From: Mckenzie, Rockeish
To: Energy Safety WSAB
Cc: Zewdu, Simon; Chua, Pjoy; Hirashima, Scott; Ballon, Czar; Hauser, Ruben L.; Williams, Jeffery A.; Bacon, John R.
Subject: LADWP Comments on WSAB Draft Guidance Advisory Opinion on POU 2022 WMPs
Date: Thursday, February 17, 2022 7:15:29 PM

Greetings Wildfire Safety Advisory Board,

The Los Angeles Department of Water and Power (LADWP) appreciates the positive feedback and recommendations from the Wildfire Safety Advisory Board (WSAB) on its Wildfire Mitigation Plan (WMP). LADWP recognizes the importance of reducing wildfire risks within its service territory and values the WSAB insights and opinions. LADWP anticipates that time will be needed beyond the proposed 2022 and 2023 milestones to fully evaluate a number of the WSAB's recommendations and make feasible improvements to LADWP's WMP and associated activities. Furthermore, LADWP is actively exploring enhancement to our wildfire mitigation activities and looks forward to frequent engagements with the WSAB.

LADWP hereby submits the specific comment below in response to the *WSAB Draft Guidance Advisory Opinion on POU 2022 WMPs.* LADWP looks forward to continued collaboration with the WSAB as we move together towards our common goal of minimizing wildfires across California.

Comments from LADWP		
Recommendation Section	**WSAB Guidance Advisory Opinion**	**LADWP Comment**
Section 1. Plan Structure, Staffing, and Evaluations **Part E. Independent Evaluations**	*"In future WMPs, and in particular for the upcoming comprehensive revisions, the Board recommends IEs perform a robust evaluation of the contents and substance of the POU's WMP, in comparison to relevant industry standards, and provides useful recommendations for wildfire mitigation Improvements where applicable."*	LADWP appreciates and recommends that the WSAB continue to provide valuable information sharing opportunities for POUs to learn from each other and industry experts. In accordance with PUC 8387, the independent evaluator's role is to "review and assess the comprehensiveness of [the POU's] wildfire mitigation plan" in order to ensure adherence to the statutory requirements. LADWP's expectation is that the independent evaluator will prescribe which/what wildfire mitigation measures are best for POUs and specifically to LADWP. It is equally important that the independent evaluation of POUs should not be compared to the independent evaluation of IOUs as POUs and IOUs have vastly different processes, procedures, and resources in managing their respective wildfire mitigation programs based on their respective risk profiles. For that reason, we believe the phrase "industry standards" is subjective and may be broadly interpreted and may not provide the optimal solution for a specific POU. LADWP recommends replacing the phrase "industry standards" on the WSAB Guidance Advisory Opinion with "industry standards that are relevant and applicable to the POU". An independent evaluator's review and comparison of industry standards that are applicable will help POUs and their governing boards to determine the appropriate, safe, and feasible wildfire mitigation practices based on the POU's specific risks, constraints, and opportunities.

Thank you,

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