

**Wildfire Mitigation Plan
Independent Evaluation
Plumas-Sierra Rural Electric Cooperative (PSREC)**

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701 Cedar Lake Blvd, Ste 320
Oklahoma City, OK 73114
+1 877 245 6382
chloeta.com
info@chloeta.com

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Executive Summary

The Plumas-Sierra Rural Electric Cooperative (PSREC) Wildfire Mitigation Plan (WMP) was prepared by Chloeta for publication in 2023. In accordance with California Public Utilities Code Section 8387(c), this plan was reviewed and assessed by an independent evaluator to establish its comprehensiveness as legally defined. Chloeta is providing the independent evaluation of this WMP prior to publication. This evaluation was conducted independently from the team that created the WMP and was not involved with any part of developing the WMP. Chloeta is completely independent of PSREC.

Analysis

This WMP was reviewed for compliance with California Public Utilities Code Section 8387, which establishes the guidelines for the comprehensiveness of a utility's wildfire mitigation plan. Section 8387 delineates multiple criteria for establishing comprehensiveness. This independent evaluation will review each criteria established in Section 8387 and determine if they are met by the WMP provided by PSREC.

A. Responsibilities of Persons Responsible for Executing Plan

Section 8387 Requirement: *An accounting of the responsibilities of persons responsible for executing the plan.*

Plan Section Number: 3. E., 6. A.

The WMP identifies PSREC's management responsibilities regarding the implementation of the activities discussed in the WMP. Section 3. E. identifies the general manager as the primary party responsible for implementing the plan under the direct supervision of the Board of Directors. Section 5. Discusses the roles and responsibilities of PSREC staff.

B. Objectives of FMP

Section 8387 Requirement: *The objectives of the wildfire mitigation plan.*

Plan Section Number: 3. B., 5.

The WMP establishes an overarching purpose in section 5 and clearly states the plan's objectives. A statutory cross-reference table is included in section 3. B., table 2.

C. Preventative Strategies and Programs

Section 8387 Requirement: *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.

Plan Section Number: 8.

Section 8 of the WMP lists mitigation programs and activities that PSREC will undertake to minimize wildfire risk. A high fire threat district map is included in Figure 2. Impacts of climate change are discussed in Section 8. K.

D. Metrics

Section 8387 Requirement: *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.*

Plan Section Number: 11. A.

Section 11 identifies the two primary metrics used to measure the performance of the WMP. Impacts of the metrics are discussed in 11. B.

E. Application of Previously Identified Metrics

Section 8387 Requirement: *A discussion of how the application of previously identified metrics to previous wildfire mitigation plan performances has informed the wildfire mitigation plan.*

Plan Section Number: 11. A., 11. B.

Section 11. A. and 11. D. state that the previous year's metrics and any deficiencies observed will be added to the WMP when known.

No metrics from last year's fire season included.

F. Public Safety Protocols

Section 8387 Requirement: *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.*

Plan Section Number: 8. G., 8. H., 9.

Section 8. G. discusses PSREC’s reclosing policy and steps taken when reclosers occur. De-energization is discussed in section 8. H. and the quantitative thresholds are shown in Table 3. Communication to affected customers is discussed in section 9.

G. Notification of Customers

Section 8387 Requirement: *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 de-energization for a given event.*

Plan Section Number: 9.

Section 9 discusses the robust community outreach and how customers are notified during deenergization and provides several links on their company website.

H. Vegetation Management

Section 8387 Requirement: *Plans for vegetation management.*

Plan Section Number: 8. D., Appendix Exhibit D.

The WMP states that PSREC meets or exceeds the minimum industry standards for vegetation management procedures and says that PSREC has developed a comprehensive Vegetation Management Plan (VMP). Vegetation clearance guidelines are given in Appendix Exhibit D.

I. Inspection Plan

Section 8387 Requirement: *Plans for inspections of the local publicly owned electric utility’s or electrical cooperative’s electrical infrastructure.*

Plan Section Number: 8. E.

The WMP briefly discusses infrastructure inspections and repair in section 8. E. It states that PSREC has already deployed two new programs recently, an unmanned aircraft inspection program and the Protection Zone Management (PZM) to archive inspections.

J. Identification of Risks

Section 8387 Requirement: *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.

Plan Section Number: 7.

Section 7. A. list the primary risks drivers for wildfire.

A risk factor bowtie analysis is not included.

K. Identification of Higher Threat Areas

Section 8387 Requirement: *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.*

Plan Section Number: 8.

Figure 2 in section 8 is a map that clearly shows areas that are at a higher risk of wildfire threat. Section 7. B. discusses PSREC's weather monitoring and the four operating conditions based on relevant weather.

L. Wildfire Risk Methodology

Section 8387 Requirement: *A methodology for identifying and presenting enterprise wide safety risk and wildfire-related risk.*

Plan Section Number: 7. B.

The WMP states that PSREC has recently deployed Protection Zone Management (PZM) to aid in identifying areas of elevated risk. It also states that PSREC will utilize a Risk Factor Analysis (RFA) to identify and manage potential risks.

There is no risk factor bowtie analysis that shows risk factors and potential risk impacts.

M. Restoration of Service

Section 8387 Requirement: *A statement of how the local publicly owned electric utility or electrical cooperative will restore service after a wildfire.*

Plan Section Number: 9. A.

Section 9. A. discusses steps taken by PSREC work crews before power can be restored.

It does not mention anything about critical infrastructure facilities being prioritized during this process or that customer and media notification will be done throughout the restoration process.

N. Processes and Procedures

Section 8387 Requirement: *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.

Plan Section Number: 3. E., 11. C., 11 D., 11. E.

Section 11. C. states PSREC anticipates limited data will be gathered to update the WMP for the first several years. Section 3. E. assigns overall responsibility to the general manager and section 11. C. states the PSREC will evaluate and modify the plan as data becomes available.

Section 11. D. states that the Manager of Engineering and Operations or his or her designee will update the General Manager regarding deficiencies on a semi-annual basis.

Section 11. E. states that deficiencies are repaired upon discovery and those that cannot be repaired immediately are assigned a priority level. PSREC staff will report annually to the board the number of deficiencies found, the number repaired within the priority timeline and those not repaired within the priority timeline.

Conclusion

Following the independent evaluation, it is our conclusion that the PSREC WMP is sufficient in meeting the requirements for comprehensiveness as set forth by California Public Utilities Code Section 8387.