



# Wildfire Mitigation Plan - 2022 Update



**ANAHEIM**  
PUBLIC UTILITIES



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**TABLE OF CONTENTS**

EXECUTIVE SUMMARY..... 3

SECTION 1- Introduction..... 6

    A. Introduction..... 6

    B. Overview and Objectives..... 8

SECTION 2 - Enterprise-wide Safety Risk Assessment..... 15

SECTION 3 - Dynamic Climate Change..... 15

SECTION 4 - Overview of Risks and Risk Drivers Related to Wildfires..... 16

SECTION 5 - Assessment of High Fire Threat in APU Electric Service Territory..... 19

SECTION 6 - Asset Inventory in High Fire Threat Zones..... 22

SECTION 7 - Overview of Preventative Strategies and Programs..... 23

SECTION 8 - Situational Awareness..... 24

SECTION 9 - Preventative Strategies to Build Resiliency..... 29

    A. Vegetation Management..... 29

    B. System Inspection and Maintenance..... 30

    C. Construction Standards..... 31

    D. Pole Loading and Wire Spacing..... 32

    E. Contact by Foreign Objects..... 33

    F. Undergrounding Power Lines..... 34

SECTION 10 - Operational Strategies to Reduce Risk of Fire Ignition..... 34

    A. System Patrols..... 34

    B. Circuit Reclosers..... 35

    C. Communication Network..... 35

    D. De-Energize Power Lines..... 35

    E. Summary of Operational Strategies..... 36

SECTION 11 - Customer Support in Emergencies..... 37

    A. Community Outreach..... 37

    B. Emergency Response..... 38

    C. Community Support..... 39

    D. Post Event Restoration Response..... 41

SECTION 12 - Workforce Training..... 41

SECTION 13 - Organization and Assignment Responsibilities..... 42

SECTION 14 - Metrics and Reporting..... 43

SECTION 15- Monitor and Auditing..... 51

## Executive Summary - 2022

The City of Anaheim (Anaheim) Public Utilities Department (APU) places top priority on the safety and resiliency of the community we serve. The Anaheim Wildfire Mitigation Plan (WMP) serves to establish methods and procedures used to construct, maintain, and operate the electric utility's electrical lines and equipment in a manner that will minimize the risk of wildfire. Safety of citizens and properties is one of the highest priorities in Anaheim, and the City Council and the City Manager's Office have directed city departments with the development of integrated strategic plans and their cross-functional implementation. As such, this 2022 WMP was developed in collaboration with the Anaheim Fire & Rescue Department.

By 2019, state legislation was enacted, most notably Senate Bill 901 which amended Public Utilities Code (PUC) section 8387, and Assembly Bill (AB) 1054 (Holden) which further defined requirements to be included in utility wildfire mitigation plans which are updated annually with a comprehensive revision not less than every three (3) years. This legislation also established the Wildfire Safety Advisory Board (WSAB) who is to review each utility's wildfire mitigation plan beginning in 2020 and provide guidance opinions for improvements and future considerations in subsequent wildfire mitigation plans. Anaheim incorporated these guidance opinions within the WMP to build upon its initial foundation.

To increase the level of transparency and information accessibility for public review, the WMP, including earlier WMPs, Independent Evaluation Reports, and supplemental filings, as appropriate, have a prominent location and may be accessed on the City of Anaheim website using the following link: <https://anaheim.net/5487/Wildfire-Mitigation-Plan>.

This year, Anaheim has not experienced any wildfires however, some significant wildfires occurred within close proximity, in the broader Orange County area, including the Silverado Fire near Irvine, California which burned 13,390 acres and the Blue Ridge Fire, near Yorba Linda, California burning 14,334 acres. Both fires were captured on the Anaheim regionally networked [fire cameras](#) via <https://www.alertwildfire.org> to assist both the Orange County Fire Authority and the local Metro Net Fire Dispatch to target resources and assess risk of the fires moving towards more densely populated areas including Anaheim. One additional fire camera system was installed in 2022, bringing the total number of fire cameras to five (5) within the Anaheim service territory. This additional camera views a Tier 3 High Fire Threat Zone (HFTZ) known as the Oak Canyon Nature Preserve, a 58-acre canyon adjacent to residential homes and a critical water treatment facility and reservoir, a key water source used by these two agencies to fight major fires including the Canyon 1 and 2 fires several years ago. The cameras have already been instrumental in improving situational awareness and supporting fire response. In 2021 there were four (4) Red Flag warning events issued for the Orange County area, which triggered APU to disable its reclosers to prevent automatic re-energization of its overhead lines following a fault, even when the cause is momentary.

Also of significance this last period is the completion of additional [undergrounding](#) of overhead electric lines in the HFTZ. It is important to note that 98.2% of APU's 145.9 miles of electric lines are underground in the geographic locations considered Fire Threat Zones (FTZ), which substantially mitigates the potential for wildfires in Anaheim. This includes a 2,000-foot section undergrounded in May 2021 in a residential neighborhood within and adjacent to a Tier 3 HFTZ named Deer Canyon. Undergrounding this segment of line eliminated the risk of ignition and the

potential for Public Safety Power Shutoff for 8 customers, but also increased accessibility for fire equipment and personnel by eliminating poles along a relatively narrow roadway.

The remaining 2.63 miles of overhead lines are across 7 segments, which represent less than 2% of APU's lines in the FTZ areas. Anaheim has applied for and was approved the funding of \$1.16 million by Federal Emergency Management Agency (FEMA) for an undergrounding design grant funding under the FEMA Hazard Mitigation Grant Program. The design is scheduled for completion in 2023 for submittal to FEMA for review, and upon approval, a second round of funding of \$8.8 million could be available towards the construction phase. In case full funding is not approved under the grant, the planned undergrounding could be implemented as a restructured project, possibly in phases.

The Governor's Office has recently issued additional water use restrictions in response to persistent drought conditions in the state. Climate-related factors contributing to wildfire risk are identified in the WMP as well as assistance offered to customers to prepare and protect properties using APU rebates, educational workshops, and resiliency programs including service lateral undergrounding. These programs are outlined in the WMP and [metrics](#) include customer participation levels. Higher sustained ambient temperatures, also related to climate change, resulted in an increased frequency of outages in September 2020. A transformer replacement program was initiated targeting replacement of overhead and sub-surface transformers based upon established criteria over a five (5) year period. Transformers in the HFTZ are prioritized and replaced with FR3 fire-retardant transformers, beginning with the undergrounding project recently completed.

In addition to use of transformer with FR3 oil, APU utilizes overhead devices that reduce the potential to start wildfires. These include use of twelve (12) sealed [lightning arresters](#) that prevent critters from causing failures by starting fires by touching the energized high-voltage section, installation of six (6) non-explosive fuses that prevent any potential hot shards caused by fuse blows from falling on shrubs or grass below and causing fires, and installation of six (6) electronic self-contained fuses that extinguish the arc within a vacuum bottle when they disrupt the high voltage circuit. The electronic fuses can be reset following a fault, which eliminates the need for a new fuse, thereby reducing outage duration for critical loads.

An additional protective measure is use of [avian protection devices](#) along two 12 kV circuit segments within migratory bird paths that have high-visibility features for daytime and LEDs for nighttime visibility to alert birds to prevent contact with overhead wires, as they fly to nearby lakes.

Vegetation Management is a collaborative effort in Anaheim among AF&R, who serves as the lead agency for Anaheim on wildfire mitigation; the Department of Public Works managing public right-of-way tree-trimming and vegetation, including neighborhoods; APU power-line clearance and [vegetation management](#) around electrical infrastructure; and the Orange County Fire Authority to survey for invasive pests threatening canyon areas. In 2022 AF&R conducted controlled burns for managing flammable re-growth and annually uses goats as an ecologically sensitive method for clearing wildgrass in canyon areas not easily accessible by equipment. As part of an Orange County grant program in coordination with AF&R, a survey of trees, initially observed by the Anaheim Community Services Department staff to be infested with an Invasive Shot Hole Borer Beetle (ISHB), was conducted by scientific experts in biology and entomology from the University of California Cooperative Extension (UCCE) in the Oak Canyon Nature

Preserve and Deer Canyon. The survey determined to either treat or remove those trees that are highly infested. The result of the survey identified 20 trees to be removed and 200 to be treated. Tree removal was completed the end of 2021 and treatment is expected to commence by summer of 2022. APU has an overhead power line that traverses the Oak Canyon Nature Preserve but is de-energized since it does not serve customer load and only acts as a circuit tie during emergencies. This circuit will be undergrounded as part of the FEMA grant mentioned above.

For ease of navigating the Anaheim WMP, Section 1(B) - [Table 3- Elements Consistent with WSAB 2022 Guidance](#) provides a summary list of comments from the 2022 WSAB Opinion and Guidance document and maps the location within the Anaheim WMP the comment is addressed.

## SECTION 1 - Introduction

### A. Introduction

APU began providing electric utility services to the City of Anaheim in 1895. Anaheim’s population has grown to approximately 360,000 and there are 20,000 businesses located in the city. Anaheim is the 10<sup>th</sup> largest city in California, with the only municipally-owned electric and water utility in Orange County. APU is governed by the Anaheim City Council who appoints a Public Utilities Board that serves as an advisory body consisting of local residents to provide recommendations and reviews APU’s operations, finances, and conducts public hearings.

The following table provides a brief overview of APU service area and topology.

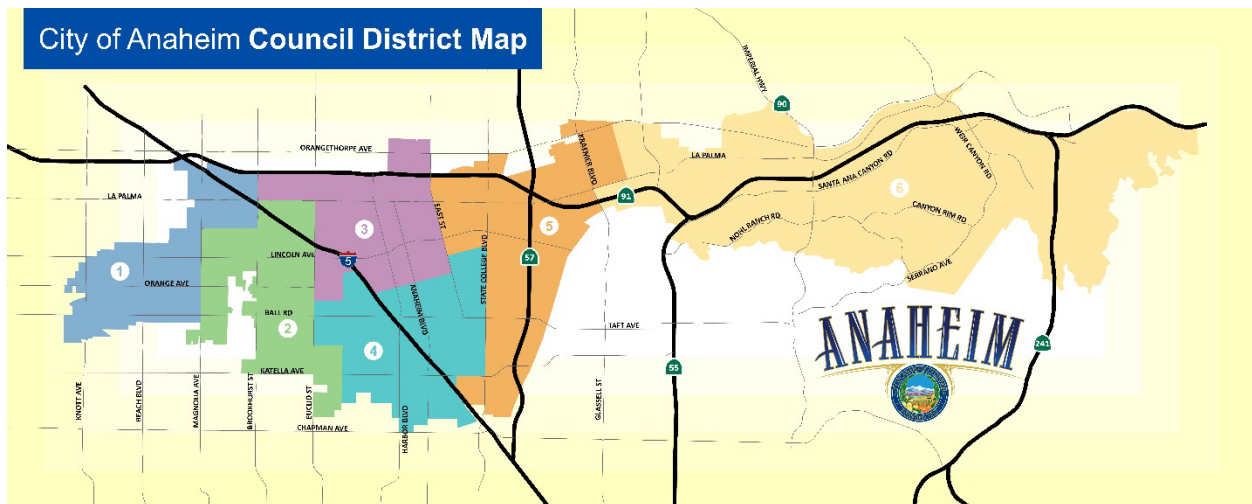
Table 1: Attributes of Anaheim Public Utilities

Attribute	APU	
Service Territory Size	50 square miles	
Owned Assets	200 MW Electric Generation 393 Circuit Miles of Overhead Electric Distribution 742 Circuit Miles of Underground Electric Distribution 18,824 Million Gallons (MG) of Water Production 754 miles of Water Distribution 920 MG Open Water Reservoir 36 MG Closed Water Reservoir 23 miles of Overhead Fiber Optic 110 miles of Underground Fiber Optic	
Number of Customers Served	121,000 electric customer accounts, 64,000 water customer accounts	
Population Within Service Territory	360,000	
Customer Class Makeup	<i>Number of Accounts</i>	<i>Share of Total Load (MWh)</i>
	85.3% Residential	21.5% Residential
	14.4% Commercial	26.6% Commercial
	0.2% Industrial	32.8% Industrial
	0.1% Other	19.1% Other
Service Territory Location/Topography <sup>1</sup>	86.5% Urban 11.4% Shrub / Herbaceous 1.2% Barren / Agriculture 0.9% Conifer Forest 0.1% Water	
Service Territory Wildland Urban Interface (based on total area)	11.9% Wildland Urban Interface 1.7% Wildland Urban Intermix	
Percent of Service Territory in CPUC High Fire Threat Districts (based on total area)	Tier 1: 7.6% Tier 2: 0.6% Tier 3: 13.9%	
Prevailing Wind Directions & Speeds by Season	Wind direction in Anaheim is most often from West for 9.3 and from East for 2.6 months, respectively, with an average wind speed of 2-14 mph	

Attribute	APU
Percent of Owned Lines in CPUC High Fire Threat Districts	Tier 1: 9.8% Tier 2: 0.08% Tier 3: 2%
Customers have ever lost service due to an IOU PSPS event?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Customers have ever been notified of a potential loss of service to due to a forecasted IOU PSPS event?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Has developed protocols to pre-emptively shut off electricity in response to elevated wildfire risks?	<input 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

Anaheim is about 50 square miles and is divided into six Council Districts (see Figure 1). For the purpose of this Wildfire Mitigation Plan (WMP), the areas considered to be in the Fire Threat Zone (FTZ) are generally in District 6, or the eastern portion of Anaheim.

Figure 1. Anaheim service territory and Council District Boundaries



APU is a Participating Transmission Owner (PTO) with the California Independent System Operator (CAISO) and is interconnected to the regional grid at 220 kilovolts (kV) and distributes power from its fourteen (14) 69 kV to 12 kV substations located throughout Anaheim through approximately 1,200 circuit miles of sub-transmission and distribution lines. APU’s historic peak demand is 596 Megawatts (MW). In 1990, the Anaheim City Council authorized an Underground Conversion Program to underground overhead lines along major thoroughfares, and in 2016 amended the program to expand the types of eligible projects that include reliability improvements such as wildfire safety. To date, 135.9 circuit miles have been undergrounded as a result of this program. APU also features the first fully underground substation in the United States that is located in District 6 that provides reliability, aesthetic, and operational benefits to the community. APU is also a full service water utility and has its Walnut Canyon Reservoir, a

920 million gallon facility, in the eastern part of Anaheim that has been used extensively by water carrying aircraft during regional fires.

Figure 2 (a) Park Substation (b) Walnut Canyon Reservoir during Canyon Fire 2



Wildfire safety is a critical issue in Anaheim. As recently as 2017, a wind-driven wildfire (Canyon Fire 2) destroyed homes and caused the evacuation of thousands of residents in Anaheim. The cause of Canyon Fire 2 was embers from a previous wildfire, and no APU sub-transmission or distribution lines were impacted as approximately 98% of APU-owned power lines in the Fire Threat Zone (FTZ) are currently underground, which significantly reduces the overall risk to the community. As a customer-owned utility, APU emphasizes safety, reliability, and affordability in its daily operations and long-term investments.

## B. Overview and Objectives

This WMP establishes methods and procedures used to construct, maintain, and operate APU's electrical lines and equipment to minimize the risk of wildfire posed by its infrastructure. The provisions set forth below outline the preventative strategies and actions for fire prevention and suppression activities and specific operational response during elevated fire and weather conditions to limit potential electric sources of fire ignition in the FTZ within APU's service territory.

The Anaheim WMP was initially developed to meet the provisions mandated in Senate Bill (SB) 1028 (Hill), which became law in 2016 and requires all public and private utilities and corporations to assess whether portions of the geographical area where the utility's overhead electrical lines and equipment are located has a significant risk of a catastrophic wildfire resulting from those electrical lines and equipment, and if so, present mitigation measures the utility intends to undertake to minimize that risk. In 2018, SB 901 (Dodd) was adopted which outlined the elements to be included when assessing the risks and formulating a wildfire mitigation plan.



The WMP elements include:

- 1) Objectives of the WMP;
- 2) A Fire Threat Assessment including location and weather condition warnings;
- 3) Identification of utility assets located in Tier 3 FTZ and immediately adjacent thereto;
- 4) A description of the preventative strategies and programs to be adopted to minimize the risk of APU electrical lines and equipment causing catastrophic wildfires including vegetation management, system inspection, and construction standards;
- 5) A description of the factors used to determine when it may be necessary to de-energize electrical lines and deactivate its reclosers;
- 6) A description of the metrics used to evaluate WMP performance and discussion of how to use performance metrics to enhance ongoing plans;
- 7) An accounting of the responsibilities of persons responsible for executing the WMP;
- 8) Monitoring and audit provisions that support implementation of the WMP, and identifying any deficiencies or areas for improvement; and
- 9) Ongoing monitoring and audit of the effectiveness of electrical line and equipment inspections.

Additionally, this WMP includes a summary of emergency shut-off procedures to de-energize power lines if they are at risk of coming into contact with each other and creating a spark due to high winds or other events. Table 2 is a summary of the elements required within a SB 901 plan as compared to the elements included in this WMP.

Table 2. Elements Consistent with SB 901 - Public Utilities Code Section 8387(b)

Requirement	Statute and Description	Section Number
Persons Responsible	<b>PUC § 8387(b)(2)(A):</b> An accounting of the responsibilities of persons responsible for executing the WMP	10(D),11,13
Objectives of the Plan	<b>PUC § 8387(b)(2)(B):</b> The objectives of the WMP	1
Preventative Strategies	<b>PUC § 8387(b)(2)(C):</b> A description of the preventive strategies and programs to be adopted by the POU to minimize the risk of its electrical lines and equipment causing catastrophic wildfires, including consideration of dynamic climate change risks.	3, 7, 8, 9, 10
Evaluation Metrics	<b>PUC § 8387(b)(2)(D):</b> A description of the metrics the POU plans to use to evaluate the plan's performance and the assumptions that underlie the use of those metrics.	14
Impact of Metrics	<b>PUC § 8387(b)(2)(E):</b> A discussion of how the application of previously identified metrics to previous wildfire mitigation plan performances has informed this plan.	14

Requirement	Statute and Description	Section Number
De-Energization Protocols	<b>PUC § 8387(b)(2)(F):</b> Protocols for disabling reclosers and de-energizing 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.	10 (B&D)
Customer Notification Procedures	<b>PUC § 8387(b)(2)(G):</b> Appropriate and feasible procedures for notifying a customer who may be impacted by the de-energizing of electrical lines. The procedures shall direct notification to all public safety offices, critical first responders, health care facilities, and operators of telecommunications infrastructure with premises within the footprint of potential de-energization for a given event.	10 (D), 11
Vegetation Management	<b>PUC § 8387(b)(2)(H):</b> Plans for vegetation management.	9 (A)
Inspections	<b>PUC § 8387(b)(2)(I):</b> Plans for inspections of POU’s electrical infrastructure.	9 (B)
Prioritization of Wildfire Risks	<b>PUC § 8387(b)(2)(J):</b> A list that identifies, describes, and prioritizes all wildfire risks, and drivers for those risks, throughout POU’s service territory. The list shall include, but not be limited to, both the following: <ul style="list-style-type: none"> <li data-bbox="483 1199 1203 1306">i. Risks and risk drivers associated with design, construction, operation, and maintenance of POU’s equipment and facilities</li> <li data-bbox="483 1329 1292 1436">ii. Particular Risks and risk drivers associated with topographic and climatological risk factors throughout the different parts of POU’s service territory.</li> </ul>	4
CPUC Fire Threat Map Adjustments	<b>PUC § 8387(b)(2)(K):</b> Identification of any geographic area in POU service territory that is a higher wildfire threat than is identified in a California Public Utilities Commission (CPUC) fire threat map, and identification of where the CPUC should expand a high fire threat district based on new information or changes to the environment.	N/A
Enterprise Risk	<b>PUC § 8387(b)(2)(L):</b> A methodology for identifying and presenting enterprise wide safety risk and wildfire-related risk.	2
Restoration of Service	<b>PUC § 8387(b)(2)(M):</b> A statement of how the POU will restore service after a wildfire.	10(D), 11

Requirement	Statute and Description	Section Number
Monitor and Audit	<p><b>PUC § 8387(b)(2)(N):</b> A description of the processes and procedures the POU shall use to do all of the following:</p> <ul style="list-style-type: none"> <li>i. Monitor and audit the implementation of the WMP</li> <li>ii. Identify any deficiencies in the WMP or its implementation, and correct those deficiencies</li> <li>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.</li> </ul>	14, 15
Qualified Independent Evaluator	<p><b>PUC § 8387(c):</b> 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>	15

As further required by AB 1054 (Holden) enacted in 2019, a WMP was required to be submitted to the WSAB for review by July 1, 2020 and, in the case of publically owned utilities (POUs), for an advisory opinion. After the initial submission, the wildfire mitigation plans were to incorporate the recommendations from the advisory opinion as needed, and submit comprehensive updates of the WMPs to the WSAB at least once every three (3) years thereafter.

After the first round of wildfire mitigation plan submittals, on December 9, 2020, the WSAB published a Guidance Advisory Opinion for the 2021 Wildfire Mitigation Plans of Electric Publicly Owned Utilities (POUs) and Cooperatives (Guidance). The Guidance included 14 recommendations that were summarized and incorporated into the APU 2021 WMP which is accessible via the APU website link: <https://anaheim.net/5487/Wildfire-Mitigation-Plan>. Going forward, it is anticipated that the WSAB will review the updated wildfire mitigation plans annually and provide additional comprehensive recommendations attributed to all POUs and also include comments specific to each individual POU. APU reviews the WSAB annual Guidance recommendations, incorporates additional information in the APU WMP to address these recommendations, and compiles Table 3 below, which identifies the recommendations, and the section within APU’s WMP to address the WSAB most current recommendations. This WMP represents the combined effort of the POU industry associations to further the development of a template to respond to the WSAB’s Guidance in future reporting wildfire mitigation plan cycles.

Table 3. Elements Consistent with WSAB 2022 Guidance

Category	WSAB Recommendation	APU WMP Section
<b>Plan Structure, Staffing, and Evaluations</b>		
A. Context Setting Information	Provide information at the beginning of the WMP regarding each POU's risk profile.	<a href="#">1(A) – Table 1</a>
	WMP information, including any earlier WMPs, Independent Evaluation Reports, and supplemental filings, as appropriate, has a prominent and easily locatable web-based publication location.	<a href="#">Executive Summary 1(B)</a>
	Inclusion of a context template and statutory cross-reference table integrated and near the front of the WMP, <i>with live links from table to section if appropriate.</i>	<a href="#">1(B) – Table 2</a>
B. General WMP Objectives	Reducing widespread damage even if a fire spreads, through building hardening and other strategies.	<a href="#">1(B), 5</a>
C. Staff Responsibilities and Approval Protocols	Simple description of POU's approval structure and processes. Utilities approach to WMP approval, consideration of public comment on WMPs, and budgetary protocols for mitigation and WMP tasks.	<a href="#">13</a>
D. Metric Development and Evaluation	Include relevant metrics that measure progress toward reducing risk and tracking those metrics consistently.	<a href="#">14</a>
E. Independent Evaluations	IE Reports to address comparison to industry standards and to make recommendations on how the POU should improve its WMP to robustly meet its statutory obligations.	<a href="#">15</a>
	Documentation of IE recommendations, WMP changes, and IE acceptance of those changes as adequate for the current WMP.	<a href="#">15</a>
<b>Grid Design, System Hardening, Operations and Inspection</b>		
	Are there design or construction issues related to the utility's specific topography or geographic location that the WFAB should be aware of.	<a href="#">4</a>
	How will the utility address risks associated with facilities requiring power that abut a Tier 2 or Tier 3 HFTZ.	<a href="#">5</a>
	How does the utility assess its risks associated with system design and construction.	<a href="#">4, 9(C), 9(D)</a>

Category	WSAB Recommendation	APU WMP Section
	How POU's with assets that pre-date the adoption of G.O. 95, are including these older assets in their WMPs and safety protocols equivalently or in a different fashion to newer lines that would be subject to G.O. 95 protocols.	N/A
	Whether the individual POU is observing the minimum standards set in G.O. 95 or, if the wildfire circumstances merit it, exceeding those standards.	<a href="#">9(C)</a> , <a href="#">9(D)</a>
	Circumstances where the G.O. 95 standards are not followed, and what replaces them and why?	<a href="#">9(C)</a> , <a href="#">9(D)</a>
	New ideas or enhanced protocols particularly considering the changing wildfire conditions in the State due to climate change, land-use change, or other change in vegetation conditions.	<a href="#">3</a>
	The POU rationale and circumstances that led to substantial undergrounding in the past and would like the POU's to think about how these and other standard practices may change in the future.	<a href="#">1</a>
<b>Risk Assessment and Mapping</b>		
	How wind speeds by season, rainfall (and snow) and temperature conditions (weather-related risk drivers) will change in future scenarios given the impacts of climate change.	<a href="#">3</a>
	Installation of and use of situational awareness technologies to better understand wildfire risk drivers, particularly through collaborative activities and shared data.	<a href="#">8</a>
<b>Vegetation Management and Inspections</b>		
	Provide clarity about meeting, exceeding, or substituting for G.O. 95 standards.	<a href="#">9(A)</a>
	Include descriptions of the variety of treatment methods each POU uses, such as tree or branch removal, trimming, pruning, mowing, goats to remove grass, use of mechanical tools to clear brush, surface fuel clearing during the dry season, and herbicide use that is ecologically relevant.	<a href="#">9(A)</a>
	How POU's deal with flammable new growth – how they track and manage that to prevent increased wildfire risk.	<a href="#">9(A)</a>

Category	WSAB Recommendation	APU WMP Section
	Identifying native and other vegetation by species, considering the ignition risk of these species, and describing how treatment methods vary depending upon the type of species.	<a href="#">9(A)</a>
	How scientific expertise and information from ongoing fire research is integrated into vegetation management planning.	<a href="#">Executive Summary</a>
<b>Community Communication, Outreach, Emergency Preparedness and Recovery</b>		
	The WFSB encourages additional attention to backup supplies, and coordination of those, in future WMPs for purposes of resiliency and wildfire recovery efforts, in addition to PSPS mitigation.	<a href="#">11(A-D)</a>
<b>WSAB Advisory Guidance Specific to Anaheim Public Utilities 2021 WMP Submittal</b>		
	The WFSB encourages Anaheim to include previous WMPs and IE Reports where feasible for easier public examination of progress.	<a href="#">Executive Summary, 15</a>

This WMP uses the statewide-adopted fire threat map developed by public and private utility agencies and corporations including APU, consistent with practices established by the California Department of Forestry and Fire Prevention (Cal-Fire) and the California Public Utilities Commission (CPUC) to focus efforts on mitigating wildfire. Furthermore, three tiers of FTZs are established within the overall fire threat map ranking, where Tier 3 FTZ with overhead electrical infrastructure are used by APU to prioritize increased infrastructure resiliency and identify operational procedures to reduce the threat of fire ignition. The FTZ tiers are more fully described in Section 5.

To implement the WMP, a matrix identifying persons responsible for executing the WMP, resources utilized to assess field conditions when elevated fire and weather indicators reach certain thresholds, and education and training for field personnel, stakeholders, and the public is located in Section 13. Finally, metrics using historical and incident driven data measure the effectiveness of the mitigation efforts and drive future enhancements.

This WMP is the roadmap to achieve a level of hardening of the electric infrastructure with priority given to Tier 3 FTZ areas. Review and update of this WMP will be performed on an annual cycle to capture additional state legislation requirements, re-assess wildfire hazards, and ensure enhanced technologies are incorporated into the preventative strategies. Performance metrics are updated annually and reviewed for effectiveness. Consistent with state legislation, a more thorough update of this WMP will take place on a three-year cycle.

In response to a comment by the Wildfire Safety Advisory Board (WSAB) in February 2022 regarding APU's 2021 WMP, all WMPs submitted to the WSAB and the Independent Evaluation report are posted on APU's Wildfire Mitigation Plan webpage for public access:

<http://www.anaheim.net/5487/Wildfire-Mitigation-Plan>.

## **SECTION 2 - Enterprise-Wide Safety Risk Assessment**

There are various methods to evaluate risk and APU follows the Committee of Sponsoring Organizations of the Treadway Commission (COSO) Enterprise Risk Management - Integrated Framework. Similar to the risk management standards established by the International Organization of Standardization (ISO) 31000, the purpose is to identify and manage potential enterprise and safety risks, including those associated with electrical infrastructure igniting a wildfire, that could threaten the community, interrupt core business functions, and threaten business continuity or impact recovery.

APU's enterprise risk management framework begins with an organizational structure ranging from Elected and Appointed Officials, Executive Management, Division Managers, and Subject Matter Experts (Risk Owners) who identify credible and foreseeable threats utilizing industry experience, and accounting for APU's unique characteristics and safety assessments. Similar to the "bow-tie" method for identifying where new or enhanced controls may be worthwhile, a repository of identified risks are prioritized based on consequence to the business enterprise, and frequency of occurrence. For each risk, mitigation plans are established, with a Risk Owner identified to oversee implementation and progression of the mitigation measures, and a member of the senior management team who is held responsible and accountable for the risk.

Ongoing efforts of reviewing and revising the risks as new threats evolve keep this process dynamic. APU measures and monitors the effectiveness of the mitigation efforts through various means including the agency-level Utilities Success Indicator report. Examples of safety and wildfire risks include loss of electric service to critical infrastructure, loss of communication connectivity, impacted roadways limiting access in FTZ areas and facilities, and regional grid Public Safety Power Shut-Off events.

Risk drivers related to wildfire potential for electric utilities commonly focus on operational and/or electrical infrastructure, vegetation, resource coordination, and the resulting loss of power to critical facilities. These internal factors are addressed with strategies to mitigate the risk within this WMP. Other risk drivers, including natural elements such as climate change and weather conditions are global and require a dynamic approach using forecasting tools to manage the risk.

## **SECTION 3 - Dynamic Climate Change**

According to the U.S. Environmental Protection Agency (EPA), the Earth's average temperature has risen by 1.4 degrees Fahrenheit over the past century, and is projected to rise another 2 degrees to 11.5 degrees Fahrenheit over the next one hundred (100) years. Although these increases are seemingly small changes to the climate, this increase in temperature could result in potentially dangerous shifts in climate and weather. Recorded impacts of the changing climate to the Earth's atmosphere include rain and snowfall patterns that are shifting and changing with more extreme weather patterns starting to become more frequent, resulting in increased floods, droughts, or intense rain, as well as more frequent and severe heat waves. Data from National Oceanic and Atmospheric Administration (NOAA) shows increases in observed sea level rise around the United States and globally. The impacts of climate change can be categorized as economic, environmental, or social.

Economic impacts could result when residences and businesses in the FTZ lose their ability to afford rising fire insurance premiums or cancellation of policies, which in Anaheim include approximately 6,417 structures with heightened exposure to wildfires. The cost for resilient infrastructure, increased labor and maintenance within the FTZ could increase operation and maintenance expenditures for utilities.

Environmental impacts are the result of increased wildfires and on the opposite spectrum, increased potential for flooding from the loss of trees and vegetation to stabilize hillsides. Prolonged periods of drought will likely result in a prolonged fire season, potentially year-round. As a result of the prolonged fire season, the potential for public safety power shut-offs will affect customers throughout the year. Also, the FTZ areas will likely expand from the higher into lower elevation wildland and canyons. The majority of wildland and canyons in Anaheim have been designated as Tier 3 FTZ (see Figure 4 - Anaheim Public Utilities Fire Threat Map) and overhead electrical infrastructure within the FTZs have been identified in this WMP along with mitigation strategies.

Social impacts involve public safety and the potential devastation from lives or homes being lost during extreme wildfires. Canyon Fire 2 in October 2017 did not result in any fatalities; however, there were 14 homes destroyed, 44 homes damaged, thousands of people evacuated, and over 9,000 acres burned from the wind-driven event that was initiated from remaining embers from a previous brush fire. As a result, the Anaheim City Council supported certain fee waivers and accelerated permitting to assist homeowners with restoring their lives.

#### SECTION 4 - Overview of Risks and Risk Drivers Related to Wildfires

As previously mentioned, a repository of wildfire-related risks from utility operations and/or equipment sparking a wildfire were identified and prioritized based on the threat to the community, core business impact, consequences, and risk mitigation path. The “bow-tie” method illustrates this process.

Figure 3. Wildfire “Bow-Tie” Risk Mitigation Chart

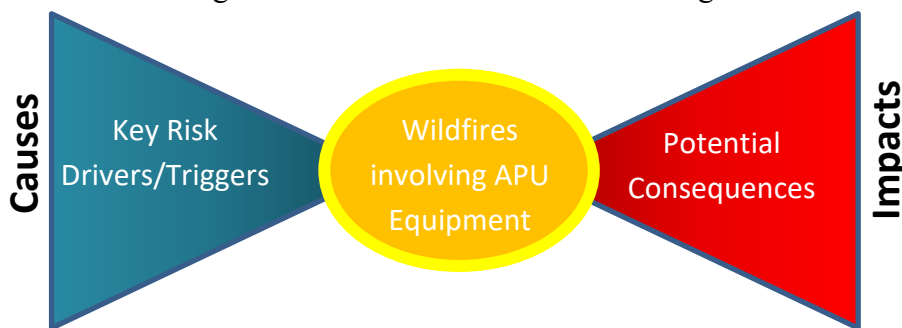


Table 4 summarizes the analysis conducted to identify APU’s exposure to, and impacts from a wildfire and to identify current controls and mitigations to reduce the significant risk of a wildfire occurring. It is important to note that the below listed potential risk drivers/triggers are an indication that a risk event could occur, but do not necessarily reflect actual conditions or threatened conditions.



Table 4. Risk Mitigation for Wildfire Ignition

Risk- APU Equipment including Third Party Attachment Igniting a Wildfire		
Potential Drivers	Description of Impact	Mitigation Measures and Programs
Topology	Wildland areas with exposure to overhead power lines.	<ul style="list-style-type: none"> <li>• Vegetation Management</li> <li>• Construction Standards</li> <li>• Water infrastructure reliability improvements to help protect homes near wildland areas</li> <li>• Ensure availability of water in Walnut Canyon Reservoir for water aircraft support</li> <li>• Patrols of utility equipment and structures</li> </ul>
Elevated wildfire conditions	Weather conditions plus topology more conducive to the spread of a wildfire.	<ul style="list-style-type: none"> <li>• Construction Standards</li> <li>• Reclosers Blocking</li> <li>• Wildfire Cameras</li> <li>• Pole Loading</li> <li>• Threat Level Communications and Public Outreach</li> </ul>
Climate Change	Expanding fire threat areas and more extreme weather conditions.	<ul style="list-style-type: none"> <li>• Inventory Assessment in the FTZ</li> <li>• Vegetation Management</li> </ul>
Contact by a foreign object	Vegetation, metallic balloons, avian, vehicle accidents, for example, coming into contact with APU overhead electric facilities.	<ul style="list-style-type: none"> <li>• Construction Standards</li> <li>• Avian Deterrents</li> <li>• Conductor Spacing</li> <li>• Undergrounding</li> </ul>
Failure of Equipment	Electrical equipment containing flammable material or potential for arcing when operated in a FTZ.	<ul style="list-style-type: none"> <li>• System Inspection</li> <li>• System Patrols</li> </ul>
Downed Conductors including Third Party attachments	Energized electrical wires falling and coming into contact with vegetation below.	<ul style="list-style-type: none"> <li>• System Inspection</li> <li>• System Patrols</li> <li>• Reclosers Blocking</li> <li>• Vegetation Management</li> <li>• De-Energize Equipment</li> <li>• Undergrounding</li> </ul>
Energized lines coming into contact	Multiple energized lines in contact with each other creating arcing and sparking in dry conditions.	<ul style="list-style-type: none"> <li>• Construction Standards</li> <li>• Conductor Spacing</li> <li>• De-energize Equipment</li> </ul>
Operational Procedures	Automatic operations to re-energize a line after an interruption or programmable settings that de-energize during specific conditions.	<ul style="list-style-type: none"> <li>• Reclosers Blocking</li> <li>• Public Safety Power Shut-off</li> <li>• Notification to AF&amp;R emergency operations to determine necessity of activation of local Emergency Operations Center (EOC) and establishment of incident command</li> <li>• Evacuation Assessment</li> <li>• Initiate citywide communications and public outreach</li> </ul>

Risk- APU Equipment including Third Party Attachment Igniting a Wildfire		
Potential Drivers	Description of Impact	Mitigation Measures and Programs
		<ul style="list-style-type: none"> <li>Staffing of 311 Call Center to assist with customer inquiries</li> </ul>
Lack of Coordinated Response	When ignition is identified, a well-coordinated response to suppression and de-energizing lines to limit progression of the fire.	<ul style="list-style-type: none"> <li>Customer Support and Emergency Response coordination with local and regional first responders</li> <li>Coordination with SCE</li> <li>Staffing of EOC and inter-departmental collaboration on traffic, emergency management, and communications</li> </ul>

The potential consequences if the risk drivers listed above were to occur and resulted in an incident, in a “worse-case-scenario”, could include:

- Personal Injury to the public, employees, and contractors
- Damage to real and personal property
- Damage and loss of City of Anaheim owned assets and facilities
- Reliability impacts
- Reputational damage
- Claims and Litigation.

As an overview of the WMP, the preventative strategies discussed further in the WMP are mapped to these potential risk drivers in Table 5 and placed in one or more of the following categories: (1) Situational Awareness, (2) Design and Construction, (3) Inspection and Maintenance, (4) Operational Practices, and (5) Response and Recovery.

Table 5. Categorization of APU Potential Wildfire Risk Drivers, and Corresponding Preventative Strategy

Risk Driver	Categorization	Assessment/ Preventative Strategy
Topology	Situational Awareness	Section 5,6
Elevated Wildfire Condition	Situational Awareness	Section 5,6,7
Climate Change	Situational Awareness	Section 3
Contact by Foreign Object	Design & Construction / Response & Recovery	Section 9(e)
Failure of Equipment	Design & Construction/ Inspection & Maintenance	Section 9(b-d) Section 10(a)
Downed Conductors including Third Party attachments	Design & Construction/ Inspection & Maintenance	Section 9(b-d) Section 10(a)
Energized lines contact together	Design & Construction	Section 9(c,d)
Operational Procedures	Operational Practices	Section 10(a-e)
Lack of Coordinated Response	Response & Recovery	Section 11,12,13

## SECTION 5 - Assessment of High Fire Threat in APU's Electric Service Territory

A statewide fire threat map was developed to delineate the boundaries to identify, evaluate, and potentially adopt stricter fire-safety regulations that apply only to overhead power lines, electric equipment, and communications lines located within those boundaries. The map was developed by a peer group of utility personnel and fire safety professionals known as the Peer Development Panel (PDP) with the oversight by an Independent Review Team (IRT) appointed by Cal-Fire and the CPUC.

Tiered FTZs within the fire map boundaries are developed based on the Cal Fire “Very High Fire Hazard Severity Zones” in Anaheim to prioritize the need to increase infrastructure resiliency to mitigate the wildfire threat posed by electric infrastructure. APU and AF&R, with outreach to Southern California Edison (SCE) and the Orange County Fire Authority, developed the Anaheim FTZ boundaries, Figure 4 - Anaheim Public Utilities Fire Threat Map, which was reviewed by the PDP and adopted by the IRT in September 2017. APU and AF&R review the map annually and on as-needed basis to address any changes to the FTZs. The map was established based on criteria for FTZ tiers listed in Table 6.

Figure 4. Anaheim Public Utilities Fire Threat Map

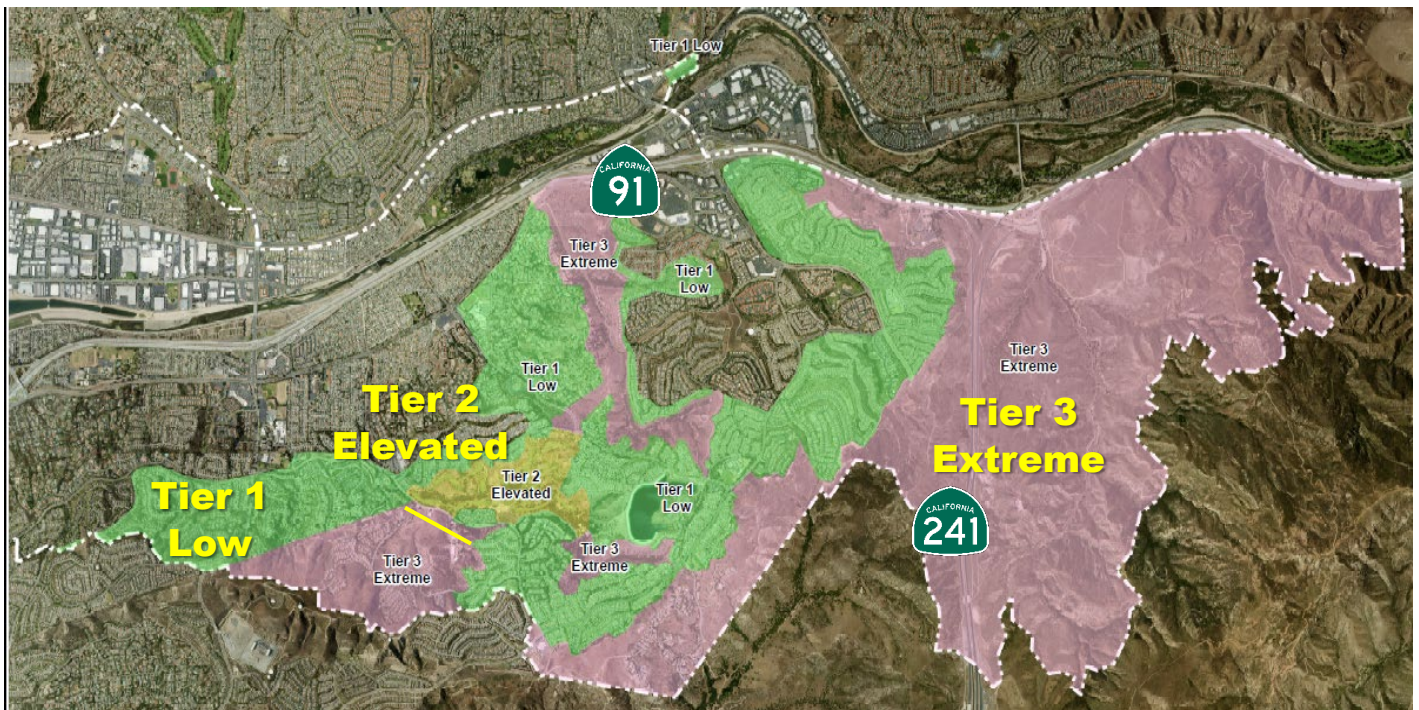


Table 6. Tiered Fire Threat Zones in Anaheim

Zone	Category	Description
Tier 3	Extreme	Typically wildland areas where exposure to overhead power lines, the availability of water resources, and emergency responder circulation routes affect response times to combat wildland fires.
Tier 2	Elevated	Elevated risk due to the vegetation, high voltage regional transmission lines crossing the area, and adjacency to Tier 3 FTZs.
Tier 1	Low	Well developed areas, typically with underground high voltage circuitry.

Topography has a considerable effect on wildland fire behavior and on the ability of fire fighters and their equipment to take action to suppress wildland fires. Due to topography, a fire starting in the bottom of a canyon may expand quickly to the ridge top before initial fire responders can arrive. Rough topography greatly limits road construction, road standards, and accessibility by ground equipment. A relatively large portion of East Anaheim is covered by natural vegetation. Of these different vegetation types, coastal sage shrubs, chaparral, and grasslands reach some degree of flammability during the dry summer months and, under certain conditions, during the winter months. For example, as chaparral gets older, twigs and branches within the plants die and are held in place. A stand of brush 10 to 20 years of age usually has enough dead material to produce fire spread rates about the same as in grass fires when the fuels have dried out. In severe drought years, additional plant material may die, contributing to the fuel load.

There will normally be enough dead fuel that has accumulated in 20 to 30-year old brush to give fire spread rates about twice as fast as in a grass fire. Under moderate weather conditions that produces a fire spread rate of one half foot per second in grass, a 20 to 30-year old stand of chaparral may have a fire spread rate of about one foot per second. Fire spread in old brush (40 years or older) has been measured at eight times as fast as grass, at about four feet per second. Under extreme weather conditions, the fastest fire spread rate in grass is 12 feet per second or about eight miles per hour. Anaheim is relatively flat with the exception of the eastern portion of Anaheim where the Wildland Urban Interface (WUI) presents greater risk of wildfire.

To manage surface fuel in the FTZ, AF&R manages the Brush Abatement Program which is divided into three phases:

- Phase I Natural Brush Abatement- The use of goats to remove flash & invasive fire fuels.
- Phase II Mechanical Brush Abatement- The use of machinery and tools to trim existing trees and brush 10 from the ground, and remove dead and invasive trees and shrub.
- Phase III- To replant with native plants and shrubs to reestablish nature’s natural fire break.

Within Anaheim’s boundaries there are four Tier 3 FTZs; these areas are exposed, generally steep north facing slopes with coastal sage shrubs and mixed chaparral. Areas designated Tier 3 contain two sections of pole lines totaling approximately one mile, which is a small portion of overhead 12 kV pole lines traversing the terrain which warrants the need for increased

infrastructure resiliency to reduce fire risk.

The first segment of overhead 12 kV line traversed a Tier 1 FTZ and partially crossed into a Tier 3 FTZ. The pole-line was along a narrow, private roadway that made it difficult for emergency vehicles to access. The WMP approved by City Council in 2018 included a recommendation to underground this segment as part of the Underground Conversion Program and in the interim, apply the preventative and operational strategies outlined in this WMP to mitigate fire risk. The line was undergrounded in May 2021 which also eliminated the need to subject this segment, and the customers it serves, to potential power shut-offs. A community meeting was previously held in October 2018 to inform the residents that 8 households could be affected by a Public Safety Power Shutoff (PSPS) event, but that mitigation measures were taken and undergrounding planned. With the undergrounding now complete, the residents were subsequently notified that they are no longer subject to PSPS based on the current hazards identified.

The undergrounding project, approved by City Council resolution, included telecommunication providers to eliminate the poles completely; however, AT&T declined to underground this segment at its expense through its Rule 32A, citing that this roadway does not meet the definition of an eligible project as currently defined, and APU therefore recommends that state agencies such as the WSAB and CPUC consider the full participation of telecommunication companies where wildfire safety is concerned in order to reduce wildfire risk and improve vehicle accessibility for fire and utility trucks through their respective regulatory processes.

The second segment is an overhead 12 kV line that traverses through a natural park and has varying elevations of terrain that would be highly disruptive to the natural setting if underground excavations took place, and would be difficult to access if underground equipment were to be installed. The construction of this line was reinforced for increased resiliency with the installation of twenty-seven (27) ductile iron poles and increased spacing between conductors. To preserve the natural habitat of the woodpecker birds in this area, some wood poles were left standing as perches with all electric conductors and equipment detached. Additionally, this segment is a circuit-tie and does not serve customers and is therefore de-energized in its normal status. The protocol has been established for visual inspection of this line prior to re-energization, and to use the line for reliability purposes including emergency power restoration when environmental conditions warrant.

Seven (7) small segments of 12 kV overhead line traverse through areas designated Tier 1 and adjacent to Tier 2 FTZ. Vegetation clearance is currently maintained following the vegetation management practices (see Section 9), and due to the moderate risk associated with Tier 2 FTZ, the line will be patrolled annually to ensure those clearances are maintained. APU partnered with AF&R to apply for grant funding to help offset the cost and accelerate the undergrounding of these lines. In February 2021, APU received approval for Hazard Mitigation Grant Program (HMGP) funds from FEMA for phase 1 design of undergrounding these high voltage electrical lines within the HFTZ, and includes the segment in the natural park where undergrounding around the park is being evaluated. The design phase is expected to be completed in 2023 at which time FEMA will then consider approval of the Phase 2 construction portion, allowing undergrounding construction to commence in late 2023.

Tier 1 FTZ areas are categorized as low risk, as the areas are served through predominantly underground lines. These areas are well developed and have access to fire hydrants, with roadways that are accessible to fire and utility personnel.

Also located within the Tier 1-3 FTZ are Southern California Edison’s (SCE) high voltage overhead 500 kV transmission lines which serves as one of several interconnection paths for Anaheim to the regional power grid. SCE is subject to regulatory oversight by the CPUC, who will review and approve SCE’s wildfire mitigation plan to address its transmission assets, including the areas that pass through Anaheim. APU coordinates with SCE on situational awareness of fire conditions, as well as operational activities that may include SCE de-energizing the high voltage transmission lines. The impact to Anaheim is mitigated since there are multiple transmission lines that serve Anaheim.

## SECTION 6 - Asset Inventory in Fire Threat Zones (FTZ)

Overhead electrical infrastructure located within the FTZ are listed in Table 7. Additionally, resources including water pumps, communication stations, and customers with medical needs are considered when planning operational strategies to minimize risk of ignition sources by de-energizing electric lines as an example.

Table 7. Fire Threat Zone Assets and Critical Facilities

Source	Asset	Tier 3 (Extreme)	Tier 2 (Elevated)	Tier 1 (Low)	FTZ Total	APU Total
APU Overhead Electric Distribution in FTZ	Circuit Miles	0.88	.04	1.71	2.63	388
	Poles	27	5	65	97	16,311
	Overhead Transformers	3	0	24	27	7,249
SCE Electric Transmission in FTZ	Circuit Miles	2.60	0.95	0	3.55	
	Towers	20	6	0	26	
APU Water Treatment in FTZ	Pump Equipment	2	0	0	2	2
Communications	Cell tower	0	0	0	0	
Critical Care	Hospitals	0	0	0	0	
Public	Community Centers	0	0	0	0	

## SECTION 7 - Overview of Preventative Strategies and Programs

Table 8. Preventative Strategies and Programs

<b>Situational/Conditional Awareness</b>
Collaboration with AF&R, Fire Safe Councils and OCFA in preparation for RFW and SAWTI events.
Fire cameras installed in Anaheim's Tier 3 FTZ and connected to the regional network AlertWildfire.org
Weather monitoring stations installed in FTZ and network access for local weather station data.
Training for AF&R Dispatch Center and APU Operators in fire camera view and operations.
Daily monitoring and reporting of elevated fire conditions including RFW and SAWTI.
On-site visual inspection by APU troubleshooter and CERTS during elevated conditions.
Training for APU Operations Reclosers Disabling.
Training for APU Operations De-energize/Restore protocol and communications.
<b>Design and Construction</b>
Installation of Fire Monitoring Cameras in the FTZ.
Installation of Weather Monitoring Stations in the FTZ.
Modified Construction Standards for FTZ.
Wood to Ductile Iron pole replacement.
Concealed lightning arrester replacement.
Insulated covers on equipment mounting brackets.
Increase overhead wire spacing.
Increased wind loading for pole strength and integrity.
Installation of avian diversion equipment.
Undergrounding electric lines in FTZ.
<b>Inspection and Maintenance</b>
Vegetation Management- Line Clearance
Surface fuel management
Vegetation tracking and recording
Detailed distribution overhead and underground line and infrared thermography inspection
Distribution wood pole intrusive testing
Visual inspection and infrared thermography of distribution substations
Substation equipment oil sampling
<b>Operational Practices</b>
Overhead Distribution line patrols
Disabling reclosing during elevated fire conditions
Independent fiber-optic communication network
De-energized power lines through Oak Canyon Nature Center
<b>Response and Recovery</b>
Wildfire Mitigation Response Procedures- Operation and communication protocols including PSPS
Communication strategy for de-energize/restore response.
Emergency Response planning for Stakeholder support during a PSPS.
Field Operations recovery procedures
Post event customer support and protection services
Modifications to policies, practices, and procedures
Waiver of electric and water service connection fees
Waiver of electric and water design/engineering, plan checks, and inspection fees
Impacted customer payment extensions, payment plans
Irrigation controllers provided at no cost to extend longevity of landscaping.

## **SECTION 8 - Situational Awareness**

In Southern California, the period for active fire conditions can exist year-round; however, conditions contributing to a higher risk of a fire igniting and spreading is attributed to the amount of dry fuel sources, high winds, relative low humidity, and dry lightning conditions. APU collaborates with multiple stakeholders including, but not limited to, AF&R, APU's Water Division, the National Weather Service, and adjacent electric utilities including SCE and San Diego Gas and Electric (SDG&E) to leverage situational awareness, camera networks, web-based real-time monitoring data from local weather stations, and fire condition warning systems that gauge fire threat conditions so APU can mobilize personnel and take specific actions to mitigate a higher fire threat.

AF&R provides daily assessment of conditions classified as Normal, Elevated, Extreme, and Red Flag Warning conditions for mountainous (East Anaheim) areas. A Red Flag Warning (RFW) is issued for weather events which may result in extreme fire behavior that will occur within 24 hours. A RFW is typically issued when relative humidity is at or below fifteen percent (15%) and sustained winds are expected to reach twenty-five (25) miles per hour (mph) or higher and/or wind gusts exceed thirty-five (35) mph for six (6) or more hours. Also, lightning under dry conditions will typically trigger a RFW. At the onset of the RFW for the mountainous areas, AF&R notifies APU and deploys fire watchers for on-site assessment of conditions. The RFW for the mountainous areas most closely correlate with the Anaheim Tier 3 FTZ and where utility overhead infrastructure is located.

In conjunction with the RFW, another early warning system is the Santa Ana Wildfire Threat Index (SAWTI), which was developed through collaboration with Cal-Fire, UCLA, the National Forest Services, the National Weather Service, SDG&E, and the Desert Research Institute, that classifies the large fire threat potential from Marginal to Extreme based on the likelihood of a catastrophic wildfire fueled by high winds. High winds contribute to increased dry fuel source, but also can cause power lines to come into contact with each other and produce a spark which potentially can cause a fire ignition. APU monitors and reports the SAWTI for Zone 2 - Orange/Inland Empire on a daily basis to key personnel.

Forecasts and weather indexes are early-warning tools to proactively prepare for events; however, real-time monitors tracking the changing dynamics of an event can refine key decisions impacting response times. High resolution cameras and weather stations are utilized in Anaheim for this purpose.

AF&R and APU jointly evaluated a regional network of fire cameras that is being deployed in the FTZ to provide high-resolution video, near-infrared capabilities, and the ability to zoom into areas to more quickly identify ignition points. Because wildfires spread rapidly in windy conditions, the ability to recognize and respond expeditiously can make a significant difference in saving lives and properties.

AF&R and APU joined with University of California San Diego-Scripps (UCSD) to become part of this regional network of fire cameras and to include locations in Anaheim through an agreement approved by the Anaheim City Council on May 14, 2019. This allows access to the larger regional system that spans from San Diego and Orange Counties, and further north to Central California, and into Nevada. This regional network is owned and managed by UCSD-



Scripps, with network partnerships including SDG&E, SCE, Orange County Fire Authority (OCFA) and Cal-Fire. This network provides AF&R Dispatchers and APU Operators with the ability to view camera images, and provides additional capabilities to AF&R to remotely control the cameras and more quickly verify an ignition while environmental conditions are being monitored in real time. AF&R can more quickly validate 911 calls reporting a fire by first using the cameras and then deploy the necessary resources based on the visual information. These cameras are now part of the Alertwildfire.org regional public access network of high resolution cameras used by fire agencies as a topographical visual tool for scouting fires.

The link for public access of regional network of fire cameras is is: <http://www.alertwildfire.org/>.

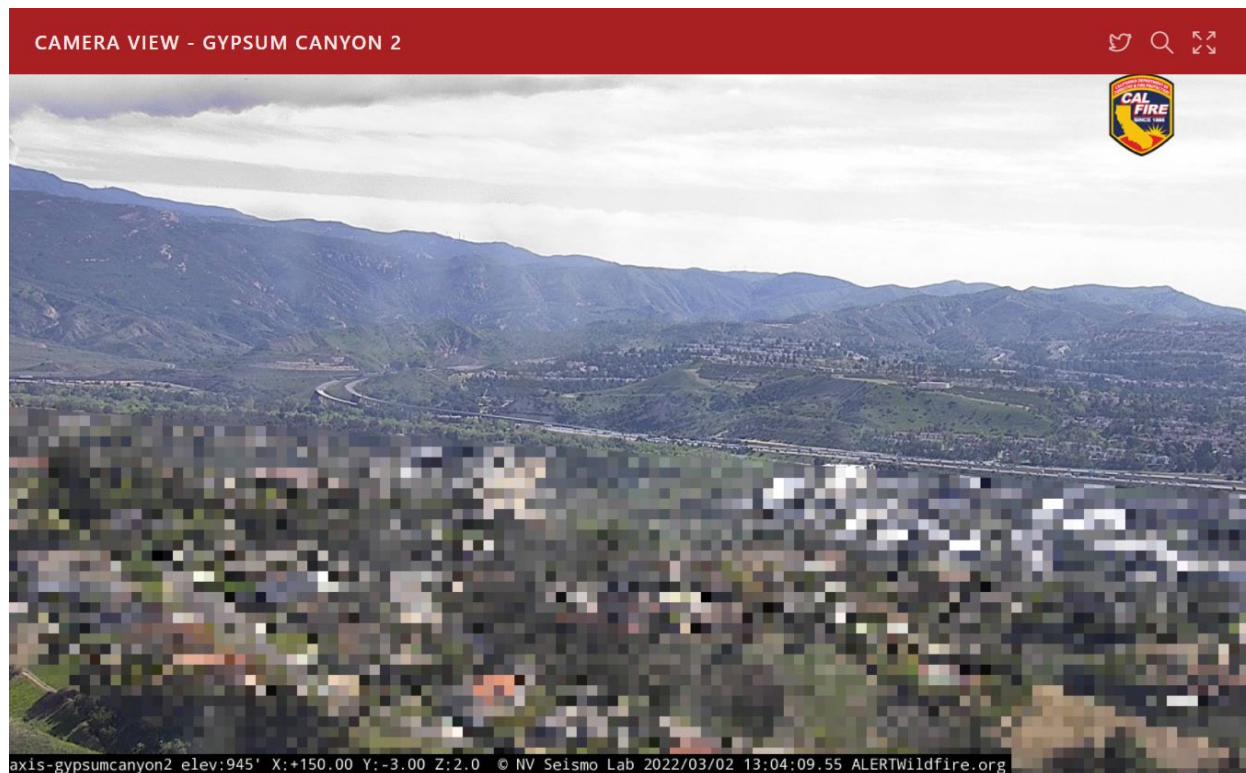
Figure 5 (a) Alertwildfire.org portal



Figure 5 (b) High Resolution Camera Installation and Camera Image Overlooking Anaheim.



Figure 5 (c) Anaheim Camera Image of 91/241 Freeway Interchange.



Anaheim has strategically placed one of its Pan-Tilt-Zoom (PTZ) cameras to capture real-time situational awareness in Gypsum Canyon, the originating location of the 2017 Canyon Fire 2. This camera was recently used by AF&R Dispatch to visually capture movement of the 2021 Blue Ridge Fire. A second camera was installed at a substation to provide a different easterly vantage point. Cameras at two (2) additional locations facing south were installed and visually captured progress of the Orange County 2021 Silverado Fire. Four (4) camera locations in total are complete.

APU has installed temporary facilities for an additional site with two cameras to overlook the Oak Canyon, a HFTZ within a residential area, which were placed in service in April 2022. Permanent facilities to house the camera and networking equipment and to place the camera cables underground, will be completed by late 2022.

Also, two additional candidate sites have been confirmed with AF&R as suitable would overlook Gypsum and Weir Canyon areas, both within HFTZs. These sites require infrastructure and substantial fiber optics extension to serve the sites and will be coordinated with UCSD Scripps for installation by 2023.

All cameras installed and planned by APU are depicted under Figure 5 (d) below.

Figure 5 (d) Camera locations in service and planned by APU to view Anaheim FTZ's.



The network provides access to existing cameras on locations that provide strategic vantage points along Santiago Peak, Pleasants Peak, and Sierra Peak in addition to the Anaheim cameras viewing Gypsum Canyon and Deer Canyon for a 360 degree view of the FTZ.

Weather stations that gauge wind conditions and humidity levels are located at the Orange County Water District (OCWD) facility, Fairmont Substation, and in 2020 at the Lenain Water Treatment facility within a Tier 3 FTZ and at the Yorba Linda pumping station in East Anaheim. The data is used by AF&R and APU to direct resources and make operational decisions based on the measured peak wind gust. In addition to the fire camera network, a network of local weather station data is publicly available through the National Weather Service /NOAA Weather and Hazards Data Viewer. Within Anaheim, there are approximately nine (9) weather stations through partnerships with SCE, the California Air Resources Board (CARB), and the Citizen Weather Observer Program (CWOP).

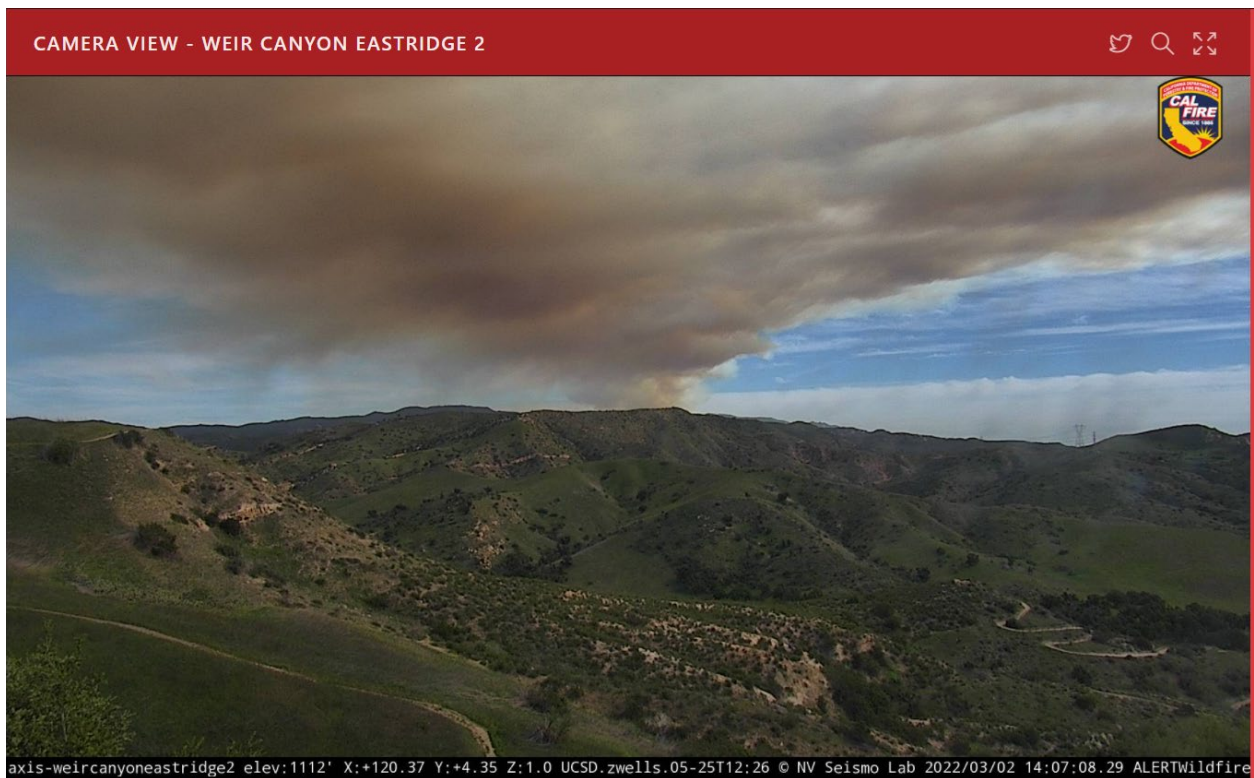
The [Alertwildfire.org](http://Alertwildfire.org) network cameras and weather stations are monitored by the AF&R Dispatchers and utilized as another real-time data source for monitoring fire threat conditions, and where appropriate, warrant APU operational actions that are discussed in this WMP. The fire cameras proved to be very useful to AF&R in October 2019 during the Contempo Fire that ignited in the FTZ in East Anaheim, south of the 91 freeway near Coal Canyon. The cameras were used to help verify ignition, direct aircraft, and position ground crews to keep the wildfire from spreading and was contained to only 5 acres. Figure 5(e) below depicts the image captured by AF&R Dispatch of that wildfire from the cameras.

More recently, the cameras allowed tracking of the 500-acre Jim Wildfire on March 2, 2022 in the Cleveland National Forest in eastern Orange County, with the camera image captured under Figure 5 (f) below.

Figure 5 (e) Anaheim Camera Image of Contempo Wildfire on 10-26-2019.



Figure 5 (f) Anaheim Camera Image of Jim Wildfire on 3-2-2022.



## **SECTION 9 - Preventative Strategies for Building Infrastructure Resiliency**

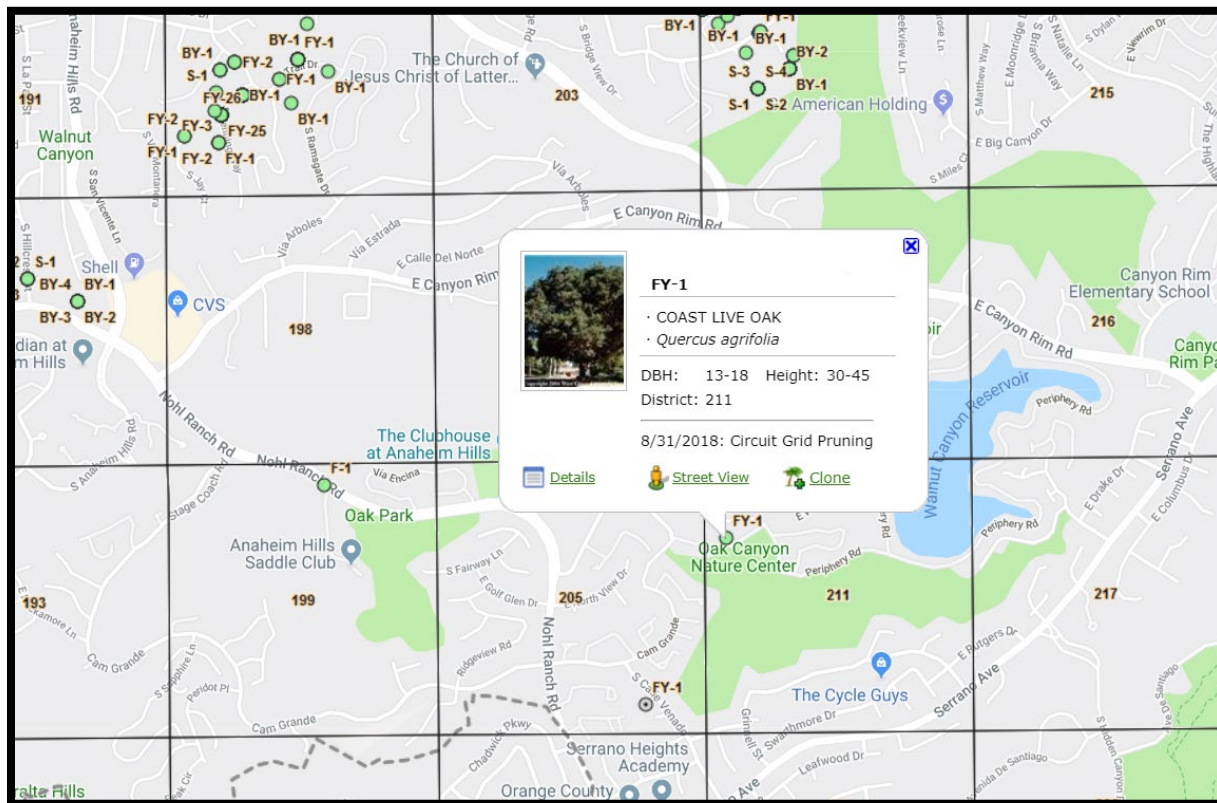
The goal of a wildfire mitigation plan is to minimize the risk of electric infrastructure being a contributing factor to the ignition of a wildfire. A prudent approach is taken to consider and, where appropriate, implement changes and improvements to physical infrastructure that are practical preventative measures in construction and maintenance practices to meet that goal. APU utilizes established guidelines and industry best practices for safe design and construction of the electric distribution system, using resources such as the CPUC General Orders (GOs). GOs outline safe clearances, integrity of construction, and maintenance requirements to achieve a level of infrastructure resiliency to withstand elevated to extreme environmental conditions.

### **A. Vegetation Management**

For the safety and reliability of service where overhead conductors traverse trees and vegetation, APU performs vegetation management activities consistent with the guidelines outlined in GO 95 – Rules for Overhead Electric Line Construction, Section III - Minimum Allowable Clearances - Extreme and Very High Fire Threat Zones in Southern California, to establish necessary and reasonable clearances between the vegetation and the energized conductors in a Tier 3 FTZ. GOs are technical requirements established by the CPUC for investor owned utilities and are utilized by APU as best industry practice for utility operation and construction. Additionally, dead or rotten trees and brush at risk of falling into energized conductors are inspected, identified, and removed as recommended by the Certified Arborist and Certified Power Line Clearance tree trimming Supervisor on staff with Anaheim, who oversees the vegetation management contractors. Clearances are increased around overhead power lines in high risk fire areas where the combination of high wind potential and dry vegetation may increase the risk of fire ignition. APU contractors perform power line clearance tree trimming for approximately 13,000 trees annually across the City, with approximately 5% of those trees within the HFTZ. Trees within the HFTZ are prioritized for trimming to be completed prior to summer before extreme temperatures begin to elevate wildfire risk. The definitions of Extreme and Very High Fire Threat Zones in Southern California are contained in GO 95 Rule 21.2, and reference the adopted CPUC Fire-Threat Map which is consistent with the AF&R adopted CAL-FIRE map.

Studies of the most recent wildfires indicate there are approximately ten (10) species of trees that have been responsible for 75% of the past fire ignitions in California. Anaheim tracks the location, species, condition, and trimming schedule for trees near power lines in the Tier 3 FTZ to maintain a defensible space. The attributes of the tree and GPS coordinates are archived in Geographic Information System (GIS) mapping, and annual inspections and trimming appropriate for the growth pattern of that species is recorded. Figure 6 depicts the attributes recorded for each tree within the FTZ.

Figure 6. Tree Inventory Tracking in a GIS Map.



In certain years, heavy rains contribute to increase growth of wild grass in Southern California and as the season transitions, the hot weather dries out the grass attributing to increase surface fuel and higher risk of ignition. As mentioned earlier, surface fuels are managed by removing the vegetation around the FTZ under the Brush Abatement Program managed by AF&R using a combination of goats to remove grass, mechanical tools to remove brush and replanting native plants to reestablish a natural fire break. Vegetation around the base of power poles where typically switching equipment is located or animal contacting energized electric lines is most prominent are trimmed annually under the APU vegetation management program. Surface fuel clearing is performed after rains have subsided and ambient temperatures begin to rise.

## B. System Inspection and Maintenance

APU conducts routine inspections of distribution and substation equipment to assess condition and prioritize maintenance or replacement. The prioritization method follows industry practice, which aligns with CPUC guidelines as delineated in GO 165 – Inspection Requirements for Electric Distribution and Transmission Facilities and GO 174 Section III- Rules for Electric Utility Substations - Inspection Programs. A visual inspection of over 8,700 underground substructures and above surface equipment was completed in 2017. Inspection of the overhead system, which included intrusive pole testing of over 17,000 poles, and associated overhead conductors and equipment was completed in 2018 with the next inspection cycle scheduled to start in 2022. Underground distribution equipment is on a 3-year inspection cycle. Surface-mounted and overhead equipment is inspected on a 5-year cycle, consistent with GO 165 guidelines. Qualified substation personnel inspect each of the fourteen (14) substations monthly for anomalies that may include hot spots, rusting, leakage, or visible signs that maintenance or

replacement is warranted. Oil samples of substation transformers are tested annually for anomalies such as rising gases or moisture contaminants that could lead to pre-mature failure of the equipment.

There are three maintenance condition levels. They are prioritized based on probable impact on safety or reliability, taking into account several factors. These factors include facility or equipment type and condition, loading, location, accessibility, and direct or potential impact on safety or reliability. The three conditions and their priority levels are:

**Condition Level “1”:** Maintenance required. Repair or replace within 90 days. If there is an imminent safety or reliability problem, the inspector should contact Electric Operations for confirmation with field personnel and to identify and schedule mitigation procedures.

**Condition Level “2”:** Maintenance needed but deferrable, no immediate safety or reliability concern.

**Condition Level “3”:** Minor aging, fully serviceable, no safety or reliability concern. Appropriate for next scheduled inspection.

Those maintenance items that pose the greatest public safety or system reliability risks will either: (a) be repaired immediately or (b) if the repair proves too complex to complete immediately or requires materials that are unavailable, a temporary repair will be made to address the risks, and the item will be reprioritized for repairs to be completed at a later date. For infrastructure located within the Tier 3 FTZ, equipment identified as needing maintenance during an inspection cycle will be designated at the highest priority Condition Level 1.

Results from the latest inspection cycle included 72 of the 86 wood poles in the FTZ that met the GO 165 criteria were intrusively tested, and the remaining 14 were visually inspected with no findings of deterioration. The inspection cycle for subsurface and pad-mounted equipment began in spring 2021 and will be completed over a 2-year period.

### **C. Construction Standards**

Specific to resiliency of the electric system to withstand extreme conditions, GO 166 – Standards for Operation, Reliability and Safety During Emergencies and Disasters establishes construction standards to withstand 3-second wind gusts that exceed the maximum structural or mechanical design specified in standard construction of electric distribution lines, as outlined in GO 95. This applies to overhead electric facilities located in geographic areas designated as the first or second highest fire threat area, at the time and place of a RFW. To establish a measured peak wind gust, APU utilizes historic data collected from the weather stations at Linda Vista Reservoir and Fairmont Substation located closer to the Tier 3 FTZ and near the applicable overhead electric infrastructure. APU construction standards for overhead infrastructure including poles, conductors, switches, connectors, and grounding in the Tier 3 FTZ have been modified to incorporate design and construction to sustain that highest measured 3-second wind gust. For example, 27 wood poles have been replaced with ductile iron poles in and through the Oak Canyon Nature Preserve, and pole loading and clearance between lines have been improved in this location.

Lightning arresters are typically placed where an energized conductor terminates at a pole. When lightning strikes a conductor, there is a high voltage spike along the conductor and the arresters limit the potential for a flash over near a grounded pole. During normal conditions, animals may perch on the cross-arm or the bracket the arrester is mounted to and have been observed to store food source in the opening of the arrester where the energized high voltage conductor enters. These arresters have been replaced with a concealed version eliminating the entry point to an energized part as shown in Figure 7. In addition, the grounded bracket supporting the arrester is also wrapped to further the distance between the conductor and grounded equipment.

Figure 7 (a) Concealed lightning arrester (b) ductile iron pole (c) comparison of lightning arrester models.



The evaluation is complete for transitioning to a vegetable (ester)-based insulating oil, for example a soybean-oil referred to as FR3, rather than the current standard mineral-oil for overhead and sub-surface transformers within the HFTZ. The vegetable-based oil test data indicates a higher fire point to withstand a higher temperature before the oil continues burning. The undergrounding project in the Tier 3 FTZ completed in May 2021 included subsurface transformers with FR3 fire-resistant insulating oil that replaced three (3) overhead transformers. The FR3 transformers have operated as expected and will be considered for future undergrounding projects in FTZ areas.

#### **D. Pole Loading and Wire Spacing**

APU is primarily the owner of the power poles throughout Anaheim, and is a participant in the Southern California Joint Pole Committee that allows members to mutually allocate space on the pole among agencies to attach equipment to provide service, including electric, telecommunications, and cable companies. APU allows for a total maximum weight attached onto the pole using standard guidelines established in GO 95, Section IV. Wind parameters for calculating pole loading were increased from 8 lbs. to 12 lbs., exceeding the GO 95 standard, and has been assessed for all poles within or adjacent to the FTZ. The pole line within the Tier 3 FTZ that traverses the Oak Canyon Nature Preserve does not have telecommunication attachments and does not serve customers. These poles were replaced with ductile iron poles able to withstand even higher wind parameters.

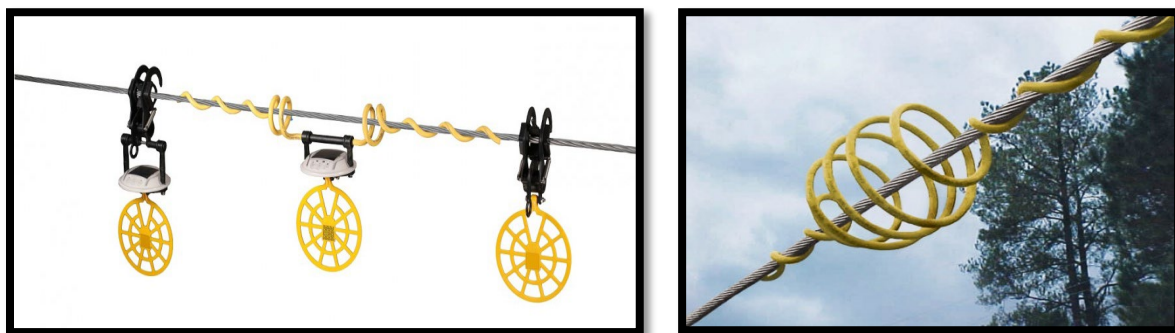


Spacing between wires attached to cross arms mounted on the poles are also increased for energized overhead lines located in or adjacent to the Tier 3 FTZ. The increased clearance reduces the potential for wires to contact each other during Santa Ana wind conditions.

### **E. Contact by Foreign Objects**

Animals have come into contact with energized overhead power lines, fallen to the ground, and ignited brush beneath the power lines and at the base of poles. APU has taken a number of measures to mitigate this risk through a combination of vegetation management, increasing wire spacing, and insulating energized parts at the pole. The concern with use of covered overhead wire for this scenario is the possibility of the bird still becoming entangled in the wires, particularly at night. APU has installed devices on the conductors themselves to deter the flight path of the birds (see Figure 8 below). These devices work in two ways, one that allows the bird to “bounce” away from the conductor rather than becoming entangled and/or making phase to phase contact with high voltage power lines. The other method, utilizes a device hung on the conductor itself with a flashing light to alert birds during the night that an obstruction is ahead. These measures have been installed on overhead conductors within two APU service area prone to avian contact and to date, no further incidents have occurred which indicates a positive results, and therefore APU will plan to continue use of these measures as an alternative to use of covered wires.

Figure 8 (a) raptor clamp with LED light (b) swan-flight diverter



A major cause of power outages utility-wide are the result of metallic balloons contacting electrical lines when released. The conductive material can cause sparking and when deflated, can fall to the ground, leading to the potential for fire ignition. Non-conductive balloons are used by some retailers, while others are reluctant to transition from metallic materials. Senate Bill 1990 (1990) and Assembly Bill 2450 (2018) passed mandating weighting down the metallic balloon and labeling of the supply chain; however, metallic balloon contact with power lines continue to be a potential wildfire risk.

APU will continue to educate customers through social media, public service announcements, and promote proper disposal of metallic balloons to reduce wildfire risk. As an example, a contest was held with high school students who were educated on the impacts of metallic balloons causing power outages and they prepared creative videos to promote safety and proper disposal of balloons that were then shared on APU’s social media sites.

## **F. Undergrounding Power Lines**

Over 98% of the 145.9 circuit miles of APU-owned power lines in the Tier 1-3 FTZ are currently underground, which significantly reduces the overall risk to the community. APU assets within the Tier 3 FTZ include approximately 0.88 circuit mile of overhead distribution power line, which is de-energized under normal conditions as this portion of the line does not serve customers. The line is used only as a tie-point between two circuits for redundancy, and is patrolled and maintained as if energized.

There was another 2,000-foot long overhead line that traversed through a residential area adjacent to Deer Canyon, a Tier 3 FTZ. APU and various telecommunication companies had overhead facilities co-located on utility poles. APU evaluated use of insulated conductors for this segment; however, it required replacing poles, additional guying support and easements and decided undergrounding the line was more prudent. On July 30, 2019, the City Council approved the APU Underground Conversion Program Five-Year Plan, which included the undergrounding of this overhead line. The street is very narrow so undergrounding helped with large utility and fire vehicle access. Undergrounding design began in summer 2019, and construction completed in May 2021, prior to the 2021 fire season.

In February 2021, APU received approval for Hazard Mitigation Grant Program (HMGP) funds from the Federal Emergency Management Agency (FEMA) for Phase 1 design of undergrounding high voltage electrical lines near the FTZ. The funds will be used towards undergrounding additional segments of overhead distribution power lines in and adjacent to the FTZ areas. The design phase is expected to be completed in 2023 at which time FEMA will then consider the Phase 2 construction portion, and if awarded construction will commence in late 2023. If the FEMA grant is not awarded, APU may need to adjust the schedule and possibly split the project up into multiple phases.

## **SECTION 10- Operational Strategies to Reduce Risk of Wildfire Ignition**

Construction methods for fire-hardening infrastructure, pro-active equipment replacement, system inspection, and preventative maintenance are essential components of a resilient electric distribution system, but there are additional strategies to mitigate the risk of operating an electric system within areas where high fire threat exists. As forecasted ambient temperatures rise, humidity levels drop and/or Santa Ana wind conditions are prevalent, these operational strategies will take effect to further reduce the potential for wildfires within the Tier 3 FTZ.

### **A. System Patrols**

A patrol is a visual inspection of applicable utility equipment and structures that is designed to identify obvious structural problems and hazards. System patrols occur on a routine basis to ensure that immediate issues are detected and addressed as quickly as possible. Patrols differ from detailed inspections which are performed for more of a diagnostic and proactive evaluation of equipment conditions.

During forecasted elevated ambient temperatures or RFW and high wind conditions, utility staff will be dispatched to patrol the overhead infrastructure in the Tier 3 FTZ as a precautionary

measure or utilize AF&R Community Emergency Response Teams (CERTS) already out on patrols for multiple purposes to provide visibility on electric infrastructure. For circuits in the HFTZ, the length of the circuit is patrolled prior to re-energizing it following a planned or unplanned power outage or a PSPS during a RFW period and/or elevated SAWTI, to ensure the line and supporting structures are intact, vegetation is not in contact with the lines, and all grounding equipment has been removed.

Annual patrols of applicable utility equipment and structures in urban areas are conducted by APU. The entire system is patrolled annually by electric troubleshooters to identify where wood poles, cross arms, or other equipment are in need of repair or replacement, and equipment or lines in need of clearance from vegetation.

## **B. Circuit Reclosers**

Microprocessor-based protective relays are used within substations to detect faults on the electric lines and signal to the substation circuit breaker to disrupt power on a circuit before damage occurs to major equipment. Once the circuit breaker has opened and disrupted power, the protective relay is programmed to signal the circuit breaker to “reclose and test” if the cause of the fault is still present or if it was momentary when, for example, a broken tree branch falls and clears the lines. If the cause is still present, the reclose function is automatically disabled and the circuit breaker will remain open with power disrupted until crews make repairs and return the system to a normal condition. The reclose and test method allows for a shorter outage duration and less impact to service when the fault is momentary. During extreme fire conditions when the area is in RFW and/or SAWTI indicates wind speeds are excessive, APU operators will disable the automatic reclosing capability of the protective relays for lines located within the FTZ as a precautionary measure, consistent with industry practices in California. Four distribution circuits have been identified as subject to disabling the reclosing function during these elevated fire and weather conditions. In addition, if these identified circuits should experience a fault and relay, they will not be re-energized until a visual inspection has been performed.

## **C. Communication Network**

APU operates and maintains critical software applications on computer servers with higher capacity and resiliency for remote operation and protection systems like circuit reclosers. The communication network used to support these systems is an independent fiber-optic communication network owned and maintained by APU. The fiber-optic system is a point-to-point network with redundancy for added flexibility to re-route the communication path in the event of damage, significantly increasing the reliability for remote communication critical to the automated protection systems. The fiber system is underground in the Anaheim FTZ.

## **D. De-Energize Power Lines**

APU serves 120,000 customers within the service territory. The potential for de-energizing power to APU customers is extremely remote; however, if becomes necessary to initiate a PSPS, with the May 2021 completion of the 0.5 circuit mile of overhead line in HFTZ area, no impact to any APU customer is anticipated.

Operational and communication protocols for de-energizing power lines impacting customers, referred to as a PSPS are documented in APU’s wildfire mitigation response procedures. Customers affected by de-energized lines will be contacted in person and by phone, text, and electronic mail by APU staff. APU offers portable back-up generators and batteries to residents and small commercial customers in situations when power is expected to be unavailable over eight (8) hours or customers who need additional equipment for medical life-support devices. Additionally, APU has established resiliency rebate programs for Uninterruptible Power Supplies (UPS) and portable battery-based generators to qualifying residents who may need assistance with medical or other essential devices.

Coordination between APU and AF&R occurs on a routine basis for structure fires whether or not there is an elevated wildfire risk. Proper precautions are taken to ensure safety of the public, AF&R fire crews, and utility personnel when fighting any fire where structures are at risk. A citywide safety committee includes relevant departments including City Safety, AF&R, Anaheim Police, Public Works, and APU to collaborate on safety matters on a quarterly basis. In situations where AF&R or other public safety first responders initiate an evacuation of an area, APU will coordinate with the City Public Information Office to keep the media and general public informed, if power has been de-energized as a precautionary measure. Operational and communication protocols are also in place to restore power after a PSPS.

The adjacent IOU, Southern California Edison, has 500 kV high voltage transmission lines passing through East Anaheim HFTZ, but SCE serves only one APU customer in those areas. APU customers are not impacted by an SCE PSPS; however, Anaheim is reliant on regional transmission service via SCE. APU and SCE meet annually to review and discuss SCE operation and communications in the event the lines are de-energized and power re-routed through SCE redundant transmission paths. These redundant paths do not traverse through a HFTZ therefore are deemed a very low risk of losing transmission service for Anaheim.

### E. Summary of Operational Strategies

Table 9 is a summary of operational strategies to be implemented during elevated weather conditions.

Table 9. Operational Strategies

Operating Strategies	Elevated Temperatures	Red Flag Warning (RFW)	Santa Ana Wind Threat Index (SAWTI) Extreme
Monitor Warnings	X	X	X
Patrols		X	X
Disable Reclosers		X	X
De-Energize Tier 3 FTZ Line			X

## SECTION 11 - Community Support in Emergencies

### A. Community Outreach

Educating the community on what to expect during elevated weather conditions, and the subsequent response to those conditions that could impact the residents and businesses in Anaheim is a priority. Anaheim has held several community outreach events including a Wildland Fire Preparedness Fair in April 2019 and Public Safety Town-Hall meeting for District 6, an area primarily located in the FTZ, in July 2019 to inform the community of how APU and AF&R are preparing for wildfires and preventative measures taken as outlined in this WMP. Specific to PSPS, APU and AF&R held an on-site outreach event in October 2018 for the residents adjacent to the Tier 3 FTZ potentially impacted by a PSPS, informing them of the measures taken to avoid a power shut-off, but also preparing them with alert notifications, utility staff presence and contact information in the event one does occur. Residents were also informed of future plans to underground the power lines. As the construction phase for additional undergrounding in the HFTZ approaches in 2023, on-site community outreach will be conducted to inform residents of the impacts and schedules of the project, and also provide information on APU rebates and incentives for fire-safety.

At February 2022 community meetings in East Anaheim, APU staff responded to wildfire-related questions including maintaining sufficient water for fire-fighting helicopters taking water from an open water reservoir and Southern California Edison's wildfire mitigation role regarding their high-voltage transmission towers and lines traversing FTZs in Anaheim.

#### Rebate Programs

In 2020, APU established a fire-safety program encouraging customers to take advantage of rebates on fire-resistant measures, planting approved fire resistant shade trees, and following AF&R recommendations to improve safety in wildfire zones by clearing brush and maintaining clearances. The fire-resistant measures include rebates up to \$750 on fire-resistant attic insulation that reduces the risk of fires starting in the attic while at the same time decreases the energy demands of heating and cooling systems. APU also offers a \$250 rebate for fire-resistant vents designed to block embers and fire from entering the home through the attic during extreme situations such as wildfires or local vegetation fires. Forty-eight (48) APU customers have received \$31,000 in rebates to install 88,000 square feet of fire-resistant insulation.

The shade tree program informs residents of the appropriate fire resistant trees to plant at safe distances from combustible structures in a FTZ. APU provides up to six (6) trees per resident. The program is intended to reduce the need for power line clearance tree trimming and eliminate the opportunity for a vertical "fire-ladder" near a home or other combustible structure.

#### Information on City Website and Social Media

Other customer outreach includes the use of social media and APU's webpages listed below which are dedicated to wildfire safety and awareness:

- APU Facebook updates on potential for wildfires:  
<https://www.facebook.com/page/187233877728/search/?q=wildfire>
- APU Workshop [Protect Your Home from Wildfire Damage](#)

- AF&R Wildfire Workshops (Wildfire tips every Wednesday on AF&R’s Facebook page, 10/23/21& 3/5/22: Emergency Preparedness Symposium, 3/31/22: Disaster Preparedness Program (8-hour workshop that includes Wildfire education – 23 residents received certificates)
- AF&R’s Brush Clearance and other programs: <http://anaheim.net/5629/Preparing-for-Wildfire>
- APU Wildfire Mitigation Plans Webpage: <http://www.anaheim.net/5487/Wildfire-Mitigation-Plan>
- APU’s Wildfire Safety Webpage: <http://www.anaheim.net/5418/Fire-Safety>

Also, the City posted notifications in late March 2022 on Anaheim Hills Buzz and NextDoor, two social media platforms commonly used by the area residents, of the impending installation of new wildfire cameras that overlook the Oak Canyon.

## **B. Emergency Response**

APU wildfire mitigation response procedures outline the protocol to ensure appropriate operational procedures up to and including PSPS protocol are implemented during extreme conditions and appropriate procedures are in place for notifying all stakeholders impacted when de-energizing and re-energizing electrical lines including customers, the Utility’s Public Information Officer (PIO), AF&R Emergency Management and Preparedness, Anaheim Police Dispatch Center, APU Water Division and Customer Service Management, and external agencies associated with APU operational support.

One of the benefits of having a municipally owned electric and water utility is the close coordination with Anaheim’s first responders, working collaboratively as emergencies such as wildfires arise. In case of emergencies including PSPS, APU has a supporting role with the AF&R in emergency protocols for public support services as delineated in the City of Anaheim Emergency Operations Plan. These services include care, shelter-in-place, animal control, disability assistance, vehicle access, and functional needs. The preparations and response for a PSPS are included with those used for major events such as flooding and earthquakes. APU will follow the emergency protocols outlined in the City of Anaheim Emergency Operations Plan, where the City adheres to the policy summarized below. In addition, considerations for special needs populations are built into the responsibilities of each member of the Emergency Operations Center organization and are also addressed in supporting procedures and checklists:

- Disabled customers will be accommodated for access to services or facilities provided by Anaheim.
- Anaheim will work to accommodate special populations and those with disabilities to address their circumstances and needs.
- During emergency situations, Anaheim will make reasonable modifications to policies, practices, and procedures to assist residents with disabilities.
- Priority will be given to house special populations and those with disabilities to keep families, friends, and/or neighbors in close proximity when in mass care emergency shelters.
- Eligibility for mass care shelters will not be dependent on a personal care attendant.

- During preparedness and mitigation activities, Anaheim will conduct outreach activities to residents with special needs to ensure they are prepared in times of crisis.

Outlined in the City of Anaheim Emergency Response Plan - Public Notification and Alerts, methods of warning the public of specific emergency conditions are described below. These systems may also be primary ways that state and local governments become aware of emergency information. Public communications such as emergency information, warnings, and actions for an event will be broadcasted to the public by any one of the following methods:

- Emergency Alert System (EAS)
- Wireless Emergency Alert (WEA)
- Integrated Public Alert and Warning System (IPAWS)
- Route alerting - Detour and evacuation routes posted by AF&R
- AlertOC – Mass notification via phone or text message initiated by Orange County
- Anaheim Alert – Mass notification via phone or text message initiated by the City of Anaheim
- Social Media
- Media-releases – through the City PIO
- Telephone emergency hotline – established during Canyon Fire 2.

APU maintains a Public Utilities Department - Emergency Response Plan (ERP) specific to utility operations to ensure a safe, timely, effective, and well-organized response to major disruptions of services provided by APU including Electric, Water, Customer, and Finance services. This ERP incorporates knowledge gained from emergency situations and includes industry best practices developed as a result of major regional storms and outages affecting other organizations over the last several years. Also included is mutual aid and other information obtained from the California Utilities Emergency Association and the American Public Power Association, as well as standards contained in the CPUC's GO166-Standards for Operation, Reliability, and Safety During Emergencies and Disasters, which APU has utilized as a guideline for emergency planning.

### **C. Community Support**

When needed, a Mobile Neighborhood Utility Center will be established in close proximity to areas impacted by major water or electric incidents to provide timely and meaningful system status to customers as well as to provide real-time customer feedback to utility staff.

Figure 9. Mobile Neighborhood Utility Center



The Neighborhood Utility Center is deployed to specific service areas for which the estimated restoration time is anticipated to be more than 24 hours. The precipitating event may be equipment failure, earthquakes, floods, storms, fire, or any combination of these events. It may also be coincident with a local or state-wide emergencies not directly associated with APU but which may impact Anaheim's water and energy resources. Activation may also be preemptive.

The Neighborhood Utility Center(s) will be located at strategic public gathering areas based upon the type of emergency event and may be relocated or closed as conditions and priorities change.

The priorities of the Neighborhood Utility Center are to:

1. Gather electric and/or water system information and intelligence relative to an incident or outage.
2. Provide timely information to the APU and City Emergency Operations Center- Utility Branch.
3. Provide restoration timelines to public in coordination with APU and City PIO, and help to reduce call volume to the call center by dealing directly with the public.
4. Provide personalized attention to members of the public who may need special assistance that is not of an emergency nature.
5. Maintain system and resource status awareness.
6. Provide mobile back-up power generation to designated Community Centers.

The Neighborhood Utility Center is facilitated by one or more Neighborhood Utility Liaisons (Liaisons). The Liaison assignment is typically filled by members of APU staff that are not performing duties respective to emergency operations centers or in direct support of water or



electric system restoration. The Liaisons are responsible for collecting, assessing, evaluating, and disseminating information pertaining to the incident. They directly interface with the public throughout the incident and continue to maintain contact with the public until substantial recovery is achieved.

#### **D. Post-Event Restoration and Response**

Post event customer support and protections are in place to facilitate recovery from the damages incurred and provide multiple options for billing adjustments, extended. Anaheim City Council approved a rule modification that upon declared emergencies, APU may waive certain charges or portions related to a) Customer service charges, b) Temporary Service, c) service connection plan checks, design/engineering, and inspection, and/or d) related administrative charges related to both electric and water services. Such fees were waived during Canyon Fire 2 for customers with damaged properties.

The associated fees for the abandonment of existing service connections, installation of new service connections and meters, and inspection of new backflow prevention assemblies are considered Service Connection Fees. Depending on the extent of damages and new construction at each property, Service Connection Fees will vary. For minor service improvements a Service Connection Fee would not be applicable; however, for a structure requiring a complete rebuild and a fire sprinkler system, Service Connection Fees could be significant. Waived charges apply to the existing property owner for one year from the date the emergency or local emergency is proclaimed or declared, unless the Anaheim City Council declares otherwise.

APU also assists customers with damaged homes who seek to keep their landscaping alive during the rebuilding process. Irrigation controllers were provided at no charge during Canyon Fire 2 upon confirmation that water service can be safely restored, allowing customers to avoid having to replace their existing landscaping that was not damaged from the fire.

### **SECTION 12 - Workforce Training**

Emergency Response training is conducted annually to prepare for multiple types of natural disasters that require activation of the City Emergency Operations Center (EOC) and the APU Electric Department Operations Center (DOC). Specific wildfire emergency training scenarios will be conducted annually, either as part of the larger Department-wide training or through table-top exercises with key personnel responsible for electric operations.

Training for operation of the wildfire cameras by the AF&R Dispatchers is conducted using a train-the-trainer method. In July 2019, representatives from UCSD-Scripps and SCE, along with supervisory personnel from AF&R conducted fire camera training. The wildfire cameras operations are slated for transition in 2022 from the [AlertWildfire.org](https://www.alertwildfire.org) to a new more user-friendly platform under [AlertCalifornia.org](https://www.alertcalifornia.org). As such, new training materials will be provided as a refresher and for new personnel in the division.

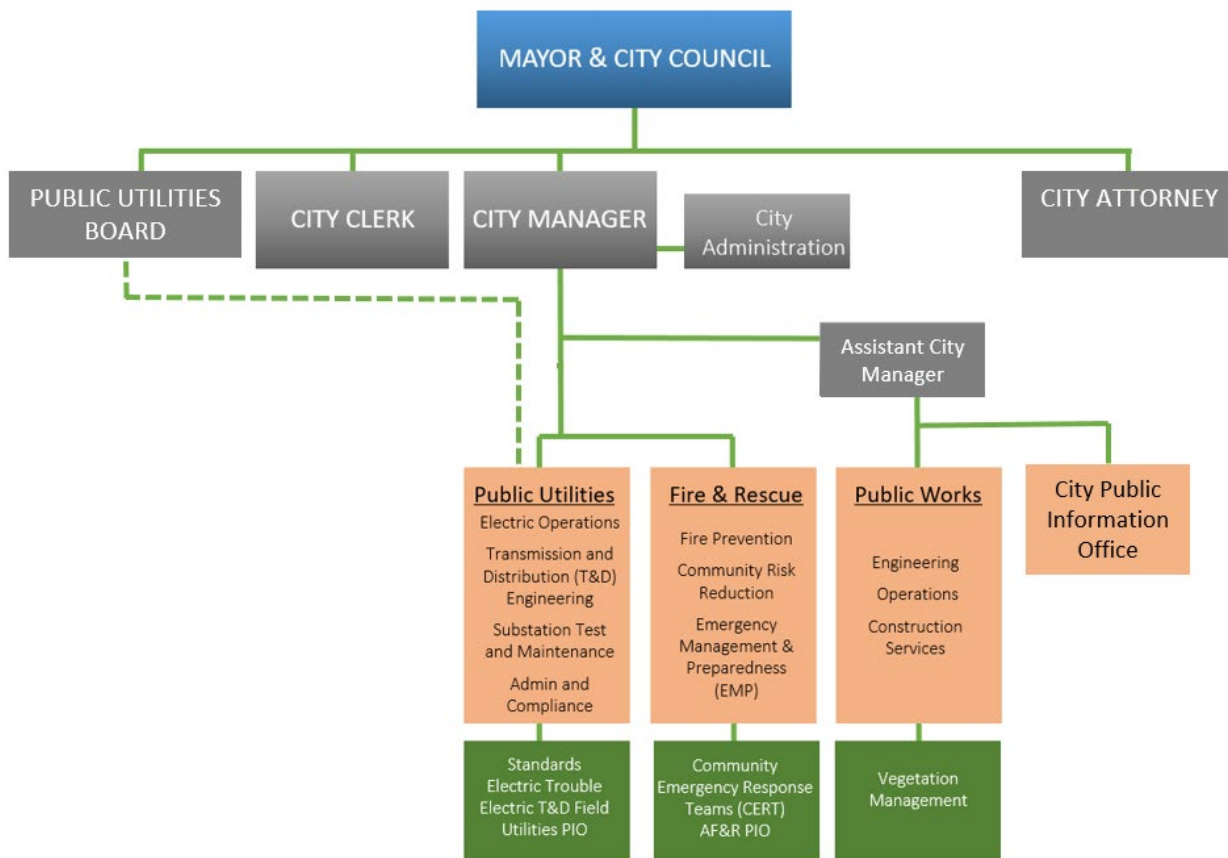
As previously mentioned in Section 10(a) - System Patrols, the AF&R CERTS are utilized in the field during elevated fire conditions to provide additional visibility of electrical infrastructure and report back to APU System Operations. APU conducts an annual training with the AF&R CERTS as part of a larger AF&R safety training, to review the elements of electrical

infrastructure including the pole tag numbers, switches, conductors and connections, transformers, and other equipment so they can prioritize the anomalies to look for, and what equipment identification is helpful for APU operators to pinpoint the location of the anomaly and make appropriate operational decisions based on that information.

### SECTION 13 - Organization and Assignment Responsibilities

This section describes the roles and responsibilities required to accomplish the objectives of this WMP. Various stakeholders play a role in the preventative and operational mitigation strategies, emergency response and communications. An organizational chart in Figure 10 below gives context to the organizational structure of the City of Anaheim and from there, specific groups responsible for implementing the measures and programs within the WMP.

Figure 10. City of Anaheim Organizational Structure,



The following Table 10 identifies the roles and responsibilities of City of Anaheim stakeholders.

Table 10. Roles and Responsibilities for Implementation of the WMP.

Advisory Warning Watch and Notification	AF&R EMP/APU Operations
Fire Threat area assessment	AF&R Fire Prevention/APU Operations
Fire Monitoring Cameras and Weather Stations	APU Operations/ AF&R Fire Prevention
On-Site Visual Inspections during RFW and SAWTI events	APU Electric Trouble/AF&R CERTS
Disabled Reclosers Procedure	APU Operations
Infrastructure Integrity Assessment	APU Electric Trouble/T&D Engineering
Construction Standards	APU T&D Engineering
Vegetation Management	APU Electric T&D Field/Public Works
Equipment Evaluation and Replacement	APU Standards/Electric Operations
Distribution System Inspection	APU Standards/T&D Engineering
Substation Inspection/Maintenance	APU Substation Test and Maintenance
Reporting	APU Administration and Compliance
WMP Review and Approval	Public Utilities Board/City Council
Budgetary approval for WMP mitigation	Public Utilities Board/City Council

## SECTION 14 - Metrics, Monitoring and Reporting

Metrics are used to evaluate the WMP’s performance consistent with GO 95 and GO 165 requirements, and utilizing the guidelines suggested in SB 901 and 1028. There are two categories of metrics: 1) specific metrics of fire incidents and 2) the WMP’s performance metrics. As industry risk metric standards continue to develop, APU will identify additional metrics to measure the reduction of wildfire risk in future WMPs. Incident metrics include RFW and elevated SAWTI initiated in the Orange County area, reclosers functions disabled in the FTZ as a result of elevated fire and wind conditions, PSPS events initiated, and reportable ignitions in a FTZ associated with electric overhead conductors. These metrics are used to track progression and to measure the effectiveness of these preventative and operational mitigation strategies to further strengthen fire preparedness and safety.

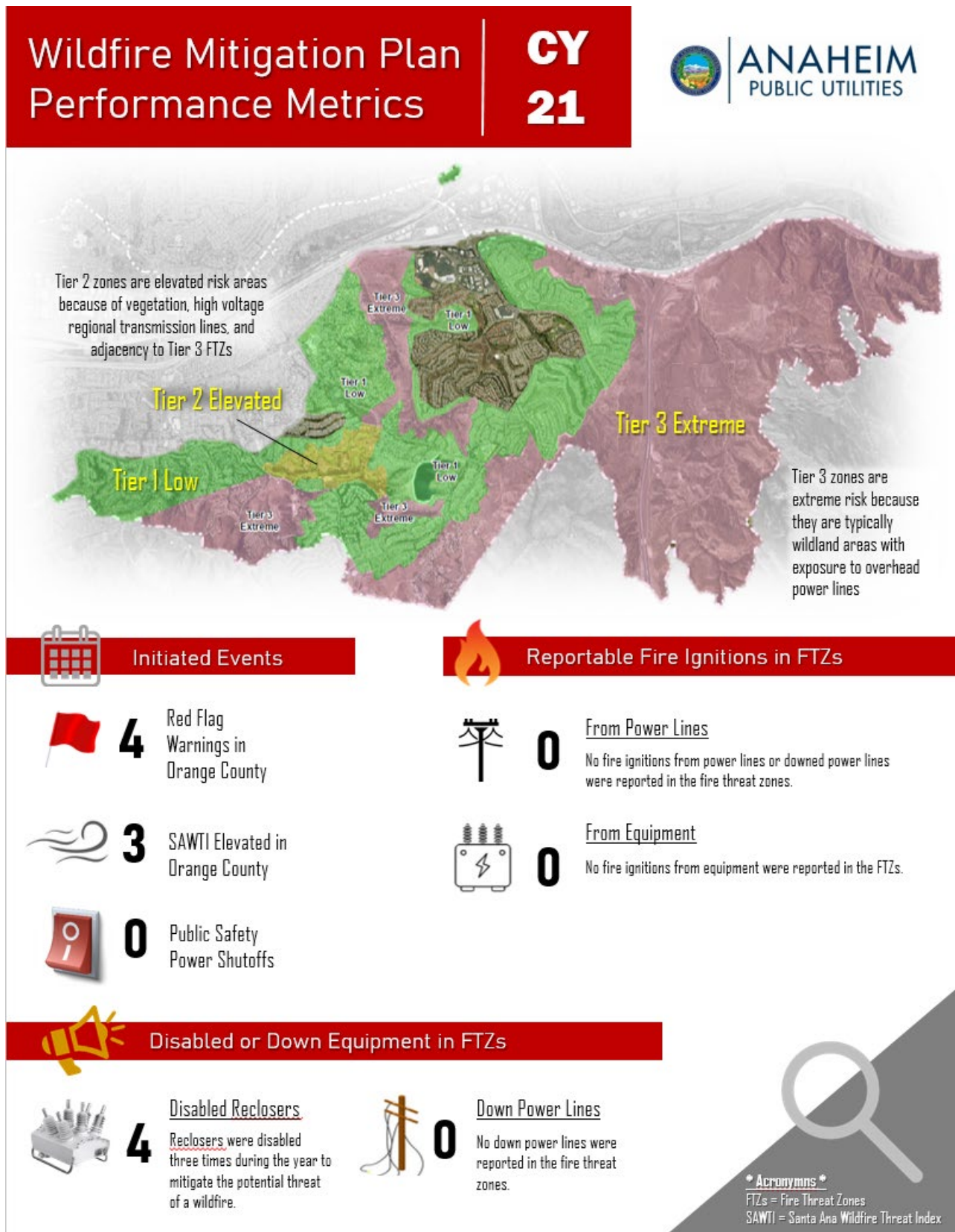
Other scenarios exist where power lines have the potential to cause fire ignition, for example a vehicle hitting a power pole or power lines in contact with each other during a high wind storm. A reportable ignition associated with electric overhead power-lines in APU’s Tier 2 and Tier 3 FTZ is the number of power-lines involved in fire incidents annually that occurred within APU’s Tier “2 or 3” FTZ. Generally, a reportable ignition includes all of the following: a) Ignition is associated with APU’s power-lines, b) something other than APU’s facilities burned, and c) the resulting fire traveled more than one meter from the ignition point.

Performance metrics tracking progress in preventative strategies and programs include a target goal to establish the benchmark comparison to actual completion. Sample Performance metrics include vegetation clearance, inspections completed, and training performed which are used to inform the performance of each preventive strategy and program.

Performance metrics were first introduced within the APU 2018 WMP and at that time relatively limited data was available to form comparisons. New metrics have been included starting with

the 2020 WMP where there may not have been a metric input applicable in the 2018 year. The following Figure 11 is a summary of incident and performance metrics associated with the APU WMP.

Figure 11. WMP Incident and Performance Metrics.



# Wildfire Mitigation Plan Performance Metrics

# CY 21



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PUBLIC UTILITIES

## 4

### Weather Monitoring Station in FTZs

There are four weather stations with temperature, wind, and humidity level data accessible to APU Operations and AF&R Dispatch. APU's goal is to install 6 more in the next three years for a total of 10 stations.



## 8

### Fire Cameras Installed in FTZs

In 2020, APU installed 4 additional robust cameras with near-infrared capability, view and control access, and linked to [AlertWildfire.org](https://www.alertwildfire.org) and networked to AF&R Dispatch and APU Operations. APU is considering 3 additional camera sites for implementation in 2022 and 2023.



## Asset Replacements

## 27

### Wood to Ductile Iron Poles

APU met its annual goal of replacing wood poles in the Tier 3 FTZ with fire-resilient, ductile iron poles.

## 12

### Concealed Lighting Arresters

To prevent animal intrusion into energized equipment, 6 non-enclosed lighting arrestors with fully enclosed units were installed in the FTZs during 2020, and 6 more were installed in 2021.

## 12

### Non-Expulsion Fuse Disconnects

To prevent potential hot shards from fuse operation to start wildfires, 6 fused disconnects within Tier 2 and 3 FTZs were replaced with self-contained fuses in 2020, with another 6 electronic fuses installed in 2021.



## % of Power Lines Underground in FTZs

# 98.2%

APU's goal is to underground 100% of power and telecom lines in or adjacent to a FTZ

Roughly 0.88 circuit mile of an overhead distribution power line traversing through residential areas is in a Tier 3 FTZ, with 100% of the line de-energized under normal conditions.



### Undergrounding Projects

In May 2021, APU completed the undergrounding of approximately 0.37 circuit miles of overhead power lines located in a FTZ along Eucalyptus Drive south of Santa Ana Canyon Road.



### Hazard Mitigation Grant

FEMA awarded a \$1.1M Phase I Hazard Mitigation Grant to APU that will support the undergrounding of seven overhead segments within and adjacent to FTZs.



## Training



### Fire Camera View & Operations

Training was held for AF&R Dispatch Center staff and APU Operators on accessing the fire monitoring cameras from the emergency dispatch centers.



### De-energize/Restore Procedures

Training was provided on triggers to initiate de-energization of circuits within the FTZs and executing the communications plan contained in SO 2529.\*



### Disabling Reclosers

Training was conducted on triggers to initiate disabling of reclosing operations on circuits within the FTZs and executing the communications plan in SO 2529.\*

#### \* Acronyms \*

FTZs = Fire Threat Zones  
APU = Anaheim Public Utilities  
AF&R = Anaheim Fire & Rescue

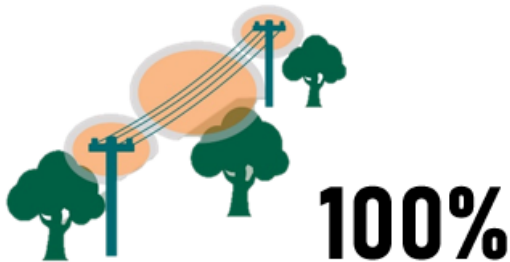
\* SO 2529 = System Order 2529 represents APU's policies and procedures to mitigate wildfire risk from electrical sources.

# Wildfire Mitigation Plan Performance Metrics

**CY  
21**



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PUBLIC UTILITIES



## % of Tier 3 FTZ Power Lines Cleared of Vegetation

All 1.02 miles of power lines along the Tier 3 FTZ were cleared of vegetation prior to the onset of fire season, meeting APU's annual goal, and reducing the risk of fire ignition and propagation from electric infrastructure.



## Utilizing Goats for Fire Prevention

Anaheim Fire & Rescue employs herds of goats to eat dry brush and invasive plants – especially in difficult topographical areas with steep hills and valleys. Invasive (or alien) plants are considered dangerous because they tend to catch on fire more easily than native-born plants from the area.



## Inspections & Patrols



### All Overhead Distribution Lines

All overhead distribution lines were patrolled within the compliance period set in GO 95/165\*, meeting the annual goal for this metric.



### All Underground Distribution Lines

Detailed line inspections were completed on all overhead and underground lines within the compliance period set in GO 95/165\*, meeting the annual goal.



### Substation & Yard Equipment

Monthly visual inspections of all substation and yard equipment were completed, meeting or exceeding GO 174\* standards.



## Sampling & Testing



### Strength of Wood Poles

Testing of wood poles in the fire threat zones were completed, in accordance with GO 95/165\* standards. Tests are performed to measure the integrity of the wood pole and its outer layer.



### Contaminants within Insulating Oil

Oil from all substation equipment residing in the fire threat zones were sampled for contaminants, as such contaminants could lead to premature equipment failure.

*GO 95 = General Order 95 are rules established by the California Public Utilities Commission (CPUC) for overhead line design, construction, and maintenance; such rules are intended for adequate service and safety for those engaged in construction, maintenance, operation, or use of such overhead lines.*

*GO 165 = General Order 165 are requirements established by the California Public Utilities Commission (CPUC) for electric distribution and transmission facility inspections to ensure safe and high-quality electrical service.*

*GO 174 = General Order 174 are uniform requirements from the State of California on substation inspection programs, intended to promote safety and service adequacy.*

Metrics added or updated starting with the APU 2020 WMP were the result of actual events that occurred and therefore informed this 2022 WMP. Two previous incidents where contact by a foreign object with energized overhead parts ignited the brush at the base of the pole which were quickly extinguished by first responders, resulted in evaluation of all lighting arresters and mounting brackets within the FTZ, and a program established to replace the equipment and install insulated wrap to prevent future occurrences. The installation of the fire cameras in Anaheim to enhance situational awareness also requires ongoing training for fire agencies authorized to operate those cameras. This training has been included in the operational strategies to reduce wildfires and therefore a metric to track the performance of training has been added. Each incident is tracked and investigated and reviewed again when updating future APU WMPs.

Tracking these metrics will provide insight into the effectiveness of APU wildfire mitigation measures and assist in formulating enhanced measures in future WMPs if warranted.

The metrics and the wildfire mitigation improvements they represent are as a result of substantial investments by APU for completed and planned projects and programs in various areas including engineered upgrades, maintenance and operations improvements, and public education and benefits programs. These investments are listed under Table 11, below.



Table 11 - APU's Wildfire Mitigation Investments						
Item	Project Description	Completed		Planned		
		Scope	Cost (\$000)	Scope	Year	Cost (\$000)
1	Wildfire Undergrounding – (all FTZ areas)	Place 2000' of overhead high voltage and communication lines underground on Eucalyptus Drive	\$2,600	Underground conversion of 3.2 miles of overhead high voltage and communication lines across 7 segments.	2021-2024	\$10,000
2	Transformer Replacements in FTZs	Replaced 12 overhead with underground fire-resistant FR3 transformers	\$60	Replace 31 overhead with fire-resistant FR3 underground and surface-mounted transformers	2023-24	\$300
3	Wildfire Cameras	Install infrastructure including fiber optics, networking equipment and camera poles to install 8 cameras at four APU sites.	\$500	Install infrastructure including fiber optics, networking equipment and camera poles to install 6 cameras at three APU sites.	2022-23	\$500
4	AF&R's Vegetation Management in FTZs	Goat herding contractor costs	\$198	Goat herding contractor costs	On-going	\$200
5	Residential Structure hardening - Attic and Vents	APU provided rebates for 88,000 sq ft of fire-resistant attic insulation installed by 48 customers. Rebates are also available for customers taking advantage of Fire-Resistant fireplace vents.	\$31	Continue with rebates for fire-resistant attic insulation and fireplace vents	On-going	\$30
6	Residential Structure Hardening - Building Code Upgrades	Plans for new construction in fire-prone areas to comply with Building Code Chapter 7A - Materials and Construction Methods for Exterior Wildfire Exposure.	N/A	Continued reviews for compliance with Building Code Chapter 7A	On-going	N/A

Item	Project Description	Completed		Planned		
		Scope	Cost (\$000)	Scope	Year	Cost (\$000)
7	Tree trimming in FTZs	Powerline Clearing of approx 840 trees per year	\$105	Continued tree pruning until all overhead lines are undergrounded in FTZs by 2025		\$105
8	Avian Protection pilot	Install avian protection devices on two powerline segments in vicinity of groundwater charging lakes frequented by migratory birds	\$80	Covered wire upgrades are being considered for a poleline to further improve electric service reliability and protect	2022-23	\$500
9	Device upgrades (sealed surge arresters, non-expulsive and electronic self-contained fuses)	In Fire threat Zones, installed 6 each self-contained electronic and non-expulsive fuses that prevent hard shards from fuse activation to fall on dry grass below, and 12 new lightning arresters with sealed caps to avoid critter contact.	\$100	Sealed Lightning arresters are now standard for all overhead installations and maintenance throughout the City	On-going	\$15
10	Reduce animal-caused outages at open air substations	Install bushing covers for High Voltage Circuit Breakers for Yorba Expansion	\$45	Other two substations serving customers in fire threat zones are in fully-enclosed structures, not subject to animal-induced outages.		\$0
11	Wildfire-resistant Plants	APU's TreePower program includes wildfire-resistant plant species: <a href="https://www.anaheim.net/763/Residential-TreePower">https://www.anaheim.net/763/Residential-TreePower</a> . 540 trees with 302 participants	\$350	Continued wildfire-resistant plants	On-going	\$350

Item	Project Description	Completed		Planned		
		Scope	Cost (\$000)	Scope	Year	Cost (\$000)
12	Mylar Balloon Safety	Mylar balloons educational video posted on City website and YouTube: <a href="https://www.anaheim.net/4752/Mylar-Balloons">https://www.anaheim.net/4752/Mylar-Balloons</a>	\$5	Continued Mylar Balloons educational program	On-going	\$5
13	Backup generators for customers	Purchased a 70kVA trailer-mounted emergency generator to restore power and contract for additional rented emergency generators	\$300	Purchase additional trailer-mounted emergency generator and extend contract for delivery of rented emergency generators, as needed.	2022/23	\$150
14	Ductile iron poles / fiberglass crossarms in Oak Canyon / Walnut Canyon Rd. area	Replaced 36 deteriorated wood poles in HFTZ with ductile iron poles. Topped wood poles left to support natural habitat for birds.	\$1,000	With future undergrounding planned, additional ductile iron poles in fire threat zones are not being considered at this time.		\$0
		<b>Total</b>	<b>\$5,374</b>			<b>\$12,155</b>

## SECTION 15 - Monitor and Auditing

APU reviews the WMP and updates performance metrics annually to align with Anaheim’s planning and budgeting process. The WMP is presented to the Anaheim Public Utilities Board (PUB) annually on or before July 1<sup>st</sup> of each year, APU will submit its wildfire mitigation plan to the California Wildfire Safety Advisory Board (WSAB). The WSAB will review and provide comments and advisory opinions regarding the content and sufficiency of the wildfire mitigation plan. APU will consider comments and opinions received by the WSAB in future wildfire mitigation plans.

Every three (3) years, a comprehensive review of APU’s wildfire mitigation plan will include results from the monitoring and tracking process, which entails tracking the metrics, garnering feedback, identifying increased risks, and ensuring that the wildfire mitigation plan adequately addresses them. Also, an assessment of the wildfire mitigation plan programs and performance combined with analysis of performance metrics to develop changes to design, construction, or maintenance standards and practices to inform activities for future wildfire mitigation plans.

This three-year-cycle comprehensive assessment and update to APU’s wildfire mitigation plan will be reviewed by a Qualified Independent Evaluator (QIE), as required by AB 1054. The QIE will assess and audit the comprehensiveness of APU’s wildfire mitigation plan prior to consideration for recommendation by the Public Utilities Board for consideration and approval

by the Anaheim City Council.

In March 2020, Guidehouse, Inc. was retained by APU to perform the initial independent audit following a competitive solicitation that followed Anaheim’s Council Policy 4.1 – Selection of Professional Consultants. Both the wildfire mitigation plan and the QIE results are posted to the APU website for public view at <http://www.anaheim.net/5487/Wildfire-Mitigation-Plan>. The focus on the first QIE review of the APU 2020 wildfire mitigation plan was to ascertain whether the Plan meets the statutory requirements, which included an audit of all documentation that support the claims made by APU in the Plan. The QIE determined the 2020 WMP and all supporting documentation was comprehensive. Going forward, APU will select a QIE with expertise in industry-wide strategies to evaluate and develop recommendations for increased grid resiliency and options for reducing impacts of wildfires on utility customers. In 2023, APU will prepare a comprehensive update of its WMP and will contract with a QIE for review of that WMP.