Imperial Irrigation District
SB 901 Wildfire Mitigation Plan
2023-2025

September 5, 2023

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1. Executive Summary

1.1. The IID Wildfire Mitigation Plan meets applicable California SB 901 requirements.

1.2. Inside the IID service territory, there are no IID owned and operated transmission, distribution, or generation facilities, inside CAL FIRE designated High or Very High Fire Hazard Severity Zones.

1.3. Long-term wildfire risk caused by Climate Change will remain very low through end of this century.

1.4. Although there is no IID owned and operated infrastructure located inside CAL FIRE designated High or Very High Fire Hazard Severity Zones, IID is submitting this plan that identifies efforts expected to help reduce the risk of fire ignitions caused by IID service territory power infrastructure.

1.5. The IID plan addresses additional requests from The Wildfire Safety Advisory Board regarding plan organization and contents.

1.6. The IID plan identifies four performance metrics;

(1) *encroachments,*

(2) imminent treats,

(3) lines and poles down incidents, and

(4) fire incidents caused by IID infrastructure.

IID is actively working on procedures and software applications to begin to capture, and report metric information.

1.7. The IID SB 901 Wildfire Mitigation Plan 2023-2025 will activate on January 1, 2023, or soon thereafter, upon IID Board approval. A comprehensive update of the plan is required every (3) years thereafter.

1.8. Annual status reports will be posted on the IID.com website for public comment, submitted to the Imperial Irrigation District Board of Directors, and provided to the California Wildfire Safety Advisory Board.

2. Imperial Irrigation District SB 901 Wildfire Mitigation Plan Objectives

The primary objectives of the Imperial Irrigation District SB 901 Wildfire Mitigation Plan are as follows:

1) Meet requirements identified in sections applicable to publicly owned electric utilities, of the State of California Senate Bill 901 Wildfires.
2) Reduce the number of fire ignitions caused by Imperial Irrigation District power infrastructure.

3. Authority to Implement the Plan

This plan is implemented under the authority of the Imperial Irrigation District Board of Directors.

4. SB 901 Public Owned Utility Statutory Requirements Cross Reference Table

	SB 901 – Public Owned Utility Wildfire Plan Requirements	IID SB 901 WF Mitigation Plan Sections
4.1	**Staff Responsibilities** SB 901 Section 42 (b) (2) (A) An accounting of the responsibilities of persons responsible for executing the plan.	**Sec 12** IID Wildfire Mitigation Plan Roles and Responsibilities
4.2	**General Objectives** SB 901 Section 42(b) (2) (B) The objectives of the wildfire mitigation plan.	**Sec 2** Imperial Irrigation District SB 901 Wildfire Mitigation Plan Objectives
4.3	**Program Descriptions** SB 901 Section 42(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.	**Sec 10** IID Utility Practices **Sec 11** IID SB901 Practice **Sec 13** Projects Expected to Reduce Fire Ignitions Caused by IID Infrastructure
4.4	**Evaluation Metrics** SB 901 Section 42(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.	**Sec 11.8** Performance Metrics
4.5	**Lessons Learned, Metrics Application** SB 901 Section 42(b) (2) (E) A discussion of how the application of previously identified metrics to previous wild fire mitigation plan performances has informed the wildfire mitigation plan.	**Sec 11.7** Monitoring the Plan and Performance Metrics

	SB 901 – Public Owned Utility Wildfire Plan Requirements	IID SB 901 WF Mitigation Plan Sections
4.6	**Protocols for Reclosers, De-energization, and PSPS Mitigation** SB 901 Section 42(b)(2)(F) Protocols for disabling re-closers and de-energizing 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.	**Sec 10.15** Disabling Re-Closer Procedure – System Operations Center **Sec 10.16** Public Safety Power Shutoff – Emergency Management Unit
4.7	**Community Notification – De-energization** SB 901 Section 42(b) (2) (G) Appropriate and feasible procedures for notifying a customer who may be impacted by the de-energizing 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.	**Sec 10.16** Public Safety Power Shutoff – Emergency Management Unit **Sec 10.5** Community Outreach and Public Awareness – Line Clearance Unit, Customer Service Unit
4.8	**Vegetation Management** SB 901 Section 42(b) (2) (H) Plans for vegetation management.	**Sec 10.1** FAC-003 Transmission System Vegetation Management Program **Sec 10.2** Vegetation Management Power Lines 200 kV and Below Not Subject to FERC Jurisdiction - Line Clearance Unit
4.9	**Infrastructure Inspections** SB 901 Section 42(b) (2) (I) Plans for inspections of the local publicly owned electric utility's or electrical-cooperative's electrical infrastructure.	**Sec 10.6** Monitor and Audit the Effectiveness of Substation Inspections – Substation Construction and Maintenance **Sec 10.7** Monitor and Audit the Effectiveness of Powerline and Powerline Equipment Inspections – Power Restoration and Troubleshooting Unit **Sec 10.8** Transmission Power Line Inspections - Power Restoration and Troubleshooting Unit **Sec 10.9** Distribution Power Line Inspections - Power Restoration and Troubleshooting Unit
4.10	**Grid Design, Construction and Operation Risks** SB 901 Section 42(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: SB 901 Section 42(b)(2)(J)(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.	**Sec 9** IID Service Territory Fire Threat Information

	SB 901 – Public Owned Utility Wildfire Plan Requirements	IID SB 901 WF Mitigation Plan Sections
4.11	**Vegetation, Topographic, and Climate Risks** SB 901 Section 42(b)(2)(J)(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.	**Sec 7** Imperial Irrigation District Service Territory Overview **Sec 8** IID Service Territory Climate Change Projections
4.12	**Identification and Expansion of Higher Wildfire Threat Areas** SB 901 Section 42(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 the environment.	**Sec 11.1** Service Territory Survey by Independent Evaluator
4.13	**Identify Enterprise-wide Risk** SB 901 Section 42(b) (2) (L) A methodology for identifying and presenting enterprise wide safety risk and wildfire-related risk.	**Sec 9** IID Service Territory Fire Threat Information
4.14	**Restoration of Service** SB 901 Section 42(b) (2) (M) A statement of how the local publicly owned electric utility or electrical cooperative will restore service after a wildfire.	**Sec 10.10** Emergency Event Procedures– Emergency Management Unit **Sec 10.11** Emergency Event Procedures – System Operations Center **Sec 10.12** Service Restoration After Major Events – System Operations Center **Sec 10.13** Standardized Emergency Management System – Emergency Management Unit
4.15	**Monitoring and Auditing of WMPs** A description of the processes and procedures to; SB 901 Section 42(b) (2) (N) (i) Monitor and audit the implementation of the wildfire mitigation plan.	**Sec 11.7** Monitoring the Plan and Performance Metrics
4.16	**Identifying and Correcting Deficiencies** A description of the processes and procedures to; SB 901 Section 42(b) (2) (N) (ii) Identify any deficiencies in the wildfire mitigation plan or its implementation, and correct those deficiencies.	**Sec 11.7** Monitoring the Plan and Performance Metrics

	SB 901 – Public Owned Utility Wildfire Plan Requirements	IID SB 901 WF Mitigation Plan Sections
4.17	**Monitoring Asset Inspections** SB 901 Section 42(b)(2)(N)(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.	**Sec 10.4** Monitor and Audit the Effectiveness of Powerline Clearance Inspections - Line Clearance Unit **Sec 10.6** Monitor and Audit the Effectiveness of Substation Inspections – Substation Construction and Maintenance **Sec 10.7** Monitor and Audit the Effectiveness of Powerline and Powerline Equipment Inspections – Power Restoration and Troubleshooting Unit **Sec 11.1** Service Territory Survey by Independent Evaluator
4.18	**Wildfire Plan Public Comments** SB 901 Section 42(b) (3) The local publicly owned electric utility or electrical cooperative shall present each wildfire mitigation plan in an appropriately noticed public meeting. The local publicly owned electric utility or electrical cooperative shall accept comments on its wildfire mitigation plan from the public, other local and state agencies, and interested parties, and shall verify that the wildfire mitigation plan complies with all applicable rules, regulations, and standards, as appropriate.	**Sec 11.3** Annual WSAB Submittal
4.19	**Independent Evaluator Wildfire Plan Assessment** SB 901 Section 42(c) The local publicly owned electric utility or electrical cooperative shall 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. The independent evaluator shall issue a report that shall be made available on the Internet Web site of the local publicly owned electric utility or electrical cooperative, and shall present the report at a public meeting of the local publicly owned electric utility's or electrical cooperative's governing board.	**Sec 11.1** Service Territory Survey by Independent Evaluator **Sec 11.5** Comprehensive Wildfire Plan Update - every three (3) years
4.20	**Biomass Energy Contract** SB 901 Section 43 An electrical corporation, local publicly owned electric utility, or community choice aggregator with a contract to procure electricity generated from biomass pursuant to subdivision (b) of Section 399.20.3, commission Resolution E-4770 (March 17, 2016), or commission Resolution E-4805 (October 13, 2016), or with a contract that is operative at any time in 2018, and expires or expired on or before December 31, 2023, shall seek to amend the contract to include, or seek approval for a new contract that includes, an expiration date five years later than the expiration date in the contract that was operative in 2018, so long as the contract extension follows the feedstock requirement of subdivision (b) of Section 399.20.3. This section shall not apply to facilities located in federal severe or extreme nonattainment areas for particulate matter or ozone.	**Sec 10.20** Addressing SB 901 Section 43 Biomass Power Purchase Requirement - Energy Business and Regulatory Compliance Programs Unit

5. Wildfire Safety Advisory Board Recommendations for Publicly Owned Utilities Cross Reference Table

Recommendations included in the WSAB Guidance Advisory Opinion for the 2022 Wildfire Mitigation Plans of Electric Publicly Owned Utilities and Rural Electric Cooperatives, Adopted February 23, 2022.

	WSAB Recommendations for Publicly Owned Utilities *Guidance Advisory Opinion for the 2022 Wildfire Mitigation Plans of Electric Publicly Owned Utilities and Rural Electric Cooperatives, February 23, 2022*	**IID SB901 WF Mitigation Plan Sections**
5.1	**Context Setting Information** Include template containing key information about the service area, near the front of the WMP	**Sec 7** Imperial Irrigation District Service Territory Overview **Sec 8** IID Service Territory Climate Change Projections **Sec 9** IID Service Territory Fire Threat Information
5.2	**Prominent WMP Information Location** Locate current and past wildfire mitigation information, including Independent Evaluator reports at a prominent and easily locatable web-based publication location.	https://www.iid.com/energy/vegetation-management/wildfire-mitigation-plan
5.3	**Statutory Cross Reference** Include statutory cross reference table near the front of the WMP. Include live links from table to plan section.	**Sec 4** SB 901 Public Owned Utility Statutory Requirements Cross Reference Table
5.4	**Reducing the Risk of Catastrophic Wildfires** Add as one of the objectives of the WF plan, to *reduce the risk of* ***catastrophic*** *wildfires* Question whether broader thought and strategies may be appropriate going forward.	**Due to the low wildfire threat in the Imperial Irrigation District Service territory, Imperial Irrigation District does not have a formal catastrophic wildfire risk reducing plan objective.**
5.5	**Public Input and Approval** Provide context-setting detail regarding how utilities approach WMP approval, consideration of public comment and budgetary protocols for mitigation and WMP tasks. Include in the statutory staff responsibilities section.	**Sec 11.4** Annual Funding of Projects **Sec 12** IID Wildfire Mitigation Plan Roles and Responsibilities
5.6	**Metric Tracking** Provide more comprehensive and consistent metric tracking. Assure metrics are appropriate for the POU	**Sec 11.8** Performance Metrics

	WSAB Recommendations for Publicly Owned Utilities *Guidance Advisory Opinion for the 2022 Wildfire Mitigation Plans of Electric Publicly Owned Utilities and Rural Electric Cooperatives, February 23, 2022*	IID SB901 WF Mitigation Plan Sections
5.7	**Independent Evaluations** Independent Evaluators shall perform a robust evaluation of the contents and substance of the POU's WMP, in comparison to relevant industry standards, and provides useful recommendations for wildfire mitigation improvements where applicable.	**Sec 11.1 Service Territory Survey by Independent Evaluator** **Sec 11.5 Comprehensive Wildfire Plan Update - every three (3) years**
5.8	**Grid Design** Are there design or construction issues related to the utility's specific topography or geographic location that the Board should be aware of?	**There are no reportable design or construction issues related to specific topography or geographic location.**
5.9	**Grid Design** How will the utility address risks associated with facilities requiring power that abut a Tier 2 or Tier 3 HFTD?	**Note: IID follows CAL FIRE, Fire Hazard Severity Zone designations; CAL FIRE High and Very High Fire Hazard Severity Zones.** **Due to the low wildfire threat in the Imperial Irrigation District service territory, Imperial Irrigation District does not have a formal procedure to address risks with facilities requiring power that are adjacent to CAL FIRE High and Very High Fire Hazard Severity Zones.** **Portable generators may be provided to customers on a case-by-case basis.**
5.10	**Grid Design** How does the utility assess its risks associated with system design and construction?	**IID construction practices meet industry construction practices such as G.O. 95.** **IID inspection practices meet industry inspection practices such as G.O. 165, GO 174.** **The Independent Evaluator service territory survey scope of work, includes a G.O. 95 detailed inspection spot check, noting G.O. 95 construction practice infractions, infrastructure condition issues.**
5.11	**Grid Design** In what areas does the utility consider going above and beyond G.O. 95 and other General Order standards related to design and construction?	**Due to the low wildfire threat in the Imperial Irrigation District service territory, Imperial Irrigation District construction practices do not go above and beyond G.O. 95 construction practices.**

	WSAB Recommendations for Publicly Owned Utilities *Guidance Advisory Opinion for the 2022 Wildfire Mitigation Plans of Electric Publicly Owned Utilities and Rural Electric Cooperatives, February 23, 2022*	IID SB901 WF Mitigation Plan Sections
5.12	**Grid Design** Provide information about facilities not directly subject to G.O. 95 due to their construction prior to G.O. 95 first being adopted. How are these included in the WMP and safety protocols equivalently or in a different fashion to newer lines that would be subject to G.O. 95 protocols.	**IID construction practices meet industry construction practices such as G.O. 95.**
5.13	**Grid Design** Provide information how the utility goes beyond the G.O. 95 minimum standards if wildfire circumstances merit exceeding the standard. Explain how and why any specific POU goes beyond the G.O. 95 minimum standards.	**Due to the low wildfire threat in the Imperial Irrigation District service territory, Imperial Irrigation District construction practices do not go above and beyond G.O. 95 construction practices.**
5.14	**Grid Design** Provide information regarding what new ideas or enhanced protocols for design, build, and maintain, POUs are considering to further mitigate wildfire risk, due to changing wildfire conditions in the State due to climate change, land use change, or other change in vegetation conditions.	**Sec 13 Projects Expected to Reduce Fire Ignitions Caused by IID Infrastructure** Although the Imperial Irrigation District does not have infrastructure located inside a CAL FIRE designated High Fire Hazard, or Very High Fire Hazard Severity Zone, the Imperial Irrigation District is submitting this plan that identifies projects expected to reduce the risk of fire ignitions caused by Imperial Irrigation District power infrastructure. **Relay Modernization Program** – Relay Protection Unit **Sec 13.1 Relay Modernization Program – Relay Protection Unit** **Sec 13.2 Distribution Power Line Bird Deterrents – Electrical Engineering Section**

	WSAB Recommendations for Publicly Owned Utilities *Guidance Advisory Opinion for the 2022 Wildfire Mitigation Plans of Electric Publicly Owned Utilities and Rural Electric Cooperatives, February 23, 2022*	IID SB901 WF Mitigation Plan Sections
5.15	**Risk Assessment and Mapping** Provide information about the installation of situational awareness technologies, to better understand wildfire risk drivers, particularly through collaborative activities and shared data with neighboring utilities. Wind speed and direction, temperatures and moister contents, active monitoring for ignitions. Weather stations, cameras, drones, satellites, and other monitoring technologies.	**Due to the low wildfire threat in the Imperial Irrigation District service territory, Imperial Irrigation District does not perform this activity.**
5.16	**Risk Assessment and Mapping** Further development of consideration of the risks and benefits of mitigation measures, such as PSPS	**Due to the low wildfire threat in the Imperial Irrigation District service territory, Imperial Irrigation District does not perform this activity.**
5.17	**Risk Assessment and Mapping** Develop information on any potential negative impacts of new technologies and how those impacts may be mitigated.	**Due to the low wildfire threat in the Imperial Irrigation District service territory, Imperial Irrigation District does not perform this activity.**
5.18	**Vegetation Management and Inspections** Provide clarity about meeting, exceeding, or substituting for G.O. 95 standards, going beyond minimum standards due to specific wildfire conditions	**Sec 10.1 FAC-003 Transmission System Vegetation Management Program** **Sec 10.2 Vegetation Management Power Lines 200 kV and Below Not Subject to FERC Jurisdiction - Line Clearance Unit** **Due to the low wildfire threat in the Imperial Irrigation District service territory, Imperial Irrigation District construction practices do not go above and beyond G.O. 95 construction practices.**
5.19	**Vegetation Management and Inspections** Include descriptions of the variety of treatment methods each POU uses, such as tree or branch removal, trimming, pruning, mowing, goats to remove grass, use of mechanical tools to clear brush, surface fuel clearing during dry season and herbicide use.	**Sec 10.1 FAC-003 Transmission System Vegetation Management Program** **Sec 10.2 Vegetation Management Power Lines 200 kV and Below Not Subject to FERC Jurisdiction - Line Clearance Unit**
5.20	**Vegetation Management and Inspections** When all vegetation is cleared from beneath or around an asset, or for access purposes, describe how POU deals with flammable new growth. How is new growth tracked, and managed to prevent increased fire risk.	**Due to the low wildfire threat in the Imperial Irrigation District service territory, Imperial Irrigation District does not perform this activity.**

	WSAB Recommendations for Publicly Owned Utilities *Guidance Advisory Opinion for the 2022 Wildfire Mitigation Plans of Electric Publicly Owned Utilities and Rural Electric Cooperatives, February 23, 2022*	**IID SB901 WF Mitigation Plan Sections**
5.21	**Vegetation Management and Inspections** How does the POU identify native and other vegetation by species, considering the ignition risk of these species, and describing how treatment methods vary depending upon the type of species?	**Due to the low wildfire threat in the Imperial Irrigation District service territory, Imperial Irrigation District does not perform this activity.**
5.22	**Vegetation Management and Inspections** Provide information of POU consideration, where appropriate of alternate management methods, such as replacing vegetation with less flammable native options and reducing the ignition chances of vegetation by strategically increasing moister content.	**Due to the low wildfire threat in the Imperial Irrigation District service territory, Imperial Irrigation District does not perform this activity.**
5.23	**Vegetation Management and Inspections** How is expertise from scientists or experts that understand the relative growing and regeneration patterns, species traits, flammability, and ecological role that vegetation plays relative to fire ignition and behavior and from ongoing fire research is integrated into vegetation management planning.	**Due to the low wildfire threat in the Imperial Irrigation District service territory, Imperial Irrigation District does not perform this activity.**
5.24	**Community Communication, Outreach, Emergency Preparedness and Recovery** How does POU provide information and assistance to their customers during wildfire starts	**Sec 10.5 Community Outreach and Public Awareness – Line Clearance Unit, Customer Service Unit**
5.25	**Community Communication, Outreach, Emergency Preparedness and Recovery** Provide information regarding resource availability and alternatives sole in the wildfire context, such as backup supplies to vital services and businesses	**Sec 10.5 Community Outreach and Public Awareness – Line Clearance Unit, Customer Service Unit** **Portable generators may be provided on a case-by-case basis.**

6. Wildfire Safety Advisory Board Recommendations Specific to Imperial Irrigation District Cross Reference Table

Recommendations included in the WSAB Guidance Advisory Opinion for the 2022 Wildfire Mitigation Plans of Electric Publicly Owned Utilities and Rural Electric Cooperatives, Adopted February 23, 2022.

	WASB Recommendations Specific to Imperial Irrigation District *Guidance Advisory Opinion for the 2022 Wildfire Mitigation Plans of Electric Publicly Owned Utilities and Rural Electric Cooperatives, February 23, 2022*	**IID SB901 WF Mitigation Plan Sections**
6.1	**Utility Information and Cross Reference Table** Provide utility information template and cross reference table up front in the wildfire mitigation plan.	**Sec 4 SB 901 Public Owned Utility Statutory Requirements Cross Reference Table**

	WASB Recommendations Specific to Imperial Irrigation District *Guidance Advisory Opinion for the 2022 Wildfire Mitigation Plans of Electric Publicly Owned Utilities and Rural Electric Cooperatives, February 23, 2022*	**IID SB901 WF Mitigation Plan Sections**
		Sec 5 Wildfire Safety Advisory Board Recommendations for Publicly Owned Utilities Cross Reference Table **Sec 6** Wildfire Safety Advisory Board Recommendations Specific to Imperial Irrigation District Cross Reference Table
6.2	**Location of Wildfire Mitigation Reports in IID Website** Provide WMP reports and information in a clear and prominent place on IID website	https://www.iid.com/energy/vegetation-management/wildfire-mitigation-plan
6.3	**Next Comprehensive Wildfire Mitigation Report** Incorporate appropriate informational response information as recommended.	**Sec 5** Wildfire Safety Advisory Board Recommendations for Publicly Owned Utilities Cross Reference Table **Sec 6** Wildfire Safety Advisory Board Recommendations Specific to Imperial Irrigation District Cross Reference Table
6.4	**Metrics** Provide future metric results for fire ignitions, wires down, imminent treat violations, encroachment violations, and infrastructure developments in HFTD areas	**Sec 11.8** Performance Metrics **Metric results are included in IID SB901 Wildfire Mitigation Annual Status Report 2021 and are expected to be included in future annual status reports.** https://www.iid.com/energy/vegetation-management/wildfire-mitigation-plan
6.5	**Independent Evaluator Reports** Provide updates on the issues identified by the independent evaluator and their impact on reducing wildfire risk in future wildfire mitigation plans.	**Expect to include updates on approved projects resulting from issues identified by Independent Evaluator in the annual IID SB901 Wildfire Mitigation Annual Status Reports**

7. Imperial Irrigation District Service Territory Overview

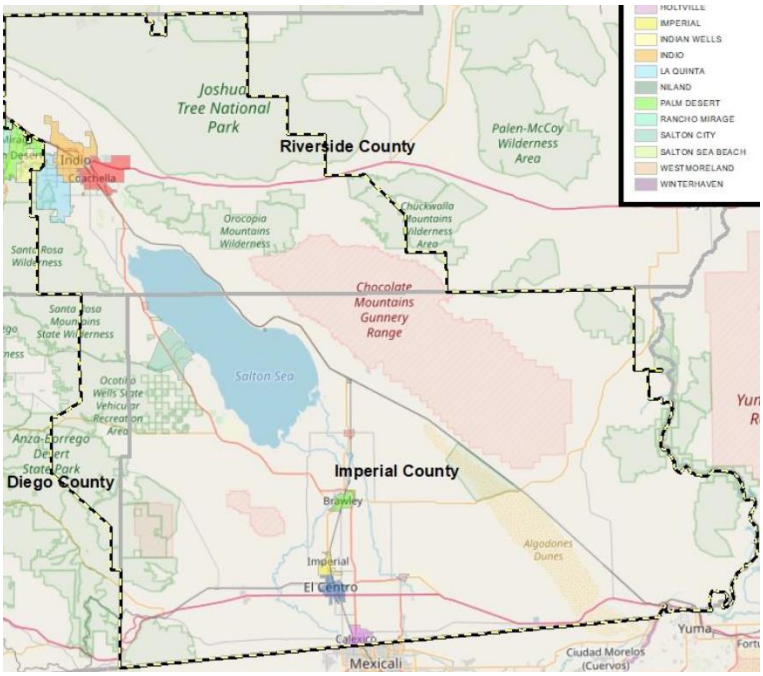
Irrigation District (IID) is an irrigation special district established under Division 11 of the California Water Code, Sections 20500, which provides non-potable water, farm drainage, and power services to the lower southeastern portion of California's desert.

Imperial Irrigation District is a transmission, distribution, and generation, energy utility. The utility operates over 1,800 miles of overhead energy transmission lines, and over 4,400 miles of power distribution lines throughout its service territory.

The Imperial Irrigation District Service Territory is located in the southeastern corner of California. The Service Territory covers over 6,600 square miles, including all of Imperial

County, the Coachella Valley in Riverside County, and a part of eastern San Diego county. The service territory is outlined with a dashed black and yellow line on the map included in the table below.

The following table provides an overview of the IID service territory.

	Imperial Irrigation District
7.1 **Service Territory Size**	 The IID Service Territory is approximately 6,600 square miles.
7.2 **Owned Assets**	IID is a vertically integrated load balancing electric utility with transmission, distribution, and generation assets.
7.3 **Number of Customers Served**	IID serves approximately **158,000** power contract accounts.

7.4

Population Within Service Territory

(source, IID internal report)

Year	Imperial County Projected Population	Coachella Valley Projected Population	Total Service Area Projected Population
2020	**214,590**	**252,388**	**468,998**
2025	**232,998**	**288,867**	**523,890**
2030	**251,611**	**330,619**	**584,260**
2035	**263,309**	**378,405**	**643,749**
2040	**293,889**	**433,099**	**729,028**

7.5 Customer Class Makeup

Number of Accounts

86 % Residential,

3.4 % Commercial,

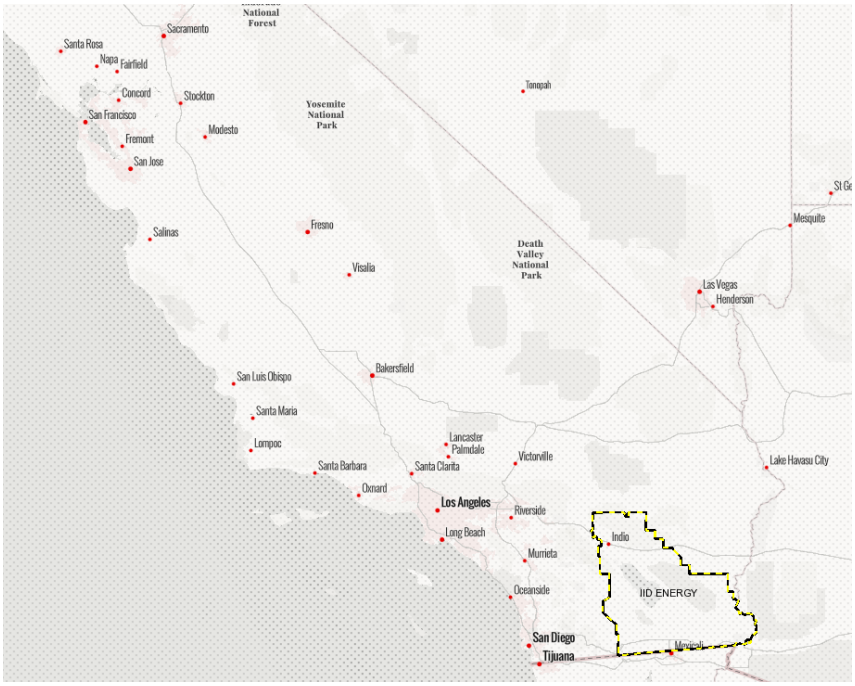
0.6 % Industrial

Share of Total Load (MWh)

47% Residential

50% Commercial

3% Industrial

7.6 **Service Territory** **Location**	 Service Territory is located in the southeastern corner of California.

7.7

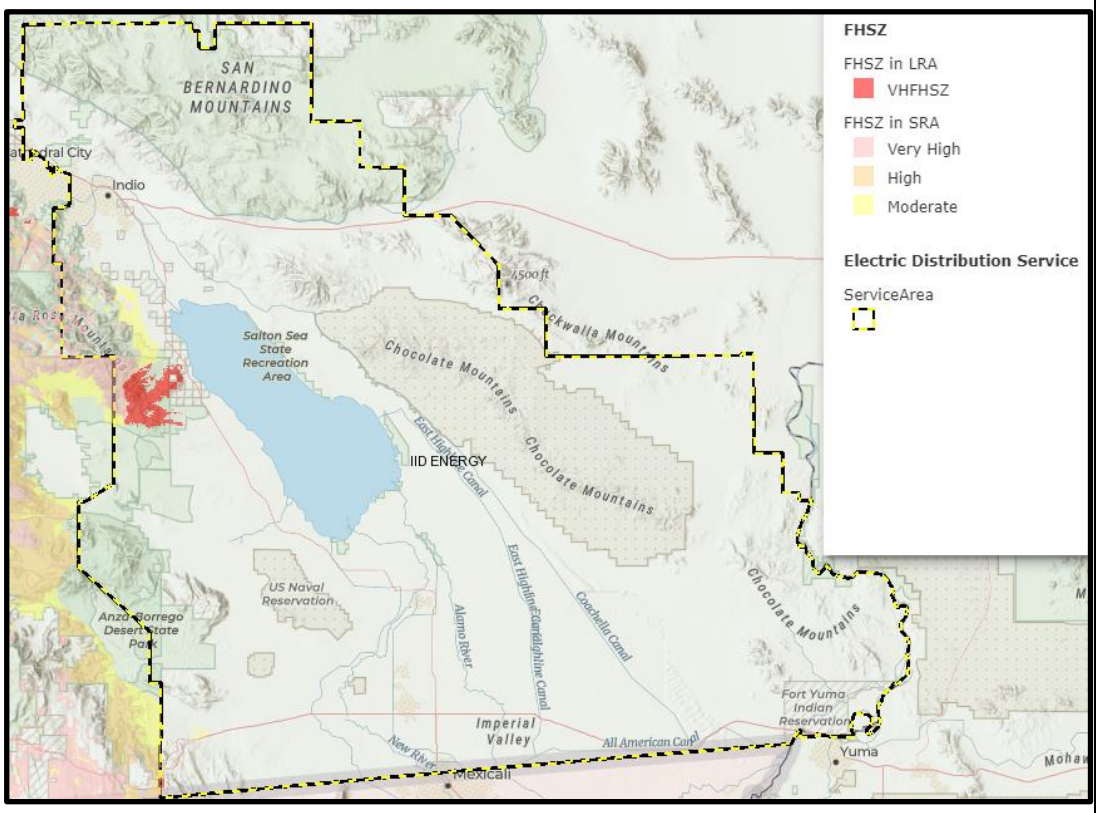
Service Territory

Wildland Urban Interface

https://www.sciencebase.gov/catalog/item/imap/617bfb43d34ea58c3c70038f

Wildland urban interface is located to the north and northwest corner of the IID service territory.

Source USGS 09/07/2022

7.8 **Percent of Service Territory in CAL FIRE High or Very High Fire Hazard Severity Zones** (based on total area, IID GIS 2019)	**High Fire Hazard Severity Zone: approx. 0.5%** **Very High Fire Hazard Severity Zone: approx. 0.6 %**  CAL FIRE Fire Hazard Map with IID service territory layer 01-25-2022 FHSZ – fire hazard severity zone LRA – Local Responsibility Area SRA – State Responsibility Area

7.9 Prevailing Wind Directions & Speeds by Season

Prevailing Wind Direction 1992-2002

Prevailing wind direction is based on the hourly data from 1992-2002 and is defined as the direction with the highest percent of frequency.

Station	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC	ANN
El Centro Naval Air Facility	W	W	W	W	W	W	W	SE	W	W	W	W	W
Imperial Airport	W	W	W	W	W	W	W	ESE	W	W	W	W	W
Thermal Airport	N	N	NNW	NNW	NW	NW	NW	NW	NNW	NNW	NW	NW	NW

Average Wind Speed 1996-2006

Average wind speeds are based on the hourly data from 1996-2006 from automated stations at reporting airports (ASOS) unless otherwise noted.

Station	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC	ANN
El Centro Naval Air Facility	5.7	6.7	8.2	10.7	8.7	8.9	7.5	6.7	7.1	6.9	5.4	5.4	7.3
Imperial Airport	5.8	7.0	8.4	10.5	9.3	9.4	8.3	7.6	7.0	6.6	5.8	5.5	7.5
Thermal Airport	5.1	5.7	7.6	9.2	9.3	9.0	7.4	6.6	6.8	6.2	5.2	4.9	6.8

Source: Western Regional Climate Center

https://wrcc.dri.edu/Climate/wind.php

<table>
<tr><td>7.10

Miles of Owned Lines Underground and/or Overhead</td><td>

3971 miles of distribution overhead and underground circuits,

974 miles of distribution overhead
2997 miles of distribution underground

563 miles of transmission circuits,
129 substations, generation stations, switching stations, and mini-substations,
10,703 distribution pad mount transformers,
4,520 vaults,
21,080 underground pull boxes,
1,048 switch cabinets,
38,102 steel poles and towers,
98,299 wood poles,
15,669 overhead service drops,
18 miles of All Dielectric Self-Supporting (ADSS) overhead communication cable,
2,603 IID owned streetlights,
5,316 customer owned streetlights.

Notes
1. Miles are measured as conductor length in miles
2. Customer Owned facilities are facilities owned by others
3. Sections of F line to Blythe and A line to Yucca Generation Station are outside service territory maintained by IID, other lines outside service territory are operated by others
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<tr><td rowspan="2">7.11

Percent of Owned Lines in CAL FIRE High or Very High Fire Hazard Severity Zones</td><td>Overhead Distribution Lines as % of Total Distribution System (Inside IID Service Territory)
HIGH: 0%
VERY HIGH: 0%</td></tr>
<tr><td>Overhead Transmission Lines as % of Total Transmission System (Inside IID Service Territory)
HIGH: 0%
VERY HIGH: 0%</td></tr>
<tr><td>7.12 Customers have ever lost service due to an IOU PSPS event?</td><td>☐ Yes X No

IID is at a low risk of being impacted by IOUs responding to PSPS events. IID customer load is contained within the IID BA and external customer load being interrupted by neighboring BAs or TOPs has little overall impacts to IID customers.</td></tr>
</table>

7.13 Customers have ever been notified of a potential loss of service to due to a forecasted IOU PSPS event?	☐ Yes **X No** Customers have not been notified of a potential loss of service to due to a forecasted IOU PSPS event since IID's customers are located within the IID BA.
7.14 Utility has developed protocols to pre-emptively shut off electricity in response to elevated wildfire risks?	☐ Yes **X No** IID has not previously pre-emptively shut off electricity in response to elevated wildfire risk as it is not in the high-risk area.
7.15 Has previously pre-emptively shut off electricity in response to elevated wildfire risk?	☐ Yes **X No** IID has not previously pre-emptively shut off electricity in response to elevated wildfire risk as it is not in the high-risk area.

8 IID Service Territory Climate Change Projections

8.1 Projections of ecological system change within the Imperial Irrigation District Service Territory with a horizon of 60 years.

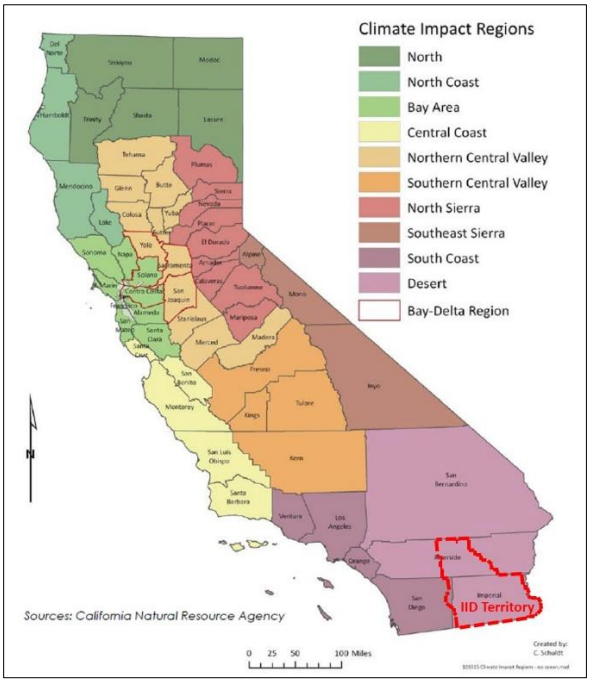
The following text is from the ***Climate Change and Health Profile Report – Imperial County, Climate Change and Health Report – Riverside County*** California Department of Public Health UC Davis 2017

https://scag.ca.gov/sites/main/files/file-attachments/chpr025imperial_county2-23-17.pdf?1604524054

https://www.shaperivco.org/content/sites/riverside/reports/Climate_Change/Climate_Change_and_Health.pdf

Climate change impacts vary widely across California. The impact of climate change in California varies across the state due to diversity in biophysical setting, climate, and jurisdictional characteristics.

The California Adaptation Planning Guide organized the state into climate impact regions based on county boundaries in combination with projected climate impacts, existing environmental settings, socioeconomic factors, and regional designations and organizations (see map below depicting California Climate Impact Regions designated in the "California Climate Adaptation Planning Guide," with the IID service territory identified with the red outline).



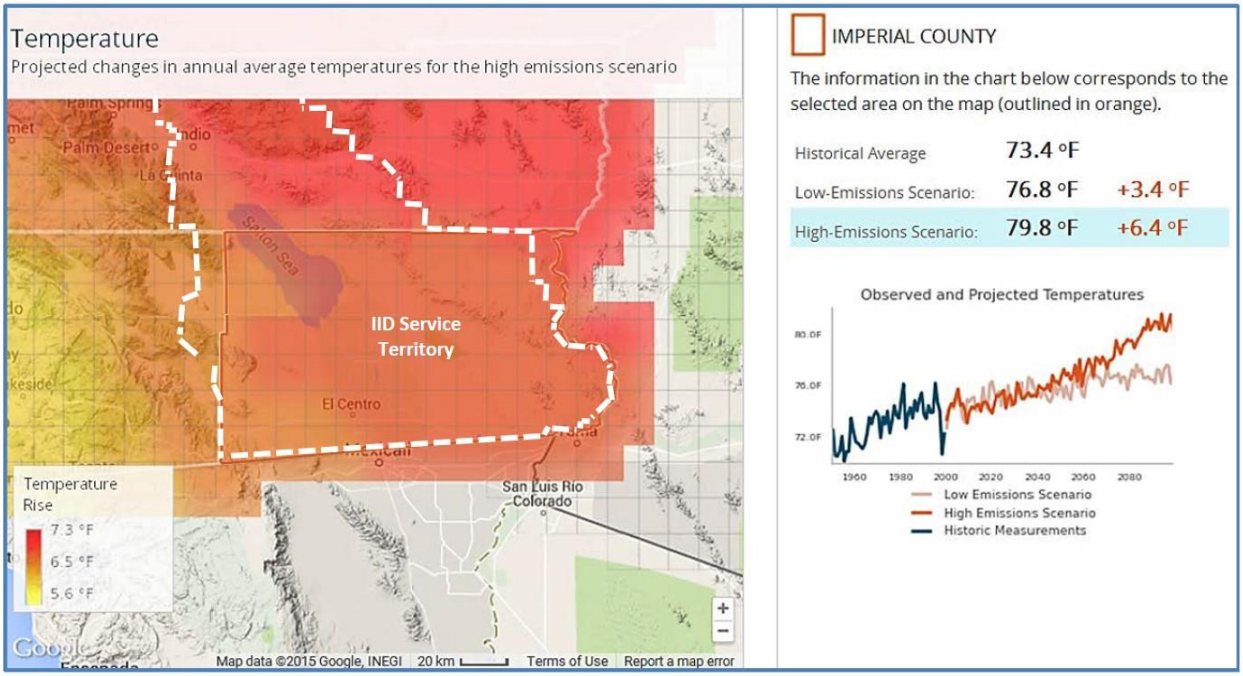
The IID Service Territory is located almost entirely in the "Desert Region", and the California Climate Adaptation Planning Guide provides the following ecological climate change impact projections for that region:

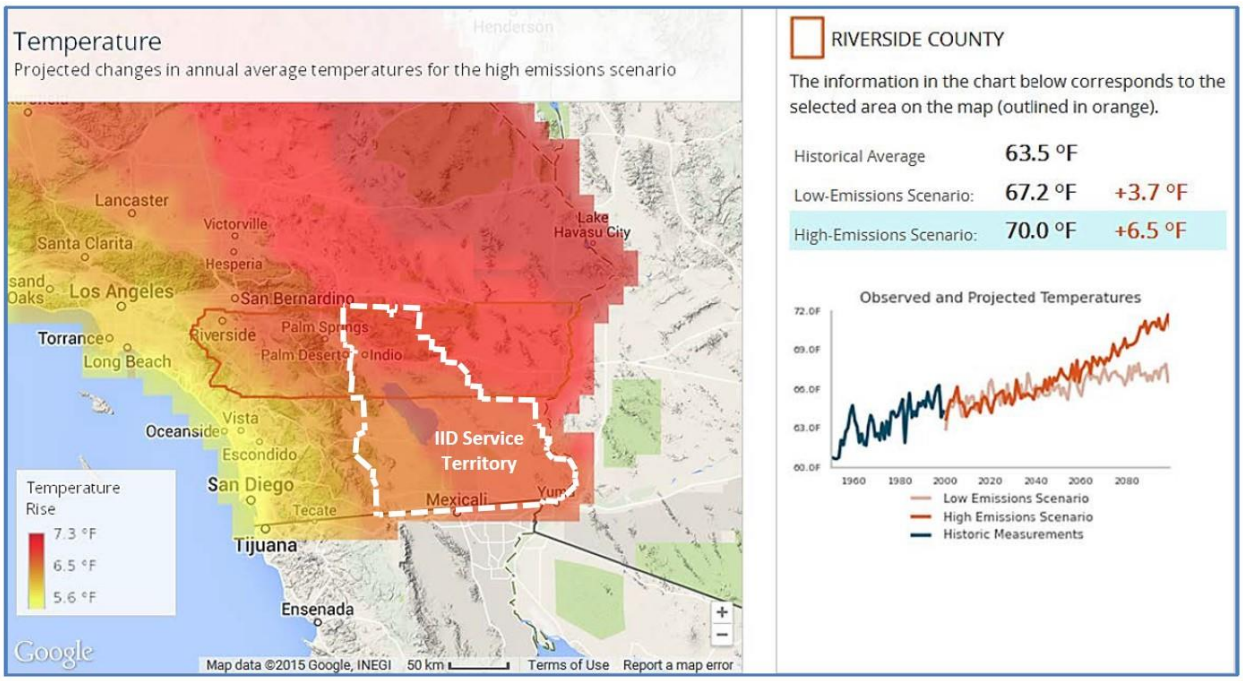
8.2 Summary of Cal-Adapt Climate Projections for the Desert Region (2011 model)

Temperature Change, 1990-2100	Projected temperatures, based on the high carbon emissions scenario; January increase in average temperatures: 2°F to 4°F by 2050 and 5°F to 8°F by 2100 July increase in average temperatures: 3°F to 5°F by 2050 and 6°F to 9°F by 2100
Precipitation	Projected rainfall, based on high carbon emissions scenario; Generally, annual rainfall will decrease in the most populous areas. Wetter areas like the western part of Riverside and southwestern San Bernardino counties will experience a 2 to 4-inch decline by 2050 and 3.5 to 6-inch decline by the end of the century. Big Bear is expected to lose around 8 inches per year by 2090. **Southern Imperial County** will have a small decline of about 0.5 inches. The eastern, desert portion of the region will see little to no change in annual rainfall.
Heat Wave	Heat waves are defined by five consecutive days over temperatures in the 100s over most of the region. Three to five more heat waves will be experienced by 2050, increasing to 12 to 16 in the western parts of the region to more than 18 to 20 in the eastern parts of the region.
Snowpack	Projected snowpack based on CCSM3 climate model; high emissions scenario March snowpack in the Big Bear area will diminish from the 2.5-inch level of 2010 to 1.4 inches in 2030 and almost zero by 2090. *Note the Big Bear area is outside the IID service territory.*
Wildfire Risk	Wildfire risk projections based on GFDL model, high carbon emissions scenario. Most areas are projected to have the same or slightly increased likelihood of wildfire risk.

Source: Public Interest Energy Research, 2011. Cal-Adapt6 http://cal-adapt.org

The following two charts show a closer view of projected temperature increases for Imperial and Riverside counties through 2099.





The Section 8.3 includes two charts that show the measured 12-month temperature averages for Imperial and Riverside Counties.

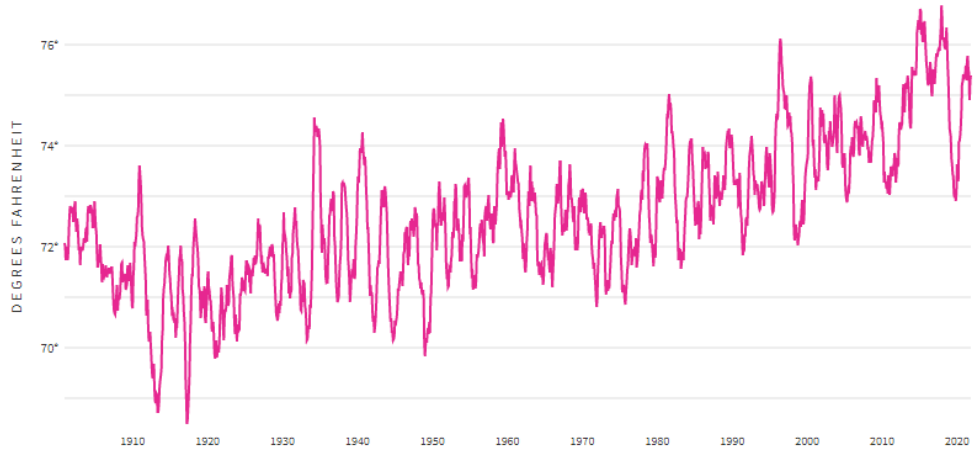
By comparing the 2010 model projections in Section 8.2, to the actual measured temperature charts below, one can see the actual measured high water-mark temperatures for year 2020 are slightly higher than the model projections.

8.3 Actual Measured 12 Month Temperature Averages Imperial County and Riverside County 1900-2020

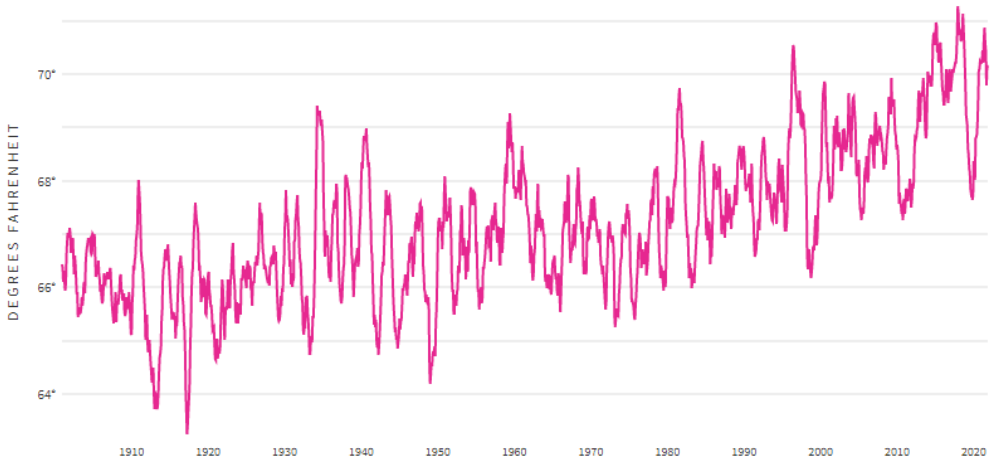
Source USA Facts

https://usafacts.org/issues/climate/state/california/county/imperial-county
https://usafacts.org/issues/climate/state/california/county/riverside-county#climate

12-month temperature averages in Imperial County



12-month temperature averages in Riverside County



8.4 Imperial and Riverside Counties Projected Increase or Decrease in Area Burned

While all of California is subject to some degree of fire hazard, there are specific features that make some areas more hazardous.

CAL FIRE Fire Hazard Severity Zones (FHSZ) were developed using a computer model. They predict the physical damage a fire is likely to cause based on the factors that influence fire likelihood and behavior. Many factors are considered such as fire history, existing and potential fuel (natural vegetation), flame length, blowing embers, terrain, and typical weather for the area. Fire Hazard Severity Zones are categorized into three categories:

Moderate: Wildland areas supporting areas of typically low fire frequency and relatively modest fire behavior, or developed/urbanized areas with a very high density of non-burnable surfaces (including roadways, irrigated lawn/parks, and low total vegetation cover (<30%) that is highly fragmented and low in flammability).

High: Wildland areas supporting medium-to high-hazard fire behavior and roughly average burn probabilities, or developed/urbanized areas with moderate vegetation cover and more limited non-burnable cover. Vegetation cover typically ranges from 30-50% and is only partially fragmented.

Very High: Wildland areas supporting high to extreme fire behavior resulting from climax fuels typified by well-developed surface-fuel profiles (e.g., mature chaparral) or forested systems where crown fire is likely, or developed/urban areas typically with high vegetation density (>70% cover) and associated high fuel continuity. This allows flames to spread over much of the area impeded only by isolated non-burnable areas.

The FHSZ rating system is more completely described on the following CAL FIRE website.

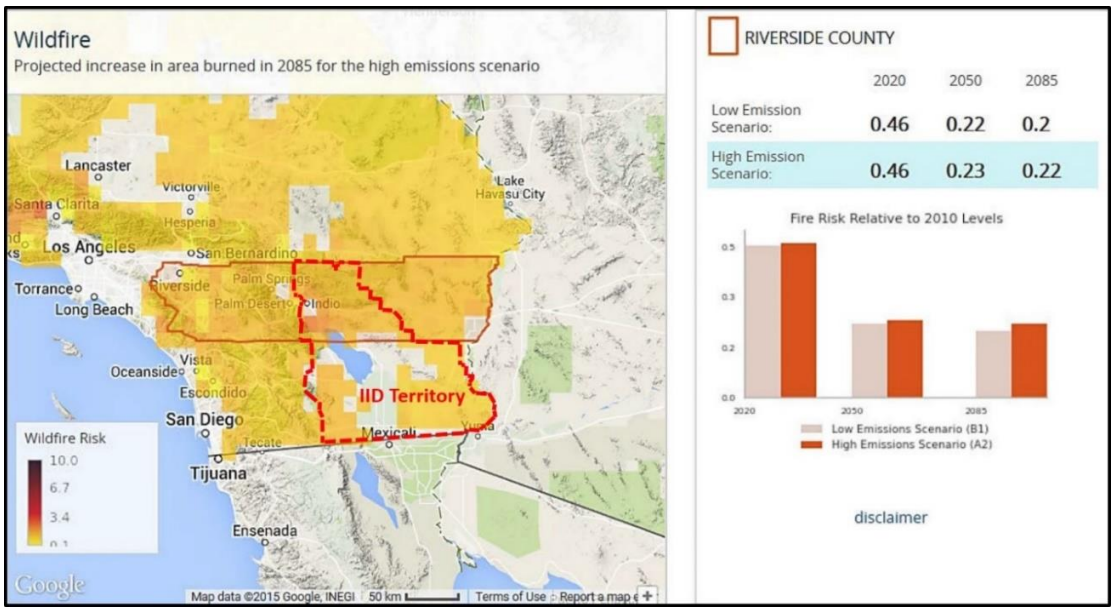
https://osfm.fire.ca.gov/divisions/community-wildfire-preparedness-and-mitigation/wildfire-preparedness/fire-hazard-severity-zones/#:~:text=California%20law%20requires%20CAL%20FIRE,How%20are%20FHSZ%20determined%3F

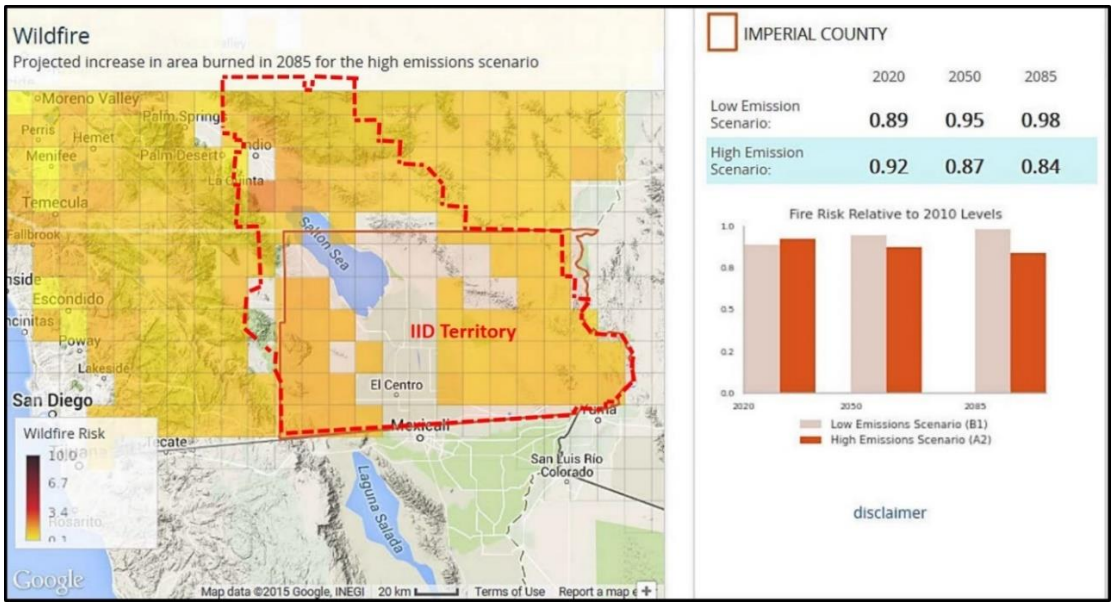
Periodic natural fire is an important ecosystem disturbance. Fire can promote vegetation and wildlife diversity, release nutrients into the soil, and eliminate heavy accumulation of underbrush that can fuel catastrophic fires. However, uncontrolled wildfires can be extremely damaging to communities and ecosystems.

The maps below for Imperial and Riverside Counties display the projected increase or decrease in potential area burned based on projections of the Coupled Global Climate Model (version 3) for the high carbon emissions scenario in 2085.

The bar graphs to the right of the maps on the following page, illustrate the projected time trend over the 21st century for both the high and low emissions scenarios.

Note: data are modeled solely on climate projections and do not take landscape and fuel sources into account. The projections of acreage burned are expressed in terms of the relative increase or decrease (greater or less than 1) from a 2010 baseline for fires that consume at least 490 acres. The 2010 baseline reflects historic data from 1980-1989 and trends through 2010.





8.5 Projections Summary

IID service territory projections of fire risk relative 2010 levels show a relative decrease through 2085, with the high emissions scenario. High emissions are projected to increase

average temperatures, increase the number of heat waves, decrease the amount of rainfall, resulting in less wildland vegetation.

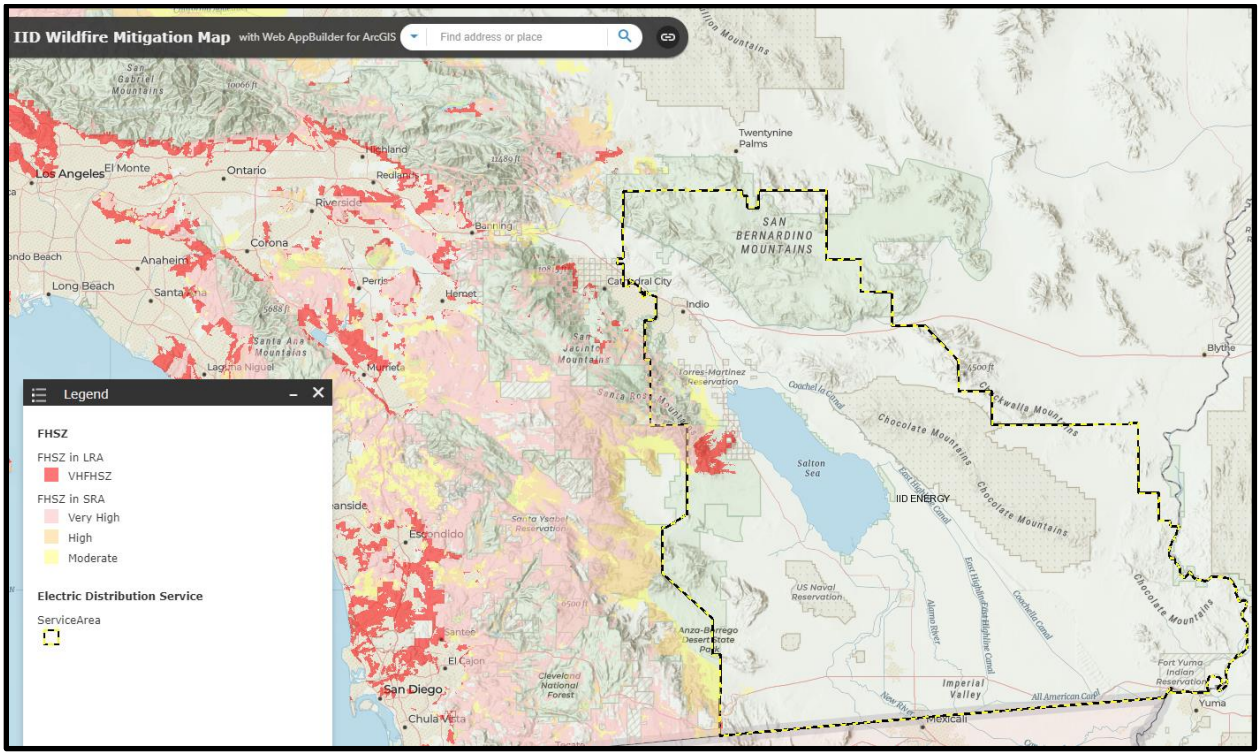
Climate Change is not likely to cause an increase of wildfires in the IID service territory.

9 IID Service Territory Fire Threat Information

9.1 CAL Fire High and Very High Fire Hazard Severity Zones

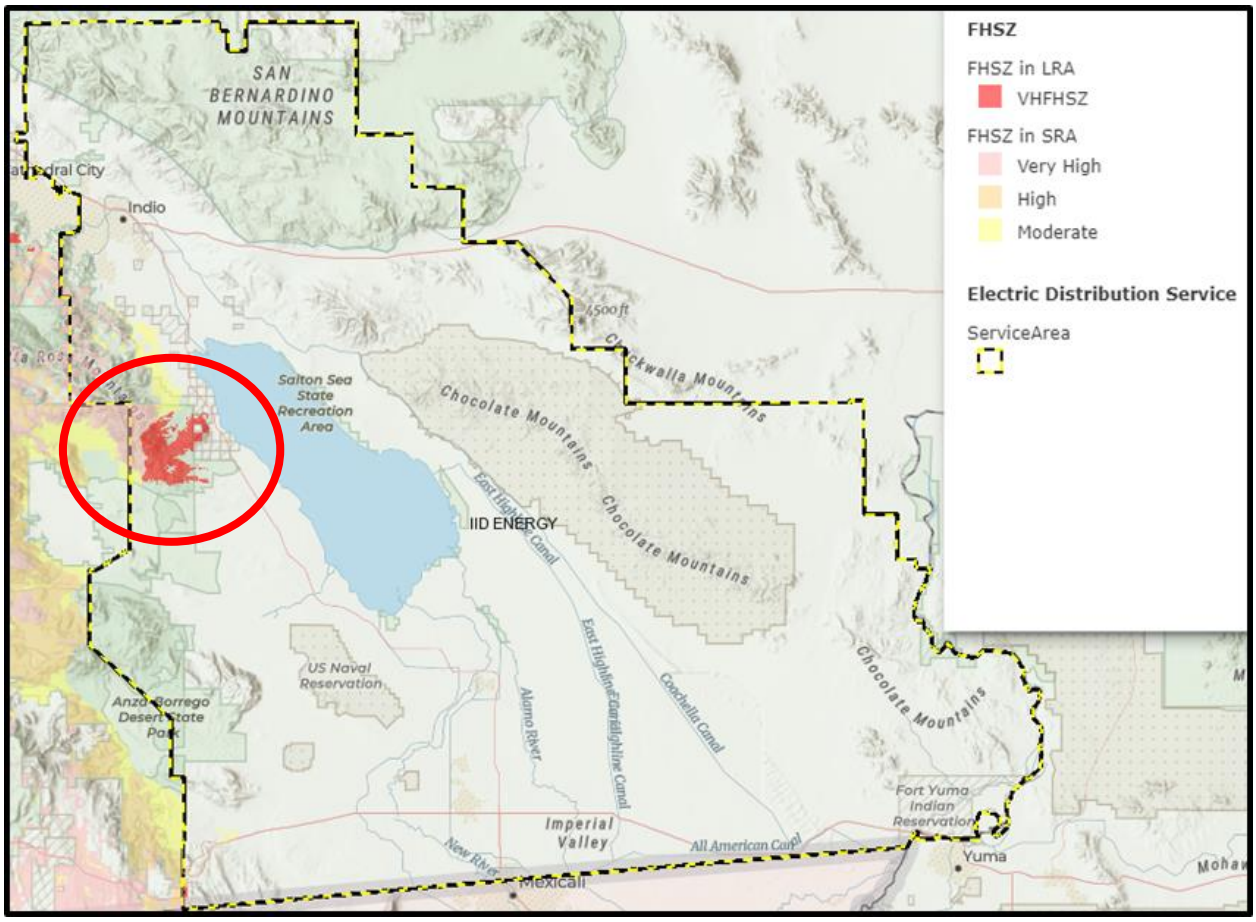
The Current Fire Hazard Severity Zones (FHSZ) for Imperial and Riverside Counties are shown below, with an IID Service Territory overlay - Note: Map includes only state and local responsibility areas. Also, note the small fringe hazard areas in northwest Imperial County and southwest Riverside County. The interactive CAL FIRE map (without the IID service territory layer) can be found at the following website https://egis.fire.ca.gov/FHSZ/

CAL Fire Map with IID Service Territory layer 01-24-2022, source IID GIS



There is one CAL FIRE designated Very High Fire Hazard Severity Zone of approximately 43 square miles, or 0.66% of the service territory, located on the West side of the Imperial Irrigation District Service Territory, near the Imperial-Riverside County line.

The area is noted with a red circle on the map on the next page. Part of this High Fire Threat zone is located in the northern section of the Anza Borrego Desert State Park continuing north, through a desert mountainous area.



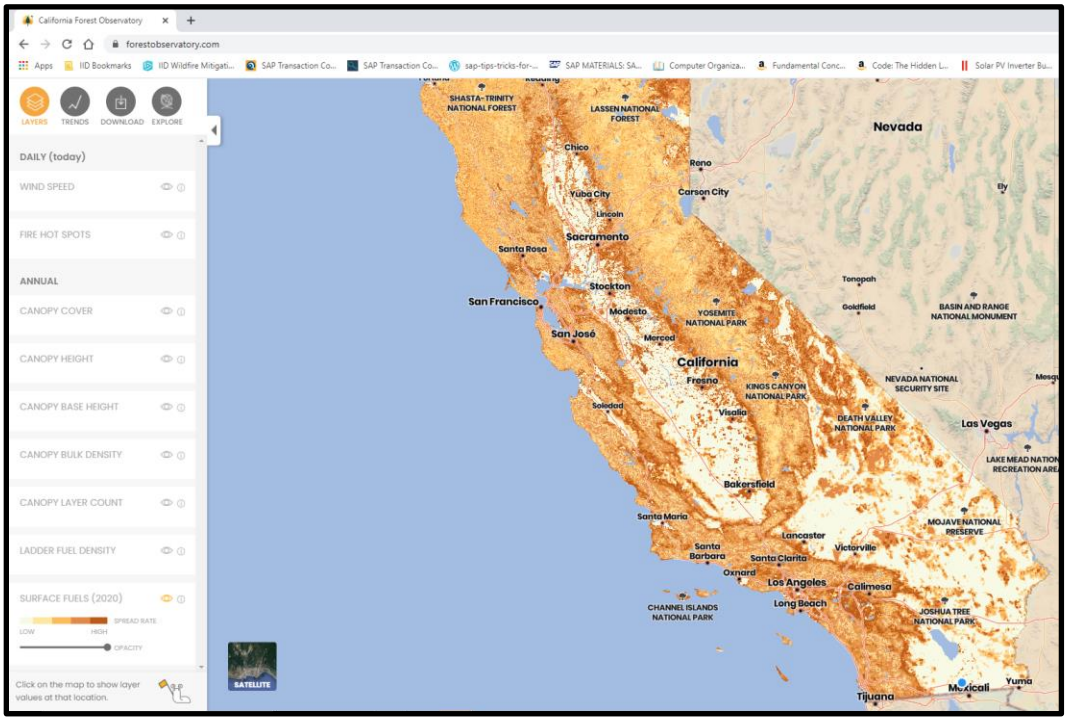
CAL FIRE Fire Hazard Map with IID service territory layer 01-25-2022, source IID GIS

FHSZ – fire hazard severity zone, LRA – Local Responsibility Area, SRA – State Responsibility Area

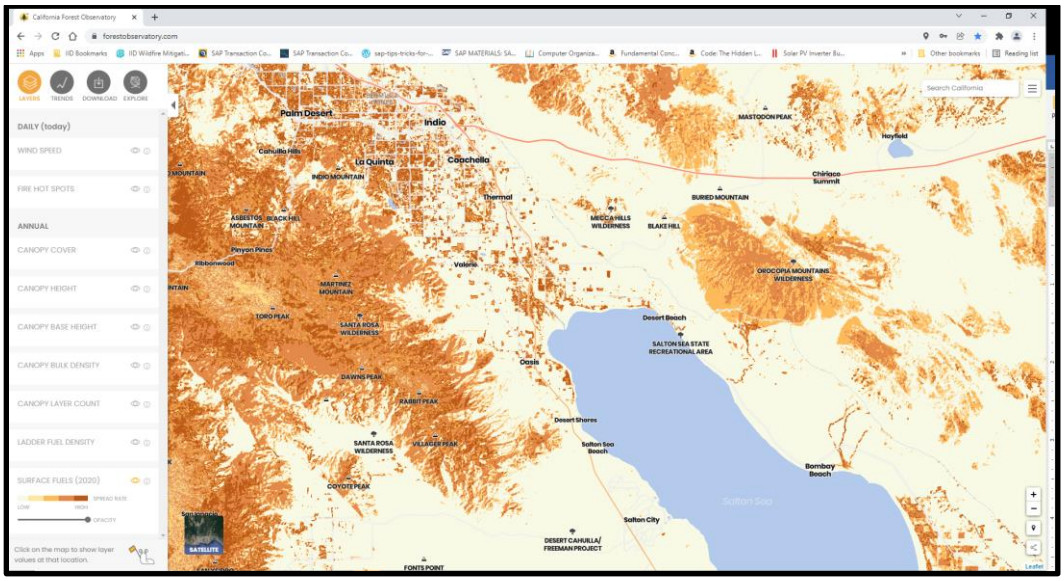
9.2 California Forest Observatory Surface Fuels

The California Forest Observatory map below shows surface fuels.

California Forest Observatory map of California with Surface Fuels layer displayed, 01-27-2022. https://forestobservatory.com/

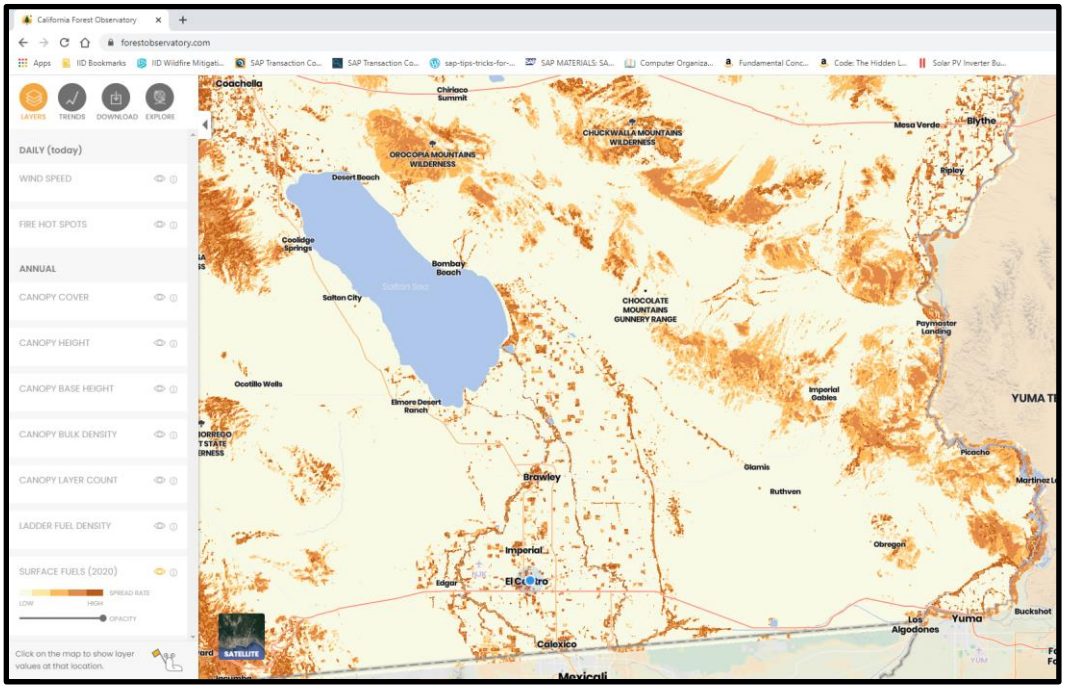


California Forest Observatory map containing Imperial Irrigation District Service Territory, **Coachella Division** with Surface Fuels layer displayed, 01-27-2022 https://forestobservatory.com/



California Forest Observatory map containing Imperial Irrigation District Service Territory, **Imperial Division** with Surface Fuels layer displayed, 01-27-2022

https://forestobservatory.com/



9.3 CAL FIRE Communities at Risk from Wildfire - IID Service Territory

CAL FIRE also provides a list of “Communities at Risk from Wildfire” in California.

https://osfm.fire.ca.gov/divisions/community-wildfire-preparedness-and-mitigation/fire-plan/communities-at-risk/

The CAL FIRE Communities at Risk list (01/05/2022) includes the communities at risk within the IID Service Territory.

Note that there are 6 communities identified that are inside the IID Service Territory.

Riverside County: Coachella, Indian Wells, Indio, La Quinta, Torrez Martinez Indian Reservation.

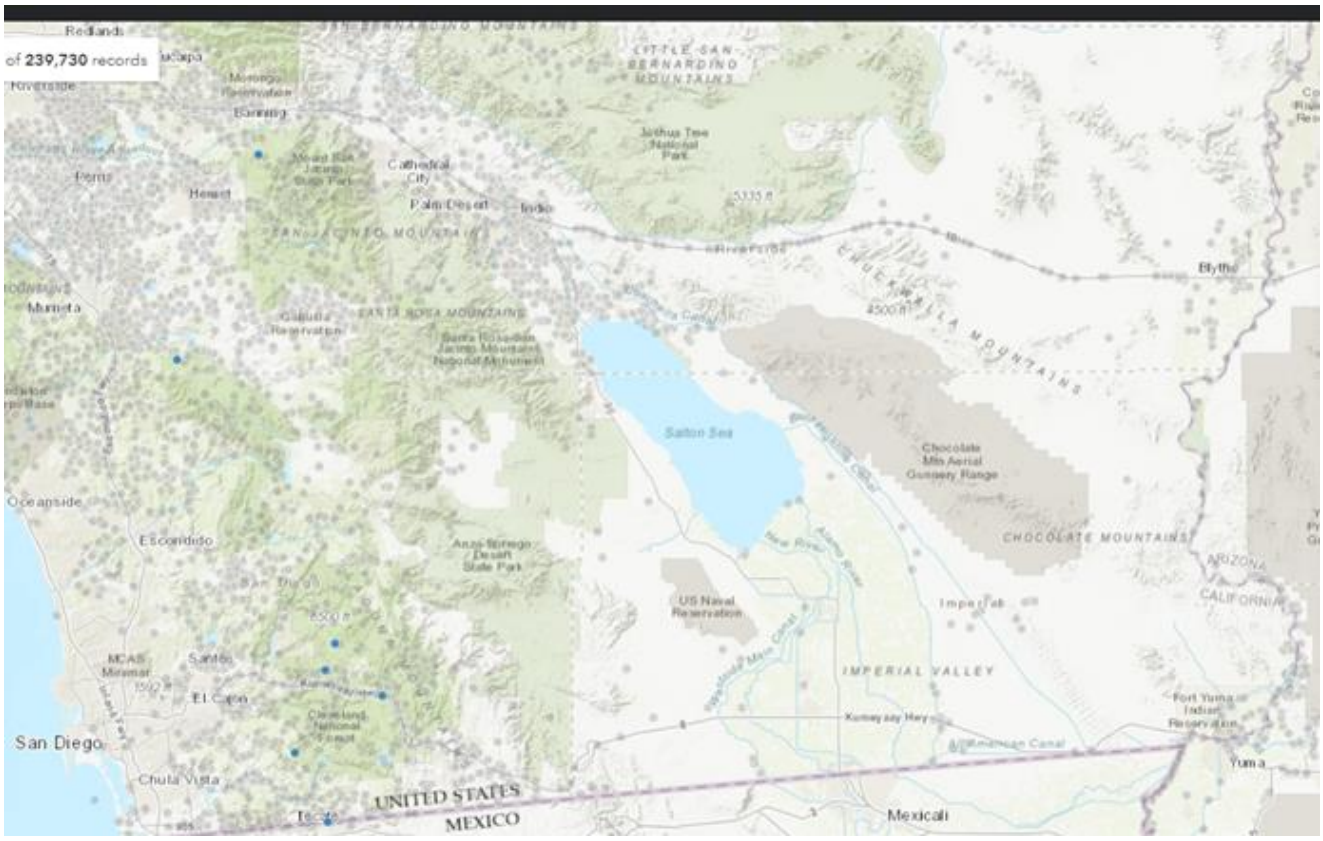
Imperial County: Winterhaven (Fort Yuma Indian Reservation).

9.4 National Interagency Fire Center – WFIGS – Wildland Fire Locations Full History, 2008- 9/14/2022; view of Southern California.

https://data-nifc.opendata.arcgis.com/datasets/nifc::wfigs-wildland-fire-locations-full-history/explore?location=33.326839%2C-115.461644%2C9.33

Locations for reported wildland fires caused by power generation/transmission are displayed as blue dots on the map below of the very southern section of California.

Note**:** no wildland fires caused by power generation/transmission were reported by the National Interagency Fire Center inside the IID service territory for period 2008-9/14/2022.



Incident Size	Fire Cause	Fire Cause General	Fire Cause Specific	Fire Code	Fire Discovery Date Time	FS Job Code	FS Override Code	Geographic Area Coordination Center Code	Incident Name	Incident Type Category	Incident Type Kind	Initial Latitude	Initial Longitude	POO County	Predominant Fuel Group
11.1	Human	Utilities	Power Generation/Transmission		5/26/2020, 1:03 PM			OSCC	SCHOLL	WF	FI			San Bernardino	Grass-Shrub
0.1	Human	Utilities	Power Generation/Transmission	M268	3/17/2020, 11:56 PM	P5	502	OSCC	Pine	WF	FI	32.836	-116.536	San Diego	Grass-Shrub
1	Human	Utilities	Power Generation/Transmission	NN3G	10/13/2020, 4:50 PM	P5	502	OSCC	Arturo	WF	FI	32.866	-116.654	San Diego	Brush
1.5	Human	Utilities	Power Generation/Transmission	M59L	6/9/2020, 11:01 AM	P5		OSCC	Vail	WF	FI	33.457	-116.997	Riverside	Grass
0.1	Human	Other Human Cause	Power Generation/Transmission	M0HA	2/26/2020, 12:23 AM	P5	502	OSCC	Boulder	WF	FI	32.913	-116.638	San Diego	Grass
0.8	Human	Utilities	Power Generation/Transmission	NE8R	8/14/2020, 8:52 AM	P5	502	OSCC	Joe	WF	FI	33.813	-117.563	Riverside	Grass-Shrub
0.1	Human	Utilities	Power Generation/Transmission	N2MB	6/10/2021, 10:23 AM	P5	512	OSCC	POWERLINE	WF	FI	33.836	-116.833	Riverside	Grass-Shrub
23.3	Human	Utilities	Power Generation/Transmission	N50U	7/15/2021, 1:44 PM			OSCC	BORDER 13	WF	FI	32.578	-116.634	San Diego	
0.4	Human	Utilities	Power Generation/Transmission	N6TV	7/24/2021, 3:19 PM	P5		OSCC	Honey	WF	FI	32.71	-116.746	San Diego	Grass

9.5 CAL FIRE Incidents inside the Imperial Irrigation District Service Territory 2013 – 2021

The tables below show the number of reported CAL FIRE incidents and acreage burned for each county inside the IID Service Territory, for calendar years 2013-2021.

CAL FIRE Incidents
Imperial Irrigation District Service Territory
2013 - 2021

Imperial County

Year	Number of Incidents	Incident Street Address	Incident Township Range	Incident City	Cause	Acres Burned
2013	0					0
2014	0					0
2015	0					0
2016	0					0
2017	0					0
2018	0					0
2019	0					0
2020	1	Off Austin Road and Weaver Road South of Brawley	T14SR13E	Brawley CA	Under Investigation	275
2021	0					
total	1			2013-2021 TOTAL ACRES BURNED		275

CAL FIRE Incidents
Imperial Irrigation District Service Territory
2013 - 2021

Riverside County

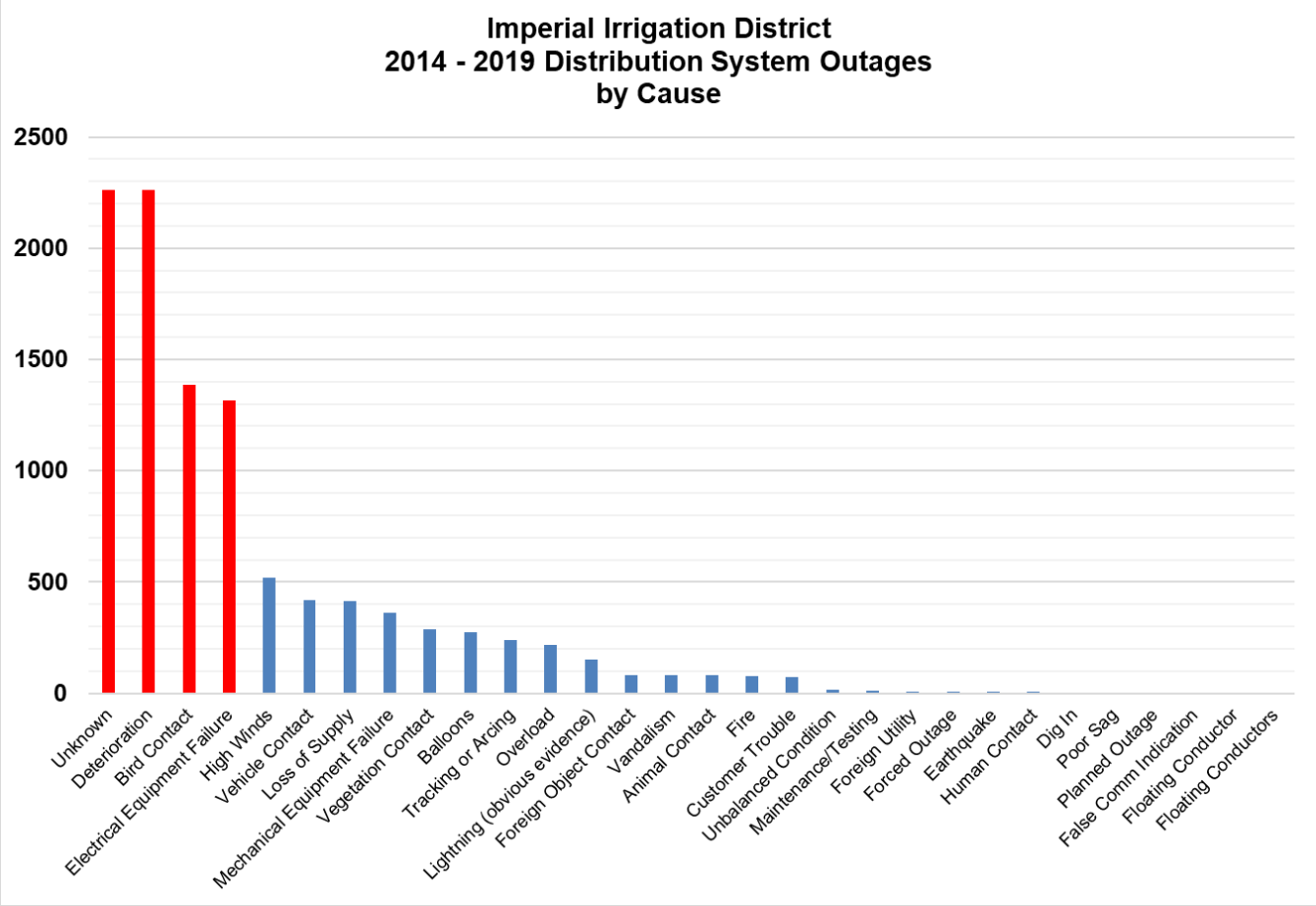
Year	Number of Incidents	Incident Street Address	Incident Township Range	Incident City	Cause	Acres Burned
2013	2	Ave 66 / Pierce St	T7R8E	Thermal CA	No Information Provided	40
		Ave 54 / Tyler	T6SR8E	Coachella CA	No Information Provided	40
2014	1	Ave 62 / Van Buren	T6SR8E (SW corner)	Thermal CA	No Information Provided	57
2015	0					0
2016	0					0
2017	2	Ave 66 / Hwy111	T7SR9E	Mecca CA	No Information Provided	15
		Ave 64 / Las Serenas ST	T7SR9E	Mecca CA	No Information Provided	48
2018	3	Ave 70 / Hwy 86	T7SR8E	Torres-Martines Reservation Mecca CA	No Information Provided	10
		Ave 66 / Martinez Rd	T7SR8E	Thermal CA	No Information Provided	40
		Tyler St / Vista Del Sur	T5SR8E	Coachella CA	No Information Provided	15
2019	4	Ave 66 / Lincoln St	T7SR9E	Mecca CA	Under Investigation	80
		Ave 66 @ Mecca	T7SR9E	Torres-Martines Reservation Mecca CA	No Information Provided	55
		Airport Blvd / Shady Lane	T6SR8E	Thermal CA	No Information Provided	130
		Johnson St and Ave 82	T8SR9E	Torres-Martines Reservation Thermal CA	No Information Provided	75
2020	1	Van Buren and Ave 58	T6SR8E	Thermal CA	No Information Provided	12
2021	3	Hwy 111 and Parkside Drive	T8SR10E	Mecca CA	No Information Provided	17
		Ave 72 and Pierce (Oasis)	T7SR8E	Torres-Martines Reservation Thermal CA	No Information Provided	43
		89000 Block of Ave 76	T8SR8E	Thermal CA	No Information Provided	20
total	16			2013-2021 TOTAL ACRES BURNED		697

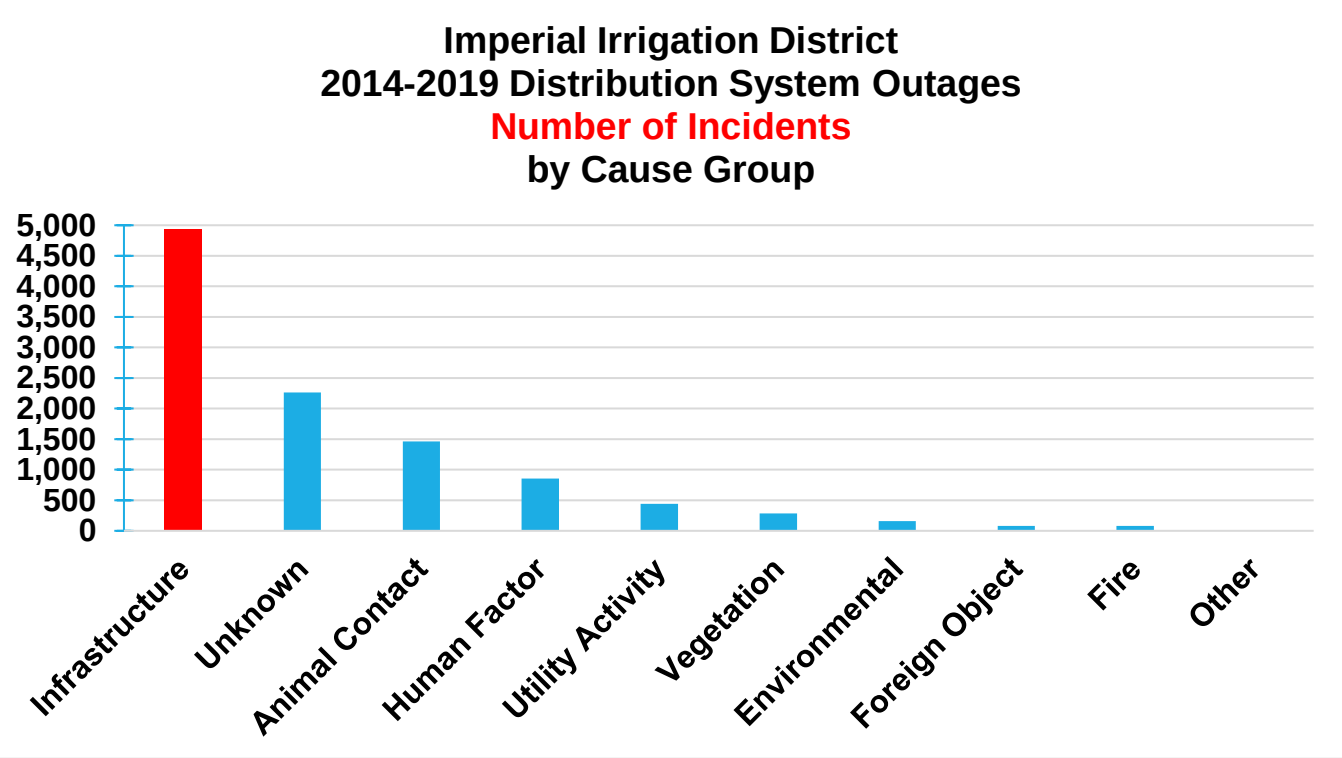
CAL FIRE Incidents Imperial Irrigation District Service Territory 2013 - 2021						
	San Diego County					
Year	Number of Incidents	Incident Street Address	Incident Township Range	Incident City	Cause	Acres Burned
2013	0					0
2014	0					0
2015	0					0
2016	0					0
2017	0					0
2018	0					0
2019	0					0
2020	0					0
2021	0					0
	0			2013-2021 TOTAL ACRES BURNED		0

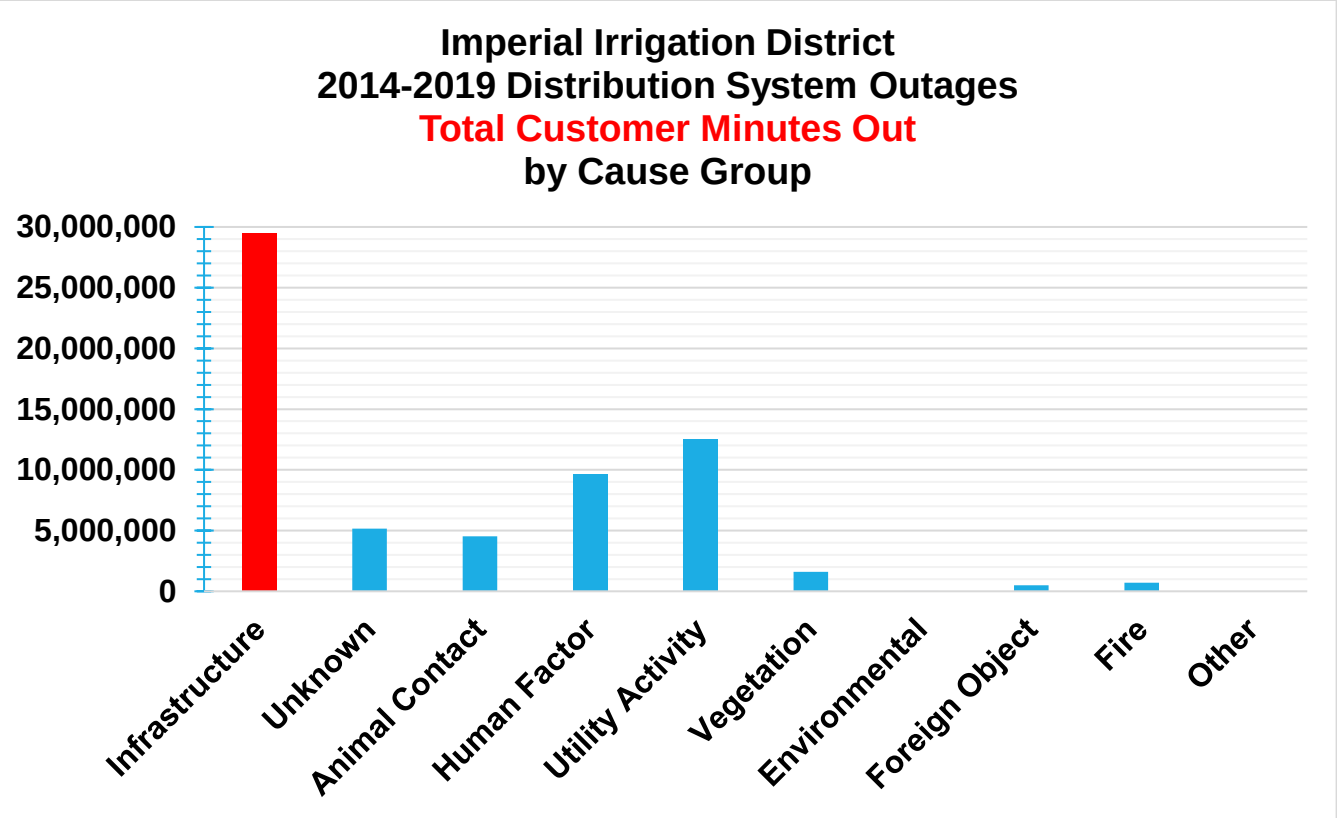
https://www.fire.ca.gov/incidents/

9.6 IID 2014-2019 Distribution Power Outages by Cause

The graph below shows IID distribution system power outages categorized by cause, occurring between 2014 and 2019, including causes linked to infrastructure-related risks. (IID Power Outages GIS 03-14-2022)




Imperial Irrigation District
2014-2019 Distribution System Outages
Number of Incidents
by Cause Group
5,000
4,500
4,000
3,500
3,000
2,500
2,000
1,500
1,000
500
0
Infrastructure
Unknown
Animal Contact
Human Factor
Utility Activity
Vegetation
Environmental
Foreign Object
Fire
Other



In the table below, distribution system outages are categorized by outage cause. Similar causes are further grouped to form larger cause groups.

The percentage of the total number of customer minutes out for each cause, and cause group, is shown in the table below.

Imperial Irrigation District 2014-2019 Distribution System Power Outages by Category and Category Group					
Cause Group/Cause	**Number of Incidents**	**Customer Minutes Out by Cause**	**Customer Minutes Out by Cause (% of total)**	**Customer Minutes Out by Cause Group**	**Customer Minutes Out by Cause Group (% of total)**
Unknown				**5,160,222**	**8%**
Unknown	2,263	5,160,222	8%		
Infrastructure				**29,474,577**	**45%**
Deterioration	2,261	6,014,643	9%		
Electrical Equipment Failure	1,314	12,283,642	19%		
High Winds	517	4,770,885	7%		
Mechanical Equipment Failure	361	2,372,262	4%		
Tracking or Arcing	241	2,741,996	4%		
Overload	216	1,221,914	2%		
Poor Sag	4	36,144	0%		
Floating Conductor	1	0	0%		
Floating Conductors	1	9,432	0%		
Unbalanced Condition	14	23,659	0%		
Animal Contact				**4,522,538**	**7%**
Bird Contact	1,385	3,845,700	6%		
Animal Contact	80	676,838	1%		
Human Factor				**9,666,399**	**15%**
Vehicle Contact	417	6,226,608	10%		
Balloons	275	2,470,546	4%		
Human Contact	5	11,206	0%		
Vandalism	81	694,775	1%		
Dig In	4	206,047	0%		
Customer Trouble	73	57,217	0%		
Vegetation				**1,591,113**	**2%**
Vegetation Contact	287	1,591,113	2%		
Foreign Object				**485,996**	**1%**
Foreign Object Contact	81	485,996	1%		
Environmental				**902,186**	**1%**
Lightning (obvious evidence)	153	843,876	1%		
Earthquake	5	58,310	0%		
Utility Activity				**12,490,666**	**19%**
Loss of Supply	412	12,251,157	19%		
Foreign Utility	9	18,860	0%		
Forced Outage	8	118,066	0%		
Planned Outage	2	4,784	0%		
Maintenance/Testing	13	97,799	0%		
Fire				**717,787**	**1%**
Fire	79	717,787	1%		
Other				**0**	**0%**
False Comm Indication	1	0	0%		
	10563	65011484	100%	65,011,484	100%

Top three cause groups with the greatest percentage of customer-minutes-out include:

- **INFRASTRUCTURE (45%)** – customer-minutes-out caused by old defective infrastructure, equipment failure, overloaded equipment, and unbalanced conditions.

- **UTILITY ACTIVITY (19%)** – customer-minutes-out caused by IID or other power providers.
- **HUMAN FACTOR (15%)** – customer-minutes-out caused by human activity such as vehicle accidents, mylar balloon contact, vandalism, etc.

Note from the table above, that approximately 1% of customer-minutes-out involve incidents where fire is also reported.

The cause of fires is not easily reportable with the IID incident tracking system at this time. Correction of this issue is one of the SB901 projects identified later in this plan document.

Summary

For period 2010-2021, inside the IID service terriory:

- No wildland fires caused by power generation or transmission infrastructure were reported by the National Interagency Fire Center.
- No fires caused by IID infrastructure were reported by CAL FIRE.
- The IID work management system shows IID responded to 1380 incidents where fires involving or adjacent to IID infrastructure were reported. A work management system improvement is planned, to provide the ability to report if a fire is caused by IID infrastructure or is caused by others.

IID Distribution Outage System information for period 2014-2019:

- Approximately 1% out of the total number of IID customer-minutes-out, involve incidents where a fire is also reported.
- The top three customer minutes-out cause groups are:
    - Infrastructure
    - Utility Activity
    - Human Factor

The key risks and drivers related to IID design, construction, operation and maintenance, per the table above in the infrastructure section will continue to be addressed. Work will include:

- Aging infrastructure repairs and replacement
- Insulator washing
- Avian deterrents
- Relay replacements

10 IID Utility Practices

10.1 FAC-003 Transmission System Vegetation Management Program

IID Objective – Line Clearance Unit

Ensure the Transmission System Vegetation Management program adheres to Western Electricity Coordinating Council (WECC) requirements and latest NERC FAC-003 standard, where applicable.

IID Practice

The Imperial Irrigation District Transmission System Vegetation Management program is a comprehensive vegetation management program applicable to the Imperial Irrigation District Bulk Electric System located in the IID Service Territory, which adheres to Western Electricity Coordinating Council (WECC) requirements. For transmission-level facilities, Imperial Irrigation District complies with the latest NERC FAC-003 standard, where applicable.

10.2 Vegetation Management Power Lines 200 kV and Below Not Subject to FERC Jurisdiction - Line Clearance Unit

IID Objective

Ensure the Distribution System Vegetation Management practice contains and effectively implements the following components:

- Inspection Patrols,
- Regulatory Requirements and Standards,
- Pruning Best Practices,
- Safety,
- Vegetation Control, and
- Customer Service

IID Practice

The work procedures identify responsible parties, inspection cycles, clearance distance for overhead, ground mounted and underground infrastructure, details procedures to address inspection findings.

Imperial Irrigation District Distribution System Vegetation Management practice contains the following components:

Inspection Patrols – The Imperial Irrigation District vegetation management practice performs periodic and on-demand patrols to identify vegetation in and adjacent to, energy infrastructure. These inspections are a trigger for pruning jobs, vegetation removals, and the application of herbicides.

Regulatory Requirements and Standards – The vegetation management practice complies with applicable regulatory requirements and standards such as, California Public Resources Code, National Electrical Safety Code, and Imperial Irrigation District regulations.

Pruning Best Practices – Imperial Irrigation District requires Vegetation Management Contractors to prune trees following the American National Standards Institute A300 pruning best practices.

Safety – The Imperial Irrigation District requires Vegetation Management Contractors to adhere to regulations and best practices such as, American National Standards Institute Z133, Safety Requirements for Arboricultural Operations, Occupational Safety, and Health Administration, California Department of Industrial Relations, and Imperial Irrigation District, safety work practices. Vegetation Management Contractors working for the Imperial Irrigation District are required to maintain certifications to work in electric utility environments and pruning best practices.

Vegetation Control - The goal is to maintain a vegetation control buffer of at least six (6) feet in addition to the required clearance distances, to allow at least one (1) year of vegetation growth, before vegetation growth encroaches into the Danger Zone. The Danger Zone clearance distances follow California Public Resources Code requirements: California Public Resources Code, Division 4, Part 2, Chapter 3 Mountainous, Forest-, Brush- and Grass-Covered Lands, Section 4293.

Imperial Irrigation District will use specific knowledge of growing conditions to determine the appropriate amount of clearance required for each site.

Clearance in All Directions Between All Vegetation and All Energized Conductors Which Are Carrying Electric Current	
Operating Voltage	**Clearance Distance**
2,400 or more Volts, but less than 72,000 Volts	4 FT
72,000 or more Volts, but less than 110,000 Volts	6 FT
110,000 or more Volts	10 FT

Customer Service – Customers may contact the Imperial Irrigation District Call Center for vegetation related service requests and information. Customers may review Vegetation Management practice information on the Imperial Irrigation District website. As an added service, the Imperial Irrigation District offers safety inspections of customer meter panels, as part of commissioning a new service panel. In addition, Imperial Irrigation District will de-energize customer service drops to allow customers to perform work adjacent to meter panels and Imperial Irrigation District electric infrastructure.

10.3 Power Line Corridor Clearance Regulation 23 – Line Clearance Unit, Power Line Inspection Unit, Real Estate Unit, Security Claims and Investigation Unit.

IID Objective

Enforce the Power Line Corridor Clearance Regulation 23, and the corresponding standard work procedure to manage power line clearance incidents.

IID Practice

In 2019, the Imperial Irrigation District, enacted Power Line Corridor Clearance Regulation 23, and a corresponding standard work procedure to manage power line clearance incidents. The regulation provides the Imperial Irrigation District the authority to clear power line encroachments within, or adjacent to, District transmission and distribution infrastructure that may threaten the reliability of the power system and pose a safety threat to persons and property. Such encroachments can take the form of vegetation, structures, haystacks, equipment, or even persons performing tasks in close proximity to Imperial Irrigation District facilities.

The regulation addresses, line to ground clearances within the District's rights-of-way; safety clearances for personnel working in proximity to the lines; potential hazards that could fall onto overhead lines; prohibits fires under or adjacent to power lines and other power infrastructure; and provides the Imperial Irrigation District an enforcement mechanism.

10.4 Monitor and Audit the Effectiveness of Powerline Clearance Inspections - Line Clearance Unit

IID Objective

Assure power line clearance inspections are meeting applicable requirements.

IID Practice

Imperial Irrigation District currently uses a geographic information system and an SAP system to plan and manage field inspections of powerline clearances. Imperial Irrigation District follows industry practice CPUC General Order 165 to schedule powerline clearance inspections.

Imperial Irrigation District Powerline Clearance Inspectors use the IID Vegetation Management Guide to standardize vegetation management practices.

To assure the effectiveness of powerline clearance inspections, IID performs the following:

As part of the SB 901 annual service territory inspection, IID identifies service territory zones for inspection. These may include CAL FIRE areas of interest, areas with a history of power disturbances, areas with a history of fire ignitions, and areas in or adjacent to high or very high fire hazard zones. The independent inspector performs an inspection of the areas identified. Inspection findings are shared with the IID management team and responsible staff. The IID management team reviews the information and makes operational adjustments as required.

10.5 Community Outreach and Public Awareness – Line Clearance Unit, Customer Service Unit

IID Objective

Perform outreach activities targeting the general public, public agencies, commercial developers, housing developers, local tree trimming contractors and landscape contractors as outlined in the wildfire mitigation plan.

IID Practice

The new Vegetation Management Program identifies outreach activities targeting the general public, public agencies, commercial developers, housing developers, local tree trimming contractors and landscape contractors.

Communication includes safety information, information regarding vegetation management danger zones, recommended trees for the wire zone and border zone, program information, process information, self-help resources, and program contact information.

Communications are performed via: customer billing inserts, Imperial Irrigation District website, outreach events, and internal IID information events

The program also contains a community outreach component where Imperial Irrigation District personnel hold annual events for land developers, local government, and the public, providing information regarding power line clearance requirements, ground mounted equipment clearance requirements, best practices for planning trees adjacent to power line corridors.

The Imperial Irrigation District provides internal communications that notify employees and the public of events as required.

Email alerts are issued to employees as required for heat advisories, energy conservation Flex Alerts, major road closures, cell telephone service outages, flash flood warnings, Red Flag Warnings, and other major weather events.

The IID Customer Service Unit issues social media notifications for energy conservation Flex Alerts and notification of major power outages.

In addition, IID management may request notifications for emergency events on a case by case basis.

10.6 Monitor and Audit the Effectiveness of Substation Inspections – Substation Construction and Maintenance

IID Objective

Ensure IID performs monthly substation inspections according to policies and procedures.

IID Practice

IID performs monthly substation inspections meeting applicable General Order 174, Rules for Electric Utility Substations requirements. SAP automatically generates work orders monthly and inspections are recorded in GIS.

Inspections are specific to equipment type and the basis of the inspection is the manufacturer's recommendation.

Substation inspectors generate SAP notifications for any abnormal condition. These notifications are converted to work orders, and assigned to maintenance staff. Once abnormal conditions are corrected, the work order is closed. On a regular basis, work orders are reviewed for completeness as a quality control measure.

10.7 Monitor and Audit the Effectiveness of Powerline and Powerline Equipment Inspections – Power Restoration and Troubleshooting Unit

IID Objective

Assure power line and powerline equipment inspections are meeting applicable requirements.

IID Practice

Imperial Irrigation District currently uses a geographic information system, and an enterprise resource planning system, to plan and manage field inspections of powerline poles, and pole mounted equipment. Imperial Irrigation District follows industry practice CPUC General Order 165 to schedule pole inspections at a circuit level.

Imperial Irrigation District Power Line Inspectors use the IID Powerline Inspection Guide to standardize pole inspection assessments.

To assure the effectiveness of the inspections IID performs an annual service territory inspection. IID identifies service territory zones for inspection, which may include CAL FIRE areas of interest, areas with a history of power disturbances, areas with a history of fire ignitions, and areas in or adjacent to CAL FIRE high or very high fire hazard zones.

The Independent Evaluator performs an inspection of the areas identified. Inspection findings are shared with the IID management team and responsible staff. The IID management team reviews the information and is responsible to make operational adjustments as required.

10.8 Transmission Power Line Inspections - Power Restoration and Troubleshooting Unit

IID Objective

Ensure IID follows FAC-003 requirements for Bulk Electric System inspections.

IID Practice

IID has a dedicated compliance administrator responsible for oversight of NERC/WECC vegetation management requirements for BES power lines.

IID complies with the NERC Vegetation Management Standard FAC-003 by performing annual inspections of the applicable transmission lines and completing any work derived from inspections before the next annual inspection.

IID submits quarterly reports to WECC for vegetation caused outages.

10.9 Distribution Power Line Inspections - Power Restoration and Troubleshooting Unit

IID Objective

- Ensure IID follows industry practices such as California Public Utilities Commission General Order 95 for construction standards and General Order 165 for inspection frequency requirements.
- Ensure the program performs periodic Patrol Inspections, Detailed Inspections, and Intrusive Inspections to assess the condition of field equipment.
- Ensure inspections assess power line physical condition, identify safety issues, identify deviations from construction design, and detect imminent failures.

IID Practice

For distribution circuits, Imperial Irrigation District follows industry practices such as California Public Utilities Commission General Order 95 for construction standards and General Order 165 for inspection frequency requirements.

The program performs periodic inspections to assess the condition of field equipment. Inspections include:

- Patrol Inspections,
- Detailed Inspections, and
- Wood Pole Intrusive

Inspections assess:

- Power line physical condition,
- Identify safety issues,
- Identify deviations from construction design, and
- Detect imminent failures.

The Imperial Irrigation District performs power line inspections following two standard work procedures. One procedure addresses Bulk Electric System infrastructure and the second procedure addresses power lines of 200KV and below that are not subject to FERC jurisdiction.

The work procedures identify responsible parties, inspection cycles, and detail procedures to address inspection findings.

Inspection Frequencies -The Imperial Irrigation District performs power line inspections with frequencies as called for in California Public Utilities Commission General Order 165, Appendix A, III, Definitions. The inspection frequency depends on the equipment type, and mounting. For example, inspection frequencies depend on equipment mounting such as overhead, surface, or underground mounting, as well as location such as urban or rural, and type of equipment.

Minimum Patrol Inspection Frequencies -All urban equipment requires patrol inspections annually. All rural overhead equipment, located in CAL FIRE, High and Very High Fire

Hazard Severity Zones require patrol inspections annually. All rural equipment requires patrol inspections every (2) years.

Minimum Detailed Inspection Frequencies - All urban underground equipment requires detailed inspections every (3) years. All urban overhead and surface mount equipment require detailed inspections every (5) years.

Minimum Intrusive Inspection Frequencies - All urban and rural wood poles over 15 years in service without and previous intrusive inspection require an intrusive inspection within 10 years. All urban wood poles require an intrusive inspection within the first 25 years of service. All urban and rural wood poles that have passed an intrusive inspection require an intrusive inspection every 20 years after the first Intrusive inspection.

CPUC G.O. 165 Distribution System Minimum Inspection Frequency (maximum intervals in years)

	Patrol		Detailed		Intrusive	
	Urban	Rural	Urban	Rural	Urban	Rural
Transformers						
Overhead	1	2[1]	5	5	---	---
Underground	1	2	3	3	---	---
Pad mounted	1	2	5	5	---	---
Switching/Protective Devices						
Overhead	1	2[1]	5	5	---	---
Underground	1	2	3	3	---	---
Pad mounted	1	2	5	5	---	---
Regulators/Capacitors						
Overhead	1	2[1]	5	5	---	---
Underground	1	2	3	3	---	---
Pad mounted	1	2	5	5	---	---
Overhead Conductor and Cables	1	2[1]	5	5	---	---
Street lighting	1	2	x	x	---	---
Wood Poles under 15 years	1	2	x	x	---	---
Wood Poles over 15 years which have not been subject to intrusive inspection	1	2	x	x	10	10
Wood poles which passed intrusive inspection	---	---	---	---	20	20

10.10 **Emergency Event Procedures**– Emergency Management Unit

IID Objective

Ensure the Emergency Management Unit applies all procedures in place to address emergencies.

IID Practice

As a local governmental agency, Imperial Irrigation District has planning, communication, and coordination obligations pursuant to the California Office of Emergency Services' Standardized Emergency Management System ("SEMS"). Applicable standard operating procedures specify roles, responsibilities, and communication for field response, local government, operational area, regional, and state.

10.11 **Emergency Event Procedures** – System Operations Center

IID Objective

Maintain electric system situational awareness to detect abnormal electric system operation.

IID Practice

The Imperial Irrigation District, Energy Department, System Operations Center maintains electric system situational awareness using the operations center SCADA system which includes synchro-phasor phase angle measurement units used to detect abnormal operation of the electric system. Abnormal electric system operation may load equipment to higher than normal levels.

10.12 **Service Restoration After Major Events –** System Operations Center

IID Objective

Ensure the System Operations Center restores service after major events following the latest version of the IID System Restoration and Black-Start Plan

IID Practice

Imperial Irrigation District System Operations Center restores service after major events following the latest version of the Imperial Irrigation District System Restoration and Black-Start Plan. This plan was developed using the Reliability Coordinator guideline document, General Guidelines for Transmission Operators to Use in System Restoration.

10.13 **Standardized Emergency Management System –** Emergency Management Unit

IID Objective

Ensure IID follows planning, communication, and coordination obligations pursuant to the California Office of Emergency Services' Standardized Emergency Management System ("SEMS").

IID Practice

As a local governmental agency, Imperial Irrigation District has planning, communication, and coordination obligations pursuant to the California Office of Emergency Services'

Standardized Emergency Management System (“SEMS”). Applicable standard operating procedures specify roles, responsibilities, and field response communications at the local government, operational area, regional, and state levels.

Major Incident Management, Imperial County

The Imperial Irrigation District, Energy Department, Emergency Management Unit provides emergency and disaster preparedness services for all district departments. Those services include emergency and disaster preparedness, mitigation and recovery through Emergency Operation Plan development, training, exercises, and mutual aid implementation.

The Imperial Irrigation District, Emergency Management Unit coordinates major event response with the Imperial County Office of Emergency Services (OES) which provides emergency management services for the County/Operational Area including its seven cities/towns and special districts. Imperial County Office of Emergency Services coordinates emergency operations activities among all the various local jurisdictions and develops written guidelines for emergency preparedness, response, recovery, and mitigation to natural / man-made disasters, and technological disasters.

The Imperial County Office of Emergency Services establishes the Imperial County / Operational Area Emergency Operations Center (EOC) when directed by County emergency management authority.

Major Incident Management, Riverside County

The Imperial Irrigation District, Human Resources Department, Office of Emergency Planning also provides similar coordinating activities with Riverside County Emergency Management Department.

10.14 Utility Mutual Aide Agreements – Emergency Management Unit

IID Objective

Ensure IID fulfils mutual aid agreements are in place with neighboring utilities.

IID Practice

Imperial Irrigation District has mutual aid agreements in place with several neighboring utilities. These agreements provide a mechanism to request assistance from member utilities in case of an emergency.

One mutual aid agreement is the *Mutual Assistance Agreement, Electric and Gas, Members of the California Utilities Emergency Association.* This agreement includes several neighboring utilities: San Diego Gas and Electric, Southern California Edison, and Western Area Power Administration.

An additional similar agreement is in place with Arizona Public Service.

10.15 Disabling Re-Closer Procedure – System Operations Center

IID Objective

Develops a disabling re-closer procedure as needed.

IID Practice

Due to the low wildfire threat in the Imperial Irrigation District Service territory, Imperial Irrigation District does not disable re-closers due to anticipated wildfires. Imperial Irrigation District does not have a formal procedure identified for disabling re-closers.

10.16 Public Safety Power Shutoff – Emergency Management Unit

IID Objective

Develop Public Safety Power Shutoff procedure.

IID Practice

Imperial Irrigation District recognizes that there may be rare occasions when a fire puts our infrastructure and our customers' safety at risk. During such events, selective de-energization of power lines may be necessary to preserve public safety, or to protect the stability and reliability of the power system.

Due to the low wildfire threat in the Imperial Irrigation District Service territory, Imperial Irrigation District does not have a formal PSPS procedure.

10.17 No New Power Lines in High or Very High Fire Hazard Severity Zones – IID Regulatory and Environmental Compliance Unit

IID Objective

Ensure that IID will work with city and county planning departments to prevent land use changes in high fire threat areas where changes require building power infrastructure in CAL FIRE designated High or Very High Fire hazard areas (as needed only)

IID Practice

Imperial Irrigation District works with city and county planning departments to prevent land use changes in high fire threat areas where changes require building power infrastructure in CAL FIRE designated High or Very High Fire Hazard Severity Zones.

10.18 Relay Protection – System Protection Unit

IID Objective

Review all system disturbances for correct operation. In the event of an incorrect operation, disturbance analysis is performed on the protection settings, relay protective devices, and or associated hardware and equipment until root cause of event is identified and corrective measures are implemented.

IID Practice

Relay Protection Engineering reviews all system disturbances for correct operation. In the event of an incorrect operation, disturbance analysis is performed on the protection

settings, relay protective devices, and or associated hardware and equipment until root cause of event is identified. Once root cause is determined, corrective measures are implemented.

10.19 Power Line and Substation Design – Electrical Engineering Section

IID Objective

Ensure IID electric facilities are designed and constructed to meet or exceed relevant federal, state, and industry standards such as National Electrical Safety Code, IEEE Standards, and industry best practices such as CPUC General Order 95.

IID Practice

Imperial Irrigation District electric facilities are designed and constructed meeting or exceeding relevant federal, state, and industry standards such as National Electrical Safety Code, and IEEE Standards.

Imperial Irrigation District meets or exceeds industry practices such as CPUC General Order 95.

10.20 Addressing SB 901 Section 43 Biomass Power Purchase Requirement - Energy Business and Regulatory Compliance Programs Unit

IID Objective

Continue participating in procurement activities with other member agencies through the Southern California Public Power Authority with regard to requirements established by Public Utilities Code §8388.

IID Practice

SB 901 Section 43 requires utilities with existing biomass procurement contracts that meet certain criteria, to amend or establish a new contract. Statute requires that the generating facility of the existing contract be operative at any time in 2018 with a contract expiration date on or before December 2023.

Pursuant to Section 43, these requirements do not apply to facilities located in federal severe or extreme nonattainment areas for particulate matter or ozone.

The figure on the page below shows that the majority of the Imperial Irrigation District Service Territory is in the federally classified nonattainment areas of Imperial County and the Coachella Valley in Riverside County. Therefore, Imperial Irrigation District is exempt from Section 43 biomass generation procurement requirements.

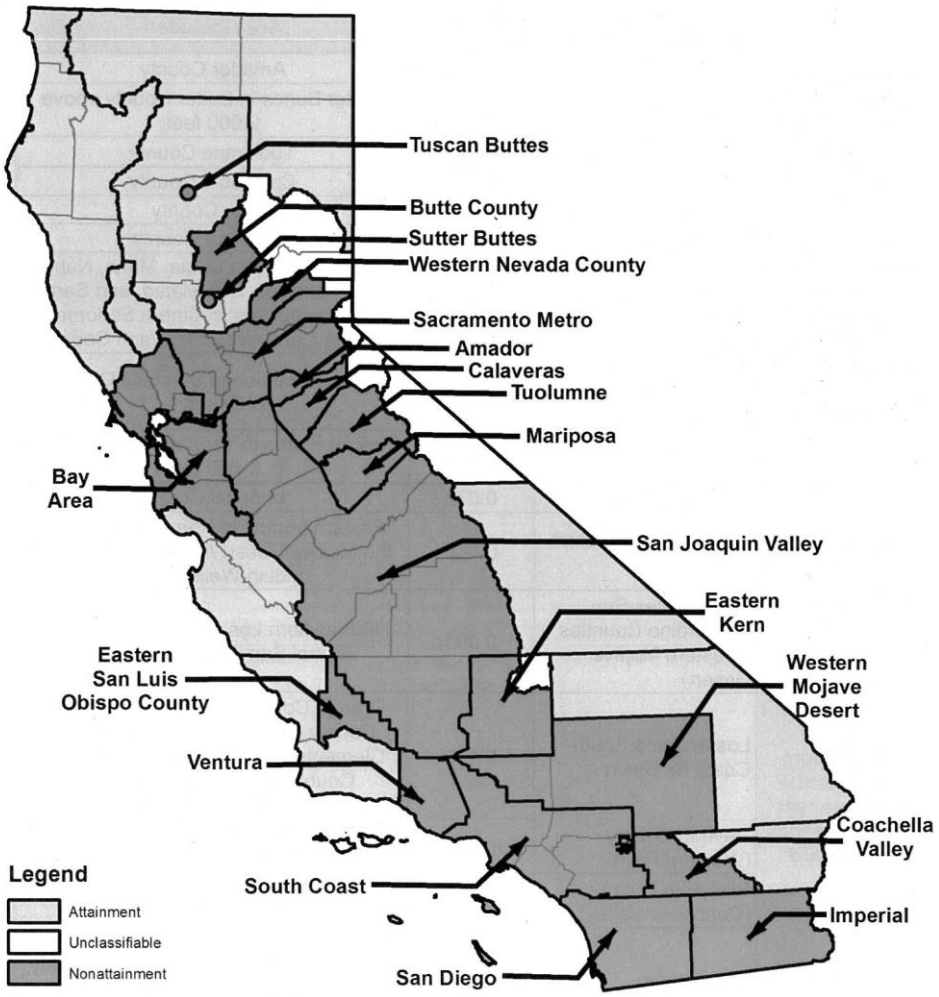
Reference: *EPA Ozone Designations 2015 Standards, California State Recommendations and EPA Response, California State Recommendation, California Air Resources Board Air Quality Planning and Science Division, Air Quality Analysis Section, Recommended Area Designations for the 0.070 PPM Federal 8-Hour Ozone Standard*

https://www.epa.gov/sites/production/files/2016-11/documents/ca-rec-enclosures.pdf

Notwithstanding section 10.9.3, IID is participating in procurement activities with other member agencies through the Southern California Public Power Authority with regard to requirements established by Public Utilities Code §8388.

Figure 1

Recommended Area Designations for the 0.070 ppm Federal 8-Hour Ozone Standard



10.21 Power Lineman Training Program – Energy Compliance and Vegetation Unit

IID Objective

Ensure IID implements and adheres to the Power Lineman apprenticeship program in partnership with the local community college

IID Practice

Imperial Irrigation District has developed a comprehensive Power Lineman apprenticeship program in partnership with the local community college. This program is an apprenticeship program administered by the Apprenticeships Program, Economic, and Workforce Development Division, of Imperial Valley College.

Aspiring Power Linemen are required to complete two levels of coursework. The first level is required of all electrical apprenticeships and a second level is specific for the power linemen apprenticeship. In addition, students are required to complete 7,200 hours of on-the-job training at Imperial Irrigation District.

After successfully completing the program, students receive; an Imperial Valley College Certificate of Completion, a State of California Journeyman Electrician Certificate of Completion, and a State of California Journeyman Electrician Card.

The first level of course work imparts basic electrical and electrical theory. The first level includes classroom lecture hours and is composed of the following classes:

Electrical Trades I **72 lecture hours**

Basic electricity and electronics mathematical functions, computations, principles of electricity, AC/DC, electro-magnetism, symbols, schematic diagrams, safety skills, impedance, current, resistance, amperage, voltage, and circuitry

Electrical Trades II **72 lecture hours** (offered Spring 2022)

Overview of transmission and distribution systems, various utility industry components, high voltage AC power, electrical diagrams, workplace safety, rope rigging and hand signals, substations, switchyards, three phase systems, delta wye configurations, electrical diagrams, safety rules, CAL-OSHA

Electrical Trades III **72 lecture hours**

Introduction to framing, setting, guys, installation of conductors and grounds, laying out of underground line systems, assembly and installation of cross arms, pins and insulators, conductor splicing, sagging and tying, manhole and vault construction, residential underground installations

Electrical Trades IV **72 lecture hours** (offered Spring 2022)

Introduction to maintenance of distribution and underground systems, safety procedures, hazardous materials, operation and maintenance of bucket truck, connecting pole top transformers, trouble shooting and replacement of equipment, transformers, cutouts, switches, capacitors, voltage regulators; troubleshooting and locating faults

The second level of course work imparts the knowledge necessary to perform power lineman activities successfully. The program includes classroom lecture hours and is composed of the following classes:

Power Lineman V **72 lecture hours**

AC theory, distribution line maintenance, transmission structures, transmission line installation, climbing steel poles, de-energizing lines, rigging, high voltage, gloves, hot sticks

Power Lineman VI **72 lecture hours**

Basic principles, construction, operation, maintenance procedures associated with substations and switchyards, inspect and test transformers, circuit breakers, and relays

Power Lineman VII **72 lecture hours**

Theory and procedures for commercial and residential connections, watthour installations, series and multiple circuit street lighting systems, resolve outages, watt hour meter installation, complete residential commercial installation, analyze, troubleshoot and repair lighting and power loss

Power Lineman VIII 72 lecture hours

Advanced theory on the use of hot sticks, energized, de-energized repair and maintenance of poles and lines, safety practices, local and state requirements, lineman mathematics, overhead construction, line construction, general orders and electrical codes

2023-2025 Plan

Continue working with local community college to provide power lineman training.

11 IID SB901 Practice

11.1 Service Territory Survey by Independent Evaluator

Public Utilities Code section 8387(c) requires Imperial Irrigation District to contract with a qualified independent evaluator with experience in assessing the safe operation of electrical infrastructure to review and assess the comprehensiveness of this Wildfire Mitigation Plan.

IID recurrently contracts an Independent Evaluator to perform Service Territory Surveys.

The main purpose of the survey is to identify any geographic area in the IID service territory that has a higher wildfire threat than is identified in the CAL FIRE, Fire Hazard Severity Zone map.

If such a zone is identified, the Evaluator will communicate the finding to the IID, and to CAL FIRE.

With each survey, IID plans to inspect different areas of the service territory. Currently, there is a four (4) year inspection rotation:

1) Survey Plan Year 1
    a. Selected areas where power infrastructure is located adjacent to CAL FIRE high or very high fire hazard zones,
    b. Selected areas where power infrastructure is located in areas with a history of fire ignitions
    c. Other areas, and power infrastructure identified by IID staff
    d. Other areas, and power infrastructure identified by the Independent Evaluator
2) Survey Plan Year 2
    a. Selected areas where power infrastructure is located adjacent to CAL FIRE high or very high fire hazard areas,
    b. Selected distribution line sections

c. Other areas and power infrastructure identified by IID staff

d. Other areas, and power infrastructure identified by the Independent Evaluator

3) Survey Plan Year 3

a. Selected areas where power infrastructure is located adjacent to CAL FIRE high or very high fire hazard areas,

b. Selected transmission line sections

c. Other areas and power infrastructure identified by IID staff

d. Other areas, and power infrastructure identified by the Independent Evaluator

4) Survey Plan Year 4

a. Selected areas where power infrastructure is located adjacent to CAL FIRE high or very high fire hazard areas

b. Selected generation stations, major substations, and cranking paths

c. Other areas and power infrastructure identified by IID staff

d. Other areas, and power infrastructure identified by the Independent Evaluator

11.2 IID SB901 Wildfire Mitigation Annual Status Report

IID produces the draft SB901 Wildfire Mitigation Annual Status Report during the first quarter each year. The status report provides project status from the previous calendar year.

The draft is submitted to responsible managers for review and comment during the first quarter of the year.

Once internal department reviews are complete the status report is submitted to the IID Board.

Finally, the status report is expected to be submitted to the Wildfire Safety Advisory Board by July 1 each year.

11.3 Annual WSAB Submittal

The annual WSAB draft submittals includes the SB901 Status Report, a cover letter, and may include the Independent Evaluator service territory findings report.

These documents are posted on the IID public website for public review and comment for approximately thirty (30) days. The IID public website features a comment area where the public can provide written comments during the public comment period.

After the thirty (30) day period, the draft submittals are presented to the IID Board of Directors at a public meeting, where public comments are also accepted.

Once the IID Board, approves the submittals, the documents are posted on the WSAB document management site.

11.4 Annual Funding of Projects

Projects included in the annual status report are normal operational projects with components that may help reduce the risk of fire ignitions caused by IID infrastructure. There projects are usually not uniquely identified as a line item in the IID published budget. Projects are usually included in larger budget line items.

The first draft of the proposed annual budget is usually complete by late summer each year.

The proposed annual budget is reviewed and adjusted by Energy Department management staff, Energy Department Manager, Chief Financial Officer, and by the IID General Manager.

Subsequently, budget workshops are held in the fall with the IID Board of Directors in meetings open to the public.

The annual budget is usually approved by the Board of Directors in December each year.

11.5 Comprehensive Wildfire Plan Update - every three (3) years

Imperial Irrigation District performs a Comprehensive Update of the IID SB 901 Wildfire Mitigation Plan every three (3) years.

Once the initial draft plan is complete, an Independent Evaluator performs an assessment of the new plan to assure the plan meets California SB 901, AB 1054, and AB 111 requirements.

Secondly the Independent Evaluator performs a Regulatory Requirement Alignment Assessment of the draft plan to assure the IID plan has no conflicts, and there is alignment with the following regulatory requirements:

North American Electric Reliability Corporation (NERC) regulations

Western Electric Coordinating Council (WECC) requirements

California Public Resource Code regulations 4292 safety requirements

California Public Resource Code regulation 4293 safety clearance requirements,

Imperial Irrigation District Energy Department, Power Line Corridor Clearance Regulation 23

Next the Independent Evaluator performs the following:

- Review of IID Wildfire Mitigation Plan performance metrics
- Review of the current and archive status reports, as required
- Review of new WSAB requirements
- Produces a plan assessment and recommendations report.

Lastly the draft plan and Independent Evaluator Report are submitted to responsible IID managers for review and comment.

11.6 Comprehensive Wildfire Plan Update Approval

Upon management approval, the proposed Imperial Irrigation District SB 901 Wildfire Mitigation Plan and the Independent Evaluator assessment are posted on the Imperial Irrigation District public website for a period of approximately thirty (30) days.

The IID public website features a comment area where the public can provide written comments during the public comment period.

After the thirty (30) day period, the draft IID SB 901 Wildfire Mitigation Plan submittals are presented to the IID Board of Directors at a public meeting, where public comment is also accepted.

Based on Board and public comments, plan adjustments are completed as required.

Once the IID Board approves the plan, documents are posted on the WSAB document management site.

11.7 Monitoring the Plan and Performance Metrics

Plan oversight is performed by the Imperial Irrigation District, Manager Operations and Energy Infrastructure, Energy Department.

Periodically the Imperial Irrigation District, Manager Operations and Energy Infrastructure, Energy Department, is responsible to review activities to identify deviations from desired results.

During first quarter of each year, the Imperial Irrigation District, Manager Operations and Energy Infrastructure Energy Department will conduct a review of the previous year's annual status report to identify deviations from desired results.

The annual IID SB901 Status Reports include plan performance metric results.

Deviation from desired results will trigger a review of operations to identify possible improvements by the Manager of Operations and Energy Infrastructure.

Examination of metric information gathered during the 2020-2022 plan period shows metric information for poles down, lines down, and fire incidents need additional detail to identify actionable improvements.

Fire incidents do not indicate if the fire incident was caused by IID infrastructure, or caused by others. Currently, only the number of fore incidents is tracked. A project is identified in Section 13 of this plan to correct this issue.

Poles down incidents do not indicate the number of poles down involved in the incident. Currently, only the number of incidents is tracked. A project is identified in Section 13 of this plan to correct this issue.

11.8 Performance Metrics

Performance Metrics – The Imperial Irrigation District SB 901 Wildfire Mitigation Program identifies several performance metrics. The metrics include the following:

11.8.1 Number of Encroachment Violations

Metric: Total number of Encroachment Violations reported for the calendar year.

Assumptions: Encroachment Violations are identified where vegetation or obstructions have entered the power line corridor, where the obstruction causes a ground clearance violation, or has the possibility of impeding Imperial Irrigation District operations. Encroachment Violations include situations where equipment, structures, material, crops, haystacks are in or are adjacent to the power line corridor, or obstructions are located where they may impede Imperial Irrigation District Energy Department operations. Some Encroachment Violations may materialize into a fault, and may result in a fire ignition with the appropriate conditions present.

Indicator Type: This is a leading indicator of fire ignitions inside the IID service territory.

Metric Goal: The goal is zero (0) incidents for the calendar year. An increasing rate is a trigger to investigate and determine the root cause, and to determine operational adjustments, public education, and outreach adjustments.

11.8.2 Number of Imminent Threat Violations

Metric: Total number of Imminent Threat Violations reported for the calendar year. An Imminent Threat Violation is where an energized conductor clearance distance violation, occurs. This is where equipment, crops, material, or people, breach the outer edge of the danger zone, and are closer than safety regulations permit.

Assumptions: Imminent Threat Violations are identified where vegetation or obstructions have entered into the danger zone space around energized equipment and power lines. The danger zone is to remain clear at all times. Some Imminent Threat Incidents may materialize into a fault resulting in a fire ignition with the appropriate conditions present.

Indicator Type: This is a leading indicator of fire ignitions caused by Imperial Irrigation District power infrastructure.

Metric Goal: The goal is zero (0) incidents for the calendar year. An increasing rate is a trigger to investigate and determine operational adjustments, public education, and outreach adjustments.

11.8.3 Number of Lines and Poles Down Incidents

Metric: Total number of lines-down, and poles down reported for the calendar year.

Assumptions: Poles and lines down are a potential cause for fire ignitions. Incidents may not result in a fire ignition.

Indicator Type: This is a leading indicator of fire ignitions caused by Imperial Irrigation District power infrastructure.

Metric Goal: The goal of zero (0) incidents per calendar year. An increasing rate is a trigger to determine the root cause of incidents, and possible development of engineering, equipment, and operational adjustments.

11.8.4 Number of Fire Ignitions per Year

Metric: Total number of fire ignitions caused by Imperial Irrigation District power infrastructure located in the Imperial Irrigation District Service Territory for the calendar year.

Assumptions: Fire ignitions have several causes, such as lightning strikes, campfires, cigarettes, arson, vehicle accidents, and power infrastructure failures. Imperial Irrigation District will track the number of preventable and non-preventable fire ignitions reported adjacent to Imperial Irrigation District Power Infrastructure. Imperial Irrigation District will record ignitions caused by other sources but these are not included in the metric total.

Indicator Type: This is a lagging indicator of fire ignitions caused by Imperial Irrigation District power infrastructure.

Metric Goal: The goal is zero (0) incidents per calendar year. An increasing rate is a trigger to determine the root cause, and possible development of engineering, equipment, and operational adjustments.

12 IID Wildfire Mitigation Plan Roles and Responsibilities

12.1 Imperial Irrigation District, Manager Operations and Energy Infrastructure Energy Department is responsible to implement, own, and manage the Imperial Irrigation District Wildfire Mitigation Plan. The Manager is responsible to coordinate with federal, state, and local fire management personnel as necessary or appropriate, to implement Imperial Irrigation District's Wildfire Mitigation Plan. The manager must take reasonable actions to reduce the fire risk caused by Imperial Irrigation District electric facilities.

12.2 Chief Electrical Engineer is responsible to identify construction standards and engineer transmission power lines and substations that comply with relevant federal, state, and industry standard requirements, including the industry standards established by the California Public Utilities Commission. The Chief Electrical Engineer shall design new transmission power lines, and substations, consistent with the objective to reduce the fire risk caused by Imperial Irrigation District electric facilities.

12.3 Manager Energy Management and Strategic Marketing is responsible to assure compliance to the SB 901 biomass generation requirements.

12.4 Manager, Planning and Engineering/Chief Electrical Engineer is responsible to identify construction standards, engineer distribution power lines that comply with relevant federal, state, and industry best practices. The Distribution Engineering Manager shall design new distribution power lines and other distribution infrastructure consistent with the objective to reduce the fire risk caused by Imperial Irrigation District electric facilities. The Manager will work with county and city planners to avoid building new power infrastructure in CAL FIRE High or Very High Fire Hazard Severity Zones.

12.5 Energy Compliance Administrator is responsible to assure this plan is consistent with and does not conflict with Federal regulatory requirements. The Energy Compliance Administrator is responsible this plan complies with SB 901 and SB 1054 regulatory requirements.

12.6 **Manager of System Operations** is responsible to maintain operational procedures in support of the Imperial Irrigation District wildfire mitigation plan. The Manager of System Operations is responsible to operate the electric system in a manner that will minimize potential fire risks by taking reasonable actions to minimize the risk of a fire is caused by Imperial Irrigation District electric facilities.

12.7 **Power Line Construction and Maintenance Scheduler** is responsible to take corrective actions when the staff witnesses or is notified of fire ignitions under or adjacent to Imperial Irrigation District owned power lines. The Power Line Construction and Maintenance Scheduler is responsible to process power line inspection findings to address potential power infrastructure fire ignition sources and construction non-conformance infractions.

12.8 **Public Information Officer**, **General Managers Office** is responsible to maintain the IID SB901 Wildfire Mitigation Plan and related information posted on the IID.com website in a prominent location for easy public access. The officer is responsible for public information and social media communication of large fire incidents.

12.9 **Superintendent Energy Construction and Maintenance** is responsible to manage the Imperial Irrigation District Power Line Inspection Program. The superintendent must immediately report fires following existing Imperial Irrigation District standard operating procedures and practices. Inspect power lines and report all infractions.

12.10 **Supervisor Emergency Management** is responsible to respond to major fire incidents and activate field commence centers following established procedures.

12.11 **Supervisor of Geographical Information System Administration IT Department** is responsible to maintain current the California High Fire Hazard Severity Map information on the Imperial Irrigation District geographic information system. The Supervisor of Geographical Information System Administration is responsible to maintain new High Fire Threat area information identified by Imperial Irrigation District, on the Imperial Irrigation District geographic information system.

12.12 **Superintendent Energy Compliance and Vegetation Management** is responsible to manage the Imperial Irrigation District Distribution Vegetation Management Program and the Transmission System Vegetation Management Standard Work Procedure. The Vegetation Management Supervisor is responsible to manage power corridor vegetation, to prevent fire ignitions caused by vegetation encroaching into the danger zone, violating clearance distance requirements.

13 Projects Expected to Reduce Fire Ignitions Caused by IID Infrastructure

Although the Imperial Irrigation District does not have infrastructure located inside a CAL FIRE designated High Fire Hazard, or Very High Fire Hazard Severity Zone, the Imperial Irrigation District is submitting this plan that identifies projects expected to reduce the risk of fire ignitions caused by Imperial Irrigation District power infrastructure.

13.1 Relay Modernization Program – Relay Protection Unit

IID plans to replace existing electromechanical and solid-state relays with microprocessor relays, per Board of Directors approved scope, schedule, and funding. New microprocessor relays include relays that have the ability to detect power line breaks before a high amperage power line fault to ground occurs.

Imperial Irrigation District budgets annually for relay modernization. These monies are subject to change annually depending on Imperial Irrigation District Board of Directors approval.

Currently Imperial Irrigation District has an installed base of 3967 relays. Of this total, 47% are Electromechanical, 14% are solid-state, and 39% are microprocessor relays.

For the Relay Modernization Program, Imperial Irrigation District has standardized on Schweitzer Engineering Laboratories (SEL) relays. SEL products offer modern, fast acting, communication assisted, microprocessor relays, with traveling wave technology, that quickly detect and act upon power line disturbances.

IID expects to complete the relay modernization program by the early 2030's.

13.2 Distribution Power Line Bird Deterrents – Electrical Engineering Section

IID is currently installing on an as-needed basis power line bird deterrents to reduce power line outages due to bird strikes.

13.3 Fire Ignition Metric Improvement

IID plans to adjust software systems to add searchable fields to identify fire ignitions caused by IID infrastructure and caused by others. Currently work management records do not have a searchable field to identify fire ignition cause. IID expects to completed this work by 2024.

13.4 Poles Down, Lines Down Metric Improvement

IID plans adjust software systems to identify the number of poles for each poles-down incident. IID also plans to have the ability to report the total number of poles down for a selected date range.

In addition, IID expects to have the ability to report the number of lines down incidents for a selected date range.

IID expects to complete this work by 2024.

13.5 Imminent Threat and Encroachment Metric Improvement

Requirements

IID plans to adjust software systems to record and report various types of powerline corridor encroachments. IID will have the ability to produce incident reports for a selected date range.

IID expects to complete this work by 2024.

14 Revision History

Date Revised	Ver. Section Number	Section / Item Numbers Changed	Revision By
10-14-2019	Original	Original	Angel Marcial
09-29-2022	Various	Comprehensive wildfire plan update for calendar years 2023-2025 Add Sec 15 Appendix 16 Independent Evaluator review	Angel Marcial

15 Approval

_____

Jamie Asbury
Imperial Irrigation District
Energy Department Manager

16 Appendix A Independent Evaluator Review

Fuentes Consulting LLC

Professional T&D Utility Consulting Services

September 29, 2022

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Angel Marcial
Imperial Irrigation District
333 E. Barioni
Imperial, CA 92251

Dear Mr. Marcial:

Per our Independent Evaluator review, Imperial Irrigation District's (IID's) Wildfire Mitigation Plan, as updated in 2022, meets the requirements of California SB 901, AB 1054, and AB 111.

Our regulatory requirement alignment assessment of the IID plan did not reveal any conflicts (see Appendix for details), and there is alignment with the following regulatory requirements:

- North American Electric Reliability Corporation (NERC) regulations
- Western Electric Coordinating Council (WECC) requirements
- California Public Resource Code regulations 4292 safety requirements
- California Public Resource Code regulation 4293 safety clearance requirements
- Imperial Irrigation District Energy Department, Power Line Corridor Clearance Regulation 23

During our evaluation we also reviewed the following:

- IID Wildfire Mitigation Plan performance metrics
- Current and archive status reports
- WSAB requirements

The remainder of this report provides the following:

- 2022 site survey findings and recommendations related to wildfire risks and CAL FIRE Hazard Designations
- Infrastructure and vegetation management observations and compliance
- Key wildfire-related mitigation recommendations
- Appendix: Regulatory alignment

Fuentes Consulting – IID 2022 WFMP Independent Evaluator Report *Page 1 of 18*

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2022 IID site survey findings related to wildfire risks and CAL FIRE hazard designations

The 2022 team scrutinized the vegetation present and potential ignition sources in areas identified by CAL FIRE as hazardous or "Communities at Risk from Wildfire."

- CAL FIRE Very High and High Fire Hazard Areas
  - No new areas calling for CAL FIRE Very High or High fire threat designation were identified.
  - Some mountainous areas (located near Imperial County line west of Mecca, west of the City of La Quinta, west of Desert Shores / Ocotillo Wells, Winterhaven, east and west of Winterhaven and east of Ocotillo) classified by CAL FIRE as Very High or High fire threat areas do not warrant the classification due to the lack of fuel and ignition sources.
- CAL FIRE Communities at Risk from Wildfire
  - The site survey team identified the existing list of Communities at Risk in the IID service territory: Coachella, Indio, Ocotillo Wells and Winterhaven.
  - The team performed a comprehensive and detailed site survey of those communities and made the following determinations:
    - Those at-risk communities had very little combustible vegetation within the transmission and distribution corridors that were surveyed and posed little to no threat of a wildfire ignition. However, there were some areas that had vegetation underneath the power lines that were noted and observed in this years and previous years site survey. Winterhaven is mostly agricultural terrain, and Ocotillo Wells is primarily desert and rocky mountainous landscapes.
    - The electrical infrastructure was older, as is most of the power grid throughout the United States, and it shows.
- Possible fire ignition sources
  - Vegetation
    - Fire risks near IID infrastructure typically involve haystacks, Date Palms, California Fan Palms, trees, and other tall vegetation located directly under and adjacent to power lines.
    - Evidence of occasional excessive vegetation near IID infrastructure was found in primarily in transmission powerline corridors.
  - System Condition
    - Some distribution and transmission system areas were found with considerable aging and degradation.
    - IID Powerline Inspectors reporting annual inspections have previously reported these issues. These issues previously reported are not resolved due to resource availability.

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Infrastructure and vegetation management observations and compliance

SB 901 contains several provisions related to an electrical corporation's infrastructure and vegetation inspection and maintenance. Public Utilities Code Section 8386(c)(9) requires an electrical corporation's WMP to contain a description of its plans for inspection and maintenance of the electric infrastructure. Inspection and maintenance include conducting system patrols, using technological inspection tools, managing maintenance, and conducting vegetation inspections and management. These activities play an important role in wildfire mitigation. IID's inspection and maintenance plan is discussed below.

- Powerline inspections
  Imperial Irrigation District performs inspections following General Order 165 inspection frequencies. Inspections verify construction practices follow National Electric Safety Code, WECC, and General Order 95 construction practices. Note that Fuentes Consulting is recommending an expansion of inspection, maintenance, upgrade, and repair efforts to mitigate aging infrastructure in the territory (see specific recommendation #1 at end of this document).

- System Hardening
  There are currently no short or long-term projects underway to "harden" the system. IID's infrastructure has little to no exposure to wildfire ignitions, and the current processes and inspections that are in place provide adequate system reliability without expending additional capital for system hardening. That said, IID budgets approximately $3 million dollars annually for relay modernization, reliable and stronger fiberglass crossarms, composite dead-ends, and is considering recommendations for expanding and updating standards, inspection, maintenance, upgrade and repair methods, and resources. IID is also considering incorporation of steel poles in their distribution system. In addition, IID works with city and county planning departments to prevent land use changes that would allow new power infrastructure in CAL FIRE designated high or very high fire hazard zones.

- Vegetation management
  IID's vegetation management practice performs periodic and on-demand patrols to identify vegetation in and adjacent to energy infrastructure. These inspections are a trigger for pruning jobs and vegetation removals. IID's transmission system vegetation management program is comprehensive and is applicable to IID's bulk electric system located in the IID service territory. The transmission vegetation management program adheres to FERC FAC-003 Transmission Vegetation Management requirements.

- New technology initiatives
  Imperial Irrigation District currently has several technology initiatives to facilitate the capture of field inspection information for pole inspections, and for vegetation management inspections (see Section 13 initiatives below). Work also includes integration with the Imperial Irrigation District Geographic Information System and the SAP system.

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Key Wildfire-Related Mitigation Recommendations

Section 13 of the 2022 IID Wildfire Mitigation Plan included the following initiatives intended to reduce the risk of fire ignitions caused by Imperial Irrigation District power infrastructure:

- Relay Modernization Program
- Distribution Power Line Bird Deterrents
- Fire Ignition Metric Improvement
- Poles Down / Lines Down Metric Improvement
- Imminent Threat and Encroachment Metric Improvement

In addition, Fuentes Consulting recommends the following initiatives:

1. We strongly recommend the immediate creation of a full-time crew to implement a "find it and fix it" strategy, starting with areas where there is a higher frequency of outages and disturbances.
2. IID SAP / GIS pole equipment records need to include basic information including city location, urban/rural designation, installation date, pole condition information, third party attachments and pole reinforcement equipment records. Staff is actively working to improve transfer of inspection information from mobile device software application to SAP.
3. Develop and implement a schedule for transmission insulator washing, with priority based on frequency and location of electrical disturbances and potential risk of outages.
4. Update engineering construction standards to resolve GO95 infractions noted in the Site Survey, cross-arm tracking, lightning arrestor operation, and avian contamination issues.
5. Report ongoing vegetation issues in the Oasis Substation area to CAL FIRE. This includes vacant lots with overgrown vegetation adjacent to IID powerline corridors that may be a threat to IID infrastructure if a fire ignition starts. CAL FIRE will enforce a trash abatement ordinance and will clean up lot if owner does not.
6. Provide CAL FIRE with data and photographs that support re-designation of Very High and High Fire Hazard areas to Moderate or Low designations within the IID service territory
7. IID currently has distribution outages on the IID GIS system up to year 2019. Recommend IID update information to include years 2020 and 2021, then maintain information current year-to-year.
8. Upload transmission outage and disturbance information to the IID GIS system to track the location of transmission disturbances and faults.

Regards,

Max Fuentes

Max Fuentes
Owner – Fuentes Consulting LLC

(Appendix follows)

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Appendix: Regulatory Alignment

The following three tables represent Fuentes Consulting's alignment assessment of IID's SB 901 plan sections with various regulatory requirements.

Sec 12 IID Wildfire Mitigation Plan Roles and Responsibilities

1. SB 901 Public Owned Utility Statutory Requirements Cross Reference Table

	SB 901 – Public Owned Utility Wildfire Plan Requirements	IID SB 901 WF Mitigation Plan Sections	IID Plan Alignment (Alignment / Conflict)
1	**Staff Responsibilities** SB 901 Section 42 (b) (2) (A) An accounting of the responsibilities of persons responsible for executing the plan.	Sec 12 IID Wildfire Mitigation Plan Roles and Responsibilities	Alignment
2	**General Objectives** SB 901 Section 42(b) (2) (B) The objectives of the wildfire mitigation plan.	Sec 2 Imperial Irrigation District SB 901 Wildfire Mitigation Plan Objectives	Alignment
3	**Program Descriptions** SB 901 Section 42(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.	Sec 10 IID Utility Practices Sec 11 IID SB901 Practice Sec 13 Projects Expected to Reduce Fire Ignitions Caused by IID Infrastructure	Alignment
4	**Evaluation Metrics** SB 901 Section 42(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.	Sec 11.8 Performance Metrics	Alignment
5	**Lessons Learned, Metrics Application** SB 901 Section 42(b) (2) (E) A discussion of how the application of previously identified metrics to previous wild fire mitigation plan performances has informed the wildfire mitigation plan.	Sec 11.7 Monitoring the Plan and Performance Metrics	Alignment
6	**Protocols for Reclosers, De-energization, and PSPS Mitigation** SB 901 Section 42(b)(2)(F) Protocols for disabling re-closers and de-energizing 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.	Sec 10.15 Disabling Re-Closer Procedure – System Operations Center Sec 10.16 Public Safety Power Shutoff – Emergency Management Unit	Alignment

	SB 901 – Public Owned Utility Wildfire Plan Requirements	IID SB 901 WF Mitigation Plan Sections	IID Plan Alignment (Alignment / Conflict)
7	**Community Notification – De-energization** SB 901 Section 42(b) (2) (G) Appropriate and feasible procedures for notifying a customer who may be impacted by the de-energizing 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.	Sec 10.16 Public Safety Power Shutoff – Emergency Management Unit Sec 10.5 Community Outreach and Public Awareness – Line Clearance Unit, Customer Service Unit	Alignment
8	**Vegetation Management** SB 901 Section 42(b) (2) (H) Plans for vegetation management.	Sec 10.1 FAC-003 Transmission System Vegetation Management Program Sec 10.2 Vegetation Management Power Lines 200 kV and Below Not Subject to FERC Jurisdiction - Line Clearance Unit	Alignment
9	**Infrastructure Inspections** SB 901 Section 42(b) (2) (I) Plans for inspections of the local publicly owned electric utility's or electrical-cooperative's electrical infrastructure.	Sec 10.6 Monitor and Audit the Effectiveness of Substation Inspections – Substation Construction and Maintenance Sec 10.7 Monitor and Audit the Effectiveness of Powerline and Powerline Equipment Inspections – Power Restoration and Troubleshooting Unit Sec 10.8 Transmission Power Line Inspections - Power Restoration and Troubleshooting Unit Sec 10.9 Distribution Power Line Inspections - Power Restoration and Troubleshooting Unit	Alignment

	SB 901 – Public Owned Utility Wildfire Plan Requirements	IID SB 901 WF Mitigation Plan Sections	IID Plan Alignment (Alignment / Conflict)
10	**Grid Design, Construction and Operation Risks** SB 901 Section 42(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: SB 901 Section 42(b)(2)(J)(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.	Sec 9 IID Service Territory Fire Threat Information	Alignment
11	**Vegetation, Topographic, and Climate Risks** SB 901 Section 42(b)(2)(J)(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.	Sec 7 Imperial Irrigation District Service Territory Overview Sec 8 IID Service Territory Climate Change Projections	Alignment
12	**Identification and Expansion of Higher Wildfire Threat Areas** SB 901 Section 42(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 the environment.	Sec 11.1 Service Territory Survey by Independent Evaluator	Alignment
13	**Identify Enterprise-wide Risk** SB 901 Section 42(b) (2) (L) A methodology for identifying and presenting enterprise wide safety risk and wildfire-related risk.	Sec 9 IID Service Territory Fire Threat Information	Alignment

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	SB 901 – Public Owned Utility Wildfire Plan Requirements	IID SB 901 WF Mitigation Plan Sections	IID Plan Alignment (Alignment / Conflict)
14	**Restoration of Service** SB 901 Section 42(b) (2) (M) A statement of how the local publicly owned electric utility or electrical cooperative will restore service after a wildfire.	Sec 10.10 Emergency Event Procedures– Emergency Management Unit Sec 10.11 Emergency Event Procedures – System Operations Center Sec 10.12 Service Restoration After Major Events – System Operations Center Sec 10.13 Standardized Emergency Management System – Emergency Management Unit	Alignment
15	**Monitoring and Auditing of WMPs** A description of the processes and procedures to; SB 901 Section 42(b) (2) (N) (i) Monitor and audit the implementation of the wildfire mitigation plan.	Sec 11.7 Monitoring the Plan and Performance Metrics	Alignment
16	**Identifying and Correcting Deficiencies** A description of the processes and procedures to; SB 901 Section 42(b) (2) (N) (ii) Identify any deficiencies in the wildfire mitigation plan or its implementation, and correct those deficiencies.	Sec 11.7 Monitoring the Plan and Performance Metrics	Alignment
17	**Monitoring Asset Inspections** SB 901 Section 42(b)(2)(N)(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.	Sec 10.4 Monitor and Audit the Effectiveness of Powerline Clearance Inspections - Line Clearance Unit Sec 10.6 Monitor and Audit the Effectiveness of Substation Inspections – Substation Construction and Maintenance Sec 10.7 Monitor and Audit the Effectiveness of Powerline and Powerline Equipment Inspections – Power Restoration and Troubleshooting Unit Sec 11.1 Service Territory Survey by Independent Evaluator	Alignment

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	SB 901 – Public Owned Utility Wildfire Plan Requirements	IID SB 901 WF Mitigation Plan Sections	IID Plan Alignment (Alignment / Conflict)
18	**Wildfire Plan Public Comments** SB 901 Section 42(b) (3) The local publicly owned electric utility or electrical cooperative shall present each wildfire mitigation plan in an appropriately noticed public meeting. The local publicly owned electric utility or electrical cooperative shall accept comments on its wildfire mitigation plan from the public, other local and state agencies, and interested parties, and shall verify that the wildfire mitigation plan complies with all applicable rules, regulations, and standards, as appropriate.	Sec 11.3 Annual WSAB Submittal	Alignment
19	**Independent Evaluator Wildfire Plan Assessment** SB 901 Section 42(c) The local publicly owned electric utility or electrical cooperative shall 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. The independent evaluator shall issue a report that shall be made available on the Internet Web site of the local publicly owned electric utility or electrical cooperative, and shall present the report at a public meeting of the local publicly owned electric utility's or electrical cooperative's governing board.	Sec 11.1 Service Territory Survey by Independent Evaluator Sec 11.5 Comprehensive Wildfire Plan Update - every three (3) years	Alignment

	SB 901 – Public Owned Utility Wildfire Plan Requirements	IID SB 901 WF Mitigation Plan Sections	IID Plan Alignment (Alignment / Conflict)
20	**Biomass Energy Contract** SB 901 Section 43 An electrical corporation, local publicly owned electric utility, or community choice aggregator with a contract to procure electricity generated from biomass pursuant to subdivision (b) of Section 399.20.3, commission Resolution E-4770 (March 17, 2016), or commission Resolution E-4805 (October 13, 2016), or with a contract that is operative at any time in 2018, and expires or expired on or before December 31, 2023, shall seek to amend the contract to include, or seek approval for a new contract that includes, an expiration date five years later than the expiration date in the contract that was operative in 2018, so long as the contract extension follows the feedstock requirement of subdivision (b) of Section 399.20.3. This section shall not apply to facilities located in federal severe or extreme nonattainment areas for particulate matter or ozone.	Sec 10.20 Addressing SB 901 Section 43 Biomass Power Purchase Requirement - Energy Business and Regulatory Compliance Programs Unit	Alignment

2. Wildfire Safety Advisory Board Recommendations for Publicly Owned Utilities Cross Reference Table

Recommendations included in the WSAB Guidance Advisory Opinion for the 2022 Wildfire Mitigation Plans of Electric Publicly Owned Utilities and Rural Electric Cooperatives, Adopted February 23, 2022.

	WSAB Recommendations for POUs *Guidance Advisory Opinion for the 2022 Wildfire Mitigation Plans of Electric Publicly Owned Utilities and Rural Electric Cooperatives, 2/23/22*	**IID SB901 WF Mitigation Plan Sections**	**IID Plan Alignment (Alignment / Conflict)**
1	**Context Setting Information** Include template containing key information about the service area, near the front of the WMP	Sec 7 Imperial Irrigation District Service Territory Overview Sec 8 IID Service Territory Climate Change Projections Sec 9 IID Service Territory Fire Threat Information	Alignment
2	**Prominent WMP Information Location** Locate current and past wildfire mitigation information, including Independent Evaluator reports at a prominent and easily locatable web-based publication location.	https://www.iid.com/energy/vegetation-management/wildfire-mitigation-plan	Alignment
3	**Statutory Cross Reference** Include statutory cross reference table near the front of the WMP. Include live links from table to plan section.	Sec 4 SB 901 Public Owned Utility Statutory Requirements Cross Reference Table	Alignment
4	**Reducing the Risk of Catastrophic Wildfires** Add as one of the objectives of the WF plan, to *reduce the risk of* ***catastrophic*** *wildfires* Question whether broader thought and strategies may be appropriate going forward.	Due to the low wildfire threat in the Imperial Irrigation District Service territory, Imperial Irrigation District does not have a formal catastrophic wildfire risk reducing plan objective.	Alignment
5	**Public Input and Approval** Provide context-setting detail regarding how utilities approach WMP approval, consideration of public comment and budgetary protocols for mitigation and WMP tasks. Include in the statutory staff responsibilities section.	Sec 11.4 Annual Funding of Projects Sec 12 IID Wildfire Mitigation Plan Roles and Responsibilities	Alignment
6	**Metric Tracking** Provide more comprehensive and consistent metric tracking. Assure metrics are appropriate for the POU	Sec 11.8 Performance Metrics	Alignment

	WSAB Recommendations for POUs *Guidance Advisory Opinion for the 2022 Wildfire Mitigation Plans of Electric Publicly Owned Utilities and Rural Electric Cooperatives, 2/23/22*	IID SB901 WF Mitigation Plan Sections	IID Plan Alignment (Alignment / Conflict)
7	**Independent Evaluations** Independent Evaluators shall perform a robust evaluation of the contents and substance of the POU's WMP, in comparison to relevant industry standards, and provides useful recommendations for wildfire mitigation improvements where applicable.	Sec 11.1 Service Territory Survey by Independent Evaluator Sec 11.5 Comprehensive Wildfire Plan Update - every three (3) years	Alignment
8	**Grid Design** Are there design or construction issues related to the utility's specific topography or geographic location that the Board should be aware of?	There are no reportable design or construction issues related to specific topography or geographic location.	Alignment
9	**Grid Design** How will the utility address risks associated with facilities requiring power that abut a Tier 2 or Tier 3 HFTD?	Note: IID follows CAL FIRE, Fire Hazard Severity Zone designations; CAL FIRE High and Very High Fire Hazard Severity Zones. Due to the low wildfire threat in the Imperial Irrigation District service territory, Imperial Irrigation District does not have a formal procedure to address risks with facilities requiring power that are adjacent to CAL FIRE High and Very High Fire Hazard Severity Zones. Portable generators may be provided to customers on a case-by-case basis.	Alignment

	WSAB Recommendations for POUs *Guidance Advisory Opinion for the 2022 Wildfire Mitigation Plans of Electric Publicly Owned Utilities and Rural Electric Cooperatives, 2/23/22*	IID SB901 WF Mitigation Plan Sections	IID Plan Alignment (Alignment / Conflict)
10	**Grid Design** How does the utility assess its risks associated with system design and construction?	IID construction practices meet industry construction practices such as G.O. 95. IID inspection practices meet industry inspection practices such as G.O. 165 and GO 174. The Independent Evaluator service territory survey scope of work, includes a G.O. 95 detailed inspection spot check, noting G.O. 95 construction practice infractions, infrastructure condition issues.	Alignment
11	**Grid Design** In what areas does the utility consider going above and beyond G.O. 95 and other General Order standards related to design and construction?	Due to the low wildfire threat in the Imperial Irrigation District service territory, Imperial Irrigation District construction practices do not go above and beyond G.O. 95 construction practices.	Alignment
12	**Grid Design** Provide information about facilities not directly subject to G.O. 95 due to their construction prior to G.O. 95 first being adopted. How are these included in the WMP and safety protocols equivalently or in a different fashion to newer lines that would be subject to G.O. 95 protocols.	IID construction practices meet industry construction practices such as G.O. 95.	Alignment
13	**Grid Design** Provide information how the utility goes beyond the G.O. 95 minimum standards if wildfire circumstances merit exceeding the standard. Explain how and why any specific POU goes beyond the G.O. 95 minimum standards.	Due to the low wildfire threat in the Imperial Irrigation District service territory, Imperial Irrigation District construction practices do not go above and beyond G.O. 95 construction practices.	Alignment

	WSAB Recommendations for POUs *Guidance Advisory Opinion for the 2022 Wildfire Mitigation Plans of Electric Publicly Owned Utilities and Rural Electric Cooperatives, 2/23/22*	IID SB901 WF Mitigation Plan Sections	IID Plan Alignment (Alignment / Conflict)
14	**Grid Design** Provide information regarding what new ideas or enhanced protocols for design, build, and maintain, POUs are considering to further mitigate wildfire risk, due to changing wildfire conditions in the State due to climate change, land use change, or other change in vegetation conditions.	Sec 13 Projects Expected to Reduce Fire Ignitions Caused by IID Infrastructure Although the Imperial Irrigation District does not have infrastructure located inside a CAL FIRE designated High Fire Hazard, or Very High Fire Hazard Severity Zone, the Imperial Irrigation District is submitting this plan that identifies projects expected to reduce the risk of fire ignitions caused by Imperial Irrigation District power infrastructure. Relay Modernization Program – Relay Protection Unit Sec 13.1 Relay Modernization Program – Relay Protection Unit Sec 13.2 Distribution Power Line Bird Deterrents – Electrical Engineering Section	Alignment
15	**Risk Assessment and Mapping** Provide information about the installation of situational awareness technologies, to better understand wildfire risk drivers, particularly through collaborative activities and shared data with neighboring utilities. Wind speed and direction, temperatures and moister contents, active monitoring for ignitions. Weather stations, cameras, drones, satellites, and other monitoring technologies.	Due to the low wildfire threat in the Imperial Irrigation District service territory, Imperial Irrigation District does not perform this activity.	Alignment
16	**Risk Assessment and Mapping** Further development of consideration of the risks and benefits of mitigation measures, such as PSPS	Due to the low wildfire threat in the Imperial Irrigation District service territory, Imperial Irrigation District does not perform this activity.	Alignment

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	WSAB Recommendations for POUs *Guidance Advisory Opinion for the 2022 Wildfire Mitigation Plans of Electric Publicly Owned Utilities and Rural Electric Cooperatives, 2/23/22*	IID SB901 WF Mitigation Plan Sections	IID Plan Alignment (Alignment / Conflict)
17	**Risk Assessment and Mapping** Develop information on any potential negative impacts of new technologies and how those impacts may be mitigated.	Due to the low wildfire threat in the Imperial Irrigation District service territory, Imperial Irrigation District does not perform this activity.	Alignment
18	**Vegetation Management and Inspections** Provide clarity about meeting, exceeding, or substituting for G.O. 95 standards, going beyond minimum standards due to specific wildfire conditions	Sec 10.1 FAC-003 Transmission System Vegetation Management Program Sec 10.2 Vegetation Management Power Lines 200 kV and Below Not Subject to FERC Jurisdiction - Line Clearance Unit Due to the low wildfire threat in the Imperial Irrigation District service territory, Imperial Irrigation District construction practices do not go above and beyond G.O. 95 construction practices.	Alignment
19	**Vegetation Management and Inspections** Include descriptions of the variety of treatment methods each POU uses, such as tree or branch removal, trimming, pruning, mowing, goats to remove grass, use of mechanical tools to clear brush, surface fuel clearing during dry season and herbicide use.	Sec 10.1 FAC-003 Transmission System Vegetation Management Program Sec 10.2 Vegetation Management Power Lines 200 kV and Below Not Subject to FERC Jurisdiction - Line Clearance Unit	Alignment
20	**Vegetation Management and Inspections** When all vegetation is cleared from beneath or around an asset, or for access purposes, describe how POU deals with flammable new growth. How is new growth tracked, and managed to prevent increased fire risk.	Due to the low wildfire threat in the Imperial Irrigation District service territory, Imperial Irrigation District does not perform this activity.	Alignment
21	**Vegetation Management and Inspections** How does the POU identify native and other vegetation by species, considering the ignition risk of these species, and describing how treatment methods vary depending upon the type of species?	Due to the low wildfire threat in the Imperial Irrigation District service territory, Imperial Irrigation District does not perform this activity.	Alignment

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	WSAB Recommendations for POUs *Guidance Advisory Opinion for the 2022 Wildfire Mitigation Plans of Electric Publicly Owned Utilities and Rural Electric Cooperatives, 2/23/22*	IID SB901 WF Mitigation Plan Sections	IID Plan Alignment (Alignment / Conflict)
22	**Vegetation Management and Inspections** Provide information of POU consideration, where appropriate of alternate management methods, such as replacing vegetation with less flammable native options and reducing the ignition chances of vegetation by strategically increasing moister content.	Due to the low wildfire threat in the Imperial Irrigation District service territory, Imperial Irrigation District does not perform this activity.	Alignment
23	**Vegetation Management and Inspections** How is expertise from scientists or experts that understand the relative growing and regeneration patterns, species traits, flammability, and ecological role that vegetation plays relative to fire ignition and behavior and from ongoing fire research is integrated into vegetation management planning.	Due to the low wildfire threat in the Imperial Irrigation District service territory, Imperial Irrigation District does not perform this activity.	Alignment
24	**Community Communication, Outreach, Emergency Preparedness and Recovery** How does POU provide information and assistance to their customers during wildfire starts	Sec 10.5 Community Outreach and Public Awareness – Line Clearance Unit, Customer Service Unit	Alignment
25	**Community Communication, Outreach, Emergency Preparedness and Recovery** Provide information regarding resource availability and alternatives sole in the wildfire context, such as backup supplies to vital services and businesses	Sec 10.5 Community Outreach and Public Awareness – Line Clearance Unit, Customer Service Unit Portable generators may be provided on a case-by-case basis.	Alignment

3. Wildfire Safety Advisory Board Recommendations Specific to Imperial Irrigation District Cross Reference Table

Recommendations included in the WSAB Guidance Advisory Opinion for the 2022 Wildfire Mitigation Plans of Electric Publicly Owned Utilities and Rural Electric Cooperatives, Adopted February 23, 2022.

	WASB Recommendations Specific to Imperial Irrigation District *Guidance Advisory Opinion for the 2022 Wildfire Mitigation Plans of Electric Publicly Owned Utilities and Rural Electric Cooperatives, 2/23/22*	**IID SB901 WF Mitigation Plan Sections**	**IID Plan Alignment (Alignment / Conflict)**
1	**Utility Information and Cross Reference Table** Provide utility information template and cross reference table up front in the wildfire mitigation plan.	Sec 4 SB 901 Public Owned Utility Statutory Requirements Cross Reference Table Sec 5 Wildfire Safety Advisory Board Recommendations for Publicly Owned Utilities Cross Reference Table Sec 6 Wildfire Safety Advisory Board Recommendations Specific to Imperial Irrigation District Cross Reference Table	Alignment
2	**Location of Wildfire Mitigation Reports in IID Website** Provide WMP reports and information in a clear and prominent place on IID website	https://www.iid.com/energy/vegetation-management/wildfire-mitigation-plan	Alignment
3	**Next Comprehensive Wildfire Mitigation Report** Incorporate appropriate informational response information as recommended.	Sec 5 Wildfire Safety Advisory Board Recommendations for Publicly Owned Utilities Cross Reference Table Sec 6 Wildfire Safety Advisory Board Recommendations Specific to Imperial Irrigation District Cross Reference Table	Alignment

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	WA SB Recommendations Specific to Imperial Irrigation District *Guidance Advisory Opinion for the 2022 Wildfire Mitigation Plans of Electric Publicly Owned Utilities and Rural Electric Cooperatives, 2/23/22*	IID SB901 WF Mitigation Plan Sections	IID Plan Alignment (Alignment / Conflict)
4	**Metrics** Provide future metric results for fire ignitions, wires down, imminent treat violations, encroachment violations, and infrastructure developments in HFTD areas	Sec 11.8 Performance Metrics Metric results are included in IID SB901 Wildfire Mitigation Annual Status Report 2021 and are expected to be included in future annual status reports. https://www.iid.com/energy/vegetation-management/wildfire-mitigation-plan	Alignment
5	**Independent Evaluator Reports** Provide updates on the issues identified by the independent evaluator and their impact on reducing wildfire risk in future wildfire mitigation plans.	Expect to include updates on approved projects resulting from issues identified by Independent Evaluator in the annual IID SB901 Wildfire Mitigation Annual Status Reports	Alignment

(end)

END