

**UPDATED 2022
INDUSTRY PUBLIC
UTILITIES
ELECTRICAL
UTILITY
WILDFIRE
MITIGATION
PLAN**

VERSION 3

June 09, 2022

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I. OVERVIEW

A. POLICY STATEMENT

City of Industry (“COI” or “City”) is a California charter city, located in Los Angeles County, approximately 12 square miles in area. It is mostly an industrial city and according to 2010 Census, it is home for over 3,000 businesses and approximately 219 residents. The electrical service to most of the customers in the City is provided by Southern California Edison (“SCE”). On February 22, 2001, the City Council adopted Ordinance No. 664, codified as Title 7 of the Industry Municipal Code, establishing a public utilities department, the Industry Public Utilities (“IPU”), to oversee the operations of the public utility. The IPU currently provides electrical service to approximately 115 customers with peak demand of 8 MW, and annual energy sales of approximately 42,000 MWh. IPU’s overarching goal is to provide safe, reliable, and economic electric service to the local community. To meet this goal, the IPU constructs, maintains, and operates its electrical lines and equipment in a manner that minimizes the risk of catastrophic wildfire posed by its electrical lines and equipment. All IPU electrical lines are underground.

B. PURPOSE OF THE WILDFIRE MITIGATION PLAN

The IPU is in a region of the state with a low wildfire risk. No part of the IPU’s service territory is in or near the High Fire Threat District designated in the California Public Utilities Commission’s (“CPUC”) Fire Threat Map, and all IPU service territory is designated as “non-fuel” or “moderate” in the California Department of Forestry and Fire Protection’s (“CALFIRE”) Fire and Resource Assessment Program (“FRAP”) Fire Threat Map. Based on a review of local conditions and historical fires, IPU has determined that its electrical lines and equipment do not pose a significant risk of catastrophic wildfire.

Moreover, the IPU’s entire 12,000-Volt electric distribution system is located underground in conduit and vaults and has no overhead distribution lines. IPU does not own, operate, or maintain any transmission or sub-transmission lines except two short underground 66,000-Volt taps less than 150 feet long which run from SCE’s 66,000-Volt Grand Crossing Substation to the IPU owned Waddingham 66,000–Volt to 12,000-Volt Substation. Two other IPU interconnections made with SCE are located at the Pacific Palms Hotel and at the Anaheim-Puente Road City owned parcel, to the west of the northerly end of the street, via an underground 12,000-Volt distribution system. All distribution lines emanating from Waddingham Substation are underground and all future distribution lines will be underground.

Historically, undergrounded electric lines have not been associated with catastrophic wildfires. The undergrounding of electric lines serves as an effective mitigation measure to reduce the potential of power-line ignited wildfires. Based on a review of local conditions and historical fires, IPU has determined that its electrical lines and equipment do not pose a significant risk of catastrophic wildfire.

Despite this low risk, IPU takes appropriate actions to help the region prevent and respond to the increasing risk of devastating wildfires. In its role as a public agency, IPU closely coordinates with other local safety and emergency officials, Los Angeles County Fire and Sheriff Departments, to help protect against fires and respond to emergencies. In its role as a utility, IPU follows all applicable design, construction, operation, and maintenance requirements that reduce safety risks associated with its system. This Wildfire Mitigation Plan describes the safety-related measures that IPU follows to reduce its risk of causing wildfires, including its various programs, policies, and procedures.

This plan is subject to direct supervision by the Industry Public Utilities Commission and is implemented by the Public Utilities Director. This plan complies with the requirements of Public Utilities Code Section 8387 for publicly owned electric utilities to prepare and get approval from IPUC on a wildfire mitigation plan by January 1, 2020, and submit to CPUC before July 1, 2020, and annually update and submit thereafter. This plan also complies with the requirement of SB 901.

C. INFORMATION ABOUT ELECTRICAL UTILITY

The Wildfire Safety Advisory Board (“WSAB”) advised that POUs provide an informational response to assist Staff and board members in understanding the unique characteristics of each POU as a part of 2021 WMP. On February 10, 2022, WSAB advised that the below informational tables be incorporated into the updated WMP 2022 to eliminate the need for a separate document submittal.

Table 1: Context-Setting Information

Utility Name	Industry Public Utilities	
Service Territory Size	2 square miles	
Owned Assets	<input type="checkbox"/> Transmission <input checked="" type="checkbox"/> Distribution <input type="checkbox"/> Generation	
Number of Customers Served	114 customer accounts	
Population Within Service Territory	15 residential customer accounts	
	<i>Number of Accounts</i>	<i>Share of Total Load (MWh)</i>

Customer Class Makeup	15 Residential; 30 Small/Medium Business; 69 Commercial/Industrial	0.4 % Residential; 1.5 % Small/Medium Business; 98.1 % Commercial/Industrial
Service Territory Location/Topography ¹	100 % Urban	
Service Territory Wildland Urban Interface ² (based on total area)	See attached map.	
Percent of Service Territory in CPUC High Fire Threat Districts (based on total area)	Includes maps not applicable Tier 2: [0]% Tier 3: [0]%	
Prevailing Wind Directions & Speeds by Season	<input type="checkbox"/> Includes maps Santa Ana wind conditions usually happen during summer months from May to October but can happen outside summer months. Santa Ana winds are strong, gusty winds with speeds which can range from 30 miles per hour to as high as 90 miles per hour.	
Miles of Owned Lines Underground and/or Overhead	Overhead Dist.: 0 miles Overhead Trans.: 0 miles Underground Dist.: 15 circuit miles Underground Trans.: 0 miles	
	Explanatory Note 1 - Methodology for Measuring "Miles": 15 circuit miles with multiple circuits in the same duct bank.	
	Explanatory Note 2 – Description of Unique Ownership Circumstances: [None]	
	Explanatory Note 3 – Additional Relevant Context: all IPU's electric infrastructure is within the IPU service territory	
Percent of Owned Lines in CPUC High Fire Threat Districts	<i>Overhead Distribution Lines as % of Total Distribution System (Inside and Outside Service Territory)</i>	
	Tier 2: 0 %	

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

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

	Tier 3: 0 %
	<i>Overhead Transmission Lines as % of Total Transmission System (Inside and Outside Service Territory)</i>
	Tier 2: 0 % Tier 3: 0 %
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 type="checkbox"/> Yes <input checked="" type="checkbox"/> No. All IPU distribution circuits are underground with minimal opportunity for any wildfire originating from IPU distribution system. IPU has three interconnections with SCE. One interconnection connects to SCE’s 66,000-Volt overhead sub-transmission lines. The other two connect to SCE’s 12,000-Volt overhead distribution lines.
Has previously pre-emptively shut off electricity in response to elevated wildfire risk?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If yes, then provide the following data for calendar year 2020:

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

Table 2: Cross References to Statutory Requirements

Requirement	Statutory Language	Location in WMP
Persons Responsible	PUC § 8387(b)(2)(A): An accounting of the responsibilities of persons responsible for executing the plan.	Section III-B Page 8
Objectives of the Plan	PUC § 8387(b)(2)(B): The objectives of the wildfire mitigation plan.	Section II Page: 7

Preventive Strategies	PUC § 8387(b)(2)(C): A description of the preventive strategies and programs to be adopted by the local publicly owned electric utility or electrical cooperative to minimize the risk of its electrical lines and equipment causing catastrophic wildfires, including consideration of dynamic climate change risks.	Section V Pages 15 to 17
Evaluation Metrics	PUC § 8387(b)(2)(D): A description of the metrics the local publicly owned electric utility or electrical cooperative plans to use to evaluate the wildfire mitigation plan’s performance and the assumptions that underlie the use of those metrics.	Section VII-A Page 18
Impact of Metrics	PUC § 8387(b)(2)(E): A discussion of how the application of previously identified metrics to previous wildfire mitigation plan performances has informed the wildfire mitigation plan.	Section VII-B Pages 19
Deenergization Protocols	PUC § 8387(b)(2)(F): Protocols for disabling reclosers and deenergizing portions of the electrical distribution system that consider the associated impacts on public safety, as well as protocols related to mitigating the public safety impacts of those protocols, including impacts on critical first responders and on health and communication infrastructure.	Section V-D,F Page 16-17
Customer Notification Procedures	PUC § 8387(b)(2)(G): Appropriate and feasible procedures for notifying a customer who may be impacted by the deenergizing of electrical lines. The procedures shall consider the need to notify, as a priority, critical first responders, health care facilities, and operators of telecommunications infrastructure.	Section V-G] Page 17
Vegetation Management	PUC § 8387(b)(2)(H): Plans for vegetation management.	Section IV-C Page 14
Inspections	PUC § 8387(b)(2)(I): Plans for inspections of the local publicly owned electric utility’s or electrical cooperative’s electrical infrastructure.	Section V-C Page 15

<p>Prioritization of Wildfire Risks</p>	<p>PUC § 8387(b)(2)(J): A list that identifies, describes, and prioritizes all wildfire risks, and drivers for those risks, throughout the local publicly owned electric utility’s or electrical cooperative’s service territory. The list shall include, but not be limited to, both of the following:</p> <p>(i) Risks and risk drivers associated with design, construction, operation, and maintenance of the local publicly owned electric utility’s or electrical cooperative’s equipment and facilities.</p> <p>(ii) Particular risks and risk drivers associated with topographic and climatological risk factors throughout the different parts of the local publicly owned electric utility’s or electrical cooperative’s service territory.</p>	<p>Section IV-B&C Pages 13-14</p>
<p>CPUC Fire Threat Map Adjustments</p>	<p>PUC § 8387(b)(2)(K): Identification of any geographic area in the local publicly owned electric utility’s or electrical cooperative’s service territory that is a higher wildfire threat than is identified in a commission fire threat map, and identification of where the commission should expand a high fire threat district based on new information or changes to the environment.</p>	<p>Section 1-B Page 1 Section V-A Pages 15</p>
<p>Enterprise-wide Risks</p>	<p>PUC § 8387(b)(2)(L): A methodology for identifying and presenting enterprise-wide safety risk and wildfire related risk.</p>	<p>Section V-F Page 16</p>
<p>Restoration of Service</p>	<p>PUC § 8387(b)(2)(M): A statement of how the local publicly owned electric utility or electrical cooperative will restore service after a wildfire.</p>	<p>Section VI Page 17</p>
<p>Monitor and Audit</p>	<p>PUC § 8387(b)(2)(N): A description of the processes and procedures the local publicly owned electric utility or electrical cooperative shall use to do all of the following</p> <p>(i) Monitor and audit the implementation of the wildfire mitigation plan.</p> <p>(ii) Identify any deficiencies in the wildfire mitigation plan or its implementation and correct those deficiencies.</p> <p>(iii) Monitor and audit the effectiveness of electrical line and equipment inspections, including inspections performed by contractors, that are carried out under the plan, other applicable statutes, or commission rules.</p>	<p>Section VII-C & VII-D Page 19-20</p>

<p style="text-align: center;">Qualified Independent Evaluator</p>	<p>PUC § 8387(c): The local publicly owned electric utility or electrical cooperative shall contract with a qualified independent evaluator with experience in assessing the safe operation of electrical infrastructure to review and assess the comprehensiveness of its wildfire mitigation plan. The independent evaluator shall issue a report that shall be made available on the website of the local publicly owned electric utility or electrical cooperative and shall present the report at a public meeting of the local publicly owned electric utility's or electrical cooperative's governing board.</p>	<p style="text-align: center;">Section [VIII] Pages [20 to 21]</p>
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D. ORGANIZATION OF THE WILDFIRE MITIGATION PLAN

This Wildfire Mitigation Plan includes the following elements:

- Objectives of the plan
- Roles and responsibilities for carrying out the plan
- Identification of key wildfire risks and risk drivers
- Description of wildfire prevention, mitigation, and response strategies and programs
- Metrics for evaluating the performance of the plan and identifying areas for improvement
- Review and validation of the plan

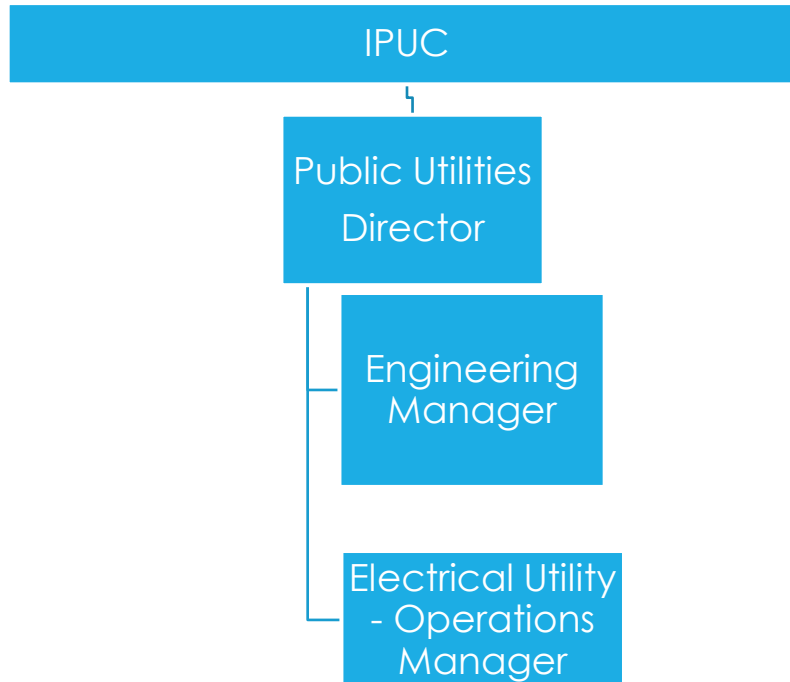
II. OBJECTIVES OF THE WILDFIRE MITIGATION PLAN

The primary goal of this Wildfire Mitigation Plan is to describe IPU's existing programs, practices, and measures that effectively reduce the probability that IPU's electric supply system could be the origin or contributing source for the ignition of a wildfire. To support this goal, IPU regularly evaluates the prudent and cost-effective improvements to its physical assets, operations, and training that can help reduce the risk of equipment-related fires.

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

III. ROLES AND RESPONSIBILITIES

A. UTILITY GOVERNANCE STRUCTURE



B. SUPERVISION AND IMPLEMENTATION OF PLAN

This plan is subject to the direct supervision by the Industry Public Utilities Commission and will be implemented by the Industry Public Utilities Director. Pursuant to Section 7.04.020 of the City of Industry Municipal Code, the City Council serves as the Commissioners of the IPU, and the City Manager serves as the Public Utilities Director. The City’s Engineering Manager serves as Engineer to the IPU and works with the Electric Utility – Operations Manager to fulfill the WMP Roles and Responsibilities for proper plan execution.

Executive Level Responsibility: The Public Utilities Director (“PUD”) will oversee implementation of the Plan and ensure that Staff follows procedures and protocols. PUD will manage the execution of performance monitoring which includes providing guidance to IPU Staff and leading the development of any reports required.

The table below describes the proposed assignments and are subject to change.

Assignment	Lead Personnel	Key Technical Personnel
IPU Wildfire Prevention and Improved Response Program	<ol style="list-style-type: none"> 1. PUD 2. Local Los Angeles County Fire Department Station 	<ol style="list-style-type: none"> 1. IPU- Engineering Manager 2. Electrical Utilities - Operations Manager 3. Local LA County Fire Department
Public Safety and Notification	<ol style="list-style-type: none"> 1. PUD 2. IPU Engineering Manager 3. IPU- Electrical Operations Manager 	<ol style="list-style-type: none"> 1. IPU Contractor – ENCO 2. LA County Emergency Operations Center 3. City and IPU Staff as required
Enhanced Inspections and Operational Practices	<ol style="list-style-type: none"> 1. IPU- Electrical Operations Manager 	<ol style="list-style-type: none"> 1. IPU Staff – Inspectors 2. IPU Contractors – PUI & ENCO
Wildfire Response and Recovery	<ol style="list-style-type: none"> 1. PUD 2. Local Los Angeles County Fire Department Station 	<ol style="list-style-type: none"> 1. IPU- Electrical Operations Manager 2. Engineering Manager 3. Local LA County Fire Department
Coordination with Los Angeles County Sheriff's and LA County Public Works Department	<ol style="list-style-type: none"> 1. PUD 2. Local Los Angeles County Fire Department Station 	<ol style="list-style-type: none"> 1. CNC Engineering for LA County Public Works Department
Coordination with other City Departments	<ol style="list-style-type: none"> 1. Engineering Manager 	<ol style="list-style-type: none"> 1. CNC Engineering

C. ROLE IN WILDFIRE PREVENTION

IPU – Electrical Staff roles and responsibilities for (1) electric facility design, maintenance, and inspection; and (2) Vegetation Management, if required.

- Operate system in a manner that will minimize potential wildfire risks.
- Take all reasonable and practicable actions to minimize the risk of a catastrophic wildfire caused by IPU electric facilities.
- Coordinate with federal, state, and local fire management personnel, as necessary or appropriate, to implement IPU Wildfire Mitigation Plan.
- Immediately report fires pursuant to existing IPU practices and the requirements of this Wildfire Mitigation Plan.

- Take corrective action when Staff witnesses or is notified that fire protection measures have not been properly installed or maintained.
- Comply with relevant federal, state, and industry standard requirements, including the industry standards established by the CPUC.

D. WILDFIRE RESPONSE AND RECOVERY

Los Angeles County Fire Department (“LACFD”) is the lead agency, in cooperation with the City and IPU, for implementation of the Wildfire Response Program. LACFD will direct IPU regarding public safety priorities. IPU Staff’s role in response to wildfire is set forth in Section E (“SEMS”) and, during the recovery process, is set forth in Section VI. As mentioned above under the roles and responsibilities, IPU will coordinate with Los Angeles County (“LAC”) personnel from the Sheriff’s Department and Emergency Operations Center (“EOC”) for situational awareness and other public safety issues. The IPU will also coordinate with LAC Department of Public Works (“LACDPW”) and other local water and wastewater companies to ensure power to these critical facilities.

E. STANDARDIZED EMERGENCY MANAGEMENT SYSTEM

IPU is located within the County of Los Angeles and will assist in the functioning of Emergency Operations Center, if required, depending on the situation and the request from the lead agency. As a local governmental agency, IPU has planning, communication, and coordination obligations pursuant to the California Office of Emergency Services’ (“OES”) Standardized Emergency Management System (“SEMS”) Regulations, adopted in accordance with Government Code section 8607. The SEMS Regulations specify roles, responsibilities, and structures of communications at five different levels: field, local, operational area, regional, and state.

SEMS Five Level Response Coordination	
SEMS Level	Agency
Field	LAC Fire Department
Local	IPU and City
Operational Area	LAC EOC with Area D
Regional	California OES - Southern Region
State	California OES

The five levels of emergency response organization are activated only as needed. Roles and responsibilities provide a coordinated response to emergencies.

1. Field level: LAC Fire Department commands emergency response personnel and resources to carry out tactical decisions in direct response to the incident.

2. Local level: IPU and City manages the overall emergency response and recovery activities within their jurisdictions. Pursuant to this structure, IPU will coordinate and communicate with the relevant safety agencies as well as other relevant local and state agencies, as required. The IPU via LACFD and LACDPW works closely with LAC to coordinate emergency operations.
3. Operational Area level: LAC EOC, with Area D, manages and coordinates information, resources, and priorities among local governments and special districts within the operational area. It acts as the liaison between local level and the regional and state levels.
4. Regional level: The State's OES – Southern Region manages and coordinates information and resources among operational areas within mutual aid regions and between Operational Areas and the State level.
5. State level: California Governor's Office of Emergency Services manages state resources in response to the emergency needs of the other levels, manages and coordinates mutual aid among the mutual aid regions and between the regional level and state level, and coordinates with the federal disaster response system.

IPU, in cooperation with the City, maintains good relations with LAC, which prepares, responds, and assists with recovery from emergencies and natural disasters.

- LAC also coordinates and maintains the County EOC. The LAC EOC is activated during a major incident such as a wildfire to carry out the principles of emergency operations and management between multiple agencies.
- LAC has a direct link to the California Governor's Office of Emergency Services during disasters or any other critical incident. In the event of a major incident, LAC can work with the City and CAL OES to obtain a Presidential proclamation declaring the event as a national emergency.
- LAC works closely with other local agencies and acts as a point of contact for local agencies to California Governor's Office of Emergency Services.

LAC has identified wildland fires as one of the specific hazards that impact the County. LAC's Board of Supervisors has approved emergency and disaster plans and annexes (<https://ceo.lacounty.gov/emergencydisaster-plans-and-annexes/>), including the Operational Area Emergency Response Plan ("OAERP") to establish the coordinated emergency management system for prevention, protection, response, recovery, and mitigation activities within the Operational Area. LAC's OAERP conforms to SEMS.

Under the SEMS structure, a significant amount of preparation is done through advanced planning at the county level, including the coordination of public, private, and nonprofit organizations. LAC's Board of Supervisors established the LAC Operational Area on July

5, 1995. LAC serves as the lead agency of this Operational Area and is guided by the Los Angeles County Disaster Council that is made up of representatives of local agencies. The Operational Area includes local and regional organizations that bring relevant expertise to the wildfire prevention and recovery planning process. It is divided into eight Disaster Management Areas to coordinate management, planning, training, and preparedness actions. The IPU is located in Disaster Management Area D. Area D participants and partners include the cities of Arcadia, Azusa, Baldwin Park, Bradbury, Claremont, Covina, Diamond Bar, Duarte, El Monte, Glendora, Industry, Irwindale, La Puente, La Verne, Monrovia, Pomona, Rosemead, San Dimas, Sierra Madre, South El Monte, Temple City, Walnut, and West Covina; County of Los Angeles Sheriff's Department; Hacienda La Puente Unified School District; the American Red Cross; and California State Polytechnic University, Pomona. City Staff, representing itself and IPU, attends the regular monthly Area D meeting.

Pursuant to the SEMS structure, IPU will participate, if required, in annual training exercises.

In the event of a potential or actual incident, IPU will contact LAC Office of Emergency Management for use of its mass notification system to receive alerts and notifications to impacted jurisdictions. The benefit of using the County's notification system is it decreases the possible spread of contradictory information due to use of multiple messaging platforms. IPU will also notify its customers by email and phone as required under the circumstances. If needed, IPU will use its website and other social media platforms to send alerts and notifications, as. Potential impacted jurisdictions are:

Name	Contact Information
LAC OEM	
Fire Station 118 – 17056 Gale Ave., Industry	(626) 854-3488
Sheriff Station – Industry	(626) 330-3322
Frontier Communications- Aerial Fatalla	(714) 375 -6717
Frontier Communications – Don Beckermann	(626) 666-3526
SCE – Andrew Lopez	(909) 286-5964
Southern California Gas Company- Orange Coast Headquarters- Jeff Schenkleberg	(714) 634-3191
Rowland Water District – Allen Davidson	(562) 697-1726
Walnut Valley Water District – Tai Diep	(909) 595-1268 ext.230
City of Industry	(626) 333-2211
Area D DMAC	(909) 394-3399
Pacific Palms Resort	(626) 810-4455
Industry Hills Expo Center	(626) 330-0324

IPU customers	IPU/ENCO maintains a customer list
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IV. WILDFIRE RISKS AND DRIVERS ASSOCIATED WITH DESIGN, CONSTRUCTION, OPERATION, AND MAINTENANCE

A. BACKGROUND

Like most areas of Southern California, the City and IPU service territory typically experiences cool, wet winters and hot, dry summers, creating extreme fire conditions from May through October, especially during the Santa Ana Wind conditions which may happen outside the hot months. Daily temperatures during the fire season from June to October are usually above 90 degrees Fahrenheit, and humidity can vary from day to day, with some days experiencing humidity in the single digits. The IPU service area is mostly an urban area without many trees or any wooded/brush area except for the Industry Business Center (“IBC”). The IBC is an area of approximately 600 acres that is currently under development. The area currently consists of vacant land with some dry brush or grass on the project site. There are no IPU overhead lines in that area or its vicinity with no significant risk to initiate wildfire. The City is working to keep the grass areas of the IBC green and reduce potential for dry brush. All existing electrical lines at the IBC are underground and any future lines will be underground.

As mentioned earlier, the potential and risk of wildfire originated from the electrical lines owned, operated, and maintained by IPU is low, because the IPU’s entire 12,000-Volt electric distribution system is located underground in conduit and vaults, and the IPU has no overhead distribution lines. Historically, underground lines have not been associated with catastrophic wildfires.

B. ENTERPRISE SYSTEM, OUTAGES AND OPERATIONAL/SAFETY RISK

As previously mentioned, IPU is a very small publicly owned utility, and below the minimum requirements of National Electric Reliability Council (“NERC”) and Western System Coordinating Council (“WSCC”) of 25 megawatts, to maintain records and report power outages with annual reliability matrixes. IPU does not own, operate, or maintain any transmission lines and all distribution lines are underground and future distribution lines will be underground. Based on the foregoing, the IPU has determined that its electrical lines and equipment do not pose a significant risk of catastrophic wildfire.

Despite this low risk, IPU takes appropriate actions to help the region prevent and respond to the increasing risk of devastating wildfires. Some of the actions include:

1. IPU will purchase and use better quality equipment such as underground distribution cable with Ethylene Propylene (“EPR”) Insulation instead of Crosslinked Polyethylene (“XLP”) which is less prone to premature cable failure and potential for arcing.
2. More frequent detailed distribution system inspection cycles than required by CPCU GO 165. For example, CPCU GO 165 requires detailed distribution inspections on a five-year cycle but the IPU will perform that inspection on a three-year cycle. That inspection will include a visual and detailed inspection of the current condition and confirmation that all the underground structures, pad mount switches, and pad mount transformers are functioning normal and catch anything which isn’t functioning as designed and take action to correct it.

C. PARTICULAR RISKS AND RISK DRIVERS ASSOCIATED WITH TOPOGRAPHIC AND CLIMATOLOGICAL RISK FACTORS

Within IPU’s service territory and the surrounding areas, the primary risk drivers for wildfire are the following:

- Extended drought - Southern California experienced the driest winter months in 100 years marking the third year of drought and the second extreme drought in 10 years. The warm, dry winter months overshadowed any gains in precipitation at the end of 2021.
- Vegetation type - The IPU service territory is mostly urban with very few trees on the City streets. The IBC Development that is approximately 600 acres has vacant land with dry grass and other brush on site and adjacent to it. The Industry Hills area near the Pacific Palms Resort and Expo Center have trees and dry brush but there are no overhead electrical lines.
- Vegetation Density - Low to moderate except in the Industry Hills and Expo Center areas.
- Weather - Summer is usually hot and dry with daily temperatures usually above 90-degree Fahrenheit from June to October. Winter is usually cool and wet in which most of the 14.68-inch average annual rain fall occurs between the months of November and March. Average annual temperature is 77 degrees Fahrenheit. Humidity can vary from day to day and can be in single digits in hot summer months from May to October creating extreme fire conditions in combination with Santa Ana Winds.
- High winds - Santa Ana Wind conditions normally happen during summer months from May to October and can also happen outside the hot months. Santa Ana Winds are

strong gusty winds with speeds which can range from 30 miles per hour to as much as 90 miles per hour.

- Terrain - there is more significant terrain variation at the IBC and at the Pacific Palms Resort area.
- Changing Weather Patterns - It is believed that the global warming has impact on the climate and increasing potential of more wildfires.
- Communities at Risk - Besides the City of Industry, other adjacent cities of Diamond Bar, Walnut and La Puente may be impacted but the chances are slim.
- Fire History- There is no known history of wildfires in the area served by IPU.

V. WILDFIRE PREVENTATIVE STRATEGIES AND PROGRAMS

A. CPUC HIGH FIRE THREAT DISTRICT

IPU did not directly participate in the development of the CPUC's Fire-Threat Map, which designates a High-Fire Threat District.

IPU has reviewed the proposed boundaries of the High Fire Threat District and confirmed that, based on local conditions and historical fire data, all IPU's service territory was properly excluded, and has no tier 2 or tier 3 fire threat area as of June 2021. IPU does not need to incorporate the High Fire Threat District into its construction, inspection, maintenance, repair, and clearance practices, until CPUC Fire Threat Map is revised to show any area served by IPU which falls within it, but IPU will continue to follow those as an extra precautionary measure where applicable.

B. DESIGN AND CONSTRUCTION STANDARDS

IPU's electric facilities are designed and constructed to meet or exceed the relevant federal, state, or industry standard. IPU follows CPUC General Orders ("GO") 128 as a key industry standard for design and construction of underground electrical facilities. Additionally, IPU monitors and follows, as appropriate, the National Electric Safety Code.

C. ENHANCED INSPECTIONS

Inspections and follow up with action items to perform required maintenance plays an important role in wildfire prevention. Currently, the IPU patrols its distribution system regularly and plans to increase the detailed inspections frequency to exceed GO165 requirements. IPU is considering detailed inspection on a three-year cycle as compared to the five years required by GO165.

Some of inspection activities may include more detailed inspections of pad mounted equipment such as switch blades, rusting, and any other abnormal thing which can cause short-circuits and failures with an initiating arc. Similarly, for underground structures, infrared tests will be performed on the cable terminators or 600-amp and 200-amp elbows, if required.

If IPU Staff discovers a facility in need of repair that is owned by an entity other than IPU, the IPU may issue a notice of repair to the facility owner and work to ensure that necessary repairs are completed promptly.

D. DEENERGIZATION

IPU has the authority to preemptively shut off power due to fire-threat conditions, however, this option is not likely to be used and will only be used in extraordinary circumstances. Due to the minimal risk of IPU's electrical supply facilities causing a power-line ignited wildfire, IPU is not adopting specific protocols for de-energizing any portions of its electric distribution system. IPU will re-evaluate this determination in future updates to this Wildfire Mitigation Plan.

E. SITUATIONAL AWARENESS

Presently IPU is considering installing smart electrical meters with automated metering infrastructure ("AMI") to track individual customer power outages along with the outage notification system as part of the Meter Data Management System ("MDMS") system. IPU's plan to upgrade to AMI and MDM would help to better provide situational awareness of the condition of the electrical distribution system. IPU has gone through the proposal process and selected vendors for AMI and MDMS. The contract is expected to be awarded soon and installation estimated to be completed before June 30, 2023.

IPU Staff monitors weather reports from the local radio and television stations, is alert during the Santa Ana Winds and other high fire threat conditions, and will attempt to not schedule any field work to be performed as a precautionary measure unless it is necessary.

F. OPERATIONAL PRACTICES

IPU will operate the electrical distribution system in a manner that will minimize potential wildfire risks including taking all reasonable and practical actions to minimize the risk of a catastrophic wildfire caused by the IPU's electrical facilities. As recommended by the third-party evaluator, IPU is in the process of hiring a consultant to perform a relay

protection coordination study for each of the six 12,000-Volt distribution feeders originating from the Waddingham Substation. This study was delayed until now as there was delay in loads coming online. This study will include protection coordination of substation feeder relays with the downstream protective devices of fuses in the pad mount switches and pad mounted transformers, fine-tune the relay settings to make sure that any electrical fault on these distribution lines is cleared as quickly as possible, and any faulted part of circuit isolated to reduce the potential risk of any arc. Staff will take corrective actions for deficiencies when witnessed or notified of improperly installed or maintained fire protection measures. In general, during high wildfire threats periods (red flag warnings), the IPU will perform only essential work.

G. PUBLIC SAFETY AND NOTIFICATION

The IPU will do the following to communicate with the community during high fire threat periods and disaster.

- Coordinate with LACFD and LAC Sheriff's Department.
- Expand current IPU customers' notification protocol used for CAISO flex alerts and planned outages to develop communication protocol for notification to the rest of community and social media.

VI. RESTORATION OF SERVICE

In the event of a wildfire or other emergency event, IPU will coordinate the activities necessary to restore electrical service to all parties, as required. The IPU will coordinate with SCE on the restoration of the three interconnection points of Waddingham's 66,000-Volt to 12,000-Volt Substation, Anaheim-Puente's 12,000-Volt and Pacific Palms Resort's 12,000-Volt interconnections. Restoration of service in each specific incident may be different but the steps taken will be similar to begin the restoration process. The steps are as follows:

Assessment.

The IPU will patrol each line segment to determine the extent of damage that has occurred. The patrol will include the assessment of access to the equipment, and crew personal protective equipment ("PPE") requirements for cleanup and debris. The IPU will work with the LACFD and LACSD as required to make sure each area is deemed safe to restore electrical power.

Planning.

After the preliminary and initial assessment, IPU Staff will discuss the plan and needed work to restore power. Any individual customer that has damage to its electrical service panel or transformer will be isolated from the pad mounted switch. Teams will focus on prioritizing the restoration efforts to the most critical infrastructure needs first, such as critical water and communication facilities, at the Pacific Palms Resort, Waddingham Substation, etc.

Mobilize and Action.

Based on the complexity of restoration efforts, the IPU will coordinate the crews and material needs, as required. IPU has contracts with material vendors for material needs but, in the event of widespread catastrophic damage in the region, it may become a challenge to acquire the needed material.

Restoration.

Rebuild effort will start as soon as the areas become safe to access. Initial effort will be to restore the interconnections with SCE, first starting from the Waddingham Substation and then all 12,000-Volt distribution circuits. On a case-by-case basis, it will be determined if rebuilding and demolition may be done simultaneously or separately. After all distribution circuits are restored, individual customers will be restored to power, except those which have sustained damage and are isolated from the circuit. After the repair or replacement of transformer and/or electrical service panel and subsequent inspection, the remaining customers will be restored.

VII. EVALUATING OF THE PLAN

A. METRICS AND ASSUMPTIONS FOR MEASURING PLAN PERFORMANCE

IPU tracks two metrics to measure the performance of this Wildfire Mitigation Plan: (1) number of fire ignitions; and (2) wires down within the service territory. WSAB advised in its comments on February 10, 2022 to evaluate these performance metrics and modify or add new performance metrics. IPU Staff is currently evaluating the addition of new performance metrics, and/or modifying existing metrics, and any changes will be incorporated in the future WMPs, but for this 2022 WMP, two metrics listed above were tracked and reported.

METRIC 1: FIRE IGNITIONS

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

- IPU facility was associated with the fire.
- The fire was self-propagating and of a material other than electrical and/or communication facilities.
- The resulting fire traveled greater than one linear meter from the ignition point.
- IPU has knowledge that the fire occurred.

For this metric, IPU will provide the number of fires that occurred that were less than 10 acres in size. Any fires greater than 10 acres will be individually described.

METRIC 2: WIRES DOWN

The second metric is the number of distribution and transmission wires downed within IPU service territory. Since IPU has no overhead transmission and distribution lines and this metric is not applicable to IPU.

IPU will not normalize this metric by excluding unusual events, such as severe storms. Instead, IPU will supplement this metric with a qualitative description of any such unusual events.

B. METRICS FOR 2022 PLAN

The metrics for calendar years 2019, 2020 and 2021 are the following:

Year	Fire Ignitions	Wires Down Events
2019	0	0
2020	0	0
2021	0	0

C. IMPACT OF METRICS ON PLAN

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

D. MONITORING AND AUDITING THE PLAN

This Wildfire Mitigation Plan will be presented to IPUC on an annual basis. Additionally, a qualified independent evaluator will review the Plan and provide any suggested improvements in the 2023 comprehensive WMP and subsequent plans, as necessary.

E. IDENTIFYING AND CORRECTING DEFICIENCIES IN THE PLAN

IPU Staff, inspectors, and contractors are encouraged to identify Wildfire Mitigation Plan deficiencies to the IPU – Operations Manager as soon as possible, when observed. The Operations Manager will evaluate each reported deficiency and, if it is determined to be a valid deficiency, it will be entered into a log with the following information:

- Date the deficiency was discovered
- Description of deficiency
- Source identifying the deficiency
- Priority based on the severity
- Corrective action required and deadline to accomplish
- Assigned staff for corrective action
- Date corrective action completed

F. MONITORING THE EFFECTIVENESS OF INSPECTIONS

As previously mentioned, IPU will endeavor to exceed the GO165 requirement to conduct a detailed inspection on a five-year cycle, and instead, perform that inspection on a three- or four-year cycle. Also, IPU performed GO165 inspections in fall 2019 and plans to do it again in fall 2022 or winter 2023, making a note of the observations to be reviewed after the inspection is completed. Anything found that needs improvement or appears hazardous will be documented and will be given a priority work order that will be tracked to the closure.

VIII. QUALIFIED INDEPENDENT EVALUATOR

IPU contacted Richard Mrlik of Intertie Incorporated, located in Sausalito, California back in November 2019 to act as an Independent Evaluator (“IE”) to review the IPU 2020 WMP scheduled to be approved by the IPUC on December 12, 2019. Mr. Mrlik was very familiar with the SB 1028 and SB 901 and statutory requirements of WMP. Mr. Mrlik also had worked with IPU in the past and has a good understanding of territory served by IPU.

Mr. Mrlik reviewed and evaluated the WMP based on the guidelines provided at that time and submitted his IE Report on December 4, 2019. He attended the IPUC meeting on December 12, 2019, for the consideration and approval of this item by IPUC. The IE report was incorporated as Exhibit B into the WMP on December 12, 2019.

Since the incorporation, there has been much discussion on the role of the IE, how often IE should be done, and compilation of an approved list of IEs. IPU is actively participating in CMUA's bi-weekly meetings and will follow and abide by what comes out of those discussion and the final decision.

IX. RESPONSES TO QUESTIONS & COMMENTS FROM WSAB ON IPU WMP FROM FEBRUARY 10, 2022

1. The Board appreciates Industry providing an informational response to the Board's 2021 Guidance Advisory Opinion. In the 2022 WMPs and beyond, the upfront template, cross-reference table with links, and other enhancements included in the informational response should be included in the WMP itself where appropriate, eliminating the need for a separate informational request and response.

Response -Information Tables 1 and 2 are included in this updated 2022 WMP on pages 2 to 6.

2. The Board appreciates Industry's submittal of a "change" letter to help guide Board review of their 2021 WMP. That letter indicates that there were few, if any, changes in the 2021 WMP versus the 2020 WMP. It is not clear to the Board that recommendations from the third party evaluator in the 2019 Independent Evaluation Report have been included in Industry's 2020 or 2021 WMP.

Response – A new change letter is included in this updated 2022 WMP and there are more changes to be incorporated in the future. The response and update to three of the Independent Evaluator's comments on Operational Practices, Situational and Conditional Awareness and Response and Recovery are included below:

- It is recommended that IPU should perform the protection coordination study of distribution feeder relays with downstream devices such as fuses of pad mounted switches and transformers and implement the results of that study to expedite the detection and isolation of system faults. The project will be completed within two years.
 - Response: As mentioned in the WMP on page 20, IPU is in the process of hiring a consultant to perform this study and will provide an update in the comprehensive 2023 WMP. The study was delayed due to the delay in loads coming online by two years and no load or very little load on three of the six distribution feeders.

- IPU is considering installing smart electric meters with automated metering infrastructure (“AMI”) to track individual power outages. IPU’s plan to upgrade to AMI can help improve situational awareness of the condition of electrical distribution system at all times.
 - Response: IPU has gone through the proposal solicitation and evaluation process, selected the vendors for both AMI and Meter Data Management System (“MDMS”), and is in the process of finalizing the awards to the selected vendors. Installation is expected to be completed before June 30, 2023, and an update will be provided in the comprehensive 2023 WMP. As a side note, Waddingham’s 66,000-Volt to 12,000-Volt substation and all six 12,000-Volt distribution feeders are now remotely monitored. IPU and its contractors receive email and text alerts in the event of power outages at the feeder level or above.
 - WMP’s SEMS lacks sufficient granularity and specification of roles, responsibilities, and structures of communication, such as a contact list of participants from the school districts, utilities, fire districts, special districts, communication providers, and other similar organizations. The WMP needs to better develop appropriate and feasible procedures for notifying a customer who may be impacted by the deenergizing of electrical lines. The procedure shall consider the need to notify, as a priority, critical first responders, health care facilities, and operators of telecommunication infrastructure.
 - Response: IPU added more information on details of SEMS including specific roles and responsibilities. IPU organization has changed since the 2020 WMP and updated the organization chart to reflect the current organization. IPU’s contractor, ENCO, has a very systematic and good way to communicate with the IPU’s customers for any planned and unplanned power outages both via email and phone. IPU does not provide electric service to any school or school district, first responder facilities such as fire and police, and any health care facilities. Frontier Communications provides telephone and internet services to IPU’s served territory and contact number of other utilities IPU deals with are listed.
3. The Board appreciates Industry’s submittal of the official minutes indicating the Industry Public Utility Commission’s adoption of the 2021 WMP. Industry should consider incorporating this information within subsequent WMPs, describing the WMP adoption process and how public review and comment is accommodated, avoiding the need for a separate submittal document.

Response - As advised by WSAB, minutes of the approval of the June 9, 2022 IPUC meeting where it considered the Updated 2022 WMP are incorporated in WMP on page 23. The June 9, 2022 meeting was publicly noticed 72 hours before the meeting date as required by the State of California. Any member of the public could attend that meeting or call in to address the IPUC or send the comments in writing to the City Clerk.

4. The Board appreciates Industry's clear and prominent website location of 2021 WMP information, including the submitted informational response. The Board encourages Industry to continue to provide public-facing information for all aspects of the WMP process, including previous versions of the WMP and Independent Evaluator Reports. The Board also encourages a paragraph describing where that information may be found on the website within future WMPs.

Response - IPU will post the 2022 WMP, along with all previous versions, including the Informational Response and Independent Evaluator Report, on its website after June 30, 2022. This information will be posted under "City of Industry – Industry Public Utilities – Electric" just below the IPU Rates and Power Content label. IPU has not yet determined where the information about the public facing and participation will be covered under the future WMP. Any suggestion from WSAB will be considered to be included in the comprehensive 2023 WMP.

5. The Board commends Industry for, as a utility unlikely to experience catastrophic wildfire, covering that risk succinctly in the 2021 WMP and continuing to look for mitigation strategies, such as increased inspection protocols, better underground cable, installation of AMI, and relay protection coordination studies. The Board encourages Industry to update the status of these mitigation strategies in future WMPs and looks forward to that updated information.

Response - Increased inspection protocol GO165 of three-year cycles instead of five years is planned to be executed in fall 2022/winter 2023 and update will be reported in Comprehensive 2023 WMP. Better underground cable with EPR insulation has already been implemented on 9.22 circuit miles of three distribution circuits from the Waddingham Substation to IBC East and IBC West. Considerable progress has been made towards installation of AMI and MDMS, and IPU is in the process of awarding the contracts and estimate installation completed by June 30, 2023. IPU is in the process of hiring a consultant to perform a relay protection coordination study and will report on the progress in the Comprehensive 2023 WMP.

X. MINUTES OF JUNE 9, 2022 IPUC MEETING

STATE OF CALIFORNIA)
COUNTY OF LOS ANGELES) SS
CITY OF INDUSTRY)

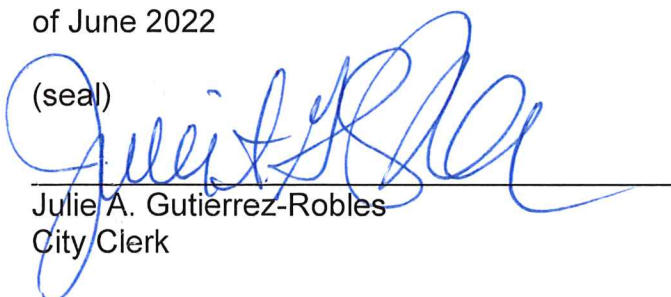
CERTIFICATION OF INDUSTRY PUBLIC UTILITIES COMMISSION MEETING
MINUTES

I, Julie A. Gutierrez-Robles City Clerk of the City of Industry, California, do hereby certify that the following is the true and correct motion and vote taken by the Industry Public Utilities Commission during the June 9, 2022, regular meeting in regard to Board Matter Item No. 6.1 – **Consideration of a updated Wildfire Mitigation Plan for Industry Public Utilities**

A motion was made by Commissioner Marcucci and seconded by Commissioner Radecki to approve the Wildfire Mitigation Plan and authorize the Public Utilities Director to submit to the California Wildfire Advisory Board. Motion carried by a vote of 5-0

WITNESS MY HAND AND THE SEAL OF THE CITY OF INDUSTRY, on this 22nd day of June 2022

(seal)



Julie A. Gutierrez-Robles
City Clerk