

IMPERIAL IRRIGATION DISTRICT

SB 901 WILDFIRE MITIGATION ANNUAL STATUS REPORT 2021

July 25, 2022

Imperial Irrigation District SB 901 Wildfire Mitigation Plan Annual Status Report 2021

Introduction

The Imperial Irrigation District SB 901 Wildfire Mitigation Plan meets applicable requirements for publicly owned electric utilities, as required by California Senate Bill 901 Wildfires, and California Assembly Bill 1054 Public Utilities Wildfires and Employee Protection.

Although the Imperial Irrigation District does not have infrastructure located in CAL FIRE designated High Fire Hazard Severity Zones, or Very High Fire Hazard Severity Zones, the Imperial Irrigation District is submitting this report, describing efforts which may reduce fire ignitions caused by Imperial Irrigation District power infrastructure.

Executive Summary

The table below provides a status overview as of December 31, 2021, for each of the 42 efforts identified in the IID 2020-2022 WF Mitigation Plan.

Each block in the overview below represents one of the efforts. The color of each block indicates the following:

- Items where additional time is needed to gather data to properly assess the effort, are identified in cyan.
- Items that are complete or are meeting goals are identified in green.
- Items that need improvement are identified in yellow.
- Items that need management intervention are identified in red.
- Items that are cancelled are identified in grey.

Status details for each effort is listed below.

NOTE: Improvements are needed for several items and management action is required for two items. No items have been cancelled.

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IID SB901 WF Mitigation Plan Status Overview

Need Additional Time to Assess	Complete or Meeting Goals	Needs Improvement	Management Action Required	Cancelled
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Vegetation Management			Inspections		System Hardening	
Item 3, Sec 9.3 Vegetation Management: Power Lines 200 kV and Below Not Subject to FERC Jurisdiction -Responsible Parties, Inspection Cycles, Clearances	Item 5, Sec 9.4 Transmission System Vegetation Management Program	Item 6, Sec 9.5 Power Line Inspections – WECC, FAC-003	Item 24, Sec 10.8 Monitor and Audit the Effectiveness of Power Line Inspections - Inspection Tool	Item 7, Sec 9.5 Power line Inspections - GO95	Item 1, Sec 9.1 Power Line and Substation Design, Engineering and Construction	Item 2, Sec 9.2 Relay Protection
Item 4, Sec 9.3 Vegetation Management: Power Lines 200 kV and Below Not Subject to FERC Jurisdiction -Vegetation Management Practice Elements	Item 8, Sec 9.6 Power Line Corridor Clearance Regulation 23	Item 14, Sec 9.12 Vegetation Management Website	Item 15, Sec 9.13 Monitor and Audit the Effectiveness of Power Equipment Inspections: Substations		Item 16, Sec 10.1 No New Power Lines in High/Very High Fire Hazard Zones	Item 17, Sec 10.2 Relay Modernization Program
Item 19, Sec 10.3 New Vegetation Management Program - Certification and CPAT	Item 18, Sec 10.3 New Vegetation Management Program - Implement		Construction and Maintenance	System Operations	Emergency Management	
Item 20, Sec 10.4 Community Outreach and Public Awareness: Vegetation Management	Item 21, Sec 10.5 Vegetation Management Internal Imperial Irrigation District Training		Item 12, Sec 9.10 Utility Mutual Aide Agreements	Item 10, Sec 9.8 Service Restoration After Major Events	Item 9, Sec 9.7 Emergency Event - Procedures	Item 11, Sec 9.9 Standardized Emergency Management System
Qualified Independent Evaluator		Biomass	Wild Fire Mitigation Plan		Performance Metrics	
Item 29, Sec 11.2 Qualified Independent Evaluator Plan Review - Contract	Item 30, Sec 11.2 Qualified Independent Evaluator Plan Review - Plan	Item 26, Sec 10.9 Addressing SB 901 Section 43 Biomass Power Purchase Requirement	Item 28, Sec 11.1 Comprehensive Plan Submissions	Item 34, Section 11.3 Annual Status Report IID Management Submittals		Item 41, Sec 11.8 Performance Metrics - Encroachments
Item 32, Sec 11.2 Qualified Independent Evaluator – Metric Review	Item 33, Sec 11.2 Qualified Independent Evaluator – Alignment Verification	Independent Evaluator	Item 35, Sec 11.3 Annual Status Report – Board Submittals	Item 38, Sec 11.8 Performance Metrics - Fire Incidents		Item 40, Sec 11.8 Performance Metrics -Imminent Threats
Item 31, Sec 11.2 Qualified Independent Evaluator Plan Review – Service Territory Survey		Item 43 Possible Ignition Sources, Safety, System Condition SAP	Item 36, Sec 11.6 Wild Fire Plan Performance Monitoring – Quarterly Review	Item 37, Sec 11.6 Wild Fire Plan Performance Monitoring – Annual Status Report		Item 42, Sec 11.8 Performance Metrics – New Developments
						Item 39, Sec 11.8 Performance Metrics – Lines Down

Management Action List

Item 8, Section 9.6

Approve Regulation 23 Standard Work Procedure, assign incident processing responsibility, provide software tools to manage incidents.

Item 15, Section 9.13

Address inspection of mini-substations, implement regular patrol schedule on the system of record and assign patrol and inspection responsibility.

Needs Improvement List

Item 6, Section 9.5

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Power line inspections – WECC, FAC-003; Address issues with GIS data and inspector field sheet, and complete new FAC-003 standard operating procedure.

Item 18, Section 10.3

Adjust the Vegetation Management Program Guide document with training information once transition to internal vegetation management crews is complete.

Item 20, Section 10.4

Start community outreach activities, once COVID restrictions are lifted.

Item 21, Section 10.5

Start internal IID vegetation management training for other units such as Customer Service Projects and Call Center, once COVID restrictions are lifted.

Item 25, Section 10.8

Need to fully implement powerline inspection guide and improve methods to monitor the effectiveness of powerline inspections.

Items 38, 39, 40, 41, Section 11.8

Need system of record reports for the following metrics: annual number of lines down, fire ignitions, imminent threats, encroachments.

Need Information to Assess List

Item 43

The Independent Evaluator identified several items in several areas; *Possible Ignition Sources, Safety, SAP*. Additional time is needed to gather information to assess progress. Once ready, expect to report on how reported issues are being addressed by operational units.

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Persons Responsible for IID Wildfire Mitigation Plan work efforts.

Name	Title	Plan Section Responsibility
Marilyn Gilbert Del Bosque Gilbert	Manager Energy Department	All
Dan DeVoy	Manager Human Resources Department	Item 9 Section 9.7 Item 11 Section 9.9 Item 23 Section 10.7
Mario Escalera	Manager Operations and Energy Infrastructure	Item 1 Section 9.1 Item 6 Section 9.5 Item 7 Section 9.5 Item 8 Section 9.6 Item 12 Section 9.10 Item 24 Section 10.8 Item 25 Section 10.8 Item 28 Section 11.1 Item 29 Section 11.2 Item 30 Section 11.2 Item 31 Section 11.2 Item 32 Section 11.2 Item 33 Section 11.2 Item 34 Section 11.3 Item 35 Section 11.3 Item 36 Section 11.6 Item 37 Section 11.6 Item 38 Section 11.8 Item 39 Section 11.8 Item 40 Section 11.8 Item 41 Section 11.8 Item 43
Constance Bergmark	Manager of Planning and Engineering/Chief Electrical Engineer	Item 1 Section 9.1 Item 2 Section 9.2 Item 27 Section 10.10 Item 42 Section 11.8 Item 43
Sabrina Barber	Manager Regulatory and Strategic Marketing	Item 16 Section 10.1 Item 26 Section 10.9
Matthew Smelser	Assistant Manager Energy Department System Operations	Item 10 Section 9.8 Item 22 Section 10.6
Jesse Medina	Assistant Manager Energy	Item 15 Section 9.13 Item 17 Section 10.2

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Daryl Buckley	Manager of Distribution Services and Maintenance Operations	Item 1 Section 9.1 Item 3 Section 9.3 Item 4 Section 9.3 Item 5 Section 9.4 Item 6 Section 9.5 Item 7 Section 9.5 Item 8 Section 9.6 Item 12 Section 9.10 Item 13 Section 9.11 Item 14 Section 9.12 Item 18 Section 10.3 Item 19 Section 10.3 Item 20 Section 10.4 Item 21 Section 10.5 Item 24 Section 10.8 Item 25 Section 10.8 Item 38 Section 11.8 Item 39 Section 11.8 Item 40 Sec 11.8 Item 41 Sec 11.8 Item 43
Angel Marcial	Program Planning and Development Manager	IID SB901 Plan development, WSAB status reports, Service Territory Survey

Effort Summary

The following includes calendar year 2021 progress summaries for each of the efforts identified in the IID 2020-2022 Wildfire Mitigation Plan. The summary is organized following the IID plan sections.

IID Plan Section 9

Existing Efforts with Elements Expected to Reduce Fire Risk

Item 1, Section 9.1

Power Line and Substation Design, Engineering and Construction

Requirement: *Ensure that IID electric facilities are designed and constructed meeting or exceeding relevant federal, state, and industry standards such as National Electrical Safety Code, IEEE Standards, and industry best practices such as CPUC General Order 95.*

Status:

IID continues to adhere to federal, state and industry standards in all designs.

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Item 2, Section 9.2

Relay Protection

Requirement: *Review all system disturbances for correct operation. In the event of an incorrect operation, disturbance analysis is performed on the protection settings, relay protective devices, and or associated hardware and equipment until root cause of event is identified. and corrective measures are implemented.*

Status:

IID continues reviewing all disturbances and analyzing all events that occur in the IID generation, transmission and distribution system Where the protection scheme does operate properly, an investigation of the event is performed to identify the element that caused the erroneous operation.

The protection scheme is composed of five elements; 1.-current transformers and potential transformers, 2.-protection relays, 3.-communications systems, 4.-direct current systems (battery bank and battery charger, and 5.-controls (direct current "DC" systems).

In case of erroneous operation, the protection element that did not operate as expected is identified, the element is analyzed, the root cause of the event is identified and corrected.

Item 3, Section 9.3

Vegetation Management: Power Lines 200 kV and Below Not Subject to FERC Jurisdiction – Responsible Parties, Inspection Cycles, Clearances

Requirement: *Ensure work procedures to identify responsible parties, inspection cycles, clearance distance for overhead, and ground mounted & underground infrastructure are followed to address inspection findings*

Status:

The Vegetation Management Program that identifies responsible parties, inspection cycles, vegetation clearance distance standards for overhead, ground mounted, underground infrastructure, and procedures to assign and complete work. The Vegetation Management Program Guide was approved 5/2020.

Item 4, Section 9.3

Vegetation Management: Power Lines 200 kV and Below Not Subject to FERC Jurisdiction – Vegetation Management Practice Elements

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Requirement: *Ensure the Distribution System Vegetation Management practice contains and effectively implements the following components per the WMP and IID schedules/standards:*

- *Inspection Patrols,*
- *Regulatory Requirements and Standards,*
- *Pruning Best Practices,*
- *Safety,*
- *Vegetation Control, and*
- *Customer Service*

Status:

IID completed the IID Vegetation Management Program Guide and IID is currently implementing the program. The guide includes several components including regulatory requirements, pruning standards, safety, vegetation clearance requirements, inspection frequency requirements, etc.

As part of the implementation effort, a project to integrate ESRI GIS inspection information with the SAP system is under way. The vegetation management inspection mobile application is currently undergoing field testing.

IID is currently transitioning away from vegetation management contract services, transitioning to in-house vegetation management line clearance crews. As of 12/31/2021 several crews have been hired. IID expects to complete the transition to all IID in-house line clearance crews by December 2022.

As part of the transition project, IID is currently developing the curriculum and the training path for new unexperienced line clearance employees. This training program is expected to include safety, pruning best practices, line clearance requirements, equipment operation orientations, and on the job work performance assessment tools. Training material development is expected to complete by December 2022.

Item 5, Section 9.4

Transmission System Vegetation Management Program

Requirement: *Ensure the Transmission System Vegetation Management program adheres to Western Electricity Coordinating Council (WECC) requirements and NERC FAC-003-4, where applicable.*

Status:

IID has a dedicated compliance administrator responsible for oversight of NERC/WECC vegetation management requirements.

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IID complies with the NERC Vegetation Management Standard FAC-003 by performing annual inspections of the applicable transmission lines and by completing any work derived from inspections before the next annual inspection.

IID submits quarterly reports to WECC for vegetation-caused outages.

There have been no vegetation-caused outages for Q1 through Q4 2021.

Item 6, Section 9.5

Power Line Inspections WECC, FAC-003

Requirement: Ensure IID follows NERC FAC-003 requirements for Bulk Electric System inspections

Status:

IID has a dedicated compliance administrator responsible for oversight of NERC/WECC vegetation management requirements for BES power lines.

IID complies with the NERC Vegetation Management Standard FAC-003 by performing annual inspections of the applicable transmission lines and completing any work derived from inspections before the next annual inspection.

IID submits quarterly reports to WECC for vegetation caused outages.

There have been no vegetation-caused outages for Q1 through Q4 2021.

A mock WECC audit was performed October 2021, resulting in no significant issues reported.

The FAC-003 SOP is currently under review. The review team has identified several areas of improvements, and is actively working to make appropriate adjustments.

In addition, the FAC-003 evidence (field inspection sheets) and support systems (SAP and GIS) review has been completed. The review identified several areas of needed improvements as listed below.

- SAP system pole equipment inventory information needs improvement for completeness
- GIS system pole inventory information needs updating
- Inspection sheets need updating

Item 7, Section 9.5

Power line inspections GO95

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Requirement: *For distribution circuits, Ensure IID follows industry best practices such as California Public Utilities*

- *Commission General Order 95 for construction standards and General Order 165 for inspection frequency requirements.*
- *Ensure the program performs periodic Patrol Inspections, Detailed Inspections, and Intrusive Inspections to assess the condition of field equipment.*
- *Ensure inspections assess power line physical condition, identify safety issues, identify deviations from construction design, and detect imminent failures*

Status:

The current IID Developer Guide is based on NESC and G.O. 95 construction practices.

Major development efforts on the IID Distribution Pole Inspection Guide are complete. The pole inspection guide was approved 5/26/2021. This guide includes patrol, detailed, and intrusive inspection requirements, and a power pole condition assessment rubric.

The power line inspection mobile application is complete and undergoing field testing. The software application is used to record inspection results, and is used to record equipment defects.

A wood pole intrusive inspection contractor has been engaged to perform transmission and distribution wood pole intrusive inspections. An internal IID program is in place where IID crews and Contractor crews replace severely defective poles.

Item 8 Section 9.6

Power Line Corridor Clearance Regulation 23

Requirement: *Enforce the Power Line Corridor Clearance Regulation 23, and the corresponding standard work procedure to manage power line clearance incidents*

Status:

The IID Board of Directors approved Regulation 23 in November 18, 2019, providing IID staff with a mechanism to address power line encroachments. The regulation provides the authority to remove encroachments along power line corridors.

Field trials of the work procedure have identified several areas for improvement. The work procedure has been modified and is currently under review. Responsible party assignments for process steps are still being negotiated between various organizational units. Responsibility assignments need to be resolved in order to complete the procedure, and complete the supporting software tool adjustments.

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Management is expected to approve the Regulation 23 standard work procedure, once the responsibility assignments are finalized.

Development of the mobile application used by inspectors to report Regulation 23 incidents is complete. Systems integration work with SAP and ESRI GIS is continuing. The SAP application to process Regulation 23 incidents is under field testing. Some issues have been discovered and are being addressed. Once responsibility assignments are finalized, additional field testing will continue.

SAP reports are needed to track the annual number of imminent threats, encroachment incidents, and other metrics as identified in the IID wildfire plan.

**Item 9 Section 9.7
Emergency Events - Procedures**

Requirement: *Ensure the Emergency Management Unit applies all procedures in place to address emergencies, including Email alerts to employees as required for heat advisories, energy conservation Flex Alerts, major road closures, cell telephone service outages, flash flood warnings, Red Flag Warnings, and other major weather events*

Status:
The Emergency Management Unit continues situational awareness activities and continues to provide internal communications as required.

**Item 10, Section 9.8
Service Restoration After Major Events**

Requirement: *Ensure the System Operations Center restores service after major events following the latest version of the IID System Restoration and Black-Start Plan*

Status:
For the 2021 Q1-Q4; IID did not have any major events. IID System Operations Center will restore power after any major event.

**Item 11, Section 9.9
Standardized Emergency Management System**

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Requirement: *Ensure IID follows planning, communication, and coordination obligations pursuant to the California Office of Emergency Services' Standardized Emergency Management System ("SEMS")*

Ensure applicable standard operating procedures roles, responsibilities, and communication for field response, local government, operational area, regional, and state are followed

Status:

The Emergency Management Unit performs work following California Office of Emergency Services' Standardized Emergency Management System ("SEMS") procedures.

**Item 12, Section 9.10
Utility Mutual Aid Agreements**

Requirement: *Ensure IID mutual aid agreements are in place with neighboring utilities*

Status:

IID has mutual aid agreements in place. IID occasionally provides and receives mutual aid.

**Item 13, Section 9.11
Power Lineman Training Program**

Requirement: *Ensure IID implements and adheres to the Power Lineman apprenticeship program in partnership with the local community college.*

Status:

An apprenticeship program is in place in coordination with Imperial Valley College. The Spring 2022 Course Schedule includes several courses.

- ELTT 101 – Electrical Trades I
- ELTT 102 – Electrical Trades II
- ELTT 104 – Electrical Trades IV

**Item 14, Section 9.12
Vegetation Management Website**

Requirement: *Ensure the Vegetation Management site is updated annually per any changes in Vegetation Management policies or procedures.*

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Status:

The 2021 IID.com website annual review was completed in November 2021. No major adjustments needed. Expect to correct two typographical errors soon.

Note: In response to WSAB comments, IID staff has completed work to make the SB 901 Wildfire Mitigation information more accessible and prominent on the IID web site. Work was completed February, 2022.

Item 15, Section 9.13

Monitor and Audit the Effectiveness of Power Equipment Inspections:

Substations

Requirement: *Ensure IID performs monthly substation inspections according to policies and procedures.*

Status:

Substation journeymen inspect IID transmission and distribution substations on a monthly basis. These inspections assess the state of the equipment as well as the surrounding facility. Precarious conditions reported by substation inspectors initiate orders to repair or replace equipment that eliminates or alleviates potential consequences. Issues that are continually addressed range from oil leaks to overgrown vegetation thanks to these monthly visits. Monthly cumulative reports guarantee completion of inspections at all of the sites listed.

For the first and second quarter of 2021, all 98 substations in the Substation Monthly Inspection program have been inspected successfully every month.

During the SB901 status update process, IID has identified that IID “mini-substations” are not being regularly inspected. Mini-substations are IID transformer installations in fenced-in areas, located inside customer properties.

Management is in the process of identifying the responsible unit that will perform the periodic inspections. Management is also considering to reclassify these installations to avoid operational confusion in the future.

IID Plan Section 10

Planned Efforts with Elements Expected to Reduce Fire Risk

Item 16, Section 10.1

No New Power Lines in High or Very High Fire Hazard Zones

Requirement: *Beginning in 2020, ensure that IID will work with city and county planning departments to prevent land use changes in CAL FIRE High Fire Hazard Zones, or CAL FIRE Very High Fire hazard zones.*

Status:

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As of 12/31/2021 per CAL FIRE map, there are no IID power lines located in CAL FIRE High Fire Hazard, or CAL FIRE Very High Fire Hazard Zones.

IID Regulatory and Environmental Compliance receives and responds to requests for impact assessment from Cities and Counties. IID Distribution System Planning and Customer Service Proposal Engineering Units perform an assessment and provide comments regarding impacts to the IID system and identify mitigations required for the proposed project. Other units such as IID Real Estate also submit comments after their evaluation. The IID Regulatory and Environmental Compliance section issue letter responses, listing environmental impacts including all IID comments, and mitigation requirements.

Item 17, Section 10.2 Relay Modernization Program

Requirement: *Ensure IID implements plans to replace existing electromechanical and solid-state relays with Microprocessor relays, per Board of Directors approved scope, schedule and funding.*

Status:

The following shows the power lines where microprocessor-based relays were installed in calendar year 2021.

CI Line Relay Replacement Van Buren to Shadow Hills.
R Line Relay Replacement Ave 58 to Coachella Switching Station.
Parkview DPU Relay Replacement B711, B712 and B713.
Terminal DPU Relay Replacement L94.
Ave 48 DPU Relay Replacement N41 and N45.
Parkview DPU Replacement B714, B721, B722, B723 and B724

Relay Replacement at Navy Base Sub on the LWNO

Aten Sub DPU Replacement L135, L136, L137 and L138

IID completed all of the scheduled 2021 Relay Projects with the exception of one that was rescheduled due to financial constraints.

Item 18, Section 10.3 New Vegetation Management Program – Implement Program

Requirement: *Ensure IID implements new Vegetation Management Program.*

Status:

IID is transitioning from line clearance contract services to internal IID line clearance crews. As part of the transition, IID is developing a line clearance, training program. Expect to complete program training materials development by 1/2023

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Once training material is complete, expect to add training material references to the Vegetation Management Program Guide.

Item 19, Section 10.3

New Vegetation Management Program - Certification and CPAT Training

Requirement: *Ensure Vegetation Management Contractor personnel receive certification, for tree pruning best practices and complete IID Competent Person Awareness Training (CPAT) to access substation sites.*

Status:

Vegetation Management contract services, request for proposals as of 07/2020 include requirements for A/300 certification, Competent Person Awareness Training, and Qualified Power Line Clearance Trimmers.

Contractor personnel that have not received CPAT training, are provided CPAT training before working inside IID substations.

The IID vegetation management unit is planning to perform A/300 training for IID staff once COVID restrictions are lifted.

Item 20, Section 10.4

Community Outreach and Public Awareness: Vegetation Management

Requirement: *Beginning in 2020, Ensure the new Vegetation Management Program implements outreach activities targeting the general public, public agencies, commercial developers, housing developers, local tree trimming Contractors and landscape Contractors as outlined in the WMP.*

Status:

Due to COVID restrictions no in-person outreach activities were performed during Q1-Q4 2021.

IID has relied on power bill information stuffers, water bill information stuffers, and IID.com web site information, as outreach activities during this period.

The IID Safety Compliance and Vegetation Line Clearance Unit plans to perform community outreach meetings once COVID restrictions are lifted.

Item 21, Section 10.5

Vegetation Management Internal Imperial Irrigation District Training

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Requirement: *Ensure the new Vegetation Management Program conducts at least one internal outreach/training session per year for internal IID Employees for the La Quinta and Imperial Areas.*

Status:
Due to COVID restrictions no in person outreach activities were performed during Q1-Q4 2021.

The IID Safety Compliance and Vegetation Line Clearance Unit plans to perform internal training sessions once COVID restrictions are lifted.

**Item 22, Section 10.6
Disabling Re-Closer Procedure**

Requirement: *Ensure that IID develops a Disabling Re-Closer procedure as needed.*

Status:
Due to the low wildfire threat in the Imperial Irrigation District Service territory, Imperial Irrigation District does not disable re-closers due to anticipated Wildfires. Imperial Irrigation District does not have a formal procedure identified for disabling re-closers.

Imperial Irrigation District will continue to assess the Wildfire threat and will develop a procedure as needed.

**Item 23, Section 10.7
Public Safety Power Shutoff (PSPS)**

Requirement: *Develop and approve a standard PSPS operation procedure and associated standard work procedure by Q1 2021.*

Status:
Imperial Irrigation District recognizes that there may be rare occasions when a fire puts our infrastructure and our customers' safety at risk. During such events, selective de-energization of power lines may be necessary to preserve public safety, and to protect the stability and reliability of the power system.

Due to the low wildfire threat in the Imperial Irrigation District Service territory, Imperial Irrigation District does not have a formal PSPS procedure.

Imperial Irrigation District will continue to assess the Wildfire threat and will develop a procedure as needed.

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Item 24, Section 10.8

Monitor and Audit the Effectiveness of Power Line Inspections - Inspection Tool

Requirement: *Make progress on current technology initiatives to facilitate the capture of field inspection information for pole inspections and for vegetation management inspections, including integration with the Imperial Irrigation District Geographic Information System and the ERP system of record.*

Status:

IID is planning to implement a steel streetlight pole inspection program in the Fall of 2022, to better mitigate any possible fire ignition issues as per SB 901. With the new program, IID will implement random quality checks to verify the effectiveness of our inspection program.

Item 25, Section 10.8

Monitor and Audit the Effectiveness of Power Line Inspections - Inspection Guide

Requirement: *Complete the Power Line Inspection Guide in Q1 2020*

Status:

IID management approved the Power Line Inspection Guide on 5/26/2021. Implement guide and improve methods to monitor the effectiveness of powerline inspections are ongoing.

Item 26, Section 10.9

Addressing SB 901 Section 43 Biomass Power Purchase Requirement

Requirement: *Continue participating in procurement activities with other member agencies through the Southern California Public Power Authority with regard to requirements established by Public Utilities Code §8388*

Status:

SB 901 Section 43 requires utilities with existing biomass procurement contracts that meet certain criteria, to amend or establish a new contract. Statute requires that the generating facility of the existing contract be operative at any time in 2018 with a contract expiration date on or before December 2023.

Pursuant to Section 43, these requirements do not apply to facilities located in federal severe or extreme nonattainment areas for particulate matter or ozone.

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The figure below shows that the majority of the Imperial Irrigation District Service Territory is in the federally classified nonattainment areas of Imperial County and the Coachella Valley in Riverside County. Therefore, Imperial Irrigation District is exempt from Section 43 biomass generation procurement requirements.

Reference: EPA Ozone Designations 2015 Standards, California State Recommendations and EPA Response, California State Recommendation, California Air Resources Board Air Quality Planning and Science Division, Air Quality Analysis Section, Recommended Area Designations for the 0.070 PPM Federal 8-Hour Ozone Standard <https://www.epa.gov/sites/production/files/2016-11/documents/ca-rec-enclosures.pdf>

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**Figure 1
 Recommended Area Designations for the 0.070 ppm Federal
 8-Hour Ozone Standard**



**Item 27, Section 10.10
 Distribution Power Line Bird Deterrents**

Requirement: *In 2020, begin investigating additional bird deterrent options (currently installed on as-needed basis) to address power line outages due to bird strikes. In 2021, identify additional options*

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Status:

IID is in the process of evaluating bird contact incidents for existing bird diverter installation locations.

For 2022, a new pilot project is planned, consisting of 30 bird diverters installed on the K48 circuit at Thermal Substation.

IID expects to monitor bird contact incidents at this location for the 2022 calendar year.

In addition, other areas with a significant number of bird contact incidents will be identified using the IID Distribution Reliability Report. These incident locations will be investigated to identify the appropriate mitigation action.

IID Plan Section 11 Managing the Plan

Item 28, Section 11.1

Comprehensive Update Submissions

Requirement: *Ensure that IID submits a comprehensive plan to the Imperial Irrigation District Board of Directors and the California Wildfire Safety Advisory Board every three years, with an annual Plan performance update*

Status:

The initial IID Wild Fire Plan was submitted to the IID Board of Directors November 2019.

A status report is completed internally quarterly, with the final annual status report completed near the end of February of the following year.

IID expects to submit the 2021 annual status report to the IID Board of Directors Q3 2022 and to the WSAB by August 03, 2022.

After a comprehensive update, IID expects to submit the next 3-year plan to the Wildfire Safety Advisory Board in 2022; IID Wildfire Mitigation Plan 2023-2025.

Item 29, Section 11.2

Qualified Independent Evaluator Plan Review Contract

Requirement: *Ensure IID contracts with a qualified independent evaluator to review and assess the comprehensiveness of the IID Wildfire Mitigation Plan*

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Status:

Engaged qualified evaluator and completed plan review in 2019 for the IID 2020-2022 WF Mitigation Plan.

Expect to engage qualified evaluator to review the IID 2023-2025 WF Mitigation Plan during Q2 2022.

Item 30, Section 11.2

Qualified Independent Evaluator Plan Review - Review Plan

Requirement: *Ensure the independent evaluator reviews the draft Imperial Irrigation District Wildfire Mitigation plan to assess the comprehensiveness of the plan and to assure the plan meets California SB 901, AB 1054, and AB 111 requirements*

Status:

Engaged qualified evaluator to complete plan review of the IID 2020-2022 WF Mitigation Plan in 2019. To demonstrate compliance IID developed a compliance table showing requirements vs IID plan contents. This table is included as part of the plan document.

Expect to perform similar activities with the 2023 – 2025 plan.

Item 31, Section 11.2

Qualified Independent Evaluator – Service Territory Survey

Requirement: *Ensure the independent evaluator annually performs an IID Service Territory Fire Hazard Survey*

Status:

Service territory survey complete June 2019
Service territory survey complete January 2021
Service territory survey expected to complete June 2022

Item 32, Section 11.2

Qualified Independent Evaluator - Metric Review

Requirement: *Ensure the independent evaluator performs a metrics performance review making recommendations to achieve metric improvements*

Ensure the independent evaluator performs a review and assessment of the IID plan progress

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Status:

IID 2020 WF Mitigation Annual Status Report review completed March 2021.

IID 2021 WF Mitigation Annual Status Report review expected to complete Q4 2022.

Item 33, Section 11.2

Qualified Independent Evaluator - Alignment Verification

Requirement: *Ensure the independent evaluator reviews the IID Wildfire Mitigation Plan to assure there are no conflicts, and there is alignment with other regulatory requirements such as FAC-003, California PRC 4292, California PRC 4293, and other Wildfire regulations*

Status:

Review of initial plan by independent evaluator is complete, and submitted as part of the IID WF Mitigation Plan in 2019. A compliance alignment table was developed and includes with the 2020-2022 IID wildfire mitigation plan.

Next comprehensive plan review by Independent Evaluator is expected Q4 2022.

Item 34, Section 11.3

Annual Status Report - IID Management Submittals

Requirement: *Ensure the evaluation results, including improvement suggestions, and deficiencies, are presented Manager, Power Line Construction and Maintenance.*

Status:

2019 Independent Evaluator, findings report submitted Q3 2019.

2020 Independent Evaluator, findings report submitted Q2 2021.

2021 Independent Evaluator, findings report is expected to be submitted Q2 2022.

Item 35, Section 11.3

Annual Status Report – Board Submittals

Requirement: *Ensure that once the final assessment is complete, the Wildfire Mitigation Plan, Independent Evaluator Assessment Report, and Service Territory Survey Report, are posted on the Imperial Irrigation District web site for public review and comment, presented to the Energy Consumers Advisory Committee (ECAC), and presented to the Imperial Irrigation District Board of Directors for approval*

**Imperial Irrigation District
SB 901 Wildfire Mitigation Annual Status Report 2021**

Status:

2019 IID WF Mitigation Plan posted, presented to ECAC and Board Q3 2019

2020 IID Wildfire Mitigation Annual Status Report posted, presented to ECAC and IID Board Q2 2021

2021 IID Wildfire Mitigation Annual Status Report expected to post, and be presented to ECAC and IID Board Q2 2022.

Expect to present the IID 2023-2025 Wildfire Mitigation Plan to IID Board Q2-Q4 2022.

Item 36, Section 11.6

Wildfire Plan Performance Monitoring – Quarterly Performance

Requirement: *Planned Efforts – Ensure that each calendar quarter the Assistant Energy Manager, Power Line Construction and Maintenance reviews business area reports to identify schedule, and deliverable performance*

Status:

Q1-Q2 2021 status report complete, and delivered for review 5/2021

Q1-Q3 2021 status report complete, and delivered for review 11/2021

Q1-Q4 2021 status report complete. Expect to deliver for review, March 2022.

Item 37, Section 11.6

Wildfire Plan Performance Monitoring – Annual Status Report

Requirement: *Plan Performance – ensure that the first quarter of each year Manager, Power Line Construction and Maintenance conducts a review of the program performance metrics to identify deviations from desired results*

Status:

2020 IID WF annual status report review completed Q1 2021

2021 IID WF annual status report review expected Q1 2022.

Item 38, Section 11.8

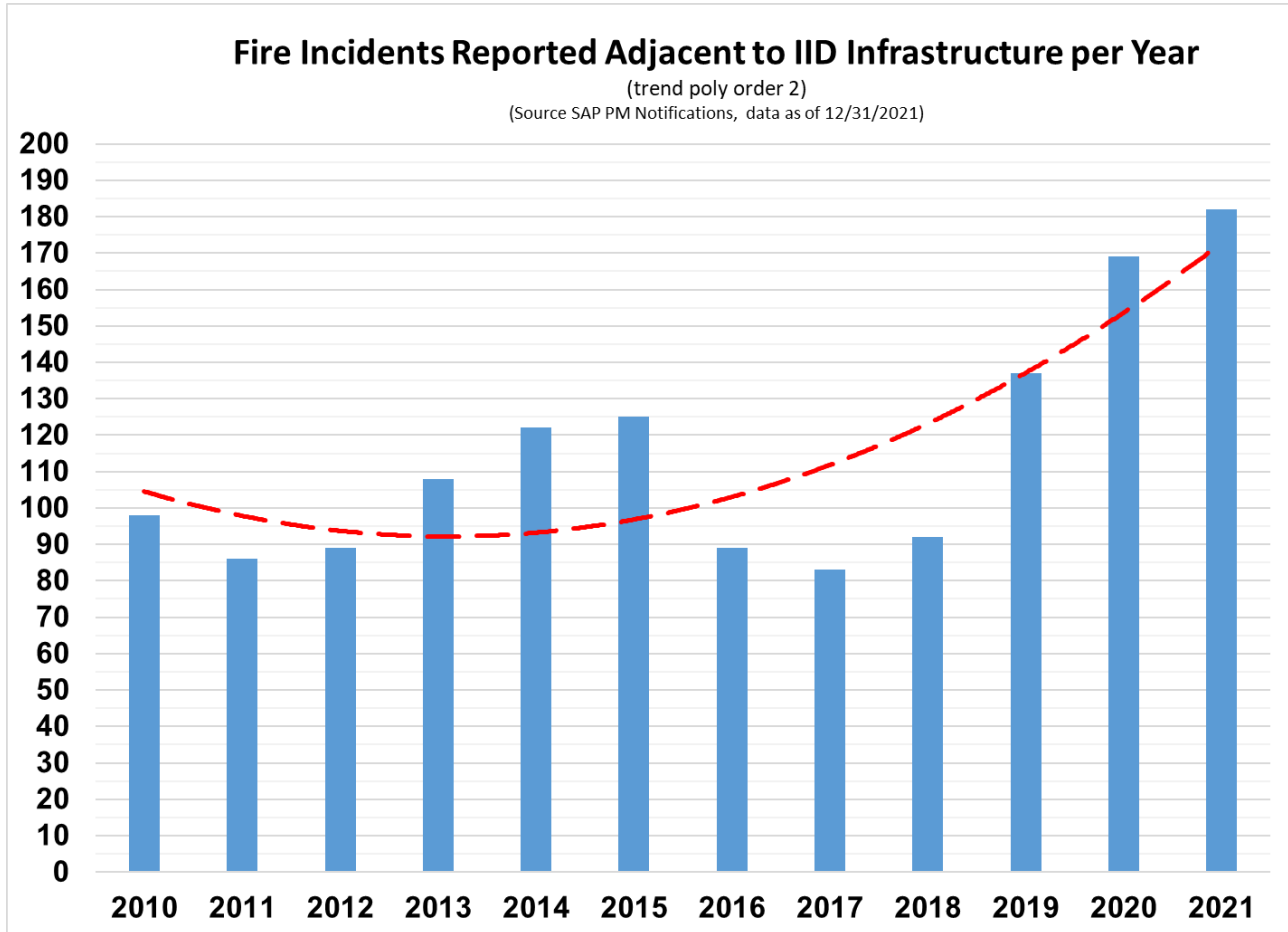
Performance Metrics-Fire Incidents

Requirement: *Track the Number of Fire Ignitions – The metric is the total number of fire ignitions caused by Imperial Irrigation District power infrastructure located in the IID Service Territory for the calendar year; Goal is zero incidents*

**Imperial Irrigation District
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Status:

Graph below shows all fire incidents reported as of 12/31/2021. Note SAP notifications do not identify fire incidents caused by IID infrastructure versus incidents caused by others.



Source SAP Notifications

NOTE: As of 12/31/2021, report includes all fire incidents reported, system does not separate incidents caused by IID infrastructure vs caused by others.

Item 39, Section 11.8

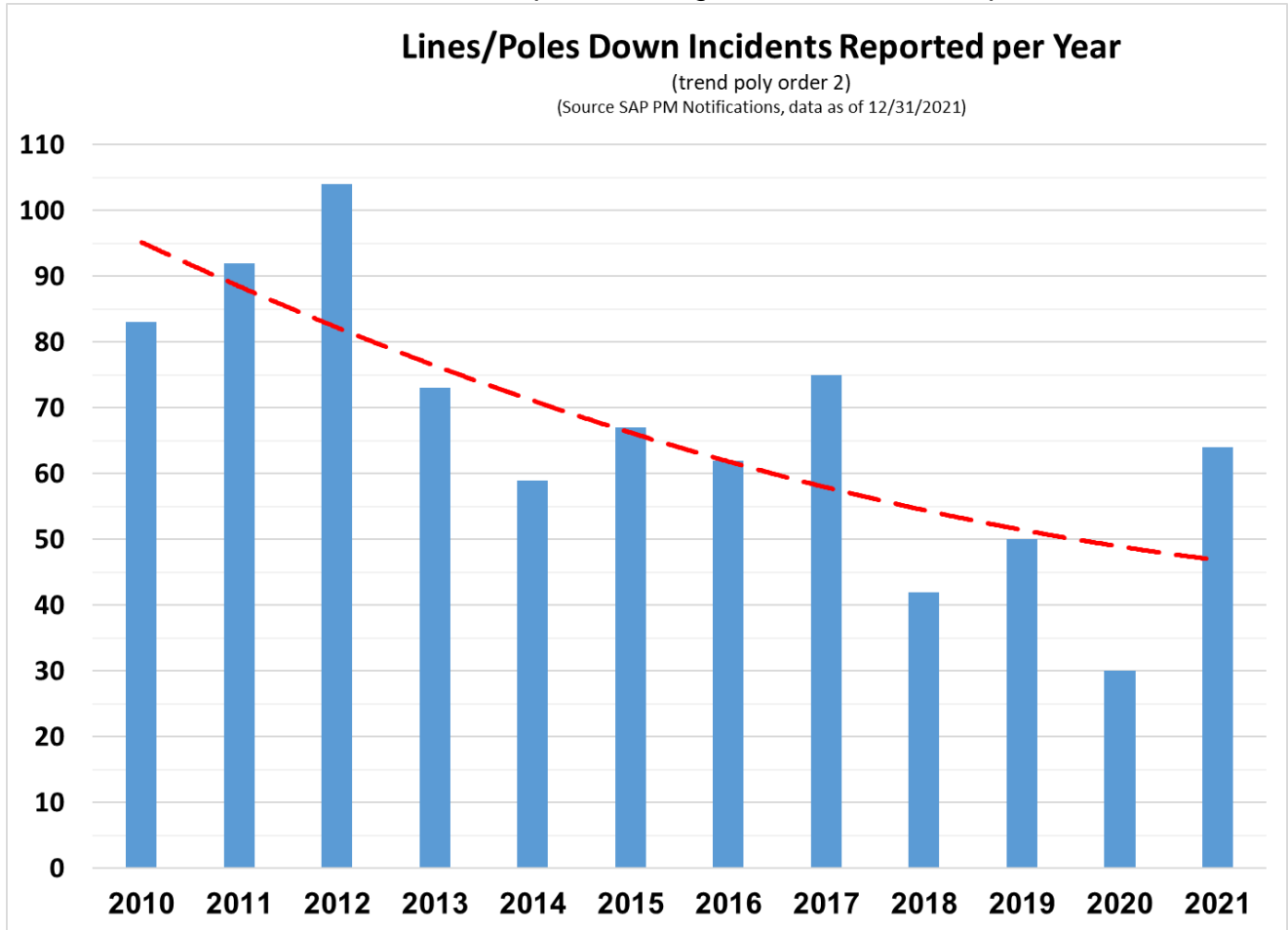
Performance Metrics – Lines Down

Requirement: *Track the Number of Lines Down Incidents – The metric is the total number of lines down incidents reported for the calendar year; The intermediate goal is a declining rate with a final goal of zero.*

Status:

**Imperial Irrigation District
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The graph below shows the lines and poles down incidents reported as of 12/31/2021. Note: SAP notifications do not separately report wires down incidents versus poles down incidents. In addition, do not have a report showing the total number of poles down.



Item 40, Section 11.8

Performance Metrics-Imminent Threats

Requirement: *Track the Number of Imminent Threat Violations – The metric is the total number of Imminent Threat Violations reported for the calendar year. The goal is zero (0) Imminent Threat Violations for the calendar year*

Status:

Regulation 23 procedure is currently under management review for approval.

As of 12/31/2021 the Imminent Threat Violation metric report is not available. IID teams are actively working to integrate SAP and GIS systems to provide the report.

**Imperial Irrigation District
SB 901 Wildfire Mitigation Annual Status Report 2021**

Item 41, Section 11.8

Performance Metrics- Encroachments

Requirement: *Track the Number of Encroachment Violations – The metric is the total number of Encroachment Violations reported for the calendar year; The number of Encroachment Violations metric goal is zero.*

Status:

Regulation 23 procedure is currently under management review for approval.

As of 12/31/2021 the Encroachment Violation metric report is not available. IID teams are actively working to integrate SAP and GIS systems to provide the report.

Item 42, Section 11.8

Performance Metrics- New Developments

Requirement: *Track the Number of Power Infrastructure developments in High Fire Threat Areas – The metric is the number of new power infrastructure developments constructed during the calendar year, located in CAL FIRE High Fire Hazard Zones or Very High Fire Hazard Zones, in the IID Service Territory; The goal is Zero Power Infrastructure Developments in High Fire Threat Areas*

Status:

IID has no infrastructure located in CAL FIRE High Fire Hazard Severity Zones, or Very High, Fire Hazard Severity Zones.

Source: IID GIS w/CAL FIRE, Fire Hazard Severity Zone layer 02/2/2021

IID is meeting goal of zero new power infrastructure developments in CAL FIRE High Fire Hazard Severity Zones, or Very High Fire Hazard Severity Zones.

Item 43, Service Territory Survey Findings

Requirement Provide status on efforts to address Independent Evaluator Service Territory Findings

Conclusion

Imperial Irrigation District is committed to providing safe and reliable power to the customers we serve. We continue to pursue operational and infrastructure improvements with components that help reduce fire ignition. IID welcomes comments and improvement suggestions from the California Wildfire Safety Advisory Board.

**Imperial Irrigation District
SB 901 Wildfire Mitigation Annual Status Report 2021**

Verification

I am an officer of the Imperial Irrigation District, and am authorized to make this verification on its behalf. The statements in the foregoing document are true of my own knowledge.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on July 26, 2022, at Imperial, California.
