This Wildfire Mitigation Plan is posted at www.pwrpa.org/legalnotices/

BACKGROUND

This Wildfire Mitigation Plan ("WMP") was prepared in accordance with Public Utilities Code ("PUC") Section 8387 as amended by Stats. 2019, Ch. 79 (AB 1054)(Effective July 12, 2019) and Stats. 2019, Ch. 410 (SB 560)(Effective October 2, 2019). <u>The 2022 update incorporates certain recommendations from</u> the Wildfire Safety Advisory Board 2022 POU WMP Guidance Advisory Opinion (February 23, 2022).

<u>PUC</u> Section 8387 requires that each local publicly owned electric utility shall:

- 1. Construct, maintain, and operate its electrical lines and equipment in a manner that will minimize the risk of wildfire posed by those electrical lines and equipment.
- 2. Before January 1, 2020, prepare a WMP in accordance with statutory criteria.
- 3. After January 1, 2020, prepare an updated WMP annually and submit it to the California Wildfire Safety Advisory Board on or before July 1 of that calendar year.
- 4. At least once every three years, prepare and submit a comprehensive WMP revision to the California Wildfire Safety Advisory Board.

This WMP describes the range of activities that PWRPA is taking or considering, to mitigate the threat of electrical infrastructure ignited wildfires, including its various strategies and procedures. The WMP will represent best efforts to implement industry best practices in a prudent and reasonable manner.

OVERVIEW OF PWRPA'S ELECTRICAL EQUIPMENT

PWRPA is the retail service provider at approximately 650 points of delivery (POD) located within the PG&E service territory. All of PWRPA's PODs comprise the water-related loads of its 15 public agency customers (pumping, delivery, transfer, etc). There are no residential, commercial or privately-owned industrial loads. Approximately 97% of the PODs are agricultural water pumping loads located in the Central Valley and the remainder are for municipal water loads (pumping, water treatment).

<u>PWRPA has no owned transmission facilities. Wholesale electric distribution service to all PODs is</u> provided by PG&E via its Wholesale Distribution Tariff (WDT). At most PODs, the electrical distribution is provided under WDT Service Agreement 17 between PG&E and the Western Area Power Administration (WAPA). At 5 PODs, the electrical distribution is provided under WDT Service Agreement 56 between PG&E and PWRPA.

This WMP pertains only to the facilities <u>at those 5 PODs</u> that comprise PWRPA's electrical infrastructure. At most delivery points, PWRPA utilizes, but does not own, the electric lines and equipment of its Participants to deliver retail electricity. The Participants own the electric infrastructure and are responsible for complying with all rules relating to electric system safety. PWRPA has ownership interests in five systems comprised of electric poles, lines and transformers through a separate Distribution Facility Agreement ("DFA") with Reclamation District 108, Glenn Colusa Irrigation District and Santa Clara Valley Water District. The DFA provides that each Participant has the responsibility to operate and maintain PWRPA's electrical infrastructure that is used to serve the respective Participant's electrical delivery point.

ORGANIZATION OF THE WILDFIRE MITIGATION PLAN CROSS REFERENCE TO STATUTORY REQUIREMENTS

Location in WMP	Requirement	Statutory Language
Section 1 - Objectives of the WMP	<u>Objectives of</u> <u>the Plan</u>	PUC § 8387(b)(2)(B): The objectives of the wildfire mitigation plan.
Section 2 - Roles and responsibilities for carrying out the WMP	Persons Responsible	PUC § 8387(b)(2)(A): An accounting of the responsibilities of persons responsible for executing the plan.
Section 3 – Identification of wildfire risks and risk drivers	Prioritization of Wildfire Risks	 <u>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 service territory. The list shall include, but not be limited to, both of the following:</u> (i) Risks and risk drivers associated with design, construction, operation, and maintenance of the local publicly owned electric utility's equipment and facilities. (ii) Particular risks and risk drivers associated with topographic and climatological risk factors throughout the different parts of the local publicly owned electric utility's service territory.
	<u>CPUC Fire</u> <u>Threat Map</u> <u>Adjustments</u>	PUC § 8387(b)(2)(K): Identification of any geographic area in the local publicly owned electric utility's service territory that is a higher wildfire threat than is identified in a commission fire threat map, and identification of where the commission should expand a high fire threat district based on new information or changes to the environment.
Section 4 - Description of wildfire prevention & mitigation strategies	<u>Preventive</u> <u>Strategies</u>	PUC § 8387(b)(2)(C): A description of the preventive strategies and programs to be adopted by the local publicly owned electric utility to minimize the risk of its electrical lines and equipment causing catastrophic wildfires, including consideration of dynamic climate change risks.
	<u>Vegetation</u> <u>Management</u>	PUC § 8387(b)(2)(H): Plans for vegetation management.
	Inspections	PUC § 8387(b)(2)(I): Plans for inspections of the local publicly owned electric utility's or electrical cooperative's

Section 6 - Notification of customers and first respondersCustomer Notification ProceduresPUC § 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 7 - Metrics for evaluating the WMP performance and identifying areas for improvement; monitor & audit plan; present riskEvaluation MetricsPUC § 8387(b)(2)(D): A description of the metrics the local publicly owned electric utility plans to use to evaluate the wildfire mitigation plan's performance and the assumptions that underlie the use of those metrics.Impact of MetricsPUC § 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.PUC § 8387(b)(2)(L): A methodology for identifying and			electrical infrastructure.
Restoration of Servicepublicly owned electric utility or electrical cooperative will restore service after a wildfire.Section 6 - Notification of customers and first respondersCustomer Notification. ProceduresPUC § 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 7 - Metrics for evaluating the WMP performance and identifying areas for improvement; monitor & audit plan; present riskPUC § 8387(b)(2)(D): A description of the metrics the local publicly owned electric utility plans to use to evaluate the wildfire mitigation plan's performance and the assumptions that underlie the use of those metrics.Impact of inskImpact of MetricsPUC § 8387(b)(2)(E): A discussion of how the application of previously identified metrics to previous wildfire mitigation plan.Enterprise wide RisksPUC § 8387(b)(2)(L): A methodology for identifying and presenting enterprise wide safety risk and wildfire-related risk.Monitor and AuditPUC § 8387(b)(2)(N): A description of the processes and procedures the local publicly owned electric utility or electrical cooperative shall use to do all of the following (i) Monitor and audit the implementation, and correct those deficiencies.(iii) Monitor and audit the effectiveness of electrical line, and equipment inspections, including inspections performed by contractors, that are carried out under the	energizing systems,		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
Notification of customers and first respondersCustomer Notification Proceduresfor 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 7 - Metrics for evaluating the WMP performance and identifying areas for improvement; monitor 			publicly owned electric utility or electrical cooperative will
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Enterprise Wide Riskspresenting enterprise wide safety risk and wildfire-related risk.PUC § 8387(b)(2)(N): A description of the processes and procedures the local publicly owned electric utility or electrical cooperative shall use to do all of the following (i) Monitor and audit the implementation of the wildfire mitigation plan.Monitor and Audit(ii) Identify any deficiencies in the wildfire mitigation plan or its implementation, and correct those deficiencies.(iii) Monitor and audit the effectiveness of electrical line and equipment inspections, including inspections performed by contractors, that are carried out under the			of previously identified metrics to previous wildfire mitigation plan performances has informed the wildfire
Procedures the local publicly owned electric utility or electrical cooperative shall use to do all of the following(i) Monitor and audit the implementation of the wildfire mitigation plan.Monitor and Audit(ii) Identify any deficiencies in the wildfire mitigation plan or its implementation, and correct those deficiencies.(iii) Monitor and audit the effectiveness of electrical line and equipment inspections, including inspections performed by contractors, that are carried out under the			presenting enterprise wide safety risk and wildfire-related
			 procedures the local publicly owned electric utility or electrical cooperative shall use to do all of the following (i) Monitor and audit the implementation of the wildfire mitigation plan. (ii) Identify any deficiencies in the wildfire mitigation plan or its implementation, and correct those deficiencies. (iii) Monitor and audit the effectiveness of electrical line
Section 8 – Public Qualified PUC § 8387(c): The local publicly owned electric utility or	Section 8 – Public	Qualified	plan, other applicable statutes, or commission rules.

notice of the WMP, updates and independent audit.	Independent Evaluator	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
		<u>cooperative, and shall present the report at a public</u> <u>meeting of the local publicly owned electric utility's or</u> <u>electrical cooperative's governing board.</u>

1. OBJECTIVES OF THE WILDFIRE MITIGATION PLAN (PUB UTIL CODE §§ 8387(b)(1), 8387(b)(2)(B))

The objectives of PWRPA's WMP are to:

- 1. Minimize the probability that PWRPA's electrical infrastructure may be the origin or contributing source for the ignition of a fire.
- 2. Protect PWPRA's electrical infrastructure from wildfire damage and improve the resiliency of the water-related systems powered by PWRPA's electrical infrastructure. This includes mitigating fire fuels located in the areas likely to be a threat to PWRPA's electrical infrastructure.

2. ROLES AND RESPONSIBILITIES (PUB UTIL CODE § 8387(b)(2)(A))

This plan is subject to the direct supervision by the PWRPA Board of Directors ("Board") and will be implemented by the PWRPA General Manager ("GM"). The Participant-specific roles and responsibilities for WMP execution are shown in the table below.

Strategy or Program	Lead Person
Vegetation Management, Section 4.1	GCID – <u>Chris CesaKevin Nelson</u>
	RD 108 – Jordon Navarrot
	SCVWD – John Brosnan
Facility Inspections, Section 4.2	GCID – Kevin Nelson
	RD 108 – Jordon Navarrot
	SCVWD – John Brosnan
Operational Awareness, Section 4.4	GCID – Kevin Nelson
	RD 108 – Jordon Navarrot
	SCVWD – John Brosnan
Wildfire Response & Recovery, Section 5	GCID – Chris Cesa
	RD 108 – Jordon Navarrot
	SCVWD – John Brosnan

Reclosing & De-energization, Section 5.2	GCID – Chris Cesa
	RD 108 – Jordon Navarrot
	SCVWD – John Brosnan
Notification, Section 6	GCID – Chris Cesa
	RD 108 – Jordon Navarrot
	SCVWD – John Brosnan
WMP Evaluation, Section 7	PWRPA – General Manager

3. WILDFIRE RISK AND RISK DRIVERS (PUB UTIL CODE §§ 8387(a), 8387(b)(1), 8387(b)(2)(J), (K), (L))

3.1. ENTERPRISE SAFETY AND WILDFIRE RISK

PWRPA is authorized to provide retail electricity anywhere in California. However, PWRPA does not have a designated service territory and its electrical infrastructure comprises five specific geographic locations. PWRPA evaluated the level of wildfire risk to the PWRPA electrical infrastructure by reviewing the history of events, outages, accidents, and/or equipment failures at each delivery point. As of the effective date of this Version 1.4, tThere have been no forced outages, wildfires or other emergencies at any delivery point served by PWRPA electrical infrastructure.

3.2. EQUIPMENT DESIGN AND OPERATIONAL RISK

PWRPA's designs and constructs its electric facilities to meet or exceed CPUC General Orders ("GO") 95 and 128, PG&E Standards, and any applicable local codes, ordinances and authority having jurisdiction. Overhead design criteria: GO 95 light loading, max loading, 25F, 8# wind. All construction meets criteria for PG&E raptor-safe construction and Wildlife Protection STD. DWG. ES 061149. Unless noted to the contrary, all equipment, materials, and labor shall be furnished in accordance with the applicable sections of the latest revisions of the following:

Institute of Electrical and Electronics Engineers (IEEE) Underwriter's Laboratories (UL) National Electrical Manufacturers Association (NEMA) National Electrical Code (NEC) National Electrical Safety Code (NESC)

The above listed codes and standards are referenced to establish minimum requirements and wherever these Technical Specifications require higher standards of materials or workmanship than required by the codes and standards, these Technical Specifications shall apply.

3.3. TOPOGRAPHIC & CLIMATOLOGICAL RISK

Within the areas that could possibly be affected by PWRPA's electrical infrastructure, the primary risk drivers associated with geography and climate for wildfire are the following: (a) extended drought; (b) vegetation type and density; (c) extreme weather events; (d) lightning; (e) low humidity; and (f) high winds. By the definitions stated in *The 2010 Wildland-Urban Interface of the Conterminous United States*, all of the PWRPA PODs are located in non-vegetated or agricultural areas with less than 6.18 houses per square km.

3.4. CPUC HIGH FIRE THREAT DISTRICTS

In 2018, the California Public Utilities Commission (CPUC) completed the development of the statewide Fire Threat Map that designates areas of the state at an elevated risk of electric line-ignited wildfires. This updated map incorporated historical fire data, fire-behavior modeling, assessments of fuel, weather modeling, and host of other factors. The CPUC's Fire Threat Map includes three Tiers/Levels of fire threat risk. Tier 1 (White) consists of areas that have the lowest hazards and risks. Tier 2 (Orange) consists of areas where there is an *elevated risk* for destructive utility-associated wildfires. Tier 3 (Red) consists of areas where there is an *extreme risk* for destructive utility-associated wildfires. No portions of PWRPA's electrical infrastructure is located in, or adjacent to, designated Tier 2 and 3 wildfire threat areas.

4. WILDFIRE PREVENTION AND MITIGATION STRATEGIES (PUB UTIL CODE §§ 8387(b)(2)(C), (H), (I))

4.1. VEGETATION MANAGEMENT

This strategy reduces vegetation near to PWRPA electrical infrastructures. This also includes fire fuels mitigation and other work in order to prevent the system from causing a fire and to protect the system from fire. PWRPA meets or exceeds the minimum industry standard vegetation management practices. For distribution level facilities, PWRPA meets: (1) Public Resources Code section 4292; (2) Public Resources Code section 4293; (3) GO 95 Rule 35; and (4) the GO 95 Appendix E Guidelines to Rule 35. The recommended time-of-trim guidelines do not establish a mandatory standard, but instead provide useful guidance to utilities. PWRPA will use specific knowledge of growing conditions to determine the appropriate time of trim clearance in each circumstance.

	GO 95, RULE 35, TABLE 1				
Case	Type of Clearance	N/A	Supply Conductors, 750 - 22,500 Volts	N/A	N/A
13	Radial clearance of bare line conductors from tree branches or foliage		18 inches		

GO 95 APPENDIX E GUIDELINES	
TO RULE 35	

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

Voltage of Lines	Case 13	
Radial clearances for any conductor of a line_ operating at 2,400 or more volts, but less than 72,000 volts	4 feet	N/A

CCR § 1254. Minimum Clearance Provisions for Poles - PRC 4292.

The firebreak clearances required are applicable within an imaginary cylindroidal space surrounding each pole or tower on which a switch, fuse, transformer or lightning arrester is attached and surrounding each dead end or corner pole. The radius of the cylindroid is 10 feet measured horizontally from the outer circumference of the specified pole or tower. Flammable vegetation and materials located wholly or partially within the firebreak space shall be treated as follows: (a) At ground level - remove flammable materials, including but not limited to, ground litter, duff and dead or desiccated vegetation that will allow fire to spread, and; (b) From 0-8 feet above ground level -remove flammable trash, debris or other materials, grass, herbacious and brush vegetation. All limbs and foliage of living trees shall be removed up to a height of 8 feet.

4.2. FACILITY INSPECTIONS

These strategies consist of assessment and diagnostic activities as well as associated corrective actions. The practices in this category aim to ensure all infrastructure is in working condition and vegetation adheres to defined minimum distance specifications. Inspection plays an important role in wildfire prevention.

- Glenn Colusa Irrigation District: Abatement staff monitors the vegetation conditions on all of its ditch banks and well sites at least weekly, and dispatches personnel to mow and/or spray these areas on an as-needed basis in order to maintain minimal vegetation growth and safe conditions. Shut-off procedures are described in Section 5.
- Reclamation District 108 (RD 108): When operating, Lateral 8 Pump Station is inspected daily and

a maintenance log is completed. Vegetation management is performed as needed. RD108 also has a SCADA system that detects irregularities at Lateral 8 Pump Station. In the event of irregularities, including power failure, the system will send an automated message to the System A operator (employee(s) on call 24/7 to respond to these alarms). Shut-off procedures are described in Section 5.

- Santa Clara Valley Water District (SCVWD): The distribution facility is located immediately adjacent to the Advanced Recycling Water Treatment Facility and is observed on a daily basis.
- Joint poles and adjacent infrastructure owned by PG&E: PWRPA's infrastructure are intervening facilities as defined in Federal law. Accordingly, they are interconnected with PG&E electrical infrastructure. The first pole in PWRPA's infrastructure is immediately adjacent to the last pole in PG&E's. For joint pole fire prevention, PWRPA shall inform PG&E when PWRPA identifies any compromised poles due to damage or wildfire susceptibility. PWRPA coordinates with PG&E throughout the year when work on its system may affect PG&E's equipment or if PWRPA identifies safety issues.

4.3. OPERATIONAL AWARENESS

These strategies consist of proactive, day-to-day actions taken to mitigate wildfire risks. The practices in this category aim to ensure PWRPA is prepared in high-risk situations, such as dry, windy environmental conditions. PWRPA will operate the system in a manner that will minimize potential wildfire risks including taking all reasonable and practicable actions to minimize the risk of a catastrophic wildfire caused by PWRPA electric facilities. PWRPA will take corrective action for deficiencies when the staff witnesses or is notified of improperly install or maintained fire protection measures.

5. WILDFIRE RESPONSE & RECOVERY (PUB UTIL CODE §§ 8387(b)(2)(F), (M))

The PWRPA electrical infrastructure at four sites located at Glenn Colusa Irrigation District and Reclamation District 108 provide electrical service to onsite agricultural water pumps only. The PWRPA electrical infrastructure at Santa Clara Valley Water District provides electrical service for onsite water pumping at the Advanced Recycled Water Treatment Facility. No electrical service is provided to the public, health care facilities or telecommunications infrastructure and, therefore, no public safety impacts would occur if a power shut-off procedure was implemented. Therefore, the only load impacted by deenergization would be that of the respective PWRPA -Participant. Site-specific information cards are included in the WMP as Exhibit A.

- Glenn Colusa Irrigation District: If incoming power needs to be shut off, GCID staff will call PG&E's Ag Hotline at (877) 311-3276 and request a shutdown at the nearby PG&E meter. In the event of fire, the operator will call 911 and or the Hamilton City Fire Department at (530) 826-0222. The Hamilton City Fire Department has standard operating procedures that address fire fighter safety when working near downed power lines. If they are the first responders to a scene with downed power lines, they assume that all lines are energized and wait for PG&E to respond and control the scene.
- Reclamation District 108 (RD 108): The System A operator that monitors Lateral 8 Pump Station will shut off power in the event of an emergency. If incoming power needs to be shut off, RD108 staff will call PG&E's Ag Hotline at (877) 311-3276 and request a shutdown at the nearby PG&E

meter 1010126474. In the event of fire, the operator will call 911 <u>and</u> the Sacramento River Fire District at (530) 458-0200. <u>The Sacramento River Fire District has standard operating procedures</u> that address fire fighter safety when working near downed power lines. If they are the first responders to a scene with downed power lines, they assume that all lines are energized and wait for PG&E to respond and control the scene.

- Santa Clara Valley Water District (SCVWD): If incoming power needs to be shut off, SCVWD staff will call PG&E's Hotline at (800) 743-5000 and request a shutdown at the nearby PG&E meter. In the event of fire, the operator will call 911 or the San Jose Fire Department Station 29 at (408) 794-7000. The San Jose Fire Department Station 29 has standard operating procedures that address fire fighter safety when working near downed power lines. If they are the first responders to a scene with downed power lines, they assume that all lines are energized and wait for PG&E to respond and control the scene.
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5.1. RESTORATION OF SERVICE

In the event of a wildfire or other emergency event, PWRPA will restore power in cooperation with <u>PG&E</u> and the affected Participant. The PWRPA Participant will notify the PWRPA General Manager to track the event and response activities as described in Section 7. PWRPA may also engage contractors on an asneeded basis.

5.2. RECLOSING AND DEENERGIZATION

PWRPA will shut off power when directed to by the local Fire Department, Police, Cal Fire, or other emergency responding agencies. This must be performed by PG&E at the adjoining pole. Otherwise, PWRPA will not preemptively shut off power during high fire threat periods unless the fire is actually threatening the PWRPA electrical infrastructure.

6. PUBLIC SAFETY AND NOTIFICATION (PUB UTIL CODE §§ 8387(b)(2)(G))

The PWRPA electrical infrastructure at four sites located at Glenn Colusa Irrigation District and Reclamation District 108 provide electrical service to onsite agricultural water pumps only. The PWRPA electrical infrastructure at Santa Clara Valley Water District provides electrical service for onsite water pumping at the Advanced Recycled Water Treatment Facility. No electrical service is provided to the public, health care facilities or telecommunications infrastructure and, therefore, no public safety impacts would occur if a power shut-off procedure was implemented. PWRPA will maintain a proactive outreach and education strategy to create public awareness of fire threats, fire prevention, and available support during a wildfire or large power outages.

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7. EVALUATION OF THE PLAN (PUB UTIL CODE §§ 8387(b)(2)(D), (E), (L), (N))

7.1. METRICS FOR MEASURING PLAN PERFORMANCE

PWRPA will track the performance of this Wildfire Mitigation Plan by recording the : (1) number of fire ignitions; and (2) conductors down at a site served by PWRPA electrical infrastructure. For purposes of this metric, a fire ignition is defined as follows: (a) PWRPA facility was associated with the fire; (b) the fire was self-propagating and of a material other than electrical facilities; (c) the resulting fire traveled greater than one linear meter from the ignition point; and (d) PWRPA had knowledge that the fire occurred. For the purposes of the second metric, a wires-down event includes any instance where an electric conductor falls to the ground or onto a foreign object.

7.2. IMPACT OF METRICS ON PLAN

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

7.3. MONITORING AND AUDITING THE PLAN

PWRPA will measure the effectiveness of specific wildfire mitigation strategies. PWRPA will assess the merits of modifications. This plan will also help determine if more cost-effective measures would produce the same or improved results. Review of this WMP will occur annually and any lessons learned will have the highest priority for improving steps in the WMP, any reference programs, and the process for implementation. The PWRPA Board of Directors will review this WMP on an annual basis.

7.4. IDENTIFYING AND CORRECTING DEFICIENCIES IN THE PLAN

PWRPA Participants' staff and qualified external stakeholders are encouraged to report Wildfire Mitigation Plan deficiencies or potential deficiencies to the PWPRA General Manager as soon as possible when observed. The General Manager shall evaluate each reported deficiency and, if the deficiency is determined to be a valid plan deficiency, it shall be entered into a log with the following information: (a) date discovered; (b) description of the deficiency; (c) priority based on deficiency severity; (d) assigned corrective action including the date when it must be completed by; (e) assigned staff responsible for completing the corrective action; and (f) date corrected.

7.5. MONITORING THE EFFECTIVENESS OF INSPECTIONS

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

8. PUBLIC NOTICES, UPDATES AND AUDIT (PUB UTIL CODE §§ 8387(b)(1), (3), 8387(c))

8.1. PLAN PREPARATION AND NOTICES

PWRPA shall:

- 1. Before January 1, 2020, prepare a WMP in accordance with statutory criteria and present it in a publicly-noticed meeting.
- 2. After January 1, 2020, prepare an updated WMP annually, present it in a publicly-noticed meeting and submit it to the California Wildfire Safety Advisory Board on or before July 1 of that calendar year.
- 3. At least once every three years, prepare and submit a comprehensive WMP revision to the California Wildfire Safety Advisory Board.

8.2. INDEPENDENT AUDITOR

PWRPA shall use a qualified independent evaluator with experience in assessing the safe operation of electrical infrastructure to review and assess the comprehensiveness of this Wildfire Mitigation Plan. The report will be available on PWRPA's website. The report and findings shall be presented to the PWRPA Board of Directors at a public meeting.

20220 Update: In the second quarter of 20220, this WMP was reviewed by <u>relevant representatives from</u> the Hamilton City Fire Department-<u>Chief</u>, and the Sacramento River Fire District-<u>Chief</u>. and San Jose Fire <u>Department Station 29</u>. Site visits with <u>PWRPA</u> and <u>Fire Department personnel</u> were conducted <u>by staff</u> to evaluate the current condition of electrical infrastructure and vegetation management. Since these evaluators are the first responders for the PWRPA sites, the: (a) WMP vegetation management plans were discussed, reviewed and confirmed as acceptable; and (b) the emergency response plans were discussed, updated and confirmed as acceptable.

ATTACHMENT A

SITE-SPECIFIC INFORMATION CARDS