PORT OF STOCKTON

UTILITY 2021-22 WILDFIRE MITIGATION PLAN

(INCLUDES REQUIRED FIRE MARSHALL INDEPENDENT EVALUATION)

May 16, 2022

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I. WILDFIRE MITIGATION PLAN REQUIREMENTS

A. SENATE BILL 901

Senate Bill (SB) 901 (2018) requires all publicly owned electric utilities (POUs), including the Port of Stockton (Port), to prepare and present a wildfire mitigation plan (WMP) to its governing board prior to January 1, 2020, and annually thereafter. SB 901 identifies specific topics that must be addressed in each POU's WMP, including describing the POU's wildfire mitigation preventative strategies and programs. POUs must also have their plan reviewed by a qualified independent evaluator to assess the comprehensiveness of the plan.

This report serves as the Port's independent evaluation in compliance with SB 901.

B. AB 1054 & AB 111

Assembly Bill (AB) 1054 (2019) and AB 111 (2019) created a new state agency called the California Wildfire Safety Advisory Board ("Board"), which will be made up of seven members, five appointed by the Governor, one appointed by the Speaker of the Assembly, and one appointed by the Senate Rules Committee. SB 1054 requires that every POU must submit its WMP to the Board by July 1 of each year, staring in 2020. The Board will then review the POU WMP and provide comments and advisory opinions on the content and sufficiency of the WMP.

C. POU WMP REQUIREMENTS

California Public Utilities Code (PUC) § 8387(b)(2) lists the statutory requirements for POU WMPs. These are the specific elements that the Fire Marshal must review in order to make its determination for this report. The following list provides the specific elements that must be addressed in a POU WMP:

- **Responsibilities:** An accounting of the responsibilities of persons responsible for executing the plan. (PUC § 8387(b)(2)(A))
- **Objectives:** The objectives of the wildfire mitigation plan. (PUC § 8387(b)(2)(B))
- **Preventive Strategies:** 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. (PUC § 8387(b)(2)(C))
- **Evaluation Metrics:** 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. (PUC § 8387(b)(2)(D))
- **Impact of Metrics:** 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)(E))

- **Recloser and/or De-energization Protocols:** 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. (PUC § 8387(b)(2)(F))

- **Customer Notification Procedures:** 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.[1] (PUC § 8387(b)(2)(G))

- **Vegetation Management:** Plans for vegetation management. (PUC § 8387(b)(2)(H))

- **Inspections:** Plans for inspections of the local publicly owned electric utility's or electrical cooperative's electrical infrastructure. (PUC § 8387(b)(2)(I))

- **Prioritization of Wildfire Risks:** 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:

    - 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. (PUC § 8387(b)(2)(J)(i))

    - 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. (PUC § 8387(b)(2)(J(ii))

- **CPUC Fire Threat Map Adjustments:** 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. (PUC § 8387(b)(2)(K))

- **Enterprisewide Risks:** A methodology for identifying and presenting enterprisewide safety risk and wildfire-related risk. (PUC § 8387(b)(2)(L))

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[1] On October 2, 2019, the Governor signed into law SB 560 (stats. 2019, ch. 410), which amends the language of this provision. As amended, this language states:

> Appropriate and feasible procedures for notifying a customer who may be impacted by the deenergizing of electrical lines. The procedures shall direct notification to all public safety offices, critical first responders, health care facilities, and operators of telecommunications infrastructure with premises within the footprint of potential deenergization for a given event.

Because the statute was amended after the Port prepared its WMP and because this new language is not yet effective, the Port of Stockton's WMP reflects the prior statutory language. The Port of Stockton Fire Marshal has determined that because the Port of Stockton is not adopting deenergization protocols, this statutory change does not impact the Port of Stockton Fire Marshal's review.

- **Restoration of Service:** A statement of how the local publicly owned electric utility or electrical cooperative will restore service after a wildfire. (PUC § 8387(b)(2)(M))

- **Monitor and Audit:** A description of the processes and procedures the local publicly owned electric utility or electrical cooperative shall use to do all of the following:

    - Monitor and audit the implementation of the wildfire mitigation plan. (PUC § 8387(b)(2)(N)(i))

    - Identify any deficiencies in the wildfire mitigation plan or its implementation, and correct those deficiencies. (PUC § 8387(b)(2)(N)(ii))

    - 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. (PUC § 8387(b)(2)(N)(iii))

II. DESCRIPTION OF POU

The Stockton Port District (Port) is a public corporation created for municipal purposes pursuant to Section 6290 of the California Harbors and Navigation Code. The Board of Port Commissioners is the Publicly Owned Utility governing body and the Port Director is the Publicly Owned Utility Chief Executive Officer.

The Port owns and maintains the utility system infrastructure, including power lines and poles, located on Rough & Ready Island, which is also known as the West Complex. Pacific Gas and Electric Company (PG&E) provides electricity to the West Complex pursuant to a utility interconnection operations agreement (IOA) filed with the Federal Energy Regulatory Commission (FERC).

Through a recently amended/extended IOA, PG&E provides the Port with wholesale electric transmission service from the California Independent System Operator's (CAISO) electric grid. The point of interconnection between the two electric systems is the high voltage (60kV) side of the Port's Rough and Ready substation. The Port provides low voltage (12kV) retail electric distribution service to its tenants within the West Complex from the Port's Rough and Ready Substation.

The Port is located in a region of the state with a very low wildfire risk. No part of the Port's service territory is located in or near the High Fire Threat District designed in the California Public Utilities Commission's (CPUC) Fire Threat Map and all of the Port's 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.

Despite this low risk, the Port takes appropriate actions to help its region prevent and respond to the increasing risk of wildfires. In its role as a public agency, the Port closely coordinates with other local safety and emergency officials to help protect against fires and respond to emergencies. In its role as a utility, the Port follows all applicable design, construction, operation, and maintenance requirements that reduce safety risks associated with its system.

The Port prepared a WMP and presented its plan to Port tenants at a public meeting at the Port offices on October 30, 2019. After receiving no public comments prior to the meeting, the Board approved the WMP at a public board meeting on December 2, 2019. The final approved WMP is available on the Port's website.

III. INDEPENDENT EVALUATION

A. INDEPENDENT EVALUATOR REQUIREMENT

SB 901 requires each POU to "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."[2] Additionally, the independent evaluator's assessment of the comprehensiveness of the Port's WMP must be issued in a report that is both posted to the POU's website and presented at a public meeting of the Port's governing board.

B. PORT OF STOCKTON FIRE MARSHAL QUALIFICATIONS

SB 901 requires that the qualified independent evaluator that performs the assessment of the Port's WMP must have experience in assessing the safe operation of electrical infrastructure. The Fire Marshal (also serving as the City of Stockton's Assistant Fire Marshal) will serve as the independent auditor for the WMP. As the Fire Marshal, this individual has specific knowledge of Port operations and is active in patrolling the Port providing inspections and safety recommendations to tenants. The physical presence of this individual allows for the constant monitoring of the necessary wildfire mitigation measures to ensure continuing compliance.

C. EVALUATION METHODOLOGY

The Fire Marshal will evaluate the comprehensiveness the Port's WMP on the following measures:

- **Statutory Compliance:** the Fire Marshal will ensure that each required element specified in SB 901 (as listed in Section II.C. above) is either addressed in the Port's WMP or the Port has sufficiently described why that element is not applicable due to the Port's size, geography, system, or other relevant factor.

- **Industry Comparison:** the Fire Marshal is familiar with existing industry practices and has reviewed the Investor Owned Utility (IOU) WMPs previously filed with the California Public Utilities Commission (CPUC).[3] The Fire Marshal has compared the Port's WMP against existing practices and any comparable actions planned by the IOUs.

- **Physical Inspections:** Because of the Fire Marshal's role in the Port, the Fire Marshal has access to and regularly inspects the Port facilities, including electrical infrastructure. Therefore, the Fire Marshal has access to a long history of data on the fire mitigation decisions and performance of the Port. The Fire Marshal's evaluation of the Port WMP draws upon this historical data and experience.

D. METRICS

The Port's WMP proposes the following metrics to measure performance of its wildfire mitigation measures: (1) number of fire ignitions,[4] and (2) wires down events.[5] The Fire Marshal has

[2] Cal. Pub. Util.Code § 8387(c).
[3] IOU WMPs are available at: https://www.cpuc.ca.gov/SB901/.
[4] For purposes of this metric, a fire ignition is defined as follows: (i) Port facility was associated with the fire; (ii) the fire was self-propagating and of a material other than electrical and/or communication facilities; (iii) the resulting fire traveled greater than one linear meter from the ignition point; and (iv) Port has knowledge that the fire occurred.

determined that these are appropriate metrics for this initial WMP. The Fire Marshal will evaluate the metrics selected in Phase 2 of the CPUC's current Wildfire Mitigation Plan rulemaking for the IOUs (R.18-10-007) and determine if any additional metrics should be incorporated into future Port WMPs.

[5] For purposes of this metric, a wires down event includes any instance where an electric transmission or primary distribution conductor falls to the ground or on to a foreign object.

IV. EVALUATION OF [POU] WILDFIRE MITIGATION PLAN

A. MINIMIZING WILDFIRE RISKS

California Public Utilities Code section 8387(a) requires the following:

> Each local publicly owned electric utility and electrical cooperative shall 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.

To support this goal, the Port 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.

B. EVALUATION OF WMP ELEMENTS

The following table lists each required element for POU WMPs and provides the Fire Marshal's assessment of the comprehensiveness of that element within the Port's WMP.

Required Element of WMP	Location in WMP	Summary of Port WMP	Independent Evaluator's Assessment
PUC § 8387(b)(2)(A): An accounting of the responsibilities of persons responsible for executing the plan.	Section III	During any emergency, the following Port staff are designated as points of contact with relevant local governmental and emergency officials: **Ricardo Navarro:** Primary Contact **Bob Wilson:** Secondary Contact, and first on site during an emergency. Bob Wilson would be the contact for Tesla and Grid Operations for outage and load restoration. **Richard Smith**: response and investigation. After an emergency has occurred, the following Port Administration Staff have following oversight roles: **Steve Escobar**: Administrator and Contracts, Rate Schedules **Juan G. Villanueva**: Project Administration and Construction Project Manager **Ricardo Navarro**: Electrical Utilities operations **Richard Smith, PE**: electrical engineering consultant from HCS Engineering **Bob Wilson**: troubleman for substation and Rough and Ready Island power outages; outside contractor with Bockmon and	Under the Port's Emergency response protocols, the Port is properly organized through outside contractors, Port staff, management, the Director, and ultimately the Board to account for the implementation and management of the Port's WMP

Required Element of WMP	Location in WMP	Summary of Port WMP	Independent Evaluator's Assessment
		Woody Electric.	
PUC § 8387(b)(2)(B): The objectives of the wildfire mitigation plan.	Section II	Effectively reduce the probability that the Port's electric supply system could be the origin or contributing source for the ignition of a wildfire	The Port's WMP contains appropriate objectives to reduce the probability that the Port's electric distribution system could be the origin or contributing source for the ignition of a wildfire. In addition, the WMP addresses a goal to improve the resiliency of the Port's distribution electric grid.
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	No part of the Port's service territory is located within the CPUC's High Fire Threat District map. However, Port regularly evaluates its service territory to determine if, based on changed environmental circumstances, any of the increased construction, inspection, maintenance, repair, and clearance requirements applicable in the High Fire Threat District should apply to any of the Port's facilities. The Port's electric facilities are designed and constructed to meet or exceed the relevant federal, state, or industry standard. The Port treats CPUC General Orders (GO) 95 and 128 as key industry standards for design and construction of overhead and underground electrical facilities. The Port meets or exceeds all standards in GO 95 and GO 128. Additionally, the Port monitors and follows, as	The Port adequately identifies the items undertaken in their programs to prevent wildfires as it relates to their electric distribution equipment. The Port's strategies include building standards, pre-construction, operation, maintenance, and vegetation management as necessary aspects of wildfire prevention safety.

Required Element of WMP	Location in WMP	Summary of Port WMP	Independent Evaluator's Assessment
		appropriate, the National Electric Safety Code.	
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	The Port's WMP proposes the following metrics to measure performance of its wildfire mitigation measures: (1) number of fire ignitions,[6] and (2) wires down events.[7] In future Utility Wildfire Mitigation Plans, the Port 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.	The Port identifies two metric, fire ignitions and wires down that it will use to measure the success of its WMP. In order to track these metrics, the reporting form (Attachment 1 – {Power Outage Log) has been prepared by Port staff to document all electric circuit events.
PUC § 8387(b)(2)(E): A discussion of how the application of previously identified metrics to previous wildfire mitigation plan performances has informed the	Section VII.B	In the initial years, the Port anticipates that there will be relatively limited data gathered through these metrics. However, as the data collection history becomes more robust, the Port will be able to identify areas of its operations and service territory that are disproportionately impacted. The Port will then	The Port has identified that it will report on the WMP metrics in an annual report annual outage report. I have examined the Port's existing records and have found no wildfires have occurred on Port property adjacent to the Port's above

[6] For purposes of this metric, a fire ignition is defined as follows: (i) Port facility was associated with the fire; (ii) the fire was self-propagating and of a material other than electrical and/or communication facilities; (iii) the resulting fire traveled greater than one linear meter from the ignition point; and (iv) Port has knowledge that the fire occurred.

[7] For purposes of this metric, a wires down event includes any instance where an electric transmission or primary distribution conductor falls to the ground or on to a foreign object.

Required Element of WMP	Location in WMP	Summary of Port WMP	Independent Evaluator's Assessment
wildfire mitigation plan.		evaluate potential improvements to the plan.	ground poles.
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 IV.E	When an outage occurs, the first step is the Troubleman is dispatched to the site to determine a source of the outage. For on-site related outages (as indicated by the protective relay system), the Troubleman visually inspects the system. The Port Troubleman visually inspects the power the distribution system for issues, and then manually recloses the onsite circuits. Then Operations bring Port load back online. The Port has not implemented automatic reclosures. For off-site related outages, the Troubleman shuts down the individual circuits of Distribution system within the Port. Then electrical operations calls Tesla and coordinate re-instating loads with the network operations centers. After power is restored to the substation, the Troubleman re-energizes up the Port distribution system circuits one at a time. The Port does not have a policy to change relay settings during emergency conditions.	The Port's complies with this requirement. The Port has no automatic reclosers in its electric distribution system. Once any part of the distribution system is deenergized, it requires manual reenergization.
PUC § 8387(b)(2)(G): Appropriate and feasible procedures for notifying a customer who may be impacted by the deenergizing	Section IV.F	Due to the minimal risk of the Port's electrical supply facilities causing a power-line ignited wildfire, the Port has not adopting specific protocols for de-energizing any portions of its electric distribution system. The Port will	The Port has procedures in place to notify its customers of public safety concerns. However, due to the minimal risk of the Port's electric distribution system causing a power-

Required Element of WMP	Location in WMP	Summary of Port WMP	Independent Evaluator's Assessment
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.		reevaluate this determination in future updates to this Utility Wildfire Mitigation Plan.	line ignited wildfire, the Port has not adopted specific protocols for deenergization and customer notification. During the next year the Port will review the necessity for augmenting its customer safety notification procedures associated with the WMP.
PUC § 8387(b)(2)(H): Plans for vegetation management.	Section V.C	The Port meets or exceeds the minimum industry standard vegetation management practices. For both transmission and distribution level facilities, the Port meets CPUC GO 95 Rule 35; and the GO 95 Appendix E Guidelines to Rule 35. The Port will use specific knowledge of growing conditions and tree species to determine the appropriate time of trim clearance in each circumstance.	The Port performs an annual vegetation/weed abatement review/action plan that meets or exceeds minimum standard practices. The Port has prepared an inspection log to document its vegetation management practices. (See Attachment 2 – West Complex Wildfire Prevention Inspection log)
PUC § 8387(b)(2)(I): Plans for inspections of the local publicly owned electric utility's or electrical cooperative's electrical infrastructure.	Section V.D	The Port meets or exceeds the minimum inspection requirements provided in CPUC GO 165 and CPUC GO 95, Rule 18. Pursuant to these rules, utilities inspect electric facilities in the High Fire Threat District more frequently than the other areas of its service territory. As described above, the Port currently does not have any overhead powerlines located within or near the High-Fire Threat District within the CPUC's Fire Threat Map. However, the Port staff uses their knowledge of the specific	The Port has identified how it will inspect, monitor and report the electric distribution system for both wildfire and weather events, as well as other events that may occur.

Required Element of WMP	Location in WMP	Summary of Port WMP	Independent Evaluator's Assessment
		environmental and geographical conditions of the Port's service territory to determine if any particular areas require more frequent inspections. If the Port staff discovers a facility in need of repair that is owned by an entity other than the Port, the Port will issue a notice to repair to the facility owner and work to ensure that necessary repairs are completed promptly.	
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: **(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.	Section IV.A	Within the Port's service territory and the surrounding areas, the primary risk drivers for wildfire are the following: • Extended drought; • Vegetation type; • Vegetation Density; • Weather; • High winds; • Terrain; • Changing Weather Patterns (Climate Change); • Communities at Risk; • Fire History.	The risk to the Port's electric distribution system are properly identified within the WMP. Particular risks and risk drivers are identified in both areas of construction, operations and maintenance, along with topographic and climatological risk factors.

Required Element of WMP	Location in WMP	Summary of Port WMP	Independent Evaluator's Assessment
(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.			
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	Section IV.B	The following threats and hazards are specific to the San Joaquin Operational Area: ▪ Hazardous materials release – aboard a product carrier or at a facility ▪ Fire or explosion – aboard a product carrier or at a facility ▪ Flood or levee break – impending or actual ▪ Severe storm – impending or actual ▪ Earthquake – impending or actual ▪ Threat, incident, or attack – terrorist or other	The Port' WMP has identified that the Port electric distribution system is not within a recognized wildfire severity zone. The Port worked with authorities in identifying wildfire threat areas. The Port will continue to evaluate wildfire zone changes and adjust its WMP accordingly.

Required Element of WMP	Location in WMP	Summary of Port WMP	Independent Evaluator's Assessment
the environment.		▪ Civil unrest The following threats and hazards are of specific concern within the Port of Stockton: ▪ Anhydrous ammonia release – aboard a product carrier or at a facility ▪ Fire – building, grass, or petroleum ▪ Chemical, biological, radiological, nuclear, explosive (CBRNE) incident involving cargo (aboard a product carrier or at a facility) ▪ CBRNE incident at a major public event – waterside ▪ Cyber attacks	
PUC § 8387(b)(2)(L): A methodology for identifying and presenting enterprisewide safety risk and wildfire-related risk.	Section IV.B	A number of known threats and hazards affect the State of California, the County of San Joaquin, the City of Stockton, and the Port of Stockton. The following threats and hazards are specific to the San Joaquin Operational Area: ▪ Hazardous materials release – aboard a product carrier or at a facility ▪ Fire or explosion – aboard a product carrier or at a facility ▪ Flood or levee break – impending or actual ▪ Severe storm – impending or actual	The Port has prepared mapping showing the locations of their above-ground electric distribution equipment and that it is not located within a recognized wildfire severity zone. The Port has also identified enterprisewide safety risks in their WMP.

Required Element of WMP	Location in WMP	Summary of Port WMP	Independent Evaluator's Assessment
		▪ Earthquake – impending or actual ▪ Threat, incident, or attack – terrorist or other ▪ Civil unrest The following threats and hazards are of specific concern within the Port of Stockton: ▪ Anhydrous ammonia release – aboard a product carrier or at a facility ▪ Fire – building, grass, or petroleum ▪ Chemical, biological, radiological, nuclear, explosive (CBRNE) incident involving cargo (aboard a product carrier or at a facility) ▪ CBRNE incident at a major public event – waterside ▪ Cyber attacks	
PUC § 8387(b)(2)(M): A statement of how the local publicly owned electric utility or electrical cooperative will restore service after a wildfire.	Section V.E	For on-site related outages (as indicated by the protective relay system), the Troubleman visually inspects the system. The Port Troubleman visually inspects the power the distribution system for issues, and then manually recloses the onsite circuits. Then Operations bring Port load back online. The Port has not implemented automatic reclosures. For off-site related outages, the Troubleman shuts down the individual circuits of Distribution	Within the WMP, the Port has outlined its procedures for restoring electrical service after any event that disrupts the customers' electric service.

Required Element of WMP	Location in WMP	Summary of Port WMP	Independent Evaluator's Assessment
		system within the Port. Then electrical operations calls Tesla and coordinate re-instating loads with the network operations centers. After power is restored to the substation, the Troubleman re-energizes up the Port distribution system circuits one at a time. The Port does not have a policy to change relay settings during emergency conditions	
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. (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	Section VIII	The Port's Fire Marshal (also serving as the City of Stockton's Assistant Fire Marshal) will serve as the independent auditor for the Utility Wildfire Mitigation Plan. As the Port's Fire Marshal, this individual has specific knowledge of Port operations and is active in patrolling the Port providing inspections and safety recommendations to tenants. The physical presence of this individual allows for the constant monitoring of the necessary wildfire mitigation measures to ensure continuing compliance. The Port Fire Marshal's report will be prepared for the review, consideration, and potential adoption by the Board of Port Commissioners at a noticed public hearing.	The Port has provided procedures within the WMP for monitoring and auditing the WPM and identifying any deficiencies within the WMP, as well as monitoring the effectiveness of the Port's electric distribution system inspection and records reporting process to collect and track WMP data for future review and reporting.

Required Element of WMP	Location in WMP	Summary of Port WMP	Independent Evaluator's Assessment
are carried out under the plan, other applicable statutes, or commission rules.			

V. RESULTS AND CONCLUSION

The Fire Marshal has reviewed the Port's WMP and on-going documentation for its third report and concludes that the Port's 2021-22 WMP comprehensively addresses all of the statutorily required elements for a POU WMP specified in California Public Utilities Code section 8387. The Fire Marshal further finds that the Port has continued to take reasonable actions to minimize the risk that its electric lines or equipment will cause a wildfire.

Qualified Independent Evaluator: Signature:

Phil Simon

Digitally signed by Phil Simon
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Phil Simon, Asst. Fire Marshal
City of Stockton Fire Dept.
and
Port District Fire Marshal

Date