is experienced due to Red Flag warning or other activity, the drill may not be necessary;

- Collect and maintain wildfire data necessary for the implementation and evaluation of this Wildfire Mitigation Plan.

E. STRATEGY - SYSTEM HARDENING

REU's electric facilities are designed, constructed, and maintained to meet or exceed the relevant federal, state, or industry standard. REU treats CPUC General Order (GO) 95 as a key industry standard for design and construction standards for overhead electrical facilities. REU meets or exceeds all standards in GO 95. Additionally, REU monitors and follows as appropriate the National Electric Safety Code. In addition to standards, REU will consider some or all of the following as described in the 10-year Capital Improvement Program:

- Addition of remote controlled field reclosers with arc detection technology;
- Poles with operating devices are cleared of all vegetation around them with a minimum radius of 10'. Perform this for every applicable wood pole in the system for resiliency;
- Provide additional access roads along power line easements and maintain to appropriate standards;
- As 115KV transmission poles reach end of useful life for Tier 3 and Tier 2 areas, replace with steel poles in kind. Have a stockpile of modular steel poles to replace poles in the event of emergency replacement such as car/pole or localized fire;
- Install steel poles (or convert to underground) feeding Pump Station #1 on the river trail and add a sectionalizer or manual switch for less critical loads beyond;
- Provide a secondary water source to Power Plant under the condition that primary water source is lost;
- Increase stock of air filters for power plant before each summer;
- Engineering – Revise construction standards to implement arc suppression components, raptor framing, squirrel guards, tree wire, lightning arresters, and arc suppression fusing. Create design standards for new equipment for remote controlled reclosers and implement into the SCADA system;
- Convert overhead lines to underground as feasible and economical;
- Alternative Technologies- REU will consider the feasibility of implementing alternative technologies, such as wire-break sensing and arc detection technology, as they become available and cost-effective.

F. STRATEGY - PUBLIC SAFETY AND NOTIFICATION

The following is part of this Plan to communicate with the community during high fire threat periods and disasters.

- Coordinate with RFD and RPD through REU's 24/7 Power Control Center (PCC);
- Coordinate with RFD and RPD through the REU EOP during emergencies or large scale outages;

- Coordinate with RFD and RPD in conjunction with the joint dispatch agency, Shasta Area Communication Agency (SHASCOM) for notification to areas that require power shutoffs as directed by public safety during emergencies;
- Develop communications protocol with Shasta County Health and Human Services for notifications to vulnerable groups;
- Expand social media using REU's Outage Management System along with the COR Communications Team;
- Provide a web-based map for the public to see current outages and estimated restoration times;
- Use public service messages on local radio and television media.

G. STRATEGY - RECLOSING AND DEENERGIZATION

As part of this Wildfire Mitigation Plan, REU disables automatic reclosing on circuits that traverse tier 2 or 3 areas. This procedure is documented in SOP-35 (Appendix F). **REU will continue to shut off power when directed to by Redding Fire, Police, Cal Fire, or other emergency responding agencies.** REU will not preemptively shut off power during high fire threat periods for the following reasons:

- Our service territory is only 60 square miles and relatively compact and visible with proper technology;
- Approximately fifty percent (50%) of the City's eight hundred (800) miles of distribution lines are located below ground;
- The City has eight (8) Redding Fire Stations positioned strategically throughout the City and with the additional six (6) Firefighters hired through the Wildfire Mitigation Plan, the response time by fire personnel, should a fire occur, will be reduced significantly;
- CalFire Northern Operations Division and CalFire Shasta Trinity Unit headquarters are located within the City of Redding limits along with CalFire's Air Attack Unit and multiple CalFire Substations are located in and around the City limits ensuring timely mutual aid response;
- The City hired twelve (12) Apprentice Firefighters, an Assistant Fire Marshall, three (3) Public Works Maintenance employees and is proactively mitigating Tier 2 and Tier 3 fire zone areas by removing brush and trees near Redding Electric equipment and lines;
- Turning off the power could put the community at higher risk to wildfire as it could impact water pumping and also create abnormal human activity that could increase opportunity for fire. During October 2019 such a fire was started just outside the city limits due to a Pacific Gas and Electric PSPS;
- REU is investing in our Wildfire Mitigation and Improved Response Program as one way to mitigate power shut offs;
- REU plans to have real-time information from staff located in areas identified as at risk of being subject to extreme weather conditions;
- REU makes use of social media and the REU website to communicate relevant and timely notifications;
- REU plans to use system hardening, situational awareness, vegetation management and the other strategies to avoid shutting off power.

H. STRATEGY - WILDFIRE RESPONSE AND RECOVERY

- During a high fire threat event (specifically Red Flag Warning periods issued by the National Weather Service), RFD will attempt to up staff and stage fire protection equipment in a ready status and the REU EOP will go to a Level 1 (SOP-35);
- First Responders shall provide staff access to the Redding Power Plant for necessary shift changes during fire events;
- Wildfire Response: Execute the REU Emergency Operations Program (SOP-200);
- Recovery/re-energization will follow priorities set by SOP-28, System Restoration.
- REU is a member of the California Utility Emergency Association, which plays a key role in ensuring communications between utilities during emergencies including mutual aid. REU also participates in the Western Energy Institute's Western Region Mutual Assistance Agreement, which is a mutual assistance agreement covering utilities across a number of western states.

I. PROGRAM – REU WILDFIRE PREVENTION AND IMPROVED RESPONSE

On May 7, 2019, the Council approved the REU Wildfire Prevention and Improved Response Program (Appendix B). The Program provides funding to the Redding Fire Department and the Community Services Department for services rendered to prevent the start of wildfires through fire fuels reduction as well as provide faster response in the event of a wildfire either caused by or threatening the electric utility assets located in and around the City of Redding. The Redding Fire Department provides coordination between REU and other local fire agencies as well as oversight of the Program.

Specifically, this program provides twelve Firefighters to increase staffing for two engines from two-person to three-person crews. This will improve initial fire response. Three Apprentice Firefighters are part of the program. During the fire season, the Apprentice Firefighter's work augments the engines. Outside of fire season, the apprentices perform fire fuels mitigation in coordination with REU's arborists. A Battalion Chief will provide oversight of this program along with the Fire Marshal's office. Finally, seven Public Works vegetation crew workers will perform fire fuels mitigation. In total twenty-two personnel will augment REU's existing nine arborists.

J. PROGRAM – REU TECHNOLOGY SOLUTIONS

Through the application of technology, REU will be able to more effectively protect and reduce threats to the electric utility infrastructure and the customers who rely upon it. The following technologies will greatly enhance REU's ability to minimize sources of ignition, manage vegetation within the City's electric grid, enhance productivity of utility staff, harden systems, more effectively protect and notify the public if an issue arises, as well as shorten the response and recovery time in the event REU equipment contributes to starting a wildfire.

Technology also helps to heighten situational awareness and enhances public safety response time, allowing first responders to react in an appropriate and effective manner before, during and after a wildfire. The Program provides funding to the Redding Police Department (RPD) and the City

Information Technology (IT) Department for services rendered to help prevent REU caused wildfires through aerial surveys of REU's overhead electric lines, video monitoring of facilities, a common communication platform, and a GPS based vehicle tracking platform. The memorandums of understanding (MOUs) are attached in Appendix E.

Specifically, this program provides for an estimated total of forty (40) cameras; a common radio platform, including base stations, handhelds and vehicle mounted radios for REU personal as well as radio equipment for Redding Police and Fire command Staff; and Automatic Vehicle Location (AVL) tracking devices on all Electric Utility vehicles and necessary upgrades for first responder vehicles. The common communication and GPS vehicle tracking platforms will be expandable and be designed to allow easy adoption by other City Departments at a small incremental cost. The Program also funds the IQ FireWatch system and Department Operations Center where all of the technology will integrate creating enhanced situational awareness during high fire threat days, system outages, and emergencies.

K. PROGRAM – REU DISTRIBUTION 10-YEAR CAPITAL IMPROVEMENT

The objective of the 10-Year Capital Improvement Program (Appendix D) is to enhance the distribution system to replace specific components used on the electrical distribution system to reduce the probability that the system itself will initiate a fire as well as harden the electrical distribution system to better survive a fire initiated by other sources. The program specifics are being designed and will be completed by mid-2021.

These objectives will be achieved using the following five strategies:

- Enhanced inspections and tracking of assets;
- System hardening of key subsystems;
- Improved situational awareness;
- System improvements providing better operational practices;
- The addition of switching to provide precision de-energization.

L. PROGRAM – REU EMERGENCY OPERATIONS

The Redding Electric Utility Emergency Operations Program (REU-EOP) (Appendix C) is an all-hazards EOP that used a system operating procedure format to ensure compatibility with current practices as well as a utility wide application. The REU-EOP was designed using the same format as the City of Redding Emergency Operations Plan (City EOP) and includes the use of the Incident Command System (ICS). The main REU-EOP elements include Standard Operating Procedure (SOP) 200, an Incident Communication Guide, and the Emergency Operations Contact Information.

Upon review of the City's EOP (adopted in 2014), the utility is responsible for several restoration and incident management objectives during an emergency. The REU-EOP recognizes this responsibility and connects the existing City-wide emergency operations responsibilities to the responsibilities dictated by the REU-EOP in order to support an efficient and effective emergency response to any hazard.

REU maintains multiple electric system operating procedures designed to mitigate, communicate, and restore abnormal system conditions to normal status. As evident from the 2018 Carr Fire and the February 2019 snow storm event, the utility could greatly benefit from the implementation of a utility-wide EOP that utilizes the Incident Command System (ICS) structure along with the established electric system operating procedures. Fortunately, REU is organizationally structured to easily fit into the ICS unit system with appropriate roles and responsibilities between incident command (Executive Team) and section chiefs (Leadership Team). Therefore, the implementation of SOP-200 fits well within the roles and responsibilities segmented appropriately.

As required, the REU-EOP establishes a Department Operations Center (DOC) at the REU Headquarters Building at Avtech Parkway during emergency conditions. This DOC will work in collaboration with the PCC (Redding Power Plant) where both facilities will have video conferencing capability to ensure ease of communication during events. Having the DOC remote from the PCC will allow it to be used as an EOC for the City.

The Incident Communication Guide was drafted to support the REU Public Information Officer (PIO) and staff with both internal and external communications during an emergency.

As required in the City's EOP, an Emergency Operations Contact Information document has been created with a listing of key REU emergency response personnel, a conference bridge, and emergency contact email and phone information.

The REU-EOP has been transferred to Utility Operations as of August 31, 2019 for ongoing administration, training, and upkeep.

6. COMMUNITY OUTREACH AND EDUCATION

REU will maintain a proactive outreach and education strategy to create public awareness of fire threats, fire prevention, and available support during a wildfire or large power outages. Prior to an emergency, communication will include regular messages related to wildfire prevention, such as right-of-way management, tree trimming, line inspection, or other relevant topics. Methods of communication will include newsletters, website updates (including City Hub), social media posts, and public service announcements.

During an emergency, the REU Emergency Operations Program, includes an REU Incident Communication Guide that will be utilized to manage both internal and external communication throughout the incident from that initial notification to termination of the incident. Use of these established notification and communication plans will allow REU to coordinate with applicable emergency service personnel (Redding Fire Dept., Cal Fire, Cal OES, Redding Police Dept., etc.) along with maintaining open lines of communication with customers, media and internal City staff.

Communications will be coordinated as appropriate with the City Communications Team.

7. RESTORATION OF SERVICE

In the event of a wildfire or other emergency event, REU will staff up its DOC to coordinate activities to restore service. REU will restore power, following an event, in cooperation with City of Redding Fire, Police, and Public Works Departments and in coordination with Cal Fire, Shasta County, or other named Incident Commander.

REU management will oversee restoration and response activities. In the event that additional staff is needed, REU may leverage mutual aid agencies, other City of Redding staff, and local aid organizations. The utility may also engage contractors on an as-needed basis.

The following describes the steps typically taken to begin the restoration process:

Declaration of Emergency. The City of Redding may declare an emergency depending on the scope of the disaster.

Assessment. REU crews must patrol each line segment to determine the extent of damage that has occurred. The patrol involves assessing equipment access issues, any cleanup/debris removal issues and determining personal protective equipment requirements for the crews. REU works with the local agency in charge of the fire to access impacted areas as soon as the area is deemed safe by fire officials.

Planning. After initial assessment, REU supervisors, managers and engineers meet to plan the needed work. The team will work with system operations to prioritize the restoration efforts, targeting the circuits that serve the most critical infrastructure needs.

Mobilize. Based on the size and complexity of the rebuild/restoration efforts, REU will coordinate the crews and material needs internally if possible. Mutual aid and contractors may be used on an “as needed” basis to provide additional support. REU maintains a critical material vendor list and has contracts it can draw on for labor and material needs. In an instance of widespread catastrophic damage, necessary materials and labor could experience shortages that may delay work.

Rebuild. The rebuild effort lead by REU will commence as soon as areas become safe and accessible. The initial efforts will be to get the lines up and restore the damaged circuits. Depending on the extent of damage, demolition may be performed concurrently or after crews start installing new facilities. REU will incorporate new materials and technologies as indicated and available.

Restore. REU, mutual aid, or contract crews will restore electric services to homes and businesses as soon as possible after the wildfire. Depending on the extent of damages, residential and business customers may have to perform repairs on their facilities and pass inspections by local agencies prior to having full electric service restored.

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 and County facilities and accounts; Sheriff's Department and jail, City Police and Fire Departments, other key utility facilities (e.g., water, sewage, gas, citywide communications), Incident Command Site or Base Camp, Incident Evacuation Centers, local broadcast and radio Stations, etc.);
- 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, REU Operations Group personnel 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:

- Redding Power Plant facilities (RPP);
- Other energy supply resources (to ensure power can be delivered/received via Western Area Power Administration, the COTP, from within BANC, the CAISO, etc.);
- Transmission circuits (115 kV) subject to NERC requirements;
- Substations;
- Distribution circuits (12 kV);
- Distribution feeders;
- Distribution transformers;
- Service lines.

8. EVALUATION OF THE PLAN

A. METRICS FOR MEASURING PLAN PERFORMANCE

REU will track two metrics to measure the performance of this Wildfire Mitigation Plan: (1) number of fire ignitions caused by REU facilities or operations; and (2) wires down within the service territory.

Metric 1: Fire Ignitions

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

- REU 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
- REU has knowledge that the fire occurred.

In future Wildfire Mitigation Plans, REU will provide the number of fires caused by REU facilities that occurred that were less than 1 acre in size. Any fires greater than 1 acre will be individually described.

Metric 2: Wires Down

The second metric is the number of distribution and transmission wires downed within REU'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 onto a foreign object. REU will divide the wires down metric between wires down inside and outside of the High Fire Threat District. REU will not normalize this metric by excluding unusual events, such as severe storms. Instead, REU will supplement this metric with a qualitative description of any such unusual events (including car vs. pole incidents).

B. IMPACT OF METRICS ON PLAN

In the initial years, REU anticipates that there will be relatively limited data gathered through these metrics. However, as the data collection history becomes more robust, REU will be able to identify areas of its operations and service territory that are disproportionately impacted. REU will then evaluate potential improvements to the plan.

C. MONITORING AND AUDITING THE PLAN

Review of this Plan will occur annually and any lessons learned will have the highest priority for improving steps in the plan, any reference programs, and the process for implementation. REU will present this plan to the Redding City Council on an annual basis.

D. IDENTIFYING AND CORRECTING DEFICIENCIES IN THE PLAN

REU staff and qualified external stakeholders are encouraged to identify Wildfire Mitigation Plan deficiencies or potential deficiencies to the Assistant Director of Utility Operations as soon as possible when observed. The Assistant Director of Utility Operations shall evaluate each reported deficiency and, if the deficiency is determined to be a valid plan deficiency, it shall be entered into a log with the following information:

- Date the deficiency was discovered;
- Description of the deficiency;
- Source identifying the deficiency (e.g., Internal Audit);
- Priority based on deficiency severity;
- Assigned corrective action including the date when it must be completed by;
- Assigned staff responsible for completing the corrective action;
- Date corrective action completed.

The Assistant Director of Utility Operations will go over the log at regularly scheduled Leadership and Supervisor Meetings.

E. MONITORING THE EFFECTIVENESS OF INSPECTIONS

REU will perform inspections on either a 5-year, 10 year, or annual cycle, based on GO 95 or fire mitigation recommendations. Any areas found that need Improvement or appear hazardous will be documented with a work order, given a priority, and the work order will be tracked. When completed the work order will have a close date.

The Assistant Director of Utility Operations will assign qualified internal staff or engage a third party to review and audit the equipment and line inspection programs called out in the Wildfire Mitigation Plan after the completion of the first six months of the plan. The assigned auditor will:

- Review records for the inspection programs;
- Interview staff performing inspections to assess their knowledge of the inspection programs;
- Monitor staff performing inspection activities;
- Review deficiencies noted in the programs;
- Identify systemic issues or problems;
- Note the timeliness of corrective actions;
- Pick a random sample of some completed corrective actions and verify the effectiveness of the corrective actions; and
- Issue a written report of findings.

The Assistant Director of Utility Operations will review the audit findings and assign corrective action as applicable. A copy of the audit report will be routed to the Director.

9. INDEPENDENT AUDITOR

Public Utilities Code section 8387(c) requires REU to contract with a qualified independent evaluator with experience in assessing the safe operation of electrical infrastructure to review and assess the comprehensiveness of REU's Wildfire Mitigation Plan.

REU's Plan was reviewed by Navigant Consulting and they presented their report and findings to the Redding City Council on December 3, 2019.

The report from the independent evaluator is available on REU's website.

10. REVISION HISTORY

Version Number	Revision Date	Summary of Changes
1.0	6/18/19	Initial
2.0	12/3/19	Added the following: REU Emergency Operations Program, REU 10-Year Capital Improvement Program, and REU Technology Solutions Program. Updated all sections with administrative changes to reflect new programs and current practices.
3.0	12/1/2020	Made minor changes to reflect current status of programs. Updated Appendix C. Detailed information regarding steps taken during the 2020 calendar year are described in a separate annual report.
4.0	5/18/2021	Added Appendix G: REU's Response to the Wildfire Safety Advisory Board's 2021 Guidance Advisory Opinion.
5.0	12/7/2021	Minor changes to reflect current status of programs and updated Appendices. Detailed information regarding steps taken during the 2021 calendar year are described in a separate annual report.

APPENDIX A

CPUC FIRE
THREAT MAP

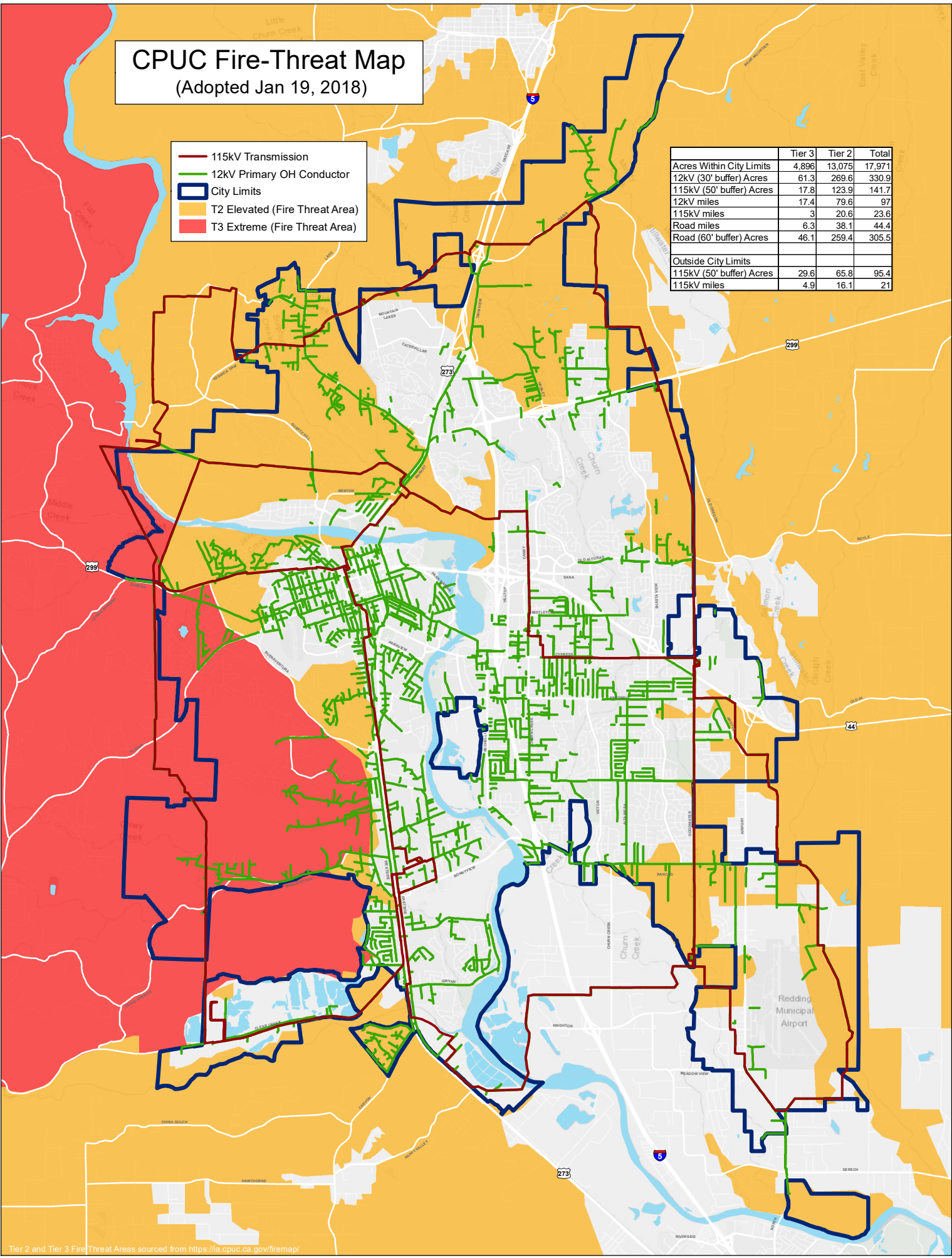
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CPUC Fire-Threat Map

(Adopted Jan 19, 2018)

- 115kV Transmission
- 12kV Primary OH Conductor
- City Limits
- T2 Elevated (Fire Threat Area)
- T3 Extreme (Fire Threat Area)

	Tier 3	Tier 2	Total
Acres Within City Limits	4,896	13,075	17,971
12kV (30' buffer) Acres	61.3	269.6	330.9
115kV (50' buffer) Acres	17.8	123.9	141.7
12kV miles	17.4	79.6	97
115kV miles	3	20.6	23.6
Road miles	6.3	38.1	44.4
Road (60' buffer) Acres	46.1	259.4	305.5
Outside City Limits			
115kV (50' buffer) Acres	29.6	65.8	95.4
115kV miles	4.9	16.1	21



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APPENDIX B

REU WILDFIRE PREVENTION AND IMPROVED RESPONSE PROGRAM

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**CITY OF REDDING
MEMORANDUM OF UNDERSTANDING**

THIS MEMORANDUM OF UNDERSTANDING (MOU) is made at Redding, California, by and between Redding Electric Utility (REU), an enterprise business unit of the City of Redding (City) a municipal corporation, Redding Fire Department (RFD) and Redding Community Services (RCS), general fund business units of the City, for the purpose of wildfire prevention and improved response services.

WHEREAS, SB 901 was adopted by Governor Brown on September 21, 2018; and REU does not have sufficient personnel to perform the services required herein thereby necessitating this MOU for RFD and RCS services.

WHEREAS, SB 901 requires the REU to draft and implement a Wildfire Mitigation Plan for the purpose of preventing the start of wildfires resulting from utility operations as well as to undertake vegetation management efforts to reduce the catastrophic impacts which may be caused by REU facilities or operations.

WHEREAS, the City Council approved a program providing for RFD and RCS to support REU in implementation of a Wildfire Mitigation Plan as more fully defined herein, and authorized the City Manager to execute this MOU between the parties.

NOW, THEREFORE, the Parties covenant and agree, for good consideration hereby acknowledged, as follows:

SECTION 1. RFD AND RCS SERVICES

Subject to the terms and conditions set forth in this MOU, RFD and RCS shall provide to REU the services described in Exhibit A - REU Wildfire Prevention and Improved Response Program, attached and incorporated herein. RFD and RCS shall provide the services at the time, place, and in the manner specified in Exhibit A.

SECTION 2. COMPENSATION AND REIMBURSEMENT OF COSTS

A. REU shall reimburse RFD and RCS for services rendered pursuant to this MOU through the City Budgeting process and as described in Exhibit B. Exhibit B is attached and incorporated herein, in a total amount not to exceed eight million dollars (\$8,000,000) for augmentation of engine company personnel to improve response time and apprentice and Public Works maintenance workers for brush clearing and related activities to execute the REU Wildfire Prevention and Improved Response Program. This sum is further limited in each fiscal year as shown in Exhibit B. REU reserves the right to increase these amounts with City Council approval using current funding mechanisms such as the Director's Contingency Fund.

- B. RFD and RCS shall submit semi-annual time, materials, and expense reports to REU along with status for work completed to the date of the report. All reports shall be itemized to reflect the employees performing the requested tasks, the billing rate for each employee and the hours worked.

SECTION 3. TERM AND TERMINATION

- A. RFD and RCS shall commence work on or about June 1, 2019, and provide services through June 30, 2023. This MOU may be extended every two years by City Council approval with mutual agreement of existing or modified terms by RFD, RCS, and REU.
- B. RFD and RCS hereby acknowledge and agree that the obligation of REU to pay under this MOU is contingent upon the availability of City's funds which are appropriated or allocated by the City Council. Should the funding for the project and/or work set forth herein not be appropriated or allocated by the City Council, this MOU shall terminate when the funding is exhausted.
- C. In the event that City Council terminates the program, RFD and RCS shall provide to REU any and all finished and unfinished reports, charts or other work product prepared by RFD and RCS pursuant to this MOU.
- D. In the event the City Council terminates the program, REU shall pay RFD and RCS the reasonable value of services rendered by RFD pursuant to this MOU. RFD and RCS shall, not later than thirty (30) calendar days after termination of this MOU, furnish to REU such financial information as in the judgment of the REU's representative is necessary to determine the reasonable value of the services rendered by RFD and RCS.

SECTION 4. MISCELLANEOUS TERMS AND CONDITIONS OF MOU

- A. No portion of the work or services to be performed under this MOU shall be assigned, transferred, conveyed or subcontracted without prior written approval of REU, the City Manager or the City Council.
- B. RFD and RCS, at such times and in such form as REU may require, shall furnish REU with such periodic reports as it may request pertaining to the work or services undertaken pursuant to this MOU. This information includes data for public viewing on City Hub and other information as needed by REU for compliance obligations.
- C. RFD and RCS shall maintain accounts and records, including personnel, property and financial records, adequate to identify and account for all costs pertaining to this MOU and such other records as may be deemed necessary by REU to assure proper accounting for all project funds. These records shall be made available for audit

purposes to state and federal authorities, or any authorized representative of City. RFD and RCS shall retain such records for three (3) years after the expiration of this MOU, unless prior permission to destroy them is granted by REU.

SECTION 5. MOU INTERPRETATION, AMENDMENT AND WAIVER

- A. This document, including all exhibits, contains the entire agreement between the parties and supersedes whatever oral or written understanding each may have had prior to the execution of this MOU. This MOU shall not be altered, amended or modified except by a writing signed by REU, RFD, and RCS and duly authorized by the City Manager. No verbal agreement or conversation with any official, officer, agent or employee of City, either before, during or after the execution of this MOU, shall affect or modify any of the terms or conditions contained in this MOU.
- B. No covenant or condition to be performed by RFD or RCS under this MOU can be waived except by the written consent of REU. Forbearance or indulgence by REU in any regard whatsoever shall not constitute a waiver of the covenant or condition in question.
- C. In the event of a conflict between the term and conditions of the body of this MOU and those of any exhibit or attachment hereto, the terms and conditions set forth in the body of this MOU proper shall prevail. In the event of a conflict between the terms and conditions of any two or more exhibits or attachments hereto, those prepared by REU shall prevail over those prepared by RFD and RCS.

SECTION 6. SURVIVAL

The provisions set forth in Sections 3 through 5, inclusive, of this MOU shall survive termination of the MOU.

SECTION 7. COMPLIANCE WITH LAWS

RFD and RCS shall comply with all applicable laws, ordinances and codes of federal, state and local governments.

SECTION 8. REPRESENTATIVES

- A. REU's representative for this MOU is the Redding Electric Director, currently Daniel Beans, telephone number (530) 339-7350. All of RFD's and RCS's questions pertaining to this MOU shall be referred to the above-named person, or to the representative's designee.
- B. RFD's representative for this MOU is Cullen Kreider, telephone number (530) 225-4141.

- C. RCS's representative for this MOU is Kimberly Niemer, telephone number (530) 225-4085.
- D. The representatives set forth herein shall have authority to give all notices required herein.

SECTION 9. DATE OF MOU

The date of this MOU shall be the date it is signed by REU.

IN WITNESS WHEREOF, REU and RFD have executed this MOU on the days and year set forth below:

**CITY OF REDDING,
A Division of a Municipal Corporation**

Dated: _____, 2019

By: Daniel Beans, Electric Utility Director

ATTEST:

APPROVED AS TO FORM:

**BARRY E. DeWALT
City Attorney**

PAMELA MIZE, City Clerk

By:

Redding Fire Department

Dated: _____, 2019

By: Cullen Kreider, Fire Chief

Redding Community Services

Dated: _____, 2019

**By: Kimberly Niemer, Director of
Community Services**

Exhibit A

REU Wildfire Prevention and Improved Response Program

1. Introduction

A. Purpose

The purpose of the REU Wildfire Prevention and Improved Response Program is to establish a framework for the electric utility to conduct an effective, coordinated program to prevent catastrophic impacts to its infrastructure from wildfire. This program is a significant component of the Redding Electric Utility Wildfire Mitigation Plan required by SB901. The Program aims to prevent the start of wildfires from utility operations as well as provide faster response in the event of a wildfire either caused by or threatening its electric utility assets located in and around the City of Redding.

B. Goals

- Prevent electric utility-caused wildfire.
- Reduce the time for the Redding Fire Department to respond to, and engage in fires that threaten grid infrastructure and the other REU facilities.
- Increase staffing to respond to emergencies reasonably likely to impact REU facilities.
- Increase available personnel for debris removal after extreme weather events.
- Create community awareness for utility wildfire prevention.

C. Objectives

The Program's primary objectives are to:

- Identify hazards that pose a potential threat of damaging wildfires that may reasonably be likely to affect REU facilities.
- Prioritize prevention efforts.
- Implement measures targeting fuel reduction to minimize the probability of utility-caused fires or wildfire impacts to REU facilities.
- Coordinate with fuel reduction efforts of other department and agencies.
- Increase community education, outreach, and dialog.

2. Strategy/Scope of Work

A. Redding Fire Department Initial Hazard Identification and Risk Assessment

REU personnel will coordinate with Redding Fire and other City departments to identify and prioritize areas for risk reduction activities using the following resources:

- REU - CPUC Fire Threat Map

Exhibit A

REU Wildfire Prevention and Improved Response Program

- CALFIRE Shasta Trinity Unit 2018 Strategic Fire Plan
- Redding Area Community Wildfire Protection Plans
- Shasta County Fire Safe Council – A collaborative composed of Western Shasta Resource Conservation District (WSRCD), federal and state land management agencies, and others and having a mission of being a framework for coordination, communication, and support to decrease catastrophic wildfire throughout Shasta County.
- Community Planning Assistance for Wildfire (CPAW) recommendations as approved by the Redding City Council
- City of Redding Hazard Mitigation Plan
- Redding Police Department

B. Redding Fire Department Personnel Assistance

Redding Fire Department to provide staff, equipment and materials for on-the-ground vegetation fuels reduction.

1. Wildfire Prevention – Apprentice Firefighter, 12 personnel
 - a. Vegetation Management within easements as prioritized
 - b. Soil sterilization
 - c. Fuel mitigation
 - d. Fuel breaks
 - e. Roadway breaks
 - f. Wildfire incident response
2. Incident Response – Firefighters, 6 personnel
 - a. Provide third person for rapid fire engagement upon arrival
 - b. Two Engine Companies, three shifts
3. Supervision – Assistant Fire Marshal
 - a. Inspection and Tracking
 - Project Tracking and Reporting Matrix
 - b. Reporting
 - Redding Fire Monthly Reports to REU
 - REU Director Annual Report to City Council
 - c. On-going Adaptive Management
 - Update Hazard and Risk Assessment
 - Revise Work Plans as Appropriate

C. Redding Community Services Personnel Assistance

Exhibit A
REU Wildfire Prevention and Improved Response Program

Redding Community Services to provide staff, equipment and materials for on-the-ground vegetation fuels reduction.

1. Wildfire Prevention – Public Works Maintenance Worker, 3 personnel
 - a. Vegetation Management within easements as prioritized
 - b. Soil sterilization
 - c. Fuel mitigation
 - d. Fuel breaks
 - e. Roadway breaks

Exhibit A
REU Wildfire Prevention and Improved Response Program

C. Project Tracking and Reporting

Ref #	Program Element	Actions	Performance Measure
1	Hazard identification, Risk assessment and Project Prioritization – Assistant Fire Marshal and Fire Chief	<ul style="list-style-type: none"> • Collaborate w/ REU • Collaborate with RPD/Parks/PW • Other duties per the REU Wildfire Mitigation Plan 	<ul style="list-style-type: none"> • Produce detailed work plan in collaboration with REU • Attend public workshops or other stakeholder meetings
2	Prevention – Apprentices and 3 Public Works Maintenance Workers	<ul style="list-style-type: none"> • Fuels reduction • Soil sterilization • Emergency debris removal • Other duties per the REU Wildfire Mitigation Plan 	<ul style="list-style-type: none"> • Acres mitigated • Circuit miles mitigated • Poles mitigated • Fuel volume mitigated
3	Rapid Incident Response and Engagement – Firefighters (also Apprentices)	<ul style="list-style-type: none"> • Provide priority response to wildfire or utility fires • Maintain heightened alert/availability during high threat periods • Other duties per the REU Wildfire Mitigation Plan 	<ul style="list-style-type: none"> • Wildfire and utility fire incidents are prioritized and responded to quickly
4	Supervision – Assistant Fire Marshal	<ul style="list-style-type: none"> • Attend monthly status meetings w/ REU staff • Inspect crew work • Reporting • Manage public complaints for fuels hazard on public and private land • Other duties per the REU Wildfire Mitigation Plan 	<ul style="list-style-type: none"> • Attends meetings • Detailed reports are provided demonstrating the prevention accomplishments • Public complaints are handled and coordinated with REU and RFD

Exhibit B
REU Wildfire Prevention and Improved Response Program Cost Estimates

	FY2019	FY2020	FY2021	FY2022	FY2023
6 Firefighters ⁽¹⁾	\$70,000	\$565,000	\$595,000	\$615,000	\$640,000
12 Apprentices ⁽¹⁾	\$70,000	\$685,000	\$735,000	\$775,000	\$820,000
1 Assistant Fire Marshal ⁽¹⁾	\$15,000	\$155,000	\$160,000	\$160,000	\$160,000
3 PW Maint. Worker ⁽¹⁾	\$25,000	\$235,000	\$240,000	\$240,000	\$240,000
PPE ⁽²⁾ , Tools, and Supplies	\$85,000	\$85,000	\$25,000	\$25,000	\$25,000
Fleet		\$300,000	\$10,000	\$10,000	\$10,000
TOTAL	\$265,000	\$2,025,000	\$1,765,000	\$1,825,000	\$1,895,000

1) Based on current salary schedules. Subject to change with salary schedule adjustments.

2) PPE = Personal Protective Equipment.

APPENDIX C

REU EMERGENCY OPERATIONS PROGRAM (EOP)

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	STANDARD OPERATING PROCEDURE	
	Title: Emergency Operations Program (Public Version)	SOP No: SOP-200
		Ver. No: 3.0
	Date: 11/17/2021	

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1. Purpose

The Emergency Operations Program (EOP) is intended to provide structured guidance for REU staff to effectively manage emergency situations from an all-hazards approach. The all-hazards approach is based on the idea that while the causes and types of emergencies can vary widely with little predictability, the basic functions needed to respond are relatively similar from one event to the next. Using a structured EOP based on the Incident Command System (ICS), this procedure provides instruction on the basic functions to be performed as well as providing decision-making processes to keep everyone that is involved on the same page with incident status, objectives, and resource requirements.

This EOP is intended to be both consistent with the ICS and to provide a scalable response from frontline REU employees to the Electric Director, and up to the City Manager, as well as the City Council. This EOP is also structured to follow the City of Redding (COR) Emergency Operations Plan and is a primary program element for REU’s Wildfire Mitigation Plan (WMP).

2. Scope

This procedure will focus on effectively managing emergencies that are either (1) impacting REU’s electrical facilities, equipment, staff, or (2) have a high potential of causing an emergency situation for REU in a similar fashion as above. The current operational risk environment requires REU to maintain an EOP with an ongoing planning and assessment lifecycle to incorporate best practices and lessons learned from past events.

For purposes of planning, the EOP will focus on these key functions for emergency management:

- Incident Command – Responsible for overall management of an incident at the REU Department Operations Center (DOC). The Incident Commander, Public Information Officer, Safety Officer, and the Liaison Officers will serve primary roles with the response units.
- Operations Section Unit – Actively seeks to preserve REU’s assets while restoring the system to normal conditions.
- Engineering, Planning, and Technology Section Unit – Manages the planning process, tracks resources, develops status reports, and supports the production of the incident action plans.
- Logistics Section Unit– Orders resources, anticipates supporting resources, and develops solutions to support Operations and Incident Command.
- Finance Section Unit– Tracks costs, manages contracts, and administers the procurement process.

The scope of the EOP is concentrated from an REU centric approach with outreach on both a COR departmental and county wide geographic footprint. Geographic coordination may include (but is not limited to) other utilities, City, County, State and Federal agencies, California Office of Emergency Services (OES) and the Federal Emergency Management Agency (FEMA). During Alert Level 3 conditions, REU will activate a Department Operations Center at the REU Avtech Headquarters Building to coordinate emergency situations as they may arise. The DOC will serve as the central point of command for REU staff,

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and will subordinate to any Emergency Operations Center activation by any local, state or federal authority.

3. Emergency Operations

The following section will provide the concept of emergency operations to be used as a general guide. Not all emergencies will require the same level of action, nor will each emergency fall neatly within the lines of this EOP. By referencing this EOP and using these sections as an action guide, REU should be positioned to manage emergency situations stemming from all hazards.

3.1. Pre-Planning

If sufficient warning exists for the pre-planning of an emergency, an REU Leadership Team meeting will immediately be called to order by the Director, or his designee, to identify the hazard and begin the process of mobilization and activation of the EOP Alert process. Pre-planning, as discussed in Section 3.2, is to be considered an Alert Level 1 condition.

3.2. Initial Notification

Initial notification of an emergency can come from any source (internal or external). The primary sources of initial notification will typically be:

- (1) An email alert to the REU Emergency Operations group email sent by the impacted Division Manager, Assistant Director, or Public Information Officer, or
- (2) The Power Control Center (PCC) Notice Generator (text alert).

Any REU staff member with information regarding a possible emergency shall immediately inform their manager or supervisor of the condition. The receiving manager or supervisor will immediately send an email to the REU Emergency Operations group email for distribution to all registered REU staff.

For emergency notifications originating from the activation of System Operating Procedure-24 REU Notification Plan (Attached), the Assistant Director of Utility Operations, or his designee, will immediately send an email to the REU Emergency Operations group.

The Director, or his designee, will decide upon the appropriate Alert Level (see Section 3.3) after reviewing as much information regarding the emergency condition as possible. Example factors to be considered include the root cause of the event, risk to staff and public, level of impact (slight, moderate, high, severe), duration (short, medium, long, extensive) and mobilization effort required.

3.3. Alert Levels

Emergency Operations will be divided into 5 distinct categories of response.

- Normal Operations
- Alert Level 1 – Possible Emergency

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- Alert Level 2 – Very High Likelihood of Emergency
- Alert Level 3 – Active emergency
- Alert Level 0 – Resume Normal Operating Conditions

For all Alert Levels, the following notification protocol shall be used to assume command of the emergency:

- The Incident Commander (IC) will assume command. The Director will typically be the IC, however, in the event the Director is unavailable for any reason, the Assistant Directors will meet and confer on the appropriate IC for the emergency condition.
- An evaluation and response assessment shall be prepared by the IC documenting the conditions that warrant issuance of an Emergency Operations Alert.
- A statement will be sent via email alert from the Public Information Officer (PIO) to the all REU employee email group and to the REU Emergency Operations group using the following format:
 - Subject: “NOTICE: REU Emergency Operations Alert Level _ Activated “
 - Body Message: “This Alert Level # has been issued due to _____. Please refer to your EOP Guide to ensure you take the proper actions for this event. This Alert Level will be updated as the situation changes.”
 - Supplemental SOP reference: “This Alert Level # will activate SOP-XX requiring special action as defined within the procedure.”

3.3.1. Alert Level 1 – Possible Emergency

The following actions shall take place in the event of an Alert Level 1 activation:

- An emergency planning meeting shall be immediately assembled by the IC and include all Incident Command personnel as available.
 - The IC will schedule the meeting including the conference bridge.
 - The meeting conference call number is [REDACTED] to ensure attendance no matter the location of staff. In addition, the IC may schedule a WebEx Meeting through an email invite to all EOP members.
 - Incident planning shall assume the emergency will escalate to Alert Level 2.
 - Activation of any required PCC System Operating Procedures as necessary.
 - Assessment of Operations, Engineering, Planning, Logistics, and Finance/Admin requirements.
 - Upon gathering input, the IC will draft an Incident Action Plan for dissemination by the PIO.
 - The Incident Action Plan will identify the priorities and objectives for emergency response in the event the possible emergency elevates to Alert Level 2.
 - Planning will include possible coordination, support and recovery requirements.
- The PIO will send an email alert to the REU Emergency Operations group including the Incident Action Plan and the next steps from the IC in the event of emergency escalation.

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An Incident Command Meeting will not be scheduled for Red Flag Warnings unless the IC escalates the situation to an Alert Level 2. When a Red Flag Warning is issued, the necessary staff will be alerted via email and/or text and will submit their operational limitations and personnel availability through the Smartsheet form.

3.3.2. Alert Level 2 – Very High Likelihood of an Emergency

The following actions shall take place in the event of an Alert Level 2 activation:

- An emergency planning meeting shall be immediately assembled by the IC and include all Incident Command personnel as available.
 - The IC will hold the meeting (including conference call), call to order and work through the agenda.
 - The meeting conference call number is [REDACTED] to ensure attendance no matter the location of staff. In addition, the IC may schedule a WebEx Meeting through an email invite to all EOP members.
 - Next steps/planning activity shall assume the emergency will escalate to Alert Level 3 including activation of the Department Operations Center.
 - Activation of any required PCC System Operating Procedures as necessary.
 - Assessment of Operations, Engineering, Planning, and Technology, Logistics, and Finance/Admin requirements.
 - Upon gathering input, the IC will draft an Incident Action Plan for dissemination by the PIO.
 - The Incident Action Plan will identify the priorities and objectives for emergency response in the event the possible emergency elevates to Alert Level 3.
 - Planning will include possible coordination, support and recovery requirements.
- The PIO will send an email alert to the REU Emergency Operations group including the following:
 - The Incident Action Plan from the IC.
 - The next steps from the IC in the event of emergency escalation.
- The PIO will send an email to the all REU employee email group with the following message:
 - An Emergency Mandatory Preparedness statement to all staff:
 - Subject: “Emergency Preparedness – Alert Level 2”
 - Body: “Due to the ___ situation an Alert Level 2 has been issued. The issuance of an Alert Level 3 is very likely if this situation escalates to an active emergency. All REU staff responsible for emergency operations shall be prepared to report to duty immediately if required. Please monitor your email and texts for updates to this situation”.
- The PIO shall post a message to REU customers on Facebook and Twitter. The message will indicate that REU’s Incident Response Team is assessing the situation and preparing for any emergency that may arise. Additional information will be posted as the situation changes.

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3.3.3. Alert Level 3 – Active Emergency

The following actions shall take place in the event of an Alert Level 3 activation:

- Activation of the REU Incident Command System (see Section 4.0)
 - Develop Incident Objectives including strategy, command emphasis/priorities and safety considerations.
 - Incident Objectives will use the SMART principles of Specific, Measureable, Achievable, Realistic and Timely.
- Activation of the Department Operations Center (see Section 4)
- Activation of the REU Communication Incident Response Guide (Attached)
- The PIO will send an email to the REU Emergency Operations group with an Incident Update (attached) at intervals decided by the IC.
- The PIO will send an email to the all REU employee email group with the following message:
 - An Emergency Condition statement to all staff:
 - Subject: “Active Emergency – Alert Level 3”
 - Body: “Due to the ___ emergency an Alert Level 3 has been issued. The Department Operations Center has been activated at the REU Avtech Headquarters Building. All REU staff responsible for emergency operations shall report immediately to their respective locations and wait for further instruction from the REU Incident Command team. Please monitor your email and text for updates to this situation”.
- The PIO will post an initial message to REU customers on Facebook and Twitter to inform of the emergency situation. Additional messaging will be managed as outlined in the Communication Incident Response Guide.

3.3.4. Alert Level 0 – Resume Normal Operating Routine

The following actions shall take place in the event of an Alert Level 0 activation:

- Demobilization of the Department Operations Center (if activated).
- A debriefing meeting shall be scheduled by the IC including all relevant Incident Command Officers and Subject Matter Expert (SME) personnel, as available, for all Level 2 and 3 events.
- The outcome of the debriefing meeting is to develop reports that include the following:
 - (1) A public REU emergency incident report for the Redding City Council that includes the following basic elements:
 - Root Cause of the event and Damage Assessment
 - Safety (i.e. injuries, loss of life)
 - Reliability (i.e. outage duration, Redding Power Plant operation, total customer counts, etc.)
 - Mutual Aid assistance.
 - Financial impact including efforts for cost recovery from outside agencies.

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- Interaction with mutual aid, outside agencies and departments.
 - Lessons learned.
 - (2) An internal REU emergency response report for all Level 2 and 3 events shall be created. The report shall be used for record keeping and continual process improvement of the emergency operations plan process.
 - Incorporate the REU emergency incident report.
 - Review of the IC structure and lessons learned.
 - Identification of EOP improvements and assignments with due dates for accountability.
- The PIO will send an email to the all REU employee email group with the following message:
 - An Emergency Condition statement to all staff:
 - Subject: “Active Emergency – Alert Level 0”
 - Body: “The ____ emergency situation has ended. Alert Level 0 has been issued. All REU staff responsible for emergency operations shall resume normal duties. As part of REU’s Emergency Operations Plan, you may be asked for feedback regarding this emergency to assist the Leadership Team with the development of an emergency response report”.
- Post Alert Level 3 emergency activation, Management will conduct Critical Incident Debriefing with all employees impacted. Additionally, each Division will work with Personnel to provide Employee Assistance through the City of Redding Employee Assistance Program and other available resources.

4. Incident Command System (ICS) Structure

The commonly accepted National Incident Management System (NIMS), Incident Command System will be utilized by REU during emergency situations. The following roles, responsibilities and main focus will be assigned by position and may be delegated under an assumption of command approach. It is not feasible that every staff member will be available during an emergency to respond, therefore it is expected that REU staff will take delegation and command as appropriate.

Department Operations Center - In the event of an Alert Level 3 condition, a 24 hour per day Department Operations Center (DOC) will be mobilized at the REU Avtech Headquarters Building. A Liaison Officer is responsible for the following items:

- Notification of activation to the City Manager’s Office (Emergency Services Director)
- Coordination with any City, County or other agency Emergency Operations Center.
- Preparation of Avtech Headquarters for DOC Activation.
- Coordination with the Logistics Section Chief for necessary supplies.
- Coordination with the Chief Information Officer for IT/OT technology support.
- Coordination with RPP for PCC and Generation Support.

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- Coordination with outside agencies for liaison participation at the DOC (i.e. police, fire, admin).

REU Leadership Roles & Responsibilities – In order for the ICS to be successful, each individual listed in Section 4.0 is responsible to understand their role and responsibility during an emergency situation. This includes, but is not limited to items such as:

- Development, maintenance and administration of ICS Section Emergency Action Plans (i.e. Operations, Engineering, Planning, and Technology, Logistics, Finance)
- Develop management and restoration objectives.
- Staff training and resource identification for optimal emergency response.
- Maintaining current PCC System Operating Procedures to ensure effective implementation during an emergency event.

It is not practical to assume this EOP will cover all areas of each work-unit and individual contributor effort during an emergency. This responsibility is held by the REU staff identified in this EOP. If you do not understand your role or responsibility or would like more clarification, please see your applicable Division Manager or Assistant Director.

4.1. Incident Command Staff

Role	Responsibility	Focus
Incident Commander (IC) or DOC Director	Overall management responsibility for the incident.	Total incident prevention, protection, mitigation, response and recovery.
Public Information Officer (PIO)	Communication of incident to internal and external stakeholders using the REU Communication Incident Response Guide	Multiple communication channels, clear and concise messaging, continual updates and information streaming.
Safety Officer (SO)	Protection of employees and customers from hazards, injury and loss of life.	Maintain safe operational practices, stand-down unsafe conditions, preserve safe work environment during emergency conditions.
Liaison Officer(s) (LO)	Coordination with internal divisions and external agencies/stakeholders for continuity, efficiency and maximum effectiveness.	Customer focus, internal division administration, situational dependent agencies, anticipate outreach.

The following positions are identified as serving ICS roles during an emergency. Delegation is the responsibility of the staff member currently serving in this position. It is the responsibility of each staff member to assign an alternate or replacement prior to the event and notify the Logistics Section Chief. If delegation is not possible, the IC will delegate as needed.

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Incident Command Officer Identification		
REU Role(s)	ICS Role	Alert Level 3 Location
Director	Incident Commander or DOC Director	DOC
Program Supervisor- Admin	Public Information Officer	DOC
Safety/Enviro. Coordinator	Safety Officer	DOC
Assist. Director - Resources	Liaison Officer	DOC or Field
Assist. Director – Enterprise Services	Liaison Officer	DOC or Field
Assist. Director – Operations	Liaison Officer	DOC or Field

4.2. Operations Section

The Operations section is comprised of various workgroups that are directly responsible for the success of maintaining REU system assets during an emergency as well as the prioritization of restoration efforts and the management of power supply resources.

Role	Responsibility	Focus
Power Control Center - System Operators – T&D	Distribution system load preservation and restoration.	Safety first, adherence to System Operating Procedures, coordination with DOC and PIO for timely updates.
Power Control Center – Energy Management	Real-time energy supply reliability.	Coordination with WAPA/BANC entities, anticipation of future power supply disruptions or situational changes.
Line & Substation Groups	Distribution system asset preservation and restoration including use of Mutual Aid.	Safety first, adherence to System Operating Procedures, coordination with Dispatch and DOC personnel, Mutual Aid management.
Customer Services – Field Services	Metering asset preservation and restoration.	Safety first, coordination with DOC and Liaisons, supplemental crew support for field operations.
Customer Services , Call Center, Walk-in, Back Office	Emergency customer service and business continuity during emergencies.	Receive and deliver customer information, coordinate messaging with PIO and DOC Liaison, provide for normal business operations during emergency situations for non-affected customers.
Redding Power Plant	Provide reliable power supply as directed by Energy Management	Anticipate and remedy abnormal operating conditions, communication with Energy Management and DOC.
Information/Operational Technology Group (City IT/OT)	Maintain REU IT/OTE systems	Remedy IT/OT issues; coordinate with DOC for priority.

The Operations Section is made up of five sub-units, each headed by the manager responsible for the overarching responsibilities of that group; the Engineering Manager, Power Plant Manager, Line Manager, Customer Services Manager, and Power Supply Manager. Each sub-unit has a specific ICS role and will have staff that may be assigned to the DOC, Power Plant, Avtech, Corporation Yard, and in the Field as

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needed to support the particular emergency situation. The Operations Section lead staff is comprised of those positions identified as serving lead operational roles during an emergency. Delegation is the responsibility of the staff members currently serving in this position. If delegation is not possible, the IC will delegate as needed

The individual roles and responsibilities of the Operations Section staff are further defined under Section 3 of Emergency Operations Plan – Operations Procedure (SOP-200.1).

4.3. Engineering, Planning, and Technology Section

The Engineering, Planning, and Technology Section is comprised of various workgroups that are directly responsible for the success of supporting REU work units during an emergency. This Section includes Engineering, Planning/Drafting, Operational Technology and GIS/Mapping (COR IT support) and Compliance.

Role	Responsibility	Focus
Engineering	Review of System Capability and support of Dispatch operations.	System configurations, loading capabilities, system studies
GIS/Mapping (City IT/OT)	Administer GIS projects and programs and prepare a variety of equipment, operational, statistical, and administrative reports related to GIS functions and services as appropriate.	Analyze and interpret GIS generated data to facilitate workflow needs with internal and external customers.
Planning/Drafting	Preparation of electric transmission and distribution (T&D) designs required to harden or upgrade the electric utility system and to serve new development.	Coordinate the development of T&D standards, T&D construction and reconstruction projects, and work order systems.
Compliance	Ensure compliance process is adhered to during emergency.	Monitor for compliance violations, track and report compliance status to ERC.

The Engineering, Planning, and Technology Section is comprised of six sub-units, each headed by the Manager, Supervisor, or Senior responsible for the overarching responsibilities of that group; the Senior Electrical Engineer, Program Supervisor-Service Planning, Program Supervisor-Technology, GIS Manager, Distribution Technician Supervisor, and Electric Manager - Compliance. Each sub-unit has a specific ICS role and will have staff that may be assigned to the DOC, Redding Power Plant, Avtech, Corporation Yard, or in the Field as needed to support the particular emergency situation. These positions are identified as serving lead roles for the Engineering, Planning, and Technology section during an emergency. Delegation is the responsibility of the staff member currently serving in this position. If delegation is not possible, the IC will delegate as needed.

The individual roles and responsibilities of the Engineering, Planning, and Technology Section staff are further defined under Section 3 of Emergency Operations Plan – Engineering, Planning, and Technology Procedure (SOP-200.2).

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4.4. Logistics Section

The Logistics section is comprised of various workgroups that are directly responsible for the success of supporting REU during an emergency. This mostly includes staff available for direct emergency support.

Role	Responsibility	Focus
Resources (Avtech staff)	Provide support for travel, purchasing, fleet vehicles, food/water, and customer specific engagement. Ensure business continuity during emergency.	Coordinate with DOC Liaison for priority, adhere to purchasing standards, and relieve Operations units from logistical duties.
Executive Assistants	Emergency meeting scheduling, minutes and document drafting support, purchasing and REU staff support.	Coordinate with IC for meeting requirements. Ensure REU staff are aware of meetings and conference calls. Coordinate with other Logistics units for response and support.

The Logistics Section is organized into two sub-units; Administration and Support Services. The administration sub-unit is focused on administrative duties such as procurement and facilitating communication. The Support Services unit is focused on execution of ad-hoc tasks and support of all other units, including the administration unit. Both sub-units will have staff assigned to the DOC, Power Plant, Avtech, and Corporation Yard with the ability to support in the field if needed. The positions are identified as those serving lead logistic roles during an emergency. Delegation is the responsibility of the staff member currently serving in this position. If delegation is not possible, the IC will delegate as needed.

The individual roles and responsibilities of the Logistics Section staff are further defined under Section 3 of Emergency Operations Plan – Logistics Procedure (SOP-200.3).

4.5. Finance

The Finance section is comprised of the normal REU Finance division staff that is directly responsible for the financial management of REU’s funds during an emergency. This includes all staff available for direct financial support.

Role	Responsibility	Focus
REU Finance	Track costs and expenses, labor time, equipment time, cost estimates, develop emergency contracts/PO’s, coordinate with City Finance for procurement and purchasing standards, disseminate an Emergency Purchasing procedure to Operations, Planning and Logistics leads.	Adhere to City (or external agency) purchase requirements, manage costs and project expenses, prepare for future City Council action as necessary.

The Finance Section is responsible for overseeing all expenditures related to emergency management and response operations for all hazards affecting the utility, including tracking and documentation necessary for recovery reimbursement purposes including personnel time tracking during emergency operations. The positions are identified as those serving lead Finance roles during an emergency. Delegation is the responsibility of the staff member currently serving in this position. If delegation is not possible, the IC will delegate as needed.

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The individual roles and responsibilities of the Finance Section staff are further defined under Section 3 of Emergency Operations Plan – Finance Procedure (SOP-200.4).

5. Supporting Documentation

The following supporting documents are included by reference. These documents can be updated separate from the Review requirement in Section 6.0. At a minimum, this supporting documentation will be reviewed and updated as necessary as stated in the review requirement in Section 6.0.

TITLE	INTENT	OWNER	LOCATION
REU Incident Response Communication Guide	Main source for REU communication process during emergency incident.	Public Information Officer	[REDACTED]
REU Emergency Incident Update Form	Main document source for consolidated incident information.	Public Information Officer	[REDACTED]
System Operating Procedure – 24 REU Notification Plan	Main procedure for Power Control Center to notify REU staff of emergency situation.	Senior System Operator – Transmission & Distribution	[REDACTED]
ICS Forms	Documentation during incidents.	FEMA	https://training.fema.gov/icsresource/icsforms.aspx

6. Update, Review and Training Requirements

This procedure can be updated at any time to ensure relevancy and completeness for the Emergency Operations Program. This SOP shall be reviewed at least twice per year during normal summer and winter preparation training meetings. All training attendance records shall be retained for a minimum period of 5 years.

APPENDIX D

REU 10-YEAR
CAPITAL
IMPROVEMENT
PROGRAM

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Objective

The objective of the 10-Year Capital Improvement Program is to enhance the distribution system in two ways:

- Selectively replace the components used on the electrical distribution system to reduce the probability that the system itself will initiate a fire.
- Harden the electrical distribution system to better survive a fire.

These objectives will be achieved using the following five strategies:

- Enhanced inspections and tracking of assets;
- System hardening of key subsystems;
- Improved situational awareness;
- System improvements providing better operational practices;
- The addition of switching to provide precision de-energization.

System Improvements Description

The suggested system improvements are proposed to be as described below:

- 1) Field Verify / T2 / T3 Boundary: The present CPUC maps defining the Tier 1, 2, and 3 boundaries were created as statewide maps that lack the detail necessary to accurately define the operation of the utility assets within the City of Redding (COR). An assessment will be performed to provide clarity of what the actual fire hazards are at critical locations on the REU distribution system. Mitigation shall be performed for certain circuits to allow the recloser operation to be reinstated and removed from the list shown in Attachment 2.
- 2) Perform necessary tree trimming and removal in priority areas.
- 3) Reconfigure specific Circuits to feed only Tier 1.
- 4) Install non-arcing arrestors, fuses, and squirrel guards and add covered wire jumpers.
- 5) Create 30-foot sterilized perimeter for T2 and T3 substations.
- 6) Apply fire retardant to poles for T2 and T3.
- 7) Install fault indicators in order to locate issues faster.
- 8) Install Mesh Network to retrieve fault and outage data.
- 9) Connect Line Fault Indicator data to SCADA.
- 10) Provide secondary water source to Power Plant.
- 11) Install additional 12KV switches at T1 boundary.
- 12) Install fast reclosers/sectionalizers at T1 boundary.
- 13) Convert overhead to underground for critical COR water plants.
- 14) Improve existing and add additional access roads to critical sections of the distribution system.
- 15) Replace existing 115KV poles with steel pole in T2 and T3 areas.
- 16) Convert overhead to underground where it is deemed cost effective.
- 17) Convert Keswick River Crossing from wood to steel.

System Improvements Timeline

Priority will be given to the improvements that can be deployed the earliest, with the largest estimated return in meeting the Program objectives. Improvements which require larger efforts such as city-wide studies and design consultant efforts will be implemented as they are completed.

REU Distribution 10-Year Capital Improvement Program

Item #	Calendar Year WMP Year # Fiscal Year	2019	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029
		1	2	3	4	5	6	7	8	9	10	
		2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	
1	Field verify and revise Tier 2 and Tier 3 boundary	Complete										
2	Perform necessary tree trimming and vegetation removal in priority areas	X	X	X								
3	Reconfigure specific distribution circuits to feed only Tier 1 areas	Complete										
4	Install non-arcing arrestors, fuses, and bird/squirrel guards, covered jumpers in T2/T3	X	X	X	X							
5	Create 30-foot sterilized perimeter for substations in T2 and T3 areas	Complete										
6	Apply fire retardant or fire wrap to wood poles for T2 and T3 areas	X	X	X	X	X	X					
7	Install fault indicators for faster location of distribution outages		X	X	X							
8	Install mesh network to retrieve outage data from Remote Metering Project		X	X								
9	Connect line fault indicator data to SCADA	Complete										
10	Integrate remote meter data and fault indicator data with Outage Management System		X	X	X							
11	Provide secondary water source to Power Plant	Complete										
12	Install additional 12KV switches at T1 boundary	Complete										
13	Install fast reclosers/sectionalizers at T1 boundary			X	X	X						
14	Convert overhead to underground for critical COR water facilities					X	X					
15	Improve existing access roads and add additional to critical sections of the system			X	X	X	X	X				
16	Replace 115KV wood poles with Steel or Laminate in T2 and T3 areas			X	X	X	X	X	X	X	X	X
17	Convert overhead circuits to underground where practical in T2 and T3 areas.					X	X	X	X	X	X	X
18	Convert Keswick River crossing from wood to steel									X	X	
19	Upgrade 12KV Breaker Port Relay to better coordinate with circuit fusing		X	X	X	X						

Revised November 2021

REU Distribution 10-Year Capital Improvement Program

Budgetary Cost Estimate

All improvement items will first be evaluated for their cost/benefit in meeting the objectives of the Program, as well as compared to the overall budget available prior to implementation. Items identified for installation in the early years are easily justified as an available technology that is quickly becoming industry standard or best practice.

The initial budgetary costs have either been completed or have been rolled into REU's expanded 10-Year Capital Improvement Plan (CIP). A summary portion of the 10-Year CIP is below to provide additional detail of the projected level of effort required to implement these remaining wildfire mitigation tasks, as well as additional distribution improvement tasks.

This table shows the estimated cost of each project over the 10-Year Capital Improvement Plan along with associated hours estimated to complete the project.

Project	Estimated Total Cost	Estimated Individual Labor	Estimated Engineering/SCADA Hours
<u>Fire Mitigation</u>			
Circuit Hardening	\$1,994,000	5840	0
Install switches at T1 boundary/Feeder Reconfiguration to T1 only	\$378,000	540	100
Install Fast reclosers/sectionalizers at T1 boundary	\$206,000	234	60
<u>Overhead</u>			
1-Phase Cutout Mounted Recloser Deployment	\$200,500	135	50
Aging Asset - Pole Replacements	\$14,360,000	46,500	0
Switch Replacement Program	\$1,370,000	4275	0
LED Streetlight Conversion	\$4,050,000	1500	0
<u>Underground</u>			
Aging Asset - Underground Cable Replacements	\$24,600,000	67,500	0
Strategic Undergrounding	\$6,500,000	12,600	0
<u>Substation</u>			
Fiber Optic Backbone	\$4,500,000	10,800	1,000
High Impedance Fault Detection	\$1,745,000	0	1360
Substation Security Improvements	\$850,000	1080	40
Substation Aging Asset Replacement (Budget Reserve Only)	\$5,300,000	0	0
Substation Fence Upgrade (Canby)	\$110,000	0	0

REU Distribution 10-Year Capital Improvement Program

<u>Operational Efficiency and Reliability Improvements</u>			
Faulted Circuit Indicator continuation (200 OH/300 UG)	\$490,000	540	N/A
Line Sensors Deployment (SEL FLT/FLR)	\$150,000	90	60
Line Capacity Upgrades and Volt-Var Optimization	\$1,053,500	8,775	0
ADMS and Device Deployment for ADMS	\$5,855,500	1,510	1,500
RMI to AMI Conversion	\$2,428,000	1,125	0
BESS Installation Pilot	\$280,000	0	80
<u>Other</u>			
Electric System Model (Windmil) Completion*	\$139,500	0	700
Engineering Studies - Fuse Coordination, DER Impact, Switching Contingency*	\$93,000	0	465
Update Standards*	\$96,000	0	465
Fault Location Isolation and Service Restoration (FLISR) Study*	\$40,000	0	200
Facilities Field Verification - Phase Identification	\$575,000	2,475	0
Totals	\$77,364,000	165,519	6,095

APPENDIX E

REU TECHNOLOGY SOLUTIONS PROGRAM

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Overview

Through the application of technology, REU will be able to more effectively protect and reduce threats to the electric utility infrastructure and the customers who rely upon it. The following technologies will greatly enhance REU's ability to minimize sources of ignition, manage vegetation within the City's electric grid, enhance productivity of utility staff, harden systems, more effectively protect and notify the public if an issue arises, as well as shorten the response and recovery time in the event REU equipment contributes to starting a wildfire.

Technology also helps to heighten situational awareness and enhances public safety response time, allowing first responders to react in an appropriate and effective manner before, during and after a wildfire. The Program provides funding to the Redding Police Department (RPD) and the City Information Technology (IT) Department for services rendered to help prevent REU caused wildfires and protect REU facilities from the threat of wildfires through aerial surveys of REU's overhead electric lines, video monitoring of facilities, a common communication platform, and a GPS based vehicle tracking platform. The memorandums of understanding (MOUs) are attached.

Specifically, this program provides for an estimated total of forty (40) cameras; a common radio platform, including base stations, handhelds and vehicle mounted radios for REU personnel as well as radio equipment for Redding Police and Fire command Staff; and Automatic Vehicle Location (AVL) tracking devices on all Electric Utility vehicles and necessary upgrades for first responder vehicles. The common communication and GPS vehicle tracking platforms will be expandable and be designed to allow easy adoption by other City Departments at a small incremental cost.

Cameras for Utility Operations, Fire Detection and Mitigation

Situational awareness is instrumental in combating fires in and around our community. Camera technology is a vital element in the early detection and intrusion of wildland fires into the City of Redding. In addition, cameras provide critical information related to any REU equipment that may be a contributory cause to a fire. The installation of cameras in areas surrounding REU's critical infrastructure will greatly enhance first responder's ability to identify, locate, and mitigate fire threats.

Live feed cameras mounted throughout REU's service territory will assist with the early detection of fires caused by the electric system. Strategically placed cameras in the proximity of REU's transmission lines, especially in the Tier 2 and Tier 3 fire areas, will also aid in risk assessments during designated Red Flag warning days or a fire weather event in which an Emergency Operations Center is activated. Early assessment and detection allows REU to quickly react and prevent the system from inflicting harm on the surrounding areas.

Mobile cameras will also be used in a variety of preventative ways through the use of Unmanned Aerial Vehicles (UAVs). This includes the identification of potential right-of-way hazards as well as the location and isolation of hot spots in REU distribution lines using Forward Looking Infrared Radar (FLIR) technologies.

In the event a fire is seen or reported, fixed cameras and UAVs can quickly discover and identify hot spots in the area, help determine the potential for the fire to spread, and give first responders specific intelligence related to scaling fire resources up or down appropriately. In addition, strategically placed fixed cameras assist first responders in determining the best evacuation routes through enhanced situational awareness. Fixed and UAV cameras allow firefighters and first responders to more effectively manage firefighting operations. Speakers mounted on UAVs greatly enhance the ability to communicate with first responders in the danger area and with citizen evacuations.

HD video streaming from the UAVs to the Department Operation Center (DOC) or command staff on computers/cell phones will allow those in control of fire operations to see a live, real-time video feed of the fire. This will streamline firefighting capabilities and enable command center personnel to make quick decisions based on real-time information, rather than using information that has been relayed through multiple parties or having to wait until first responders are in place. Command center personnel will be able to see the direction a fire is spreading, providing the ability to move resources to the most effective positions.

Implementation of an artificial intelligence overwatch camera and software system will assist in the early detection of fires. Fire watch systems are specifically manufactured for early wildfire detection and can be calibrated for any region, vegetation, and type of weather. This technology includes a triple optical sensing unit, control and detection software that performs self-diagnostics, and smoke detection. While this technology is recommended to be used with a detection radius of ten (10) miles, it has proven itself capable of locating smoke plumes up to forty (40) miles away during clear weather days. When smoke is detected by the system it alerts users so that first responders can react quickly and efficiently before flames reach the tree tops. Early detection of fire arising proximate to REU facilities using the system allows first responders to launch a direct attack using minimal resources and results in both physical and monetary savings to REU.

Fire caused by REU facilities or threatening REU facilities can rapidly becoming a city-wide threat to the inhabitants of the City. City-wide issues and concern can begin long before the cause of a fire is known due to lack of certainty. By determining the cause, or origin, of a fire quickly, we can not only save life and properties, we can mitigate the risk of uncertainty. In this regard, early detection of fire caused by REU facilities or threatening REU facilities protects the City as a whole.

Aerial Imagery

The city-wide aerial orthophotography is a core data set for the GIS Division. Aerial imagery or orthophotography provides the picture from which many GIS data layers are created and maintained. For example, our parcels, roads, water system, wastewater system, and storm drain system GIS layers are all created and maintained using high-resolution orthophotography. Also, high-resolution imagery is a powerful visual tool when represented on maps and exhibits. It is important that the imagery be kept up-to-date. The most recent aerial imagery was flown prior to the Carr fire, and is therefore not a true representation of our community's current landscape.

New imagery would allow fire crews to be able to identify current overgrown areas proximate to REU facilities, as well as those areas at a higher risk of fires. Ensuring the imagery is kept up to date on a more frequent basis will play a critical role in ensuring fire crews are able to maintain a clearer/safer landscape around REU facilities as vegetation regrows. Newer imagery would allow for accurate GIS data, which in turn, would further enhance the City's Fire Department in their fire mitigation efforts to enhance wildfire buffers around REU facilities. This imagery will be performed every two years.

City-Wide Communications Platform

Immediate and reliable communication is vital during an emergency such as a wildfire, or major storm event. The current City of Redding radio systems have reached their end of useful life and are requiring replacement. RPD is currently in the process of upgrading their existing radio system and REU is proposing to expand upon this project to include additional features that will meet Redding Electric Utility's need to monitor and react to wildfire threat to REU facilities or to protect the City from wildfire threat posed by REU facilities while also creating a unified platform across City Departments. By implementing a unified stationary and mobile communication platform, City of Redding personnel will have the ability to communicate across Departments during emergency situations quickly and efficiently. This platform will provide immediate connection to all parties, free of cross-channel interference, allowing each Department to work simultaneously and in support of one another. In addition to purchasing the communications platform, REU will provide radios for Electric Utility employees and Redding Police and Fire command staff to ensure reliable communication between first responders and REU to ensure the preservation of life and property. *Initial costs associated with the communications platform will be paid by REU. The Redding Police Department will be responsible for a partial repayment for handheld and vehicle radios through an interdepartmental lease process.

This radio system will allow first responders to immediately report downed electric lines to REU or report a fire that has been started due to a downed line. This will lead to faster response times and better fire management. Direct radio communication between Redding Fire Department personnel to Police personnel will provide safe direction to high risk areas during evacuations as well as allow first responders to request specific power shutoffs from REU's DOC during an emergency.

Automatic Vehicle Location (AVL)

AVL will assist each Department with the identification and tracking of first responder and emergency vehicles. During a wildfire event, it is critical for the Department Operations Center (DOC) to be able to determine the location of each vehicle so that resources can be dispatched and/or redirected to REU facilities in the most effective manner, and to identify where a vehicle is located so assistance may be provided if an employee is in danger. AVL aids in the identification of employee location during emergencies and allows dispatchers to warn personnel who are in the vicinity of an at-risk area.

AVL will allow REU to track the progress of employees while patrolling equipment during a Red Flag outage. By doing so, REU can ensure that outages are handled quickly and efficiently, and that employees are not at risk. If an emergency situation is identified, AVL will provide REU with the ability to quickly report a vehicle's location and allow dispatchers to send first responders directly to the vehicle and employee(s).

REU Wildfire Technology Matrix

	Cameras for Detection & Mitigation	Aerial Imagery	Citywide Communications Platform	Automatic Vehicle Location (AVL)
Vegetation Management	x	x		
Enhanced Inspections	x	x		x
Situational Awareness	x	x	x	x
Operational Practices	x		x	x
System Hardening	x	x	x	x
Public Safety & Notification	x		x	x
Reclosing & Deenergization	x		x	x
Wildfire Response & Recovery	x		x	x

REU Technology Strategies Matrix

	Cameras for Detection & Mitigation	Aerial Imagery	Citywide Communications Platform	Automatic Vehicle Location (AVL)
Wildfire Prevention & Improved Response	x	x	x	x
Technology Solutions	x	x	x	x
Distribution 10-year Capital Improvements	x		x	x
REU Emergency Operations	x	x	x	x

Budgetary Cost Estimate

Item #	Item Description	Total Cost
1	Cameras for Utility Operation, Fire Detection and Mitigation	\$2,989,000
2	Aerial Imagery	\$50,000
3	City-Wide Communication Platform	\$8,820,000
4	Automatic Vehicle Location (AVL)	\$60,000
	Total	\$11,919,000

CITY OF REDDING
MEMORANDUM OF UNDERSTANDING
RPD – WMP - 1

THIS MEMORANDUM OF UNDERSTANDING (MOU) is made at Redding, California, by and between Redding Electric Utility (REU), an enterprise business unit of the City of Redding (City) a municipal corporation, and Redding Police Department (RPD), a general fund business unit of the City, for the purpose of wildfire prevention and improved technology.

WHEREAS, SB 901 was adopted by Governor Brown on September 21, 2018; and REU does not have sufficient personnel to perform the services required herein thereby necessitating this MOU for RPD services.

WHEREAS, SB 901 requires the REU to draft and implement a Wildfire Mitigation Plan for the purpose of preventing the start of wildfires resulting from utility operations as well as to expand technology in order to reduce the catastrophic impacts which may be caused by or inflicted upon REU facilities or operations.

WHEREAS, the City Council approved a program providing for RPD to support REU in implementation of a Wildfire Mitigation Plan as more fully defined herein, and authorized the City Manager to execute this MOU between the parties.

NOW, THEREFORE, the Parties covenant and agree, for good consideration hereby acknowledged, as follows:

SECTION 1. RPD SERVICES

Subject to the terms and conditions set forth in this MOU, RPD shall provide to REU the services described in Exhibit A - REU Technology Solutions Program, attached and incorporated herein. RPD shall provide the services at the time, place, and in the manner specified in Exhibit A.

SECTION 2. COMPENSATION AND REIMBURSEMENT OF COSTS

A. REU shall reimburse RPD for services rendered pursuant to this MOU through the City Budgeting process and as described in Exhibit B. Exhibit B is attached and incorporated herein, in a total amount not to exceed one million five hundred ninety-nine thousand dollars (\$1,189,000) for the purchase and implementation of technology, as well as the training of staff members. This sum is further limited in each technology category as shown in Exhibit B.

SECTION 3. TERM AND TERMINATION

- A. RPD shall commence work on or about the date of this agreement and continue or be terminated with mutual agreement of existing or modified terms by REU and RPD.
- B. RPD hereby acknowledges and agrees that the obligation of REU to pay under this MOU is contingent upon the availability of City's funds which are appropriated or allocated by the City Council. Should the funding for the project and/or work set forth herein not be appropriated or allocated by the City Council, this MOU shall terminate when the funding is exhausted.
- C. In the event that City Council terminates the program, RPD shall provide to REU any and all finished and unfinished reports, charts or other work product prepared by RPD pursuant to this MOU.
- D. In the event the City Council terminates the program, REU shall pay RPD the reasonable value of services rendered by RPD pursuant to this MOU. RPD shall, not later than thirty (30) calendar days after termination of this MOU, furnish to REU such financial information as in the judgment of the REU's representative is necessary to determine the reasonable value of the services rendered by RPD.

SECTION 4. MISCELLANEOUS TERMS AND CONDITIONS OF MOU

- A. No portion of the work or services to be performed under this MOU shall be assigned, transferred, conveyed or subcontracted without prior written approval of REU, the City Manager or the City Council.
- B. RPD, at such times and in such form as REU may require, shall furnish REU with such periodic reports as it may request pertaining to the work or services undertaken pursuant to this MOU.
- C. RPD shall maintain accounts and records, including personnel, property and financial records, adequate to identify and account for all costs pertaining to this MOU and such other records as may be deemed necessary by REU to assure proper accounting for all project funds. These records shall be made available for audit purposes to state and federal authorities, or any authorized representative of City. RPD shall retain such records for three (3) years after the expiration of this MOU, unless prior permission to destroy them is granted by REU.

SECTION 5. MOU INTERPRETATION, AMENDMENT AND WAIVER

- A. This document, including all exhibits, contains the entire agreement between the parties and supersedes whatever oral or written understanding each may have had prior to the execution of this MOU. This MOU shall not be altered, amended or

modified except by a writing signed by REU and RPD and duly authorized by the City Manager. No verbal agreement or conversation with any official, officer, agent or employee of City, either before, during or after the execution of this MOU, shall affect or modify any of the terms or conditions contained in this MOU.

- B. No covenant or condition to be performed by RPD under this MOU can be waived except by the written consent of REU. Forbearance or indulgence by REU in any regard whatsoever shall not constitute a waiver of the covenant or condition in question.
- C. In the event of a conflict between the term and conditions of the body of this MOU and those of any exhibit or attachment hereto, the terms and conditions set forth in the body of this MOU proper shall prevail. In the event of a conflict between the terms and conditions of any two or more exhibits or attachments hereto, those prepared by REU shall prevail over those prepared by RPD.

SECTION 6. SURVIVAL

The provisions set forth in Sections 3 through 5, inclusive, of this MOU shall survive termination of the MOU.

SECTION 7. COMPLIANCE WITH LAWS

RPD shall comply with all applicable laws, ordinances and codes of federal, state and local governments.

SECTION 8. REPRESENTATIVES

- A. REU's representative for this MOU is the Redding Electric Director Daniel Beans, telephone number (530) 339-7350. All of RPD's questions pertaining to this MOU shall be referred to the above-named person, or to the representative's designee.
- B. RPD's representative for this MOU is Redding Police Chief William Schueller, telephone number (530) 225-4284.
- C. The representatives set forth herein shall have authority to give all notices required herein.

SECTION 9. DATE OF MOU

The date of this MOU shall be the date it is signed by REU.

IN WITNESS WHEREOF, REU and RPD have executed this MOU on the days and year set forth below:

**CITY OF REDDING,
A Division of a Municipal Corporation**

Dated: _____, 2019

By: Daniel Beans, Electric Utility Director

ATTEST:

APPROVED AS TO FORM:

**BARRY E. DeWALT
City Attorney**

PAMELA MIZE, City Clerk

By:

Redding Police Department

Dated: _____, 2019

By: William Schueller, Chief of Police

Exhibit A

REU Technology Solutions Program

1. Introduction

A. Purpose

The purpose of the Redding Electric Utility (REU) Technology Solutions Program is to establish a framework for the electric utility to conduct an effective, coordinated program to prevent catastrophic impacts to its infrastructure from wildfire. This program is a significant component of the Redding Electric Utility Wildfire Mitigation Plan required by SB901. The Program aims to prevent the start of wildfires from utility operations as well as provide faster response in the event of a wildfire either caused by or threatening its electric utility assets located in and around the City of Redding.

B. Goals

- Prevent electric utility-caused wildfires.
- Reduce the time for the Redding Police Department (RPD) to report, respond to, and engage in emergencies that threaten grid infrastructure and other REU facilities.
- Increase technology use and reliability in order to promote interdepartmental coordination.

C. Objectives

The Program's primary objectives are to:

- Identify hazards that pose a potential threat of damaging wildfires that may reasonably be likely to affect REU facilities.
- Prioritize interdepartmental communication through radios.
- Quickly identify possible fire risks and choreograph proper response routes.
- Decrease recovery time after a fire occurs.
- Increase accuracy of fire investigation results.
- Utilize cameras to identify possible threats that are naturally occurring or human caused.
- Track progress and location of employees to ensure the safety and effectiveness of positioning.

2. Strategy/Scope of Work

A. REU will coordinate with RPD to fund the following technology:

- Unmanned Aerial Vehicle (UAV)
- Cameras for Surveillance, Fire Detection, and Investigation

Exhibit A
REU Technology Solutions Program

B. Redding Police Department to procure technology deemed necessary as well as provide staff and requisite training to operate the following technology:

- UAV units: RPD will assist REU in the aerial patrol of overhead lines using UAVs equipped with Forward Looking Infrared Radar (FLIR). This service will be provided on an as needed basis but at a minimum of once yearly as required by California Public Utilities Commission General Order 165. This process aids in ensuring the stability of REU's overhead lines and assists in the location and mitigation of potential fire hazard risks.
- UAV units: RPD will assist RFD in the monitoring of fires using UAVs equipped with FLIR technology. This service will be provided on an as needed basis.
- Cameras for Surveillance, Fire Detection, and Investigation: RPD will assist REU in the detection as well as investigation of fire origination and cause of ignition through the use of fixed and/or mobile cameras.
- Radio System: RPD will report all Utility related fire hazards to REU personnel through the unified communication platform.

Exhibit B
REU Technology Solutions Program
Cost Estimates

1. UAVs
 - Four (4) UAVs equipped with FLIR capabilities
 - Two (2) UAVs without FLIR capabilities
 - One (1) Insight RT System with Road Case
 - Yearly Inspection of Power Lines
 - Total cost is not to exceed \$230,000

2. Cameras
 - Forty (40) fixed cameras
 - Intelligence Led Policing (ILP)
 - 3D Laser Scanner and Equipment
 - Added equipment and warranties
 - Total cost is not to exceed \$959,000

CITY OF REDDING
MEMORANDUM OF UNDERSTANDING
IT-WMP-1

THIS MEMORANDUM OF UNDERSTANDING (MOU) is made at Redding, California, by and between Redding Electric Utility (REU), an enterprise business unit of the City of Redding (City) a municipal corporation, and Information Technology Department (IT), a general fund business unit of the City, for the purpose of wildfire prevention and improved technology.

WHEREAS, SB 901 was adopted by Governor Brown on September 21, 2018; and REU does not have sufficient personnel to perform the services required herein thereby necessitating this MOU for IT services.

WHEREAS, SB 901 requires the REU to draft and implement a Wildfire Mitigation Plan for the purpose of preventing the start of wildfires resulting from utility operations as well as to undertake vegetation management efforts to reduce the catastrophic impacts which may be caused by REU facilities or operations.

WHEREAS, the City Council approved a program providing for IT to support REU in implementation of a Wildfire Mitigation Plan as more fully defined herein, and authorized the City Manager to execute this MOU between the parties.

NOW, THEREFORE, the Parties covenant and agree, for good consideration hereby acknowledged, as follows:

SECTION 1. IT SERVICES

Subject to the terms and conditions set forth in this MOU, IT shall provide to REU the services described in Exhibit A - REU Technology Solutions Program, attached and incorporated herein. IT shall provide the services at the time, place, and in the manner specified in Exhibit A.

SECTION 2. COMPENSATION AND REIMBURSEMENT OF COSTS

A. REU shall reimburse IT for services rendered pursuant to this MOU through the City Budgeting process and as described in Exhibit B. Exhibit B is attached and incorporated herein, in a total amount not to exceed eight million eight hundred eighty-one thousand dollars (\$10,730,000) for the purchase and implementation of technology, as well as the training of staff members. This sum is further limited in each technology category as shown in Exhibit B.

SECTION 3. TERM AND TERMINATION

- A. IT shall commence work on or about the date of this agreement and continue or be terminated with mutual agreement of existing or modified terms by REU and IT.
- B. IT hereby acknowledges and agrees that the obligation of REU to pay under this MOU is contingent upon the availability of City's funds which are appropriated or allocated by the City Council. Should the funding for the project and/or work set forth herein not be appropriated or allocated by the City Council, this MOU shall terminate when the funding is exhausted.
- C. In the event that City Council terminates the program, IT shall provide to REU any and all finished and unfinished reports, charts or other work product prepared by IT pursuant to this MOU.
- D. In the event the City Council terminates the program, REU shall pay IT the reasonable value of services rendered by IT pursuant to this MOU. IT shall, not later than thirty (30) calendar days after termination of this MOU, furnish to REU such financial information as in the judgment of the REU's representative is necessary to determine the reasonable value of the services rendered by IT.

SECTION 4. MISCELLANEOUS TERMS AND CONDITIONS OF MOU

- A. No portion of the work or services to be performed under this MOU shall be assigned, transferred, conveyed or subcontracted without prior written approval of REU, the City Manager or the City Council.
- B. IT, at such times and in such form as REU may require, shall furnish REU with such periodic reports as it may request pertaining to the work or services undertaken pursuant to this MOU.
- C. IT shall maintain accounts and records, including personnel, property and financial records, adequate to identify and account for all costs pertaining to this MOU and such other records as may be deemed necessary by REU to assure proper accounting for all project funds. These records shall be made available for audit purposes to state and federal authorities, or any authorized representative of City. IT shall retain such records for three (3) years after the expiration of this MOU, unless prior permission to destroy them is granted by REU.

SECTION 5. MOU INTERPRETATION, AMENDMENT AND WAIVER

- A. This document, including all exhibits, contains the entire agreement between the parties and supersedes whatever oral or written understanding each may have had prior to the execution of this MOU. This MOU shall not be altered, amended or

modified except by a writing signed by REU and IT and duly authorized by the City Manager. No verbal agreement or conversation with any official, officer, agent or employee of City, either before, during or after the execution of this MOU, shall affect or modify any of the terms or conditions contained in this MOU.

- B. No covenant or condition to be performed by IT under this MOU can be waived except by the written consent of REU. Forbearance or indulgence by REU in any regard whatsoever shall not constitute a waiver of the covenant or condition in question.
- C. In the event of a conflict between the term and conditions of the body of this MOU and those of any exhibit or attachment hereto, the terms and conditions set forth in the body of this MOU proper shall prevail. In the event of a conflict between the terms and conditions of any two or more exhibits or attachments hereto, those prepared by REU shall prevail over those prepared by IT.

SECTION 6. SURVIVAL

The provisions set forth in Sections 3 through 5, inclusive, of this MOU shall survive termination of the MOU.

SECTION 7. COMPLIANCE WITH LAWS

IT shall comply with all applicable laws, ordinances and codes of federal, state and local governments.

SECTION 8. REPRESENTATIVES

- A. REU's representative for this MOU is the Redding Electric Director Daniel Beans, telephone number (530) 339-7350. All of IT's questions pertaining to this MOU shall be referred to the above-named person, or to the representative's designee.
- D. IT's representative for this MOU is Redding Information Technology Director Anthony Van Boekel, telephone number (530) 225-4070.
- E. The representatives set forth herein shall have authority to give all notices required herein.

SECTION 9. DATE OF MOU

The date of this MOU shall be the date it is signed by REU.

IN WITNESS WHEREOF, REU and IT have executed this MOU on the days and year set forth below:

**CITY OF REDDING,
A Division of a Municipal Corporation**

Dated: _____, 2019

By: Daniel Beans, Electric Utility Director

ATTEST:

APPROVED AS TO FORM:

**BARRY E. DeWALT
City Attorney**

PAMELA MIZE, City Clerk

By:

Information Technology Department

Dated: _____, 2019

**By: Anthony Van Boekel, Information
Technology Director**

Exhibit A

REU Technology Solutions Program

1. Introduction

A. Purpose

The purpose of the Redding Electric Utility (REU) Technology Solutions Program is to establish a framework for the electric utility to conduct an effective, coordinated program to prevent catastrophic impacts to its infrastructure from wildfire. This program is a significant component of the Redding Electric Utility Wildfire Mitigation Plan required by SB901. The Program aims to prevent the start of wildfires from utility operations as well as provide faster response in the event of a wildfire either caused by or threatening its electric utility assets located in and around the City of Redding.

B. Goals

- Prevent electric utility-caused wildfires.
- Reduce the time for first responders to report, respond to, and engage in emergencies that threaten grid infrastructure and other REU facilities.
- Increase technology use and reliability in order to promote interdepartmental coordination.

C. Objectives

The Program's primary objectives are to:

- Identify hazards that pose a potential threat of damaging wildfires that may reasonably be likely to affect REU facilities.
- Prioritize interdepartmental communication through radios.
- Quickly identify possible fire risks and choreograph proper response routes.
- Decrease recovery time after a fire occurs.
- Increase accuracy of fire investigation results.
- Utilize cameras to identify possible threats that are naturally occurring or human caused.
- Track progress and location of employees to ensure the safety and effectiveness of positioning.

2. Strategy/Scope of Work

A. REU will coordinate with COR Information Technology (IT) Department to fund the purchase and maintenance of the following technology:

- Fixed and Mobile Communication Platform
- Automatic Vehicle Location (AVL)
- IQ FireWatch
- Aerial Imagery

Exhibit A
REU Technology Solutions Program

B. City of Redding IT Department to procure and implement technology deemed necessary as well as provide staff and requisite training to operate the following technology:

- Radio System: The City IT Department will design, purchase, and implement the infrastructure and equipment necessary to create a stable radio system based within City Limits. This system will have the capacity to expand to all City Divisions that express a need for radio use.
- Radios: The City IT Department will determine the appropriate design and functionality of radios and order the amount necessary to outfit REU, RPD, and RFD.
- AVL: The City IT Department will design, implement, and maintain the necessary programs and technology to expand AVL services to all vehicles in REU.
- IQ FireWatch: The City IT Department will purchase, implement, and maintain the technology and equipment required to utilize the IQ FireWatch system.
- Aerial Imagery: The City IT Department will aid in the city-wide aerial orthophotography every two (2) years and assist in its inclusion in the City's GIS maps.

Exhibit B
REU Technology Solutions Program
Cost Estimates

1. Fixed and Mobile Communication Platform
 - Master Site Controller
 - Two RF sites
 - Backhaul Network
 - SHASCOM Console site
 - Subscribers (Radios) for RFD, RPD, REU and the EOC
 - External Services
 - Radio Management
 - Key Management Facilities
 - Technical Training
 - Mobile Command Center Unit
 - Total cost is not to exceed \$8,820,000

2. Automatic Vehicle Location (AVL)
 - AVL coverage for all vehicles in REU
 - Total cost is not to exceed \$60,000

3. IQ FireWatch
 - Triple Optical sensing unit
 - Pan/tilt with weather housing
 - Switchbox and cabling to head unit
 - Control unit with remote control and Watchdog function
 - Ethernet switch
 - Power supply with surge protection and EMI filter
 - Control and detection software including self-diagnostics
 - Detection units
 - Construction of additional viewing towers
 - Integration/Connection to Public Services/Emergency Responders (Fire and Forestry Service)
 - Training and calibration labor
 - Permitting fees
 - Total cost is not to exceed \$1,800,000

4. Aerial Imagery
 - Provides orthophotography to the GIS division for mapping
 - High-resolution imagery
 - Total cost is not to exceed \$50,000 every two (2) years

TECHNOLOGY	TOTAL COST	GENERAL FUND COST	REU COST
Unmanned Aerial Vehicles			
UAV (Matrice 210)	\$ 175,000		\$ 175,000
UAV (Mavic 2 Dual)	\$ 15,000		\$ 15,000
Annual ongoing maintenance and training	\$ 20,000		\$ 20,000
Insight RT System w/Road Case	\$ 15,000		\$ 15,000
Yearly Power Line Inspection	\$ 5,000		\$ 5,000
<i>*RPD will provide assistance to REU and RFD</i>	\$ 230,000		\$ 230,000
Cameras			
Fixed Cameras (40) with Live Feed	\$ 800,000		\$ 800,000
Laser Scanner	\$ 85,500		\$ 85,500
Scanner Equipment and Warranties	\$ 27,500		\$ 27,500
Fuji File Mirrorless Camera Forensic Bundle	\$ 5,000		\$ 5,000
Ultralight ALS Complete Turbo Kit	\$ 6,000		\$ 6,000
Intelligence Led Policing	\$ 35,000		\$ 35,000
IQ FireWatch	\$ 1,800,000		\$ 1,800,000
<i>*For use by REU, RFD, and RPD</i>	\$ 2,759,000		\$ 2,759,000
Aerial Imagery			
Orthophotography every two years	\$ 50,000		\$ 50,000
Fixed and Mobile Communication Platform			
Master Site Controller	\$ 8,220,000	\$ 3,407,000	\$ 4,813,000
- Two RF Sites			
- IP Based Backhaul Network			
- SHASCOM Console Site			
- Subscribers (Radios) for RFD, RPD, REU, and EOC			
- External Services			
- Radio Management			
- Key Management Facilities			
- Technical Training			
- Contingency Funding			
- Backup Subscribers for Major Events (20)			
Mobile Command Center Unit	\$ 550,000		\$ 550,000
- Maintenance Performed by IT	\$ 50,000		\$ 50,000
<i>*Subscribers provided to REU, RFD, and RPD</i>	\$ 8,820,000	\$ 3,407,000	\$ 5,413,000
Automatic Vehicle Location (AVL)			
Additional module to ESRI Contract	\$ 7,000		\$ 7,000
Professional Services for Installation	\$ 20,000		\$ 20,000
Computer Hardware/Storage	\$ 23,000		\$ 23,000
Contingency Funding	\$ 10,000		\$ 10,000
<i>*Installed on REU, RFD, and RPD vehicles</i>	\$ 60,000		\$ 60,000
TOTALS	\$ 11,919,000	\$ 3,407,000	\$ 8,512,000

Ongoing costs for all technologies of approximately \$120,000 will be primarily funded by the City's IT Department. Staff anticipates this to be partially offset by reduced maintenance due to the replacement of aging infrastructure.

APPENDIX F

SYSTEM OPERATING PROCEDURE SOP-35 OPERATING DURING HIGH FIRE THREAT CONDITIONS (PUBLIC VERSION)

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Procedure No: SOP-35	Version: 5	Approval Date: 8/23/2021	System Operating Procedure (Public Version)
Effective Date: 08/27/2021	Reviewed On: 08/27/2021		
Document Owner: Electric Manager - Engineering & Operations			

REDDING ELECTRIC UTILITY

Power Operations Division

System Operating Procedure SOP-35 Operating During High Fire Threat Conditions



Reviewed By:
**Senior System Operator - Transmission & Distribution,
Assistant Director - Utility Operations**

Approved By: **Electric Manager - Engineering & Operations**

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1. Purpose

The purpose of this procedure is to formalize and provide applicable REU employees with the information necessary to understand which procedures will be applied and what work may be accomplished during **high fire threat conditions**. These periods would include Fire Weather Watches and Red Flag Warnings as issued by the National Weather Service.

2. Applicability

All REU Electric Utility System Operators-Transmission & Distribution (EUSO-T&D), Electric Utility Assistant System Operators-Transmission & Distribution (EUASO-T&D), Electric Manager-Line, Electric Program Supervisors-Line, Electric Manager-Generation, Electric Program Supervisors-Generation, and all Qualified Electrical Workers.

3. Definitions

- 3.1. Fire Weather Watch (FWW): A FWW is typically issued to alert fire and land management agencies to the possibility that RFW conditions may generally exist within the next 12 to 48 hours in advance of the expected conditions, but can be issued up to 72 hours in advance if the NWS agency is reasonably confident. That watch then remains in effect until it expires, is canceled, or upgraded to a RFW.
- 3.2. Red Flag Warning (RFW): A RFW means warm temperatures, very low humidity, and stronger winds are expected to combine to produce an increased risk of fire danger. This informs affected parties and agencies that conditions are ideal for wildland fire combustion, and rapid spread. To the public, a RFW means high fire danger with increased probability of a quickly spreading vegetation fire in the area generally within the next 24 hours.
- 3.3. Automatic Circuit Reclosers (ACR): ACR's, or reclosers, in electric power distribution, are a class of switchgear which is designed for use on overhead electricity distribution networks to detect and interrupt momentary faults. If a line or circuit trips because of an event, the automatic recloser opens, deenergizing the line or circuit. After a preset time, the device closes again, which reenergizes the line or circuit. If the condition that caused the event is still present, the device opens again. This sequence is repeated a predetermined number of times until the condition has cleared or the device locks out.
- 3.4. Tier 1: Tier 1 of the CPUC Fire-Threat Map delineates the designation of the U.S. Forest Service and CALFIRE joint map of Tree Mortality High Hazard Zones
- 3.5. Tier 2: Tier 2 of the CPUC Fire-Threat Map delineates where there is an elevated risk for utility-associated wildfires
- 3.6. Tier 3: Tier 3 of the CPUC Fire-Threat Map delineates where there is an extreme risk for utility associated wildfires
- 3.7. Incident Command Structure (ICS): The ICS will be utilized by REU during emergency situations to delineate and delegate the various roles, responsibilities and main focus by employee position under an assumption of command approach.

- 3.8. Power Control Center (PCC): The PCC is the location of the E/U Distribution System Operators and shall serve as REU's Department Operations Center during an Alert Level 3 event.

4. Communication

- 4.1. All communication associated with Red Flag Warning events shall be in accordance with SOP-024 "REU Notification Plan"

- 4.2. Refer to SOP-24 for the Notice Generator Contact List for RFW events.

5. National Weather Service Alert Issuances

- 5.1. When the NWS issues a weather alert, a corresponding email is sent to the PCC's email inbox ([REDACTED]). The EUSO-T&D on duty shall then note the type, time, and details of the issuance in the Distribution Log and then notify the Fire Weather Group (Ref SOP-24 "REU Notification Plan") of the alert via that group's selection in the PCC Notice Generator. Should the NWS issuance later be cancelled or modified in any way of time, date, or severity, this shall also be noted in the Distribution Log and a subsequent notice shall be sent to the Fire Weather Group.

6. Reclosers

- 6.1. During periods in which the NWS has issued a RFW or at REU Management Discretion, the EUSO-T&D shall disable (cut-out) the reclosers (ACRs) for the circuits designated on the Tier 2/Tier 3 Affected Circuit List (see Attachment 2). The reclosers shall be cut-out at a time commensurate with the start time of the RFW issuance and shall be re-enable (cut-in) at the termination of the RFW event.

- 6.1.1. The EUSO-T&D shall disable the reclosers via SCADA by the following steps: The SCADA has a page option (list it) that contains the 12kV and 115kV circuits that need to have reclosing disabled when a RFW is issued. To access the page, use the "Red Flag" shortcut at the bottom of the "Circuits" page. When using the group command you use the "Execute" command, regardless if you are disabling or enabling reclosers; the command script toggles the position of all reclosers on that page. Once pressed, the Execute command turns on the script to complete the command which takes 60 to 90 seconds to execute. Please be patient, it should start about 10 seconds after the top of the minute.

- 6.1.2. If you place a control inhibit tag on a recloser that is on the list, the script will not operate that recloser. It is Distribution's practice to place control inhibit tags on reclosers where a non-test has been issued. If you are switching, be aware of the potential impacts of transitioning out of RFW issuance procedure, you may need to add additional control inhibit tags to prevent unintended operations

- 6.1.3. The EUSO-T&D shall re-enable the reclosers, via SCADA, following the termination/cancellation of a RFW issuance by repeating the steps above, including reviewing the circuit reclosers for any applicable control inhibit tags.

6.1.4. Refer to SOP-21 *Circuit Switching Guidelines* for the general steps in Operating Under a Red Flag Warning.

7. Allowable Work Designations

- 7.1. Allowable work to be accomplished during a FWW or RFW event is dependent upon the Tier level (Tiers 1-3) the affected circuit, device, or equipment resides in. Each work type, Tier level, NWS issuance, and affected work group has allowable work that they may or may not perform during these events along with any type of additional restriction that may be placed upon that work as designated by the Allowable Work Matrix for NWS Alerts (Attachment 3).
- 7.2. The Redding Electric Scheduled Power Outage form (Attachment 4) allows for work in Tier 2 and Tier 3 areas, while under RFW issuances, **provided** that an exception is written by the requestor of the outage and the exception is signed (pre-approved) by either the Assistant Director of Utility Operations or the Line Manager for safety (this is work that can then be done regardless of weather conditions). An example of this might be a pole replacement in a Tier 3 zone but which is in an area, like a parking lot, that is completely void of vegetation and not subject to fire threat conditions.

8. SOP-200 Alert Level

- 8.1. Whenever an RFW event is announced for the Redding area, an SOP-200 Alert Level 1 shall be implemented by the REU Public Information Officer.
- 8.2. During an RFW where reclosers have been disabled the restoration process is usually more involved and takes considerably longer to identify the cause. Under the following conditions, a qualified representative from Operations management, typically the Line Manager or Supervisors, shall travel to the field and assist the assessment & restoration process by coordinating Troublemens, crew needs, and communication updates. This management representative shall be designated as the on-scene Incident Commander.
 - 8.2.1. Full circuit outage, after business hours, where recloser logic has been disabled.
 - 8.2.2. Multiple partial circuit outages, after business hours, where one troubleman is on duty.
 - 8.2.3. A fire has been identified near the city limits threatening REU infrastructure.
 - 8.2.4. A major Power Plant Outage has occurred.
 - 8.2.5. A Restraint has been placed on the REU transmission system.
- 8.3. Upon assessment and confirmation of events listed in Section 7.2 (or similar events) the REU Public Information Officer shall issue an SOP-200 Alert Level 2 or 3 as determined by the Incident Commander.
 - 8.3.1. The Incident Commander shall brief the REU Emergency Operations Team and request additional assistance as required.
 - 8.3.2. Should the media be at the scene, the Incident Commander should brief the media when an official statement is requested from REU.

9. Review and Updating Requirements

This procedure will be reviewed annually and may be updated, as necessary, at any time.

10. Training

- 10.1. This document shall be reviewed at least annually by all applicable REU personnel.
- 10.2. This subject will be covered in annual Emergency Operation Procedural training and will be referenced in both the REU Wildfire Mitigation Plan as well as SOP-200 Emergency Operations Program.

11. Revision History

Removed for Public Version.

12. Attachments:

ATTACHMENT 1: TIER 2/TIER 3 AFFECTED CIRCUIT LIST

During Red Flag Warnings or at REU Management Discretion, disable reclosing capabilities on the following 12kV circuits. Also disable the 115kV reclosers on lines that cross Tier 2 & 3 areas where the below 12kV reclosers are cut-out.

Substation	Tier 2 or 3 Circuit
Airport	1301
Airport	1302
Airport	1303
Airport	2701
Airport	2702
Airport	2703
Airport	2704
Beltline	1101
Beltline	1102
Beltline	1103
Beltline	1104
College View	2901
College View	2902
East Redding	1501
East Redding	1504
Eureka Way	1001
Eureka Way	1002
Eureka Way	1003
Eureka Way	1004
Moore	1602
Moore	2603
Moore	2604
Oregon	2201
Sulphur Creek	2301
Sulphur Creek	2302
Sulphur Creek	2303
Sulphur Creek	2304
Sulphur Creek	2801
Sulphur Creek	2802
Sulphur Creek	2803
Sulphur Creek	2804
Texas Springs	1401
Texas Springs	1402
Texas Springs	1403
Texas Springs	1404
Waldon	2102
Waldon	2104
Revision Date	08/23/2021

**System Operating Procedure SOP-35
Operating During High Fire Threat Conditions**

Version 5

ATTACHMENT 2: ALLOWABLE WORK MATRIX FOR NWS ALERTS

Crew Work To Be Accomplished in Tiers 1, 2, 3	Normal	NWS Issued Conditions		Comment
		Fire Weather Watch (FWW)	Red Flag Warning (RFW)	
Corresponding Alert Level (Per SOP-200)	0	1	2	1
Fire crew clearing work T2/T3	Yes	Yes w/ water tank	Modified	2
Emergency repair work T1	Yes	Yes	Yes w/ water tank	
Emergency repair work T2/T3	Yes	Yes w/ water tank	Yes w/ water tank	
Normal scheduled work T1	Yes	Yes	Yes w/ water tank	
Normal scheduled work (Energized OH) T2/T3	Yes	Yes w/ water tank	No	
Normal scheduled work (Energized UG) T2/T3	Yes	Yes w/ water tank	No	
Normal scheduled work (De-energized OH) T2/T3	Yes	Yes w/ water tank	No	3
Normal scheduled (De-energized UG) T2/T3	Yes	Yes w/ water tank	No	3
Scheduled OT work T1	Yes	Yes	Yes w/ water tank	
Scheduled OT work T2/T3	Yes	Yes w/ water tank	No	3
Inspections/Patrols T1-3	Yes	Yes	Yes	3
RPP Generation/DOT Pipeline Work	Yes	Time Dependent	No Touch	
Tree Crew Work T1	Yes	Yes	Yes w/ water tank	
Tree Crew Work T2/T3	Yes	Yes w/ water tank	No	
RPP Generation/DOT Pipeline Work	Yes	Time Dependent	No Touch	
Active Reclosers on all 115kV circuits	Yes	Yes	No (Reclosers Cut Out)	
Active Reclosers on T2/T3 12kV circuits	Yes	Yes	No (Reclosers Cut Out)	
Active Reclosers on T1 12kV circuits	Yes	Yes	Yes	
Back-Up Troubleman on notice	No	Yes	Yes	
Troubleman staffing 12pm-5am	No	No	No	4
Comments				
1-For Alert Level 3 (Active Emergency) Crews would be responding to work as directed through the ICS				
2-Modified may include shifting hours, tool maintenance, brush dragging, patrol for new prioritizing, etc.				
3-Work may be done w/ water tank if the RFW exception is pre-approved by the Assistant Director of Utility Operations or the Line Manager for safety (work that can be done regardless of weather conditions). Requests for approval to be submitted on the Redding Electric Utility Scheduled Overtime Work Form				
4-FUTURE POSSIBILITY: If no Troubleman is available a crew may be brought in during RFW conditions to help patrol & inspect as needed				

ATTACHMENT 3 – Redding Electric Utility Scheduled Overtime Work Form

Removed for Public Version.

APPENDIX G

REU RESPONSE TO WILDFIRE SAFETY ADVISORY BOARD'S 2021 GUIDANCE ADVISORY OPINION

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REDDING ELECTRIC UTILITY WILDFIRE MITIGATION PLAN 2021 INFORMATIONAL RESPONSE

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

May 18, 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. Redding Electric Utility (REU) provides this document to the WSAB in order to respond to each of the recommendations included in the 2021 WSAB Guidance Advisory Opinion. REU will provide a narrative response and/or a cross reference to the location in REU’s Wildfire Mitigation Plan (WMP) where the topic is addressed. Where the recommendation is not applicable to REU, the response will provide a brief description supporting this conclusion.

II. CONTEXT SETTING INFORMATION

The WSAB requested that Publicly Owned Utilities (POUs) provide an informational table to assist the Staff and Board members in understanding the unique characteristics of each POU.

Table 1: Context-Setting Information

Utility Name	Redding Electric Utility	
Service Territory Size	61 square miles	
Owned Assets	X Transmission X Distribution X Generation	
Number of Customers Served	44,358 customer accounts	
Population Within Service Territory	92,000 people	
Customer Class Makeup	<i>Number of Accounts</i>	<i>Share of Total Load (MWh)</i>
	86 % Residential; 2 % Government; - % Agricultural; - % Small/Medium Business; 12 % Commercial/Industrial	52 % Residential; 8.4 % Government; - % Agricultural; - % Small/Medium Business; 39.6 % Commercial/Industrial
Service Territory Location/Topography	- % Agriculture 9.43 % Barren/Other - % Conifer Forest - % Conifer Woodland - % Desert - % Hardwood Forest - % Hardwood Woodland - % Herbaceous - % Shrub 75.4% Urban 2.6% Water	

Service Territory Wildland Urban Interface¹ (based on total area)	38% Wildland Urban Interface; 24% Wildland Urban Intermix
Percent of Service Territory in CPUC High Fire Threat Districts (based on total area)	Tier 2: 33.5% Tier 3: 12.5% The CPUC High Fire Threat Map is included in Appendix A of REU's Wildfire Mitigation Plan.
Prevailing Wind Directions & Speeds by Season	Prevailing winds were taken from the Shasta Trinity Strategic Fire Plan Battalion 4 Map. The City of Redding is located within this Fire Plan area. The Plan states the following: gradient winds are generally out of the south/southwest at 5 to 12 mph. Occasional light east winds occur in the morning then shift to more south/southwest flow in the afternoon and can reach speeds of 15 to 20 mph, generally up slope and up canyon. North wind events occur periodically throughout the fire season and can reach in the 10 to 30 mph range with associated higher gusts. These winds frequently switch to the northeast and strengthen after dark, maintaining low relative humidity, often in the single digits throughout a 24-hour period.
Miles of Owned Lines Underground and/or Overhead	Overhead Dist.: 527.1 miles within service territory/ 27.6 miles outside of service territory Overhead Trans.: 50.9 miles within service territory/ 20.7 miles outside of territory Underground Dist.: 1,051.21 miles Underground Trans.: N/A * Miles of owned lines reported above are lines 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: 24.55% Tier 3: 7.25%
	<i>Overhead Transmission Lines as % of Total Transmission System (Inside and Outside Service Territory)</i>
	Tier 2: 44.8% Tier 3: 10.95%
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

¹ 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.

Has developed protocols to pre-emptively shut off electricity in response to elevated wildfire risks?	<input checked="" type="checkbox"/> Yes <input 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 If yes, then provide the following data for calendar year 2020: <i>Number of shut-off events: N/A</i> <i>Customer Accounts that lost service for >10 minutes: N/A</i> <i>For prior response, average duration before service restored: N/A</i>

III. CROSS REFERENCE TO STATUTORY REQUIREMENTS

The WSAB requested a clear roadmap as to where each statutory requirement is addressed within the utility’s WMP.

Table 2: Cross References to Statutory Requirements

Requirement	Statutory Language	Location in REU’s WMP
Persons Responsible	PUC § 8387(b)(2)(A): An accounting of the responsibilities of persons responsible for executing the plan.	Section: 3 Pages: 7-8
Objectives of the Plan	PUC § 8387(b)(2)(B): The objectives of the wildfire mitigation plan.	Section: 2 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: 2 Pages: 4-6
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: 8 Pages: 24
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: 8 Pages: 24-25
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: 5 Page: 17

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: 5 Pages: 16-17
Vegetation Management	PUC § 8387(b)(2)(H): Plans for vegetation management.	Section: 5 Pages: 13-14
Inspections	PUC § 8387(b)(2)(I): Plans for inspections of the local publicly owned electric utility's or electrical cooperative's electrical infrastructure.	Section: 5 Page: 14-15
Prioritization of Wildfire Risks	<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>	Section: 4 Pages: 10-12
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: 4 Page: 11-12
Enterprisewide Risks	PUC § 8387(b)(2)(L): A methodology for identifying and presenting enterprisewide safety risk and wildfire-related risk.	Section: 4 Page: 10
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:7 Pages: 22-23
Monitor and Audit	<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>	Section: 8 Pages: 24-25

	(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: 9 Page: 26

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.

REU 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.

REU Response: REU serves under the purview of the elected members of the Redding City Council. The first program in REU's WMP, the Wildfire Prevention and Improved Response Program, was approved by the Council on May 7, 2019. Three additional programs, the Technology Solutions Program, the Distribution 10-year Capital Improvement Program, and the Emergency Operations Program were approved on December 3, 2019 along with the plan as a whole, the auditor's report, and a Budget Resolution to fund the SB901 Technology Solutions Program. On December 1, 2020, the Council approved REU's 2020 Monitoring and Auditing Report as well as the revised WMP.

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.

REU Response: The Redding Electric Utility Wildfire Mitigation Plan and Independent Report can be located on the City of Redding website at: <https://www.cityofredding.org/departments/redding-electric-utility/reu-pages/wildfire-plan> . For a timeline of present and future improvement plans please visit REU's 2020 Monitoring & Auditing Annual Report on Wildfire Mitigation posted on the above link and dated 12-1-2020.

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.

REU 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.

REU Response: REU customers are unlikely to be directly impacted by an IOU PSPS event because Redding is not connected to the IOU in Northern California. All customers outside of the City of Redding are served by an IOU and have experienced multiple PSPS events.

Customer behavior can cause additional fire threats to the area. Additionally, many citizens in the surrounding areas often respond to PSPS events by utilizing our electric services, either by staying at hotels, with family members, or utilizing recreational sites within the city limits.

REU's customers are unlikely to be directly impacted by an IOU PSPS event because REU is located in the Balancing Area of Northern California (BANC) and not in the CAISO. Redding is directly connected to the Western Area Power Administration (WAPA) which is also located in BANC. Additionally, REU has a 183MW generation plant located within its service territory.

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.

***REU Response:** REU follows an Emergency Operations Plan to communicate to the customers through a variety of methods. These methods include press releases, social media (Twitter, Facebook, Instagram), website and local news and radio interviews. Maps from the National Weather Service related to Red Flag Warnings are posted online for all customers to view and specific communications are in place with the Shasta County Health and Human Services for customers with critical needs.*

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.

***REU Response:** REU's approach to grid hardening is discussed in Appendix D of REU's WMP.*

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?

REU Response: REU performs a circuit-by-circuit analysis as part of the SB699 Physical Security Plan. This procedure includes identifying which substation serves each essential facility and ensuring the facility has access to backup power.
• Does the POU assess system hardening measures that could be installed to prevent PSPS for those facilities?
REU Response: REU does not implement public safety power shutoffs. However, we do assess system hardening measures to prevent turning off re-closing during Red Flag Warning days.
• In what way does the POU prepare these facilities for a PSPS or another wildfire related de-energization event?
REU Response: REU is implementing a Wildfire Mitigation Plan which includes system hardening.
• 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?
REU Response: Yes, these facilities are in the jurisdiction of City of Redding Public Works. As we harden our facilities, we are coordinating with them.
• Are pump stations self-contained or have some level of fire protection? Is the supply to sewage treatment plants hardened?
REU Response: These facilities in the jurisdiction of City of Redding Public Works. As we harden our facilities, we are coordinating with them.
• Is supplemental generation available such as backup batteries or backup power facilities?
REU Response: Yes, besides the Redding Power Plant, most water and wastewater facilities have backup power for critical processes.
• Are the majority installed by the customers themselves or the utility?
REU Response: Installed by customers.
• Can the utility open and close taps? Can the utility back-feed?
REU Response: Yes, manually.
• Are there wildfire related circumstances wherein either of these tactics would be useful?
REU Response: Yes, in advance of the Carr Fire, REU switched all load from the Eureka Way Substation to others out of harms way.
• Can the utility sectionalize in a localized fashion?
REU Response: Yes, REU has extensive field switching capability to feed load from many circuits and substations.

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.

REU Response: REU does an annual patrol of all overhead powerlines. Inspections include searching for deteriorated poles, crossarms and bare connectors, tree hazards, and

various other items that require immediate repairs to be made in order to mitigate fires or outages within REU's system. Once items are identified, field tags are created for line or arborist crews to address issues and take corrective action to mitigate the problem to prevent fires or outages. During Red Flag Warnings, REU operations patrols areas as needed. If a fire has impacted the infrastructure inspections are immediately conducted once Fire Command permits access to assess damage and coordinate restoration.

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

REU Response: REU collaborates with varying agencies throughout the north state and California. POU's such as the City of Shasta Lake work closely with REU to identify risks that could lead to wildfires. In addition, REU works closely with the Redding Fire Department, CalFIRE, and surrounding municipalities to ensure risks to infrastructure are identified. Finally, REU is a member of several agencies, such as California Municipal Utility Association (CMUA) and Northern California Power Agency (NCPA) to communicate with other POU's and cities across the north state.

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.

REU Response: REU's assessment of wildfire risks is discussed in Section 4 of REU's WMP. REU designs and constructs its electric facilities to meet or exceed the relevant federal, state, or industry standards. REU treats CPUC General Order (GO) 95 as a key industry standard for design and construction standards for overhead electrical facilities and, as such, meets or exceeds all applicable standards in GO 95. Additionally, REU monitors and follows as appropriate the National Electric Safety Code.

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

REU Response: Areas of dense brush and annual grasses are common and result in high fire danger and significant fires especially during north wind events. These conditions combine to create extreme fire danger, with the city facing one of the highest wildfire threats in the state. The risk of catastrophic wildfire in the area rises as the recent trend of drought conditions increases.

<ul style="list-style-type: none"> • How will the utility address risks associated with facilities requiring power that about a Tier 2 or Tier 3 HFTD?
<p>REU Response: <i>New facilities are almost always required to be installed underground depending on the existing infrastructure. Additionally, existing overhead facilities are, at times, required to be relocated underground as part of proposed developments. Development size will typically dictate the requirement of undergrounding existing facilities, but at a minimum, infrastructure is to be installed to accommodate any future plans for undergrounding.</i></p>
<ul style="list-style-type: none"> • How does the utility assess its risks associated with system design and construction?
<p>REU Response: <i>REU’s Engineers and Planners visit and inspect new constructions sites within noted Tier 2 and Tier 3 areas and have quarterly meetings to discuss any needed changes to design and construction standards and/or equipment and materials in an effort to mitigate any future fire risk. Also, on noted Red Flag Warning days, we refrain from any utility work within Tier 2 and Tier 3 areas. If Utility work is required, we utilize water tenders to mitigate fire risk at the construction site.</i></p>
<ul style="list-style-type: none"> • 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?
<p>REU Response: <i>In Tier 2 and Tier 3, REU currently utilizes materials approved for construction by Cal-Fire.</i></p>

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.

REU Response: *REU is installing several programs utilizing technology to enhance situational awareness as noted in Appendix E of the WMP Technology Solutions Program. Increasing situational awareness while shortening the response time of public safety during a wildfire were key in the decision-making process for REU to install situational awareness technology. By working closely with the Redding Police and Fire Departments, REU is able to utilize those agency’s expertise to reduce or respond to a catastrophic wildfire.*

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.

REU Response: REU’s vegetation management program is discussed in Appendix B of REU’s WMP. The purpose of the REU Wildfire Prevention and Improved Response Program is to establish a framework for the electric utility to conduct an effective, coordinated program to prevent catastrophic impacts to its infrastructure from wildfire.

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

<ul style="list-style-type: none"> Describe the reasoning behind each treatment plan and the ecological impact of the treatment options chosen.
<p>REU Response: REU’s line clearance and vegetation management involves removing and trimming trees that are in close proximity to utility lines or infrastructure. The vegetation that is targeted for removal is closely monitored and treated to reduce the potential damage utility infrastructure.</p>
<ul style="list-style-type: none"> Describe how vegetation management in the HFTD or Fire Threat Zones differs from other areas, including within private property and urban landscaping.
<p>REU Response: The State of California requires higher clearance areas for all transmission and distribution lines in high fire threat districts versus urban landscaping. REU works directly with private property owners on vegetation management in high fire threat zones to lower fire risks.</p>
<ul style="list-style-type: none"> Describe any enhanced vegetation management that goes beyond the minimum G.O. 95 standard.
<p>REU Response: REU funds staff and equipment for vegetation management at the Redding Fire Department and Redding Parks Department to clear brush and trees away from poles, substations, REU’s powerplant, and various high fire threat areas in the Redding community. Additionally, the Parks staff conducts weed abatement around power poles in high threat areas. Power poles in high risk areas are also treated with fire retardant material during the fire season. REU utilizes goats in areas near power lines that are often difficult for personnel to reach.</p>
<ul style="list-style-type: none"> A list of native and non-native species in the POU’s Service Territory and describe how treatment methods vary.
<p>REU Response: REU treats both native and non-native trees in our service area. The following trees are vigorous in growth and are treated regularly: oak, ailanthus altissima, and poison oak.</p>
<ul style="list-style-type: none"> Describe how the POU tracks new vegetation growth that occurs in areas that has previously been cleared or treated.

REU Response: All Tier 2 and Tier 3 high fire threat districts are patrolled by personnel to determine the growth from the previous year's vegetation management. Additionally, LIDAR is being utilized to patrol all powerlines for vegetation near REU's distribution and transmission lines.

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).

REU Response: REU utilizes the expertise provided through the National Oceanic and Atmospheric Administration's (NOAA) weather notification program. Red Flag Warnings (RFW) are an example of key information provided during the fire season. Upon receiving these instrumental Red Flag Warning's, the utility activates its Emergency Operations Program as noted in the WMP, Appendix C.

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

REU Response: REU has worked closely with the Redding Fire and Parks Departments to hire additional staff to conduct vegetation management in addition to the team of qualified arborists for line clearance. By utilizing LIDAR technology REU has been able to target the highest risk areas within the community that may impact REU's lines and/or infrastructure.