

CITY OF SANTA CLARA-SVP WILDFIRE MITIGATION PLAN 2021 INFORMATIONAL RESPONSE

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

April 29, 2021

I. PURPOSE OF THIS 2021 INFORMATIONAL RESPONSE

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

II. CONTEXT SETTING INFORMATION

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

Table 1: Context-Setting Information

Utility Name	SVP	
Service Territory Size	[__19.5__] square miles	
Owned Assets	x <input type="checkbox"/> Transmission x <input type="checkbox"/> Distribution x <input type="checkbox"/> Generation	
Number of Customers Served	[__57,988__] customer accounts	
Population Within Service Territory	[__132,925__] people	
Customer Class Makeup	<i>Number of Accounts</i>	<i>Share of Total Load (MWh)</i>
	[__85__]% Residential; [__1__]% Government; [__0__]% Agricultural; [__12__]% Small/Medium Business; [__3__]% Commercial/Industrial	[__7__]% Residential; [__0__]% Government; [__0__]% Agricultural; [__2__]% Small/Medium Business; [__91__]% Commercial/Industrial
Service Territory Location/Topography¹	[__0__]% Agriculture [__0__]% Barren/Other [__0__]% Conifer Forest [__0__]% Conifer Woodland [__0__]% Desert [__0__]% Hardwood Forest [__0__]% Hardwood Woodland	

¹ This data shall be based on the California Department of Forestry and Fire Protection, California Multi-Source Vegetation Layer Map, depicting WHR13 Types (Wildlife Habitat Relationship classes grouped into 13 major land cover types) available at: <https://www.arcgis.com/home/item.html?id=b7ec5d68d8114b1fb2bfbf4665989eb3>.

	[_0_] % Herbaceous [_0_] % Shrub [_100_] % Urban [_0_] % Water
Service Territory Wildland Urban Interface² (based on total area)	[_0_] % Wildland Urban Interface; [_100_] % Wildland Urban Intermix;
Percent of Service Territory in CPUC High Fire Threat Districts (based on total area)	<input type="checkbox"/> Includes maps Tier 2: [_0_] % Tier 3: [_0_] %
Prevailing Wind Directions & Speeds by Season	<input type="checkbox"/> Includes maps [Spring – NW/9kts, Summer – NW/9kts, Fall – NW/8kts, Winter – SE/10kts] REF: Wind history map
Miles of Owned Lines Underground and/or Overhead	Overhead Dist.: [_187_] miles Overhead Trans.: [31] miles Underground Dist.: [_375_] miles Underground Trans.: [_5_] miles
	Explanatory Note 1 - Methodology for Measuring "Miles": [Circuit Miles]
	Explanatory Note 2 – Description of Unique Ownership Circumstances: [Two lines outside of the SVP service territory are maintained and operated by an IOU: 1. Grizzly-Bucks Creek. 3.4 miles, 100% owned by SVP. Data included in this table. 2. Castlerock-Lakeville. 4.8% owned by SVP]
	Explanatory Note 3 – Additional Relevant Context: [2.1% of lines are outside SVP service territory]
Percent of Owned Lines in CPUC High Fire Threat Districts	<i>Overhead Distribution Lines as % of Total Distribution System (Inside and Outside Service Territory)</i>
	Tier 2: [_0_] % Tier 3: [_0_] %
	<i>Overhead Transmission Lines as % of Total Transmission System (Inside and Outside Service Territory)</i>
	Tier 2: [_2_] % Tier 3: [_0_] %
	Explanatory Note 4 – Additional Relevant Context: [e.g., explain any difference from data reported in WMP due to different numerator used for this form]
Customers have ever lost service due to an IOU PSPS event?	<input type="checkbox"/> Yes <input type="checkbox"/> No

² This data shall be based on the definitions and maps maintained by the United States Department of Agriculture, as most recently assembled in *The 2010 Wildland-Urban Interface of the Conterminous United States*, available at https://www.fs.fed.us/nrs/pubs/rmap/rmap_nrs8.pdf.

Customers have ever been notified of a potential loss of service to due to a forecasted IOU PSPS event?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Has developed protocols to pre-emptively shut off electricity in response to elevated wildfire risks?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Has previously pre-emptively shut off electricity in response to elevated wildfire risk?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If yes, then provide the following data for calendar year 2020: <i>Number of shut-off events:</i> [<u> 1 </u>] -*event occurred outside of service territory and no customers were affected. <i>Customer Accounts that lost service for >10 minutes:</i> [<u> 0 </u>] <i>For prior response, average duration before service restored:</i> [<u> 24 _hrs_</u>]

III. CROSS REFERENCE TO STATUTORY REQUIREMENTS

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

Table 2: Cross References to Statutory Requirements

Requirement	Statutory Language	Location in WMP
Persons Responsible	PUC § 8387(b)(2)(A): An accounting of the responsibilities of persons responsible for executing the plan.	Section [IIIA] Page [4]
Objectives of the Plan	PUC § 8387(b)(2)(B): The objectives of the wildfire mitigation plan.	Section [II] Page: [3]
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 [IV] Page [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 [VII] Page [12/13]
Impact of Metrics	PUC § 8387(b)(2)(E): A discussion of how the application of previously identified metrics to previous wildfire mitigation plan performances has informed the wildfire mitigation plan.	Section [VII] Page [13]
Deenergization Protocols	PUC § 8387(b)(2)(F): Protocols for disabling reclosers and deenergizing portions of the electrical distribution system that	Section [V] Page [11/12]

	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.	
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.	Not Applicable
Vegetation Management	PUC § 8387(b)(2)(H): Plans for vegetation management.	Section [V] Page [9]
Inspections	PUC § 8387(b)(2)(I): Plans for inspections of the local publicly owned electric utility's or electrical cooperative's electrical infrastructure.	Section [V] Page [11]
Prioritization of Wildfire Risks	PUC § 8387(b)(2)(J): A list that identifies, describes, and prioritizes all wildfire risks, and drivers for those risks, throughout the local publicly owned electric utility's or electrical cooperative's service territory. The list shall include, but not be limited to, both of the following: (i) Risks and risk drivers associated with design, construction, operation, and maintenance of the local publicly owned electric utility's or electrical cooperative's equipment and facilities. (ii) Particular risks and risk drivers associated with topographic and climatological risk factors throughout the different parts of the local publicly owned electric utility's or electrical cooperative's service territory.	Section [IV] Page [6]
CPUC Fire Threat Map Adjustments	PUC § 8387(b)(2)(K): Identification of any geographic area in the local publicly owned electric utility's or electrical cooperative's service territory that is a higher wildfire threat than is identified in a commission fire threat map, and identification of where the commission should expand a high fire threat district based on new information or changes to the environment.	Section [IV] Page [7]
Enterprisewide Risks	PUC § 8387(b)(2)(L): A methodology for identifying and presenting enterprisewide safety risk and wildfire-related risk.	Section [IV] Page [7]
Restoration of Service	PUC § 8387(b)(2)(M): A statement of how the local publicly owned electric utility or electrical cooperative will restore service after a wildfire.	Section [VII] Page [12]
Monitor and Audit	PUC § 8387(b)(2)(N): A description of the processes and procedures the local publicly owned electric utility or electrical cooperative shall use to do all of the following (i) Monitor and audit the implementation of the wildfire mitigation plan.	Section [VII] Page [13]

	<p>(ii) Identify any deficiencies in the wildfire mitigation plan or its implementation, and correct those deficiencies.</p> <p>(iii) Monitor and audit the effectiveness of electrical line and equipment inspections, including inspections performed by contractors that are carried out under the plan, other applicable statutes, or commission rules.</p>	
Qualified Independent Evaluator	<p>PUC § 8387(c): The local publicly owned electric utility or electrical cooperative shall contract with a qualified independent evaluator with experience in assessing the safe operation of electrical infrastructure to review and assess the comprehensiveness of its wildfire mitigation plan. The independent evaluator shall issue a report that shall be made available on the Internet Web site of the local publicly owned electric utility or electrical cooperative, and shall present the report at a public meeting of the local publicly owned electric utility’s or electrical cooperative’s governing board.</p>	<p>Section [VIII] Page [15]</p>

IV. WSAB GUIDANCE ADVISORY OPINION RECOMMENDATIONS

The WSAB Guidance Advisory Opinion identifies 14 specific recommendations that POU’s are requested to address in their 2021 WMPs. As specified in Public Utilities Code § 8387(b)(1), each POU is required to perform a comprehensive revision to the POU’s WMP at least once every three years. Pursuant to this guidance, the POU’s will be updating their WMPs based on the direction of their local governing boards within this 3-year cycle. Because the WSAB’s recommendations have been provided after the initial WMP submission, the POU’s will have varying capacities to fully address each recommendation in their 2021 WMP. This Section IV restates each of the WSAB recommendations and provides an opportunity for each POU to do one or more of the following: (1) provide a narrative response to the recommendation; (2) provide a cross reference to where in the POU’s WMP this topic is addressed; (3) describe why the recommendation is not applicable to the POU; or (4) inform the WSAB of the POU’s intent to address the recommendation at the point of the POU’s next comprehensive revision, occurring in either the 2022 or 2023 WMP.

A. Plan Structure

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

SVP 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.

SVP Response: On October 9th, 2018, Silicon Valley Power presented Wildfire Threat Map to City Council during their normal meeting to bring awareness to Council Members of the issues for Santa Clara remote assets and this wildfire threat map was accepted by the City Council. Report to Council (RTC) 18-1127 was presented on the Consent Calendar.

On June 25th, 2019, Silicon Valley Power presented the first Wildfire Mitigation Plan to City Council during a public hearing. Council had the opportunity to ask question and provide comments to the plan. The plan was approved by City Council during this meeting. RTC 19-160 was presented and approved by Council during a Public hearing.

On June 9th, 2020, Silicon Valley Power presented an updated Wildfire Mitigation Plan to City Council, minor clarifications were presented in RTC 20-483 and the plan was accepted and filed by Council.

Funding for Wildfire Mitigation has been funded within our Tree Trimming contract. If additional work is required, additional contracts will be prepared and funded as necessary through City process and procedures.

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.

SVP Response: Silicon Valley Power has posted the past two Wildfire Mitigations plans on the City Website, which are available for public review. SVP has had the Wildfire Mitigation Plan reviewed by local fire agencies near the remote properties and their comments have been incorporated into the plan. Silicon Valley Power plans to have the Wildfire Mitigation Plan reviewed by a qualified Independent Auditor over the next year and this report will be posted on the City's website.

WSAB Recommendation #4: Develop, in collaboration with POU industry associations, WMP guidelines for future WMPs, understanding that it may take multiple cycles for POU's to integrate these recommendations into the WMPs.

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

B. Customer Impacts

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

SVP Response:

SVP's customers may be impacted by the PSPS events ordered by CAIOS/PG&E. The following provides responses to specific questions included in the WSAB's 2021 WSAB Guidance Advisory Opinion:

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

SVP Response: The SVP System Control Center has direct communication channels with the PG&E Grid Control Center at all times. The SVP Control Center in addition to having access to the PG&E PSPS Portal, is a subscriber to PSPS notifications from PG&E related to all SVP owned facilities. SVP management has a standing meeting with the PG&E account manager for SVP where any issues are discussed.

- Does the POU receive advance notification?

SVP Response: Yes

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

SVP Response: Transmission

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

SVP Response: Yes, there could be a rare case that a PSPS affects the transmission lines bringing power into the Bay Area. This could result in a forced reduction of SVP load as directed by the CAISO. As a pro-active measure, SVP has developed a communication plan in conjunction with the City. The plan is to inform the public of actions to take prior to a PSPS event. The plan also informs the public of actions to take if load curtailment happens within the City. Because messaging from PG&E targets the whole bay area, SVP must be pro-active with communications about when a PSPS happens in neighboring Cities and when it may affect us.

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

SVP Response: No

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

SVP Response: No

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

SVP Response: SVP may de-energize lines outside of the service area if conditions warrant.

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

SVP Response: No communication to customers is necessary as these lines tie SVP generation assets into the PG&E grid.

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

SVP Response: No.

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

SVP Response: As a department of the City of Santa Clara, SVP utilizes the available communication channels and infrastructure to deliver messaging to the community. Our websites and phone lines offer non-English speaker translation services. SVP coordinates with the City's Office of Emergency Services and the Public Safety department to receive notification of customers on their "at-risk" list, such as medical baseline customers. SVP keeps the confidential list for notification use only if a PSPS event would cause SVP to enact rolling blackouts due to a required load reduction from the CAISO. There is no direct wildfire or PSPS threat to the water and communication infrastructure unless PG&E's PSPS event causes a transmission restriction into the Bay Area.

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.

- 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?

SVP Response: SVP does perform a circuit-by-circuit analysis in preparation for potential impact by an IOU PSPS. This analysis is to ensure Critical Loads and High Priority Loads are protected from load shed. These loads include; Hospitals, Communication Centers and Community Resources Centers.

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

SVP Response: N/A

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

SVP Response: By ensuring that the distribution feeders that these facilities are connected to remain energized.

- 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?

SVP Response: Critical Water and Sewer facilities are High Priority Loads and are managed as described above.

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

SVP Response: Critical pumping stations for water and sewer within Santa Clara, have back-up generation.

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

SVP Response: Data Centers make up a large percentage of SVP load. These facilities are designed with back-up power supplies for large portions of their load. The City of Santa Clara has back-up power for critical water and sewer pumps, Emergency Dispatch and Utility Dispatch.

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

SVP Response: All customer back-up power supplies are provided by the customers.

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

SVP Response: No.

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

SVP Response: No.

- Can the utility sectionalize in a localized fashion?

SVP Response: Yes

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.

SVP Response: Coordinated with a contacted annual maintenance patrol utilizing Infrared and partial discharge detection technology, SVP performs a specific wildfire pre-season patrol annually. This patrol is performed on lines operated by SVP system operators. The objective is to identify any wildfire risks presented by vegetation or compromise of line equipment. If applicable, a list of recommendations is created for the observed risk and mitigation is prioritized and completed accordingly.

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

SVP Response: SVP is evaluating a project to contract a certified arborist to provide annual inspections, scope of work, and reports in line with CPUC regulations for SVP owned and operated facilities that are either in or bordering a High Fire Threat District (HFTD).

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.

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

SVP Response: No.

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

SVP Response: SVP has facilities that abut a Tier 2 HFTD. SVP Treats the facilities in these areas that are operated by SVP as if they were in the Tier 2 area.

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.

SVP Response: Context setting information is provided above.

Silicon Valley Power (SVP) relies on the information provided by other agencies including but not limited to; Northern California Geographic Area Coordination Center (ONCC), National Oceanic and Atmospheric Administration (NOAA) and PG&E Weather Data who are more ideally situated to provide up-to-date information for SVP to operate lines associated with HFTD areas

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.

SVP Response: SVP’s vegetation management practices is discussed in Section V.D of SVP’s WMP. SVP meets or exceeds the minimum industry standard vegetation management practices. For transmission-level facilities, SVP complies with NERC FAC-003-4, where applicable. For both transmission and distribution level facilities, SVP 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.

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).

SVP Response: The agencies that SVP relies on for situational awareness aggregately employ scientific experts in the areas of ecology, fire ecology, fire behavior, geology and meteorology.

The expertise of SVP staff managing contractors performing vegetation management is grounded in an extensive knowledge of Electric Utility Network construction, maintenance and operations. Staff have expertise in power system risk assessment and mitigation.

The SVP vegetation management program relies on the expertise, qualification and internal controls of the contractor(s) hired to ensure that their employees comply with OSHA regulations and MAD requirements. This expectation is written into the contracts entered into with vendors providing this service.

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

SVP Response: SVP is evaluating managing vegetation with Satellite/AI software.