

**Wildfire Mitigation Plan
Independent Evaluation
Riverside Public Utilities (RPU)**

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Executive Summary

The Riverside Public Utilities (RPU) Wildfire Mitigation Plan (WMP) was prepared in house by RPU's Wildfire Working Group in conjunction with Riverside Fire Department and the City of Riverside for publication in 2023. In accordance with California Public Utilities Code (CPUC) 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. Chloeta is completely independent of RPU.

Analysis

This WMP was reviewed for compliance with CPUC 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 RPU.

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: 4.

The WMP identifies RPU's management responsibilities regarding the implementation of the activities discussed in the WMP. Table 3 identifies the roles and responsibilities of citywide emergency response. Section 4. B. assigns full responsibility of the plan to the assistant manager of energy delivery.

B. Objectives of FMP

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

Plan Section Number: 2. B., 3.

The WMP establishes an overarching purpose in section 3 and clearly states the plan's objectives. A statutory cross-reference table is included in section 2. 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: 6.

Section 6 of the WMP lists mitigation programs and activities that RPU will undertake to minimize wildfire risk. A high fire threat district map is included in Figure 3. Impacts of climate change are discussed in Section 5. A.

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: 8.

Section 8 discusses and clearly defines the three primary metrics used to measure the performance of the WMP.

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: 8. B., 8. C., 8 D.

Section 8 contains and discusses the impacts of the previous year's metrics. These 3 metrics are broken down in Table 7 and Table 8. A matrix of preventive strategies is compiled in Table 9. Section 8. C. discusses the monitoring and auditing of the plan and states that the Board of Public Utilities reviews the plan annually.

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: 6. G., 6. H., 7. A.

Section 6. G. thoroughly discusses RPU's reclosing policy and steps taken when reclosers occur. De-energization is discussed in section 6. H. Impacts to public safety are discussed in section 7. A.

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: 7. B., 7. C., 7. D.

Section 7. B. states that customer notification will follow the City of Riverside Emergency Operations Plan. This section also discusses which channels will be used during an emergency and where possible, up to 72 hours before a potential hazard event. Sections 7. C. and 7. D. further explain communications channels and community outreach and public awareness.

H. Vegetation Management

Section 8387 Requirement: *Plans for vegetation management.*

Plan Section Number: 6. D.

The WMP establishes vegetation management goals and procedures to reduce wildfire risk. The WMP discusses clearing and trimming trees and gives some specific perimeters in table 5.

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: 6. E., 9 B.

The WMP includes a dedicated section on infrastructure inspections and repair. It does state that the RPU is developing a more robust inspection program. Inspections and maintenance are included in Table 9 Preventive Strategies Matrix. Section 9. B. discusses how RPU has begun partnering with the local police department to conduct enhanced infrared 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: 5.

Section 5. A. discusses the 5 primary risks driver for wildfire. A risk factor bowtie analysis is included in section 5. B. Figure 2.

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: 6. A.

Figure 3 is a map that clearly shows areas that are at a higher risk of wildfire threat. Table 4 is a summary of RPU assets in the high fire district and includes information on overhead distribution lines and overhead sub-transmission.

L. Wildfire Risk Methodology

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

Plan Section Number: 5. B.

The WMP does discuss situational awareness and having the ability to alter practices dependent on fire conditions. Figure 2 in section 5. B. is a risk factor 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: 6. I.

Section 6. I. discusses what needs to be done before power can be restored but the service restoration process following a wildfire is not detailed in the WMP. It states that critical infrastructure facilities are prioritized during this process. Customer and media notification will be done once 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: 4. B., 8 C., 8. D., 8. E.

Section 8. C. states the WMP efforts will be submitted to the Board of Directors annually. Section 4. B. assigns overall responsibility to the assistant general manager of energy delivery to ensure the plan is executed properly and submitted for monitoring and auditing.

Section 8. D. states that RPU is committed to identifying and correcting deficiencies. Section 4. B. assigns overall responsibility to the assistant general manager of energy delivery to ensure deficiencies in the plan are monitored and corrected.

Section 8. E. discusses inspections and clearly states who is responsible for each inspection.

Conclusion

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