



RANCHO CUCAMONGA FIRE PROTECTION DISTRICT

INDEPENDENT EVALUATION OF THE RANCHO CUCAMONGA MUNICIPAL UTILITY'S (RCMU) WILDFIRE MITIGATION PLAN

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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 City's Rancho Cucamonga Municipal Utility (RCMU) 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 independent evaluation of RCMU's WMP 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"), is 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. AB 1054 requires that every POU must submit its WMP to the Board by July 1 of each year, starting 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. RCMU'S WMP REQUIREMENTS

California Public Utilities Code (PUC) § 8387(b)(2) lists the statutory requirements for RCMU's WMP. These are the specific elements that the Rancho Cucamonga Fire Protection District must review in order to make its determination for this report. The following list provides the specific elements that must be addressed in RCMU's 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 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. (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))

- **Enterprise wide Risks:** A methodology for identifying and presenting enterprisewide safety risk and wildfire-related risk. (PUC § 8387(b)(2)(L))
- **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 RANCHO CUCAMONGA MUNICIPAL UTILITY

The Rancho Cucamonga Municipal Utility (RCMU) provides economic and reliable electricity to over 2,800 metered businesses and residents in a selected area within the Southeastern portion of the City of Rancho Cucamonga. RCMU’s service area is located in an urban area that is categorized in the “Low” – Tier 1 (Low Risk) fire threat category. Additionally, RCMU’s electric system is 100% undergrounded, which serves as an effective mitigation measure to reduce the potential of any power-line ignited wildfires.

Despite its low risk, RCMU has taken appropriate actions to help its region prevent and respond to the increasing risk of devastating wildfires by following all applicable design, construction, operation, and maintenance requirements that reduce safety risks associated with its electric system. This Wildfire Mitigation Plan (WMP) describes the safety-related measures that RCMU follows to reduce its risk of causing wildfires.

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.”¹ Additionally, the independent evaluator’s assessment of the comprehensiveness of the POU WMP must be issued in a report that is both posted to the POU’s website and presented at a public meeting of the POU’s governing board.

B. RANCHO CUCAMONGA FIRE PROTECTION DISTRICT QUALIFICATIONS

SB 901 requires that the qualified independent evaluator that performs the assessment of RCMU’s WMP must have experience in assessing the safe operation of electrical infrastructure. RCMU has determined that the Rancho Cucamonga Fire Protection District (Fire District) is the most qualified independent evaluator who understands the local conditions and fire risks for the City of Rancho Cucamonga and is aware of the RCMU service area. The Fire District has served the City of Rancho Cucamonga area since 1975.

¹ Cal. Pub. Util. Code § 8387(c).

C. EVALUATION METHODOLOGY

The Fire District will evaluate the comprehensiveness the RCMU's WMP on the following measures:

- **Statutory Compliance:** The Fire District will ensure that each required element specified in SB 901 (as listed in Section II.C. above) is either addressed in RCMU's WMP or RCMU has sufficiently described why that element is not applicable due to RCMU's size, geography, system, or other relevant factor.
- **Industry Comparison:** The Fire District is familiar with existing industry practices and has reviewed the Investor-Owned Utility (IOU) WMPs previously filed with the California Public Utilities Commission (CPUC).² The Fire District has compared RCMU's WMP against existing practices and any comparable actions planned by the IOUs.
- **Physical Inspections:** Because of the Fire District's role in Rancho Cucamonga, the Fire District has access to and regularly inspects City facilities as needed, including electrical infrastructure. Therefore, the Fire District has access to all data on the fire mitigation decisions and performance of RCMU. The Fire District's evaluation of the RCMU WMP draws upon this historical data and expertise in fire prevention and safety.

D. METRICS

The RCMU WMP proposes the following metrics to measure performance of its wildfire mitigation measures: (1) number of fire ignitions,³ and (2) inspections of above-ground, utility-owned distribution system components.⁴ The Fire District has determined that these are appropriate metrics for this initial WMP. The Fire District 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 RCMU WMPs.

² IOU WMPs are available at: <https://www.cpuc.ca.gov/SB901/>.

³ For purposes of this metric, a fire ignition is defined as follows: (i) RCMU 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) RCMU has knowledge that the fire occurred.

⁴ For purposes of this metric, a routine inspection for above-ground, utility-owned distribution systems components includes inspections of distribution substations (step-down transformers) and distribution lines.

IV. EVALUATION OF RCMU'S 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.

The Fire District has determined that RCMU complies with this standard due to the construction of RCMU's equipment and resources not being located in an area that is considered an elevated or extreme risk of electric line wildfire. Also, with RCMU's electrical lines being entirely underground, this significantly decreases the opportunity for wildfires to occur above ground during high fire danger conditions. This was also addressed and discussed by the Rancho Cucamonga City Council via resolution No. 18-103 on September 19, 2018.

B. EVALUATION OF WMP ELEMENTS

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

Required Element of WMP	Location in WMP	Summary of RCMU's WMP	Independent Evaluator's Assessment
PUC § 8387(b)(2)(A): An accounting of the responsibilities of persons responsible for executing the plan.	Section III.A	The Rancho Cucamonga City Council is responsible for executing RCMU's WMP.	<i>RCMU's WMP meets this requirement.</i>
PUC § 8387(b)(2)(B): The objectives of the wildfire mitigation plan.	Section II	RCMU's WMP provides measures that effectively reduce the probability that RCMU's electric system could be the origin or contributing source for the ignition of a wildfire.	<i>RCMU's WMP meets this requirement.</i>
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	Section III.A	Even though RCMU's Service Area is not in the High Fire Threat Area, RCMU will ensure that its design	<i>RCMU's WMP meets this requirement.</i>

Required Element of WMP	Location in WMP	Summary of RCMU's WMP	Independent Evaluator's Assessment
minimize the risk of its electrical lines and equipment causing catastrophic wildfires, including consideration of dynamic climate change risks.		and construction standards and inspections meets all requirements.	
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 VIII.A	Metric 1: Fire Ignitions Metric 2: Above-Ground Utility-Owned Distribution System Components	<i>RCMU's WMP meets this requirement.</i>
PUC § 8387(b)(2)(E): A discussion of how the application of previously identified metrics to previous wildfire mitigation plan performances has informed the wildfire mitigation plan.	Section II.C Section VIII.B Section X	Metric data will be collected as necessary.	<i>RCMU's WMP meets this requirement.</i>
PUC § 8387(b)(2)(F): Protocols for disabling reclosers and deenergizing portions of the electrical distribution system that consider the associated impacts on public safety, as well as protocols related to mitigating the public safety impacts of those protocols, including impacts on critical first responders and on health and communication infrastructure.	Section V.F	Protocols have been placed in the WMP.	<i>RCMU's WMP meets this requirement.</i>
PUC § 8387(b)(2)(G): Appropriate and feasible procedures for notifying a customer who may be impacted by the deenergizing of electrical lines. The procedures shall consider the need to notify, as a priority, critical first responders, health care facilities, and operators of telecommunications infrastructure.	Section VI	Protocols and procedures have been placed in the WMP.	<i>RCMU's WMP meets this requirement.</i>

Required Element of WMP	Location in WMP	Summary of RCMU's WMP	Independent Evaluator's Assessment
PUC § 8387(b)(2)(H): Plans for vegetation management.	Section V.D	N/A: This section is not applicable to RCMU.	<i>This element is Not Applicable to RCMU; therefore, it was not included in RCMU's WMP.</i>
PUC § 8387(b)(2)(I): Plans for inspections of the local publicly owned electric utility's or electrical cooperative's electrical infrastructure.	Section V.E Section VIII.A Section VIII.B	RCMU meets or exceeds the minimum inspection requirements provided in the CPUC's GO 165	<i>RCMU's WMP meets this requirement.</i>
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. (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.	Section IV.A Section V.C	The primary risk drivers for wildfire in RCMU's Service Area are the following: <ul style="list-style-type: none"> • High Temperature; • Low Humidity; • Hillside Terrain; • Fire Weather Conditions; • Prolonged Drought; • Climate Change; • Fire History 	<i>RCMU's WMP meets this requirement.</i>
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	Section V.A	RCMU's service area is not located in a high fire threat district. However, the City's Wildland Urban Interface Fire Area Map and the CPUC's Fire-Threat Map is included as reference.	<i>RCMU's WMP meets this requirement.</i>

Required Element of WMP	Location in WMP	Summary of RCMU's WMP	Independent Evaluator's Assessment
information or changes to the environment.			
PUC § 8387(b)(2)(L): A methodology for identifying and presenting enterprisewide safety risk and wildfire-related risk.	Section IV.B	This is identified in the WMP.	<i>RCMU's WMP meets this requirement.</i>
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 VII	This is identified in the WMP.	<i>RCMU's WMP meets this requirement.</i>
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 are carried out under the plan, other applicable statutes, or commission rules.	Section VIII.C	This is identified in the WMP.	<i>RCMU's WMP meets this requirement.</i>

V. RESULTS AND CONCLUSION

The Fire District concludes that RCMU's WMP comprehensively addresses all the applicable statutorily required elements for the Publicly Owned Utilities' WMP as specified in California Public Utilities Code section 8387. The Fire District further finds that RCMU has taken reasonable actions to minimize the risk that its lines or equipment will cause a wildfire.