



Powering The Center of What's Possible

August 11, 2022

Wildfire Safety Advisory Board
Office of Energy Infrastructure Safety
California Natural Resources Agency
715 P Street, 20th Floor
Sacramento, CA 95814

Re: Silicon Valley Power's 2022 Wildfire Mitigation Plan Update

To Whom It May Concern,

In compliance with Public Utilities Code section 8387, attached is the Silicon Valley Power's (SVP) draft 2022 Wildfire Mitigation Plan. The plan is currently in draft status and will be brought before the City Council for adoption in September 2022 along with SVP's Independent Evaluator Report.

SVP staff conducted a comprehensive review of its plan as part of the Public Utilities Code section 8387(b)(1) requirement to conduct a comprehensive revision of the plan. As part of the process, SVP engaged Dudek to perform an independent evaluation. SVP incorporated feedback received from Dudek into the 2022 plan. SVP also incorporated feedback received from the California Wildfire Safety Advisory Board Guidance Advisory Opinion for the 2022 Wildfire Mitigation Plans of Electric Publicly Owned Utilities and Rural Electric Cooperatives ("2021 Guidance Opinion"). SVP will make a supplemental filing after the draft plan is adopted by the City Council and redline edits. Exhibit A is SVP's informational response to the 2021 Guidance Opinion. Exhibit B is a high-level summary of the changes.

If you have any questions regarding the plan, please contact Basil Wong who can be reached by email at bwong@SantaClaraCA.gov.

Respectfully submitted,

Kevin Kolnowski
Electric Utility Chief Operating Officer

Exhibit A: Information Response to Wildfire Safety Advisory Board 2021 Guidance Opinion

Feedback	SVP Response
<p>The Board appreciates many POUs providing an informational response to the Board’s 2021 Guidance Advisory Opinion but did not receive such a submittal from SVP. In SVP’s 2022 and subsequent WMPs, the utility should include the upfront template and table indicating where in the WMP statutory requirements can be found and add other information pursuant to the December Guidance document as appropriate.</p>	<p>SVP had prepared an Information Response to the Board’s 2021 Guidance Advisory Opinion as part of its 2021 Wildfire Mitigation Plan update. However, due to an oversight did not include the response as part of its submission. SVP submitted the Informational Response to the Wildfire Safety Advisory Board through the docket process on February 14, 2022.</p>
<p>The Board’s 2021 Guidance Advisory Opinion requested information about the adoption and public comment processes for WMPs. SVP has not provided much information here, other than stating that annual WMPs will be “presented” to the City Council. SVP should consider adding a short paragraph in its subsequent WMPs describing the WMP adoption process and how public review and comment is accommodated, as recommended in the Board’s 2021 Guidance Advisory Opinion.</p>	<p>Additional language was added in Section VIII of the 2022 draft Wildfire Mitigation Plan highlighting the plan approval process.</p>
<p>The Board appreciates SVP’s submittal of a “change” letter to help guide Board review of their 2021 WMP but the letter minimally describes changes, making it still difficult to see what has been altered. The Board encourages SVP to reflect updates more completely in the 2022 and subsequent WMPs, particularly in the 2023 major revision.</p>	<p>There were minimal non-substantive changes to the 2021 Wildfire Mitigation Plan.</p> <p>For the 2022 plan submission, SVP Staff will provide a summary of changes (included in this letter) along with a redline version of the plan highlighting all the changes</p>
<p>The Board notes that SVP has apparently not engaged an IE for either the 2020 or 2021 WMPs. SVP does not appear to have posted on their website or filed an IE Report with the Board for the 2020 or 2021 WMPs. SVP’s WMPs suggest that an IE will be engaged to review, but there is no evidence that this has</p>	<p>SVP engaged Dudek to perform an independent evaluation of SVP’s 2021 Wildfire Mitigation plan. SVP will present the IE Report to the City Council at the same time the 2022 Wildfire Mitigation Plan is considered.</p>

<p>happened. The Board has recommended that IEs perform a robust evaluation of the contents and substance of the WMPs and encourages SVP to engage with a qualified IE for the 2022 and future WMPs.</p>	
<p>The Board notes that SVP's WMPs do not contain information about where they can be found on SVP's website, and it appears that the WMPs are not easily, if at all, located on the SVP website. The Board's 2021 Guidance Advisory Opinion recommended that WMPs be posted in a prominent, easily located position on a utility's website.</p>	<p>SVP will be creating a new webpage for the Wildfire Mitigation Plan. The location of this webpage will be included in the 2023 Wildfire Mitigation Plan.</p>
<p>The Board appreciates that SVP's WMP includes a list of wildfire risks, but notes that the statute requires description and prioritization of those risks in the WMP, such description appears to be lacking in SVP's 2021 WMP. Although the Board recognizes that due to the urban location of SVP's service territory and circumstances around SVP's remote transmission assets that SVP's likelihood of encountering catastrophic wildfire issues appears low, the Board still encourages SVP to describe wildfire risks related to the remote transmission assets in more detail and provide more description of interaction with PG&E's surrounding electric infrastructure assets.</p>	<p>SVP appreciates the Board's suggestions. Section IV(a) describes specific risks and risk drivers associated with each of SVP's remote transmission assets.</p>
<p>The Board's 2021 Guidance Advisory Opinion requested information be included in WMPs related to supply shortages. SVP has indicated that the generation assets served by their remote transmission assets may not be available in some wildfire situations, and the Board recommends more detail about substitute assets, plans for continuing to supply power with those substitute assets, and any wildfire risks associated with that substitution.</p>	<p>SVP's remote generation assets and remote transmission assets may not be available in some wildfire situations or weather-related de-energization. In those cases, the CAISO would automatically provide unspecified market power resources to SVP. It's not known where those resources come from and if there would be any wildfire risk associated with the substitution resources.</p>

The Board notes that descriptions of grid hardening and other mitigation measures are relatively sparse in SVPs WMP. The Board requests information about any consideration of typical or innovative grid alterations, such as replacement of expulsion fuses, installing covered conductors, undergrounding, etc., particularly for SVP's assets in or near HFTD areas.

As noted in the WMP, most of SVP's remote transmission assets are grid tie lines to SVP's remote generation resources. The wildfire mitigation plan notes that although SVP has expulsion fuses in a non-HFTD area, SVP has taken extra precaution by treating the risk of the expulsion fuse as if it were in a HFTD area by maintaining a 10ft radius around the fuse clear of vegetation and flammable material. Since these resources do not serve customers directly, the most cost effective mitigation measure in the event of a wildfire or weather related event is to de-energize.

Exhibit B: Summary of Changes

Overall:

- Minor changes for clarity

Section 1B:

- Clarification that the remote transmission assets are “generation tie” lines instead of “transmission” lines.

Section 4A:

- Addition of wildfire event that damaged the Grizzly generation tie line but was not caused by the tie line or any of SVP assets.

Section 4B:

- Added additional description of SVP enterprise wide risk mitigation activities.
- Added brief description of System Operations Procedure for wildfire mitigation developed in 2019

Section 5B:

- Added clarification on the frequency of monitoring the ONCC Significant Fire Potential website
- Added definition of Wildfire Season as advised by the Independent Evaluator
- Added clarification on frequency of patrols during “High Risk Conditions”

Section 5C: Design and Construction Standards

- Added additional description on design standards used and example of how SVP took extra precaution around the use of expulsion fuses.
- Added description of raptor guard installation at 9 location on the Black Butte 60 kV line

Section 5D: Vegetation Management

- Added additional description of process used with SVP’s contracted vegetation management company
- Removed a process that was replaced by SVP’s use of third-party vegetation management company

Section 5E: Inspections

- Added additional description of what is inspected, the frequency of inspection, and what tools are employed.

Section 6: Reclosing Policy

- Consolidated “Restoration of Service” and “Reclosing Policy”

Section 8: Community Outreach and Public Awareness

- Added description of SVP's public process for adoption of SVP's Wildfire Mitigation Plan

Section 11: Independent Auditor

- Added description of engagement of independent evaluator services.

Appendix B: PUC 8387(b) Requirements Table was added to Wildfire Mitigation Plan based on 2020 Guidance Opinion from Wildfire Safety Advisory Board.

Appendix C: Context Setting Information was added to the Wildfire Mitigation Plan based on 2020 Guidance Opinion from the Wildfire Safety Advisory Board.