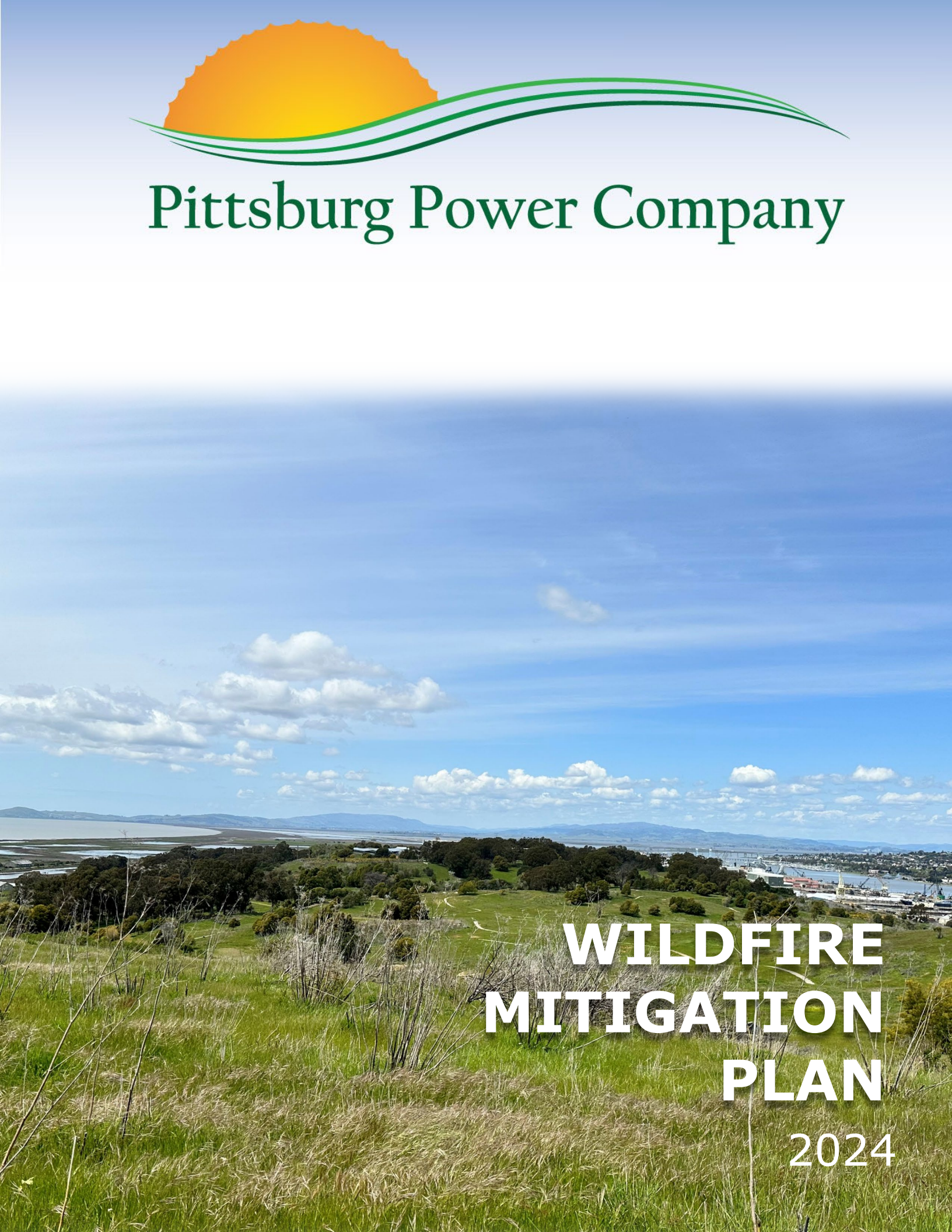
Pittsburg Power Company



WILDFIRE MITIGATION PLAN

2024

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1.0 OVERVIEW

1.1 POLICY STATEMENT

Senate Bill 901 (now Public Utilities Code §8387), approved in 2018, requires Pittsburg Power Company (PPC) to prepare a wildfire mitigation plan that describes how electrical lines and equipment are constructed, maintained, and operated in a manner that minimizes the risk of wildfire. PPC has always had standard requirements for design, construction, and maintenance of its facilities to reduce wildfire risk. This Wildfire Mitigation Plan (WMP) builds on those requirements and complies with PUC §8387.

PPC's goal is to provide safe, reliable, and economic electric service to its Mare Island customers. To meet this goal, PPC constructs, maintains, and operates its electrical lines and equipment in a manner that minimizes the risk of ignition posed by its electrical lines and equipment.

1.2 PURPOSE

This Wildfire Mitigation Plan describes programs, policies, and procedures implemented by PPC to mitigate the threat of power line-ignited wildfires. This plan is subject to direct supervision by the PPC Executive Secretary and its Board of Directors and is implemented by the PPC Power Company Manager. Specific roles and responsibilities for the plan are identified in Section 9.1.

Pittsburg Power Company ("PPC") is a joint powers agency of the City of Pittsburg, California. PPC operates a municipal electric and gas utility distribution system on Mare Island Vallejo using the name "Island Energy." PPC does not own, operate, or maintain transmission facilities (69kV and higher).

PPC's service territory is limited to Mare Island, Vallejo and is bordered to the east by the Napa River, to the south and west by San Pablo Bay and to the north by wetlands and Highway 37 (Figure 1).

PPC is primarily an underground utility but does have some overhead distribution segments with a total of 61 active low and medium voltage distribution system wood poles.

In general, PPC's fire prevention and safety efforts conform to the intent of Vallejo's ("City") General Plan and other safety planning efforts and programs implemented by the City. PPC participates in and coordinates directly with the City on such programs.

Mare Island is within the City of Vallejo City limits and is under the jurisdiction of the City's municipal departments. PPC coordinates with the City of Vallejo Public Works, Police and Fire departments on matters related to utility operations, safety, and emergency response on Mare Island, including fire response.

1.3 COMPLIANCE WITH PUC §8387 (B)

Table 1 lists each of the elements required of Public Utilities Code §8387 (SB 901) and references where that information can be found in this plan.

Table 1: Plan Compliance with Public Utilities Code §8387 (b)

PUC §8387 (b) Requirement	Description	Plan Section
b (2) (A)	An accounting of the responsibilities of persons responsible for executing the plan.	9.1
b (2) (B)	The objectives of the wildfire mitigation plan.	2.0
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.	6.0
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.	9.2
b (2) (E)	A discussion of how the application of previously identified metrics to previous wildfire mitigation plan performances has informed the wildfire mitigation plan.	6.3
b (2) (F)	Protocols for disabling reclosers and deenergizing portions of the electrical distribution system that consider the associated impacts on public safety, as well as protocols related to mitigating the public safety impacts of those protocols, including impacts on critical first responders and on health and communication infrastructure.	6.7
b (2) (G)	Appropriate and feasible procedures for notifying a customer who may be impacted by the deenergizing of electrical lines. The procedures shall consider the need to notify, as a priority, critical first responders, health care facilities and operators of telecommunications infrastructure.	7.4
b (2) (H)	Plans for vegetation management.	6.4
b (2) (I)	Plans for inspections of the local publicly owned electric utility's or electrical cooperative's electrical infrastructure.	6.5

PUC §8387 (b) Requirement	Description	Plan Section
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:	4.0
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.	6.3
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.	4.3, 4.5
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.	5.2
b (2) (L)	A methodology for identifying and presenting enterprise-wide safety risk and wildfire-related risk.	4.1
b (2) (M)	A statement of how the local publicly owned electric utility or electrical cooperative will restore service after a wildfire.	8.0
b (2) (N)	A description of the processes and procedures the local publicly owned electric utility or electrical cooperative shall use to do all of the following:	See below;
b (2) (N) (i)	Monitor and audit the implementation of the wildfire mitigation plan.	9.2
b (2) (N) (ii)	Identify any deficiencies in the wildfire mitigation plan or its implementation and correct those deficiencies.	9.4
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.	9.5

PUC §8387 (b) Requirement	Description	Plan Section
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.	7.0, 1.3
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.	10.0

1.4 CONTEXT SETTING INFORMATION

The Wildfire Safety Advisory Board (WSAB) requested that Publicly Owned Utilities (POU's) provide an informational table to assist the Staff and Board members in understanding the unique characteristics of each POU (Table 2).

Table 2: Context Setting Information

Utility Name:	Pittsburg Power Company (PPC)	
Service Territory Size	2.1 square miles	
Owned Assets	☐ Transmission **X** Distribution ☐ Generation	
Number of Customers Served	600 customer accounts	
Population Within Service Territory	1,000 residents 1,500 work population	
Customer Class Makeup	*Number of Accounts*	*Share of Total Load (MWh)*
	64.5 % Residential; 6.8 % Government; 0 % Agricultural; 10.3 % Small/Medium Business; 18.3 % Commercial/Industrial	8.8 % Residential; 7.9 % Government; 0 % Agricultural; 10.4 % Small/Medium Business; 72.9 % Commercial/Industrial

Utility Name:	Pittsburg Power Company (PPC)
Service Territory Location/Topography[1]	0 % Agriculture 0.63 % Barren/Other 0 % Conifer Forest 0 % Conifer Woodland 0 % Desert 0 % Hardwood Forest 2.22 % Hardwood Woodland (eucalyptus) 71.70 % Herbaceous 0 % Shrub 45.11 % Urban 2.93 % Water
Service Territory Wildland Urban Interface[2] **(based on total area)**	33.4% Wildland Urban Interface; 4.74% Wildland Urban Intermix;
Percent of Service Territory in CPUC High Fire Threat Districts (based on total area)	☒Includes maps Tier 2: 0 % Tier 3: 0 %
Prevailing Wind Directions & Speeds by Season	☒Includes maps Winter: N-NW Spring: S-SW Summer: S-SW Fall: SW, N
Miles of Owned Lines Underground and/or Overhead	Overhead Dist.: 10,480 feet Overhead Trans.: 0 miles Underground Dist.: 11 miles (approx.) Underground Trans.: 0 miles
	Explanatory Note 1 - *Methodology for Measuring "Miles":* Measurement of ductbank miles, x2 circuits on average
	Explanatory Note 2 – *Description of Unique Ownership Circumstances:* n/a
	Explanatory Note 3 – *Additional Relevant Context:* n/a
Percent of Owned Lines in CPUC High Fire Threat Districts	*Overhead Distribution Lines as % of Total Distribution System (Inside and Outside Service Territory)*
	Tier 2: 0 %

[1] This data shall be based on the California Department of Forestry and Fire Protection, California Multi-Source Vegetation Layer Map, depicting WHR13 Types (Wildlife Habitat Relationship classes grouped into 13 major land cover types) *available at*: https://www.arcgis.com/home/item.html?id=b7ec5d68d8114b1fb2bfbf4665989eb3.

[2] This data shall be based on the definitions and maps maintained by the United States Department of Agriculture, as most recently assembled in *The 2010 Wildland-Urban Interface of the Conterminous United States*, *available at* https://www.fs.fed.us/nrs/pubs/rmap/rmap_nrs8.pdf.

Utility Name:	Pittsburg Power Company (PPC)
	Tier 3: 0 %
	Overhead Transmission Lines as % of Total Transmission System (Inside and Outside Service Territory)
	Tier 2: 0 % Tier 3: 0 %
	Explanatory Note 4 – *Additional Relevant Context:* [e.g., explain any difference from data reported in WMP due to different numerator used for this form]
Customers have ever lost service due to an IOU PSPS event?	**X** Yes ☐ No
Customers have ever been notified of a potential loss of service due to a forecasted IOU PSPS event?	**X** Yes ☐ No
Has developed protocols to pre-emptively shut off electricity in response to elevated wildfire risks?	**X** Yes ☐ No
Has previously pre-emptively shut off electricity in response to elevated wildfire risk?	☐ Yes **X** No If yes, then provide the following data for calendar year 2020: *Number of shut-off events*: n/a *Customer Accounts that lost service for >10 minutes:* n/a *For prior response, average duration before service restored:* n/a

2.0 OBJECTIVES

2.1 MINIMIZE ELECTRICAL SOURCES OF IGNITION

The primary objective of this Wildfire Mitigation Plan is to minimize the probability that PPC's distribution system may be the origin, or a contributing source, for igniting a wildfire. PPC continually evaluates prudent and cost-effective improvements to its standards, physical assets, operations, and training that can help meet the objective. PPC has implemented those changes consistent with this evaluation.

2.2 MAINTAIN RESILIENCY OF THE ELECTRIC GRID

The second goal of this Wildfire Mitigation Plan is to improve the resiliency of the electric grid. Resiliency is the ability for the electric power system to withstand and recover from extreme, damaging conditions, including weather and other natural disasters, as well as

cyber and physical attacks. In developing this plan, PPC assessed new industry practices and technologies that may reduce the likelihood of an interruption in service and/or improve the restoration of service, and regularly evaluates best practices for possible inclusion in the Plan.

2.3 MINIMIZE UNNECESSARY OR INEFFECTIVE ACTIONS

The final goal for this Wildfire Mitigation Plan is to measure the effectiveness of specific ignition mitigation measures and look for opportunities to improve efficiency. Where a particular action, program component, or protocol is determined to be unnecessary or ineffective, PPC will assess whether a modification or replacement is merited. This plan will also help determine if more cost-effective measures would produce the same or improved results.

3.0 PPC PROFILE AND SERVICE AREA

3.1 SERVICE TERRITORY

Pittsburg Power Company ("PPC") is a joint powers agency of the City of Pittsburg, California. PPC operates a municipal electric and gas utility distribution system on Mare Island Vallejo using the name "Island Energy". PPC does not own, operate, or maintain transmission facilities (kV and higher).

PPC's service territory is limited to Mare Island, Vallejo and is bordered to the east by the Napa River, to the south and west by San Pablo Bay and to the north by wetlands and Highway 37. Please refer to Figure 1.

PPC is primarily an underground utility but does have some overhead distribution segments with a total of 61 active low and medium voltage distribution system wood poles. Areas of trees, dense brush and tall grasses comprise a total of approximately 280 acres. Please refer to Exhibit A – PPC Wood Pole Inventory for a listing of pole location, status, vegetation, and inspection and maintenance actions. Exhibit B contains a description of the three (3) overhead electrical distribution system segments.

As shown on Figure 1 PPC's utility operations on Mare Island, Vallejo are not within any identified California Public Utilities Commission ("CPUC") High-Fire Threat Districts.

3.2 PPC PURPOSE AND VISION

Pittsburg Power Company's overarching goal is to provide safe, reliable, and competitively priced electric service to its customers, while being a good steward of resources and providing a high level of customer satisfaction and safety.

3.3 UTILITY GOVERNANCE STRUCTURE

Board of Directors: PPC is governed by a "Pittsburg Power Company Board of Directors". The Board of Directors is comprised of five (5) members, who also serve as the City Council for the City of Pittsburg.

Executive Secretary: The currently sitting City Manager serves as the Pittsburg Power Company Executive Secretary.

Director of Community Services: The Director of Community Services serves as PPC's Department Head.

Power Company Manager: The Power Company Manager is a direct-hire City employee managing the day-to-day activities of the utility. PPC is governed by a five-member locally elected Board of Directors.

3.4 IGNITION PREVENTION GENERAL PRACTICE

The utility has a staff of three (3) Utility Technicians dedicated to electric operations. In addition to the Utility Technicians, three (3) Lineworker positions support the electric and gas operations.

Administrative Officer and Administrative Assistant positions support the Power Company Manager.

The Power Company Manager is responsible for operation of the utility and the effective implementation and management of the Wildfire Mitigation Plan.

Utility staff perform all forms of distribution system operations and maintenance, including phase checking, switching, system repairs, minor upgrades, metering, system safety inspections assessments and related work.

Vegetation management is supervised by a Utility Technician and performed by the Lineworker position, other available staff, and contractors as may be required.

Typical vegetation management includes tree trimming per CPUC GO 95, manual and mechanical clearing of brush and grass from around wood poles and rights-of-way, and the limited application of herbicides to prevent recurrence of grasses around wood power poles. The Mare Island master developer employs both mechanical methods and a contracted goat herd to reduce various fuels around the island.

In all of its activities related to electric facility design, maintenance, inspection, and vegetation management, all PPC staff adhere to the following principles, goals, and objectives:

- Operate the system in a manner that will minimize the potential for ignition and wildfire risks.
- Take all reasonable and practicable actions to minimize the risk of a catastrophic wildfire caused by PPC electric facilities.
- Coordinate with federal, state, and local fire management personnel as necessary or appropriate to implement PPC's Wildfire Mitigation Plan.
- Immediately report fires, pursuant to existing PPC practices and the requirements of this Wildfire Mitigation Plan.
- Take corrective action when the staff witnesses or is notified that fire protection measures have not been properly installed or maintained.
- Comply with relevant federal, state, and industry standard requirements, including the industry standards established by the California Public Utilities Commission.
- Collect and maintain wildfire data necessary for the implementation of this Wildfire Mitigation Plan.
- Provide regular training programs for all employees having obligations for implementation of this Wildfire Mitigation Plan.

PPC's goal is to prevent electric facilities from starting fires throughout its service territory and wherever its lines are located. Attention is focused toward the 10,480 feet of overhead lines. As shown on Figure 1, none of the PPC service territory is located within CPUC Tier 2 or Tier 3 high fire threat districts.

The Wildland Urban Interface (WUI) is the zone of transition between unoccupied land and human development. It is the line, area or zone where structures and other human development meet or intermingle with undeveloped wildland or vegetative fuels. As shown on Figure 2, 61.77% of the PPC service territory lies outside of a WUI. The developed eastern and southern portions of Mare Island include 4.74% Intermix WUI and 33.4% Interface WUI.

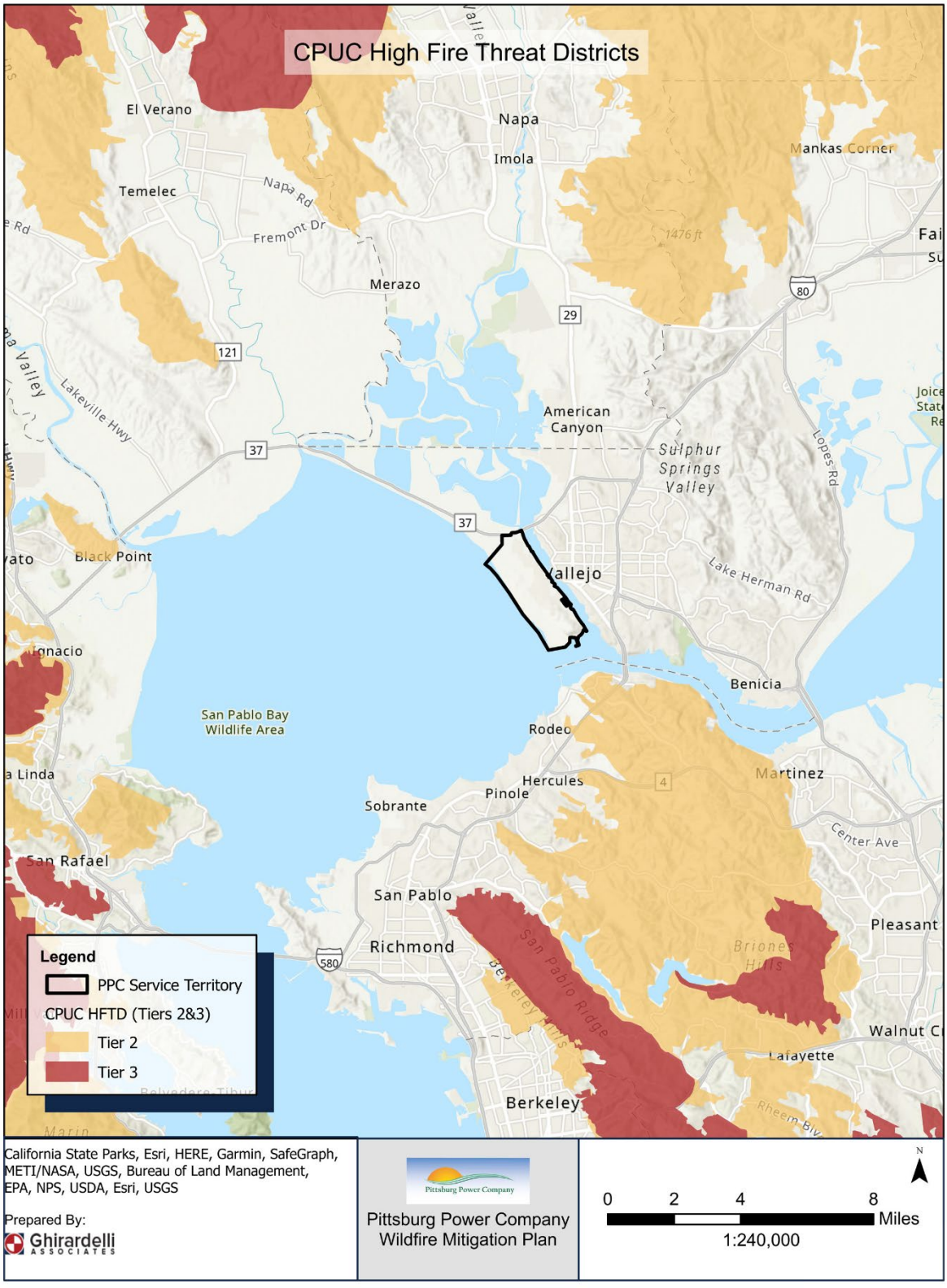


Figure 1: CPUC High Fire Threat Districts in PPC Service Territory

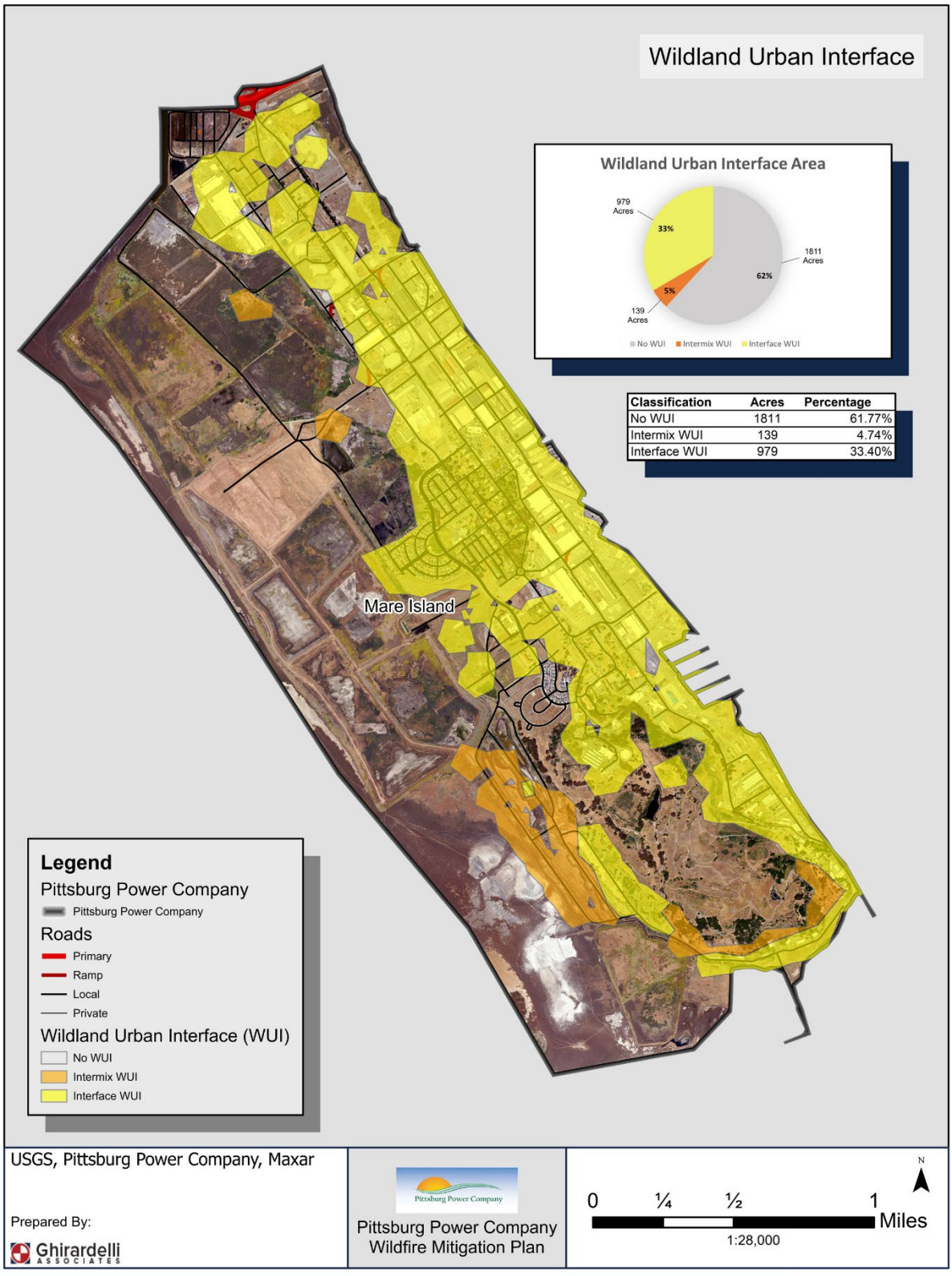


Figure 2: Wildland Urban Interface in PPC Service Territory

4.0 WILDFIRE RISKS AND DRIVERS

4.1 ENTERPRISE RISK MANAGEMENT

Enterprise-wide safety risks are almost exclusively limited to the energized overhead PPC distribution system. Figure 3 depicts the land cover classifications on Mare Island, including the entire PPC service territory. Within the overhead distribution system, vegetation coverage in the southern area of the service territory is classified as Herbaceous, with some Hardwood Woodland (mostly eucalyptus trees). The land cover underlying overhead circuits in the center of the service territory near Club Drive is classified as Hardwood Woodland and Herbaceous. Based on field observations, land cover that is currently mapped as Herbaceous could be better classified as Shrub in some locations. Circuits on the north end of the service territory are located in Herbaceous ground cover.

The underground portion of the distribution system poses low risk of ignition, as the underground system is in developed commercial, industrial, and residential areas. Events in these areas tend to be highly localized and absent vegetation.

4.2 FIRE RISK DRIVERS

Since only a single utility-caused wildfire has occurred in PPC service territory PPC researched historic causes of fires in California to identify the following primary risk drivers:

Drought – As the vegetation gets drier, there is a greater risk of fire ignition and rapid spread of fire.

Vegetation Type – The lower elevation of PPC's Fire Zone are predominantly grass lands, but as the elevation increases, the vegetation transitions to brush and trees, especially in the Coast Range. If ignited, brush and trees can produce more intense fires.

Vegetation Density – As the elevation increases in PPC's Fire Zone, the vegetation density increases, especially in the Coast Range. Greater vegetation density has the potential to produce more intense fires.

Weather – Lack of rain, low humidity, and high temperatures can increase the intensity of fire behavior.

High winds – High winds may increase chances of fire ignition and fire spread.

Terrain – Fire may spread more rapidly uphill, the Coast Range includes terrain that is conducive to the uphill spread of fire. In addition to the Coast Range, there are portions of the Sierra foothills where terrain is conducive to wildfire

spread.

Changing Weather Patterns (Climate Change) – As the climate gets drier and/or hotter, conditions in the future may increase fire risk.

4.3 CLIMATE AND CLIMATE CHANGE

The average rainfall in the PPC service territory is about 24 inches per year, most of which falls from October through April. Hot summer temperatures are moderated by onshore southwesterly breezes flowing across San Francisco and San Pablo Bays from the Pacific Ocean. Morning fog and high humidity are characteristic of local summer days, thereby reducing the threat of ignition. The typical extended summer dry season results in a heightened risk of fires well into the fall before the rainy season begins. During dry years, the fire risk can extend into the winter and through the spring. While wet winters can delay the ignition of significant fires later into spring or early summer, they also promote more vegetation growth, and may therefore produce higher fire risk during the inevitable hot, dry, summer season.

The statewide fire experience over the last few years has shown that catastrophic fires can occur anywhere, even in residential subdivisions outside areas of high fire risk. PPC is prepared to assist fire agencies with their response to active fires anywhere within its territory. However, PPC concurs with the Cal Fire and CPUC risk designations and sees no reason to change the boundaries of fire risk zones within the PPC territory.

According to experts, climate change is expected to increase the frequency and intensity of wildfires, as well as the extent of wildfires. The severity of wildfires is a function of the type of vegetation, the health of trees, dryness of the combustible vegetation material involved, slope, topography, and weather conditions. Tree stress and mortality, including damage due to insect infestations can exacerbate fire hazards.

California's fire season has historically extended from early spring through the late fall, but due to drier conditions and factors such as campfires and vandalism, fire protection and mitigation is becoming a year-round necessity.

4.4 VEGETATION TYPE

As illustrated in Figure 3, the PPC service territory is 45% urbanized and is surrounded by the Napa River, San Pablo Bay, and protected wetlands to the north. Homes, warehouses associated with the former Mare Island Naval Base, open fields, commercial equipment storage and laydown yards, and some residential and office uses among vegetated areas. Vegetation in the service territory is approximately 72% herbaceous, 3% water, and 2.5% hardwood woodland (eucalyptus).

Visual observations show that many areas classified as herbaceous also contain shrubs, as do the hardwood woodlands. PPC is cognizant of the increased fuel loading of shrubs vs. grasses.

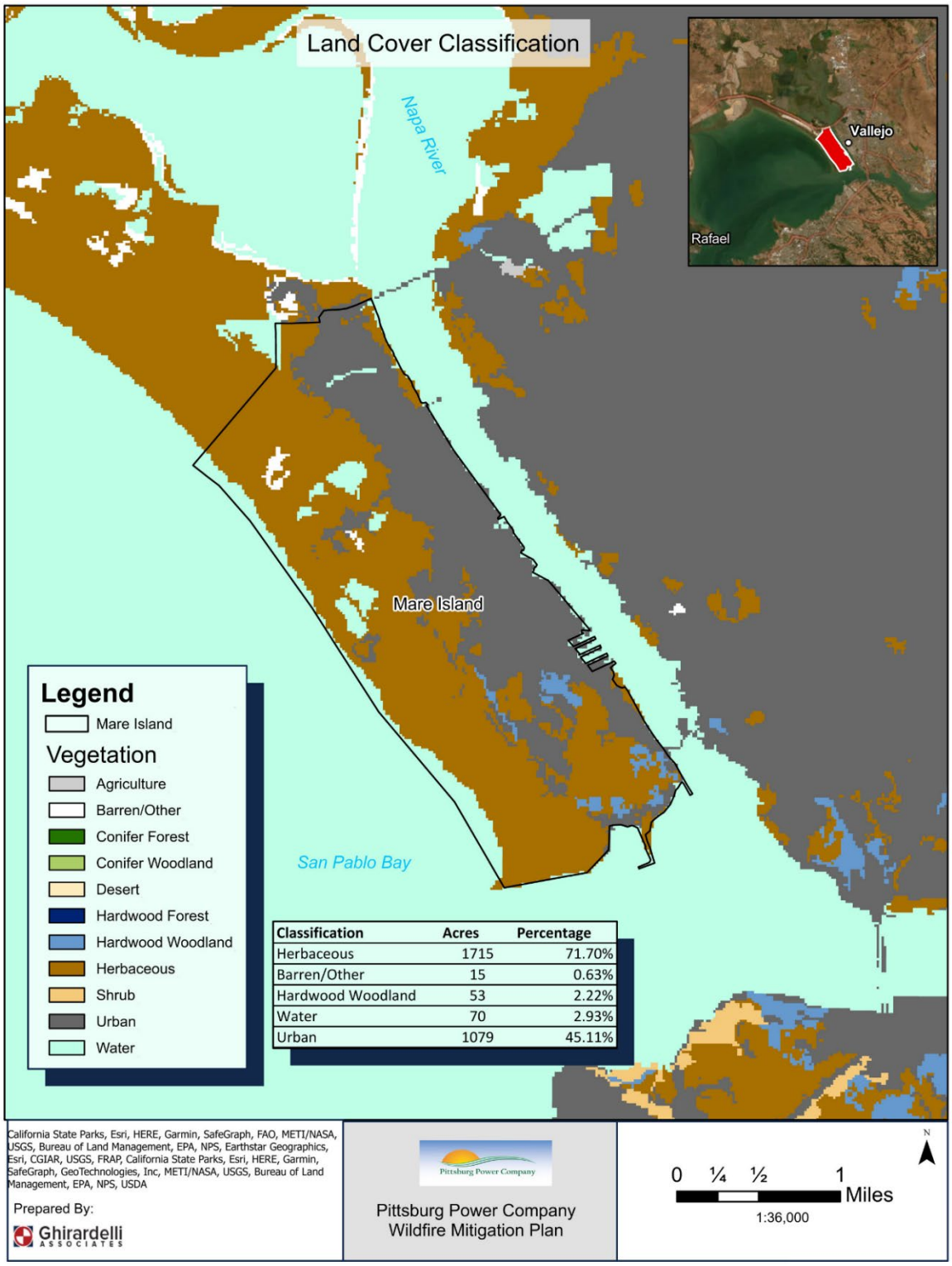


Figure 3: Land Cover Classification in PPC Service Territory

4.5 TOPOGRAPHY AND SLOPE

Fires propagate and move faster depending on topography. Flat or moderate slopes (0- 5%) generally have slower moving fires, with lower intensity than fires on steeper slopes (10-30%). The northern two thirds of Mare Island is relatively flat and nearly sea level. The southern section of the lsland rises abruptly from a narrow plateau adjacent to the Napa River and San Pablo Bay to an elevation of approximately 250'. Thus, the southern end of the island has a higher potential for wildfire spread, with higher intensities. This is an area of focus for PPC's vegetation management efforts.

5.0 PPC ASSETS IN FIRE ZONES

5.1 PPC ASSETS

For purposes of risk assessment, PPC assets consisting of its substation, transformers, switch gear, and distribution electrical lines were considered as potential sources of wildfire ignition.

Table 3: PPC Assets in the Fire Zone and Assets in High Fire Districts Outside the Fire Zone

Asset Class	Asset Type	Quantity
Transmission Lines	Transmission structures and switches operating at or above 69 Kilovolts (kV)	None
Distribution Lines	Overhead and underground lines operating at up to 12 kV	10,480' of overhead lines.
Substations	Power transformers, voltage regulators, protective devices, relays, open-air structures, switch gear and control houses	10 locations

5.2 LOCATIONS OF FIRE ZONES

PPC's service territory contains no locations of high fire hazard zones, and none of its service territory is within State Responsibility Areas (SRAs).

A single incident in 2019 is the only known ignition event since PPC began operating the utility in 1997. This human-caused event was a result of vandalism and burned approximately 40 acres of brush and scrub on the south end of the island.

6.0 WILDFIRE PREVENTATIVE STRATEGIES

6.1 HIGH FIRE THREAT DISTRICT

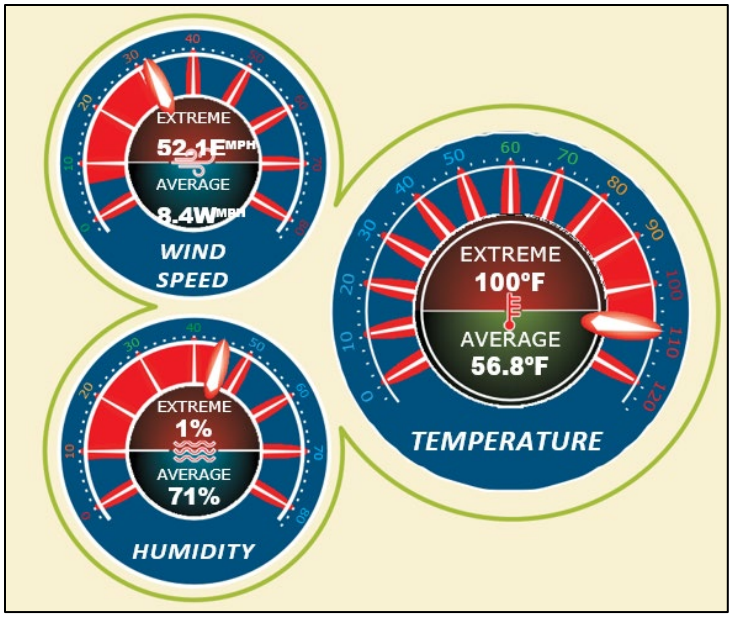
PPC was not a participant in the development of the CPUC Fire-Threat Map,[3] which designates a High-Fire Threat District. PPC's utility operations are not within any CPUC identified High-Fire Threat District.

PPC self-performed identifying any areas of PPC's service territory that are at an elevated risk of power line caused ignitions. PPC has incorporated the elements of this plan and prudent utility practice into its construction, inspection, maintenance, repair, and clearance practices, where applicable

6.2 WEATHER MONITORING

PPC monitors current and forecasted weather data from a variety of sources including:

- United States National Weather Service.
- National Fire Danger Rating System.
- National Interagency Fire Center – Predictive Services for Northern California.
- Local Fire District Warnings.



PPC utilizes commercially available internet services to monitor local and regional weather conditions. For temperature and humidity and related current local and forecast conditions including alerts, we refer to www.Weather.com

For current and forecast wind conditions, PPC -Island Energy utilizes www.Windfinder.com to monitor prevailing winds within its service territory and the surrounding region. Windfinder has eight (8) monitoring stations in Vallejo and nearby, providing a high-resolution view of prevailing winds at any given time. The greater San Francisco Bay Area has several dozens of Windfinder monitoring points.

PPC receives Fire Watch, Red Flag and related alerts, such as San Pablo Bay and Napa River small craft advisories, from the National Weather Service (NWS) directly to its computer

[3] Adopted by CPUC Decision 17-12-024.

task bars that will trigger system watch activities such as vehicle patrols of the system's 61 poles. PPC operates its utility in NWS weather zone 018 (CAZ018).

PPC assigns one of four operating conditions based on the relevant weather data and knowledge of local conditions:

Normal: During normal conditions, no changes are made to operations or work policy.

Elevated: During elevated ignition conditions, PPC will periodically monitor both electrical system and weather conditions.

Extreme: During extreme ignition conditions, PPC will perform mobile patrols and inspections of the distribution system within areas of high vegetation and ignition risk.

Red Flag: If the National Weather Service declares a Red Flag Warning for any portion of PPC's service territory, PPC may selectively de-energize portions of its overhead distribution system.

6.3 DESIGN AND CONSTRUCTION STANDARDS

PPC's electric facilities are designed and constructed to meet or exceed the relevant federal, state, or industry standard. PPC treats CPUC General Order (GO) 95 as a key industry standard for design and construction standards for overhead electrical facilities, and PPC meets or exceeds all standards in GO 95. PPC also monitors and follows the National Electric Safety Code as appropriate.

6.4 VEGETATION MANAGEMENT

PPC meets or exceeds the minimum industry standard vegetation management practices. Please refer to Exhibit C, PPC Metrics FY 2022 – 2023. PPC meets:

- Public Resources Code Sections 4292; 4293, 4294, and 4296;
- Title 14 Section 1257 of California Code of Regulation;
- Public Resources Code section 4293;
- GO 95 Rule 35; and
- GO 95 Appendix E Guidelines to Rule 35.

Table 4: GO 95, Rule 35, Table 1

Case	Type of Clearance	Trolley Contact, Feeder and Span Wires, 0-5kv	Supply Conductors and Supply Cables, 750 – 22,500 Volts	Supply Conductors and Supply Cables, 22.5 – 300 kV	Supply Conductors and Supply Cables, 300 – 550 kV (mm)
13	Radial clearance of bare line conductors from tree branches or foliage	18 inches	18 inches	¼ Pin Spacing	½ Pin Spacing
14	Radial clearance of bare line conductors from vegetation in the Fire-Threat District	18 inches	48 inches	48 inches	120 inches

Table 5: Appendix E – Guidelines to Rule 35

The radial clearances shown below are recommended minimum clearances that should be established, at time of trimming, between the vegetation and the energized conductors and associated live parts where practicable. Reasonable vegetation management practices may make it advantageous for the purposes of public safety or service reliability to obtain greater clearances than those listed below to ensure compliance until the next scheduled maintenance. Each Utility may determine and apply additional appropriate clearances beyond clearances listed below, which take into consideration various factors, including: line operating voltage, length of span, line sag, planned maintenance cycles, location of vegetation within the span, species type, experience with particular species, vegetation growth rate and characteristics, vegetation management standards and best practices, local climate, elevation, fire risk, and vegetation trimming requirements that are applicable to State Responsibility Area lands pursuant to Public Resource Code Sections 4102 and 4293.

Voltage of Lines	Case 13	Case 14
Radial clearances for any conductor of a line operating at 2,400 or more volts, but less than 72,000 volts	4 feet	12 feet
Radial clearances for any conductor of a line operating at 72,000 or more volts, but less than 110,000 volts	6 feet	20 feet
Radial clearances for any conductor of a line operating at 110,000 or more volts, but less than 300,000 volts	10 feet	30 feet
Radial clearances for any conductor of a line operating at 300,000 or more volts	15 feet	30 feet

Within higher fire threat areas, PPC performs an evaluation of every tree that has the potential to strike overhead facilities if it were to fail on an estimated annual basis. PPC

performs more frequent and detailed inspections of any such trees, and in cases where "hazard trees" (Dead, Dying, Diseased or leaning) could strike the facilities, will work with the City of Vallejo (or property owner) to remove the tree or portion of the tree that poses a risk. Please refer to Exhibit C – PPC Pole Segments

6.5 INSPECTIONS

PPC meets or exceeds the minimum inspection requirements provided in CPUC GO 165 and CPUC GO 95, Rule 18. Pursuant to these rules, PPC inspects electric facilities in areas of high fire threat more frequently than the other areas of its service territory.

Additionally, PPC staff use their knowledge of the specific environmental and geographical conditions to determine when areas outside of a higher fire threat area require more frequent inspections.

If PPC staff discovers a facility in need of repair that is owned by an entity other than PPC (such as a utility customer), PPC will issue a notice to repair to the facility owner and work to ensure that necessary repairs are completed promptly.

PPC works to ensure that all inspections to be performed within its service territory are completed generally in late spring, with mitigation performed not later than September 1st.

PPC monitors drought conditions and other relevant factors throughout the year to determine if inspections should be completed in a shorter timeframe.

6.6 WORKFORCE TRAINING

PPC has implemented work rules and complementary training programs for its workforce to help reduce the likelihood of a PPC related ignition.

Specific training includes safety monitoring of system distribution facilities, identification of circuit disconnect / isolation points and right-of-way brush management and removal.

6.7 RECLOSING POLICY

"Reclosers" are electrical fault detection devices that trip-open when detecting an electrical fault, but then "reclose" the circuit to test if the fault was temporary.

PPC does not currently employ the use of 'reclosers' within its service territory and does not have plans to add such devices in the future.

6.8 DE-ENERGIZATION

PPC has the authority to preemptively shut off power due to ignition-threat conditions; however, this option will only be used in extraordinary circumstances. PPC will make a case-by-case decision to shut off power based on the following considerations:

- Red Flag Warnings issued by the National Weather Service for fire weather zones that contain PPC circuits;
- PPC staff assessments of local conditions, including wind speed (sustained and gust), humidity and temperature, fuel moisture, fuel loading and data from area weather stations;
- Real-time information from staff located in areas identified as at risk of being subject to extreme weather conditions;
- Input from PPC, fire experts and vegetation experts;
- Input from local and state fire authorities regarding the potential consequences of ignitions in select locations;
- Alternative ways to reroute power to affected areas;
- Awareness of mandatory or voluntary evacuation orders in place;
- Expected impact of de-energizing circuits on essential services;
- Other operational considerations to minimize potential ignitions, including the blocking of reclosers on the identified circuit(s);
- On-going fire activity throughout PPC territory and California;
- Ability to notify customers;
- Notifications to local governments and public officials; and
- Potential impacts to communities and customers

6.9 GRID HARDENING

The North Island, as shown in Exhibit B has few active facilities, contains 14 wood poles, and is slated for full mixed-use development (residential, commercial). At the time of development, any remaining overhead lines and poles will be removed, and all electrical facilities will be undergrounded. Circuit maintenance and vegetation management will continue until such time.

The two other overhead circuits – Club Drive and South Island – will be undergrounded at such time the poles and related appurtenances are no longer serviceable. Vegetation management will continue until that time. All other above-ground facilities, such as

substations, are fenced, have security lighting and are subject to annual vegetation management.

7.0 COMMUNITY OUTREACH AND PUBLIC AWARENESS

PPC has performed community outreach regarding potential ignitions and power outage risk in three ways:

- PPC had previously drafted and issued a statement regarding the potential for power interruptions on Mare Island due to PG&E PSPS an ignition risk. PPC has posted the Wildfire Mitigation Plan on its website under "Regulations and Rates". PPC also uses social media and the Everbridge communications platform for public outreach.
- Responding to individual customer inquiries regarding the potential for power interruptions.
- Fiscal Year Public Rate Hearings on Mare Island

Going forward, other public meetings and tools such as 'Everbridge' will be employed. PPC will also continue to use social media to communicate important public and customer information.

7.1 IMPACTS TO PUBLIC SAFETY

In the event of the need to shut off power within the service territory, or when PG&E's supply of power to PPC is shutoff, the following may be impacted:

- Customers with special medical devices requiring power and not having backup.
- City of Vallejo streetlights and traffic signals are out
- US Coast Guard ship traffic radar station is out
- Vallejo G Street Causeway Bridge inoperable until a temporary power generator is connected.
- Note that many critical facilities within the utility service territory have back-up generation, including the VA Medical Clinic, US Coast Guard communications facility and WETA Bay Ferry terminal.
- There are no water treatment, wastewater treatment or primary police or fire facilities within the utility service territory.

7.2 CUSTOMER NOTIFICATION PROTOCOLS

The basic protocols for customer notification remain telephone, email, the utility website and social media.

Customers will be notified in advance of a planned shutdown, whether by PPC or by PG&E – to the extent PPC is made aware of or can anticipate a grid-wide shutdown event by PG&E.

Future customer and public notification schemes include 'Everbridge' email, phone and text notifications.

8.0 RESTORATION OF SERVICE

Restoration of electric distribution services will be per PPC utility operation procedures. Such procedures include, but are not limited to:

- Inspect involved facilities and any related facilities for damage and/or operability. Perform repairs or replacement as may be necessary.
- Check relay protections and circuit breaker status for correct setting / position.
- Confirm circuit phasing.
- Perform circuit switching per switching protocol.
- Confirm restoration and normal operation of system.
- Perform final safety check.

9.0 EVALUATION OF THE PLAN

9.1 ROLES AND RESPONSIBILITIES FOR PLAN EXECUTION

The PPC Power Company Manager is responsible for overseeing this WMP. The Power Company Manager assigns tasks to the Utility Technicians or Line Worker as needed and as governed by this plan. Additionally, the Power Company Manager may contract with outside vegetation management or utility maintenance providers to augment internal resources. The Power Company Manager is responsible for:

- Overall Responsibility for Implementation of the WMP.
- Tree trimming to maintain clearances required by PPC Standards. Vegetation removal at base of poles in accordance with PPC Standards.
- Weather monitoring for Red Flag Warnings.
- Implementation of enhanced safety measures during Red Flag Warnings Collection and analysis of outage statistics and fire incidents in the PPC Fire Zone.

9.2 METRICS AND ASSUMPTIONS FOR MEASURING PLAN PERFORMANCE

PPC will track two metrics to measure the performance of this Wildfire Mitigation Plan:

- number of ignitions
- wires down within the service territory.

Metric: PPC Ignitions

For purposes of this metric, a fire ignition is defined as follows:

- A PPC facility was associated with the fire;
- The fire was self-propagating and of a material other than electrical and/or communication facilities;
- The resulting fire traveled greater than one linear meter from the ignition point; and
- PPC has knowledge that the fire occurred.

In future Wildfire Mitigation Plans, PPC will provide the number of ignitions that occurred that were less than 10 acres in size. Any fires greater than 10 acres will be individually described.

Metric: Wires Down

The second metric is the number of distribution and/or transmission wires downed within PPC's service territory. For purposes of this metric, a "wires down" event includes any instance where an electric transmission (PPC does not own, operate, or maintain transmission facilities) or primary distribution conductor falls to the ground or on to a foreign object.

PPC does not have any facilities within a defined High Fire Threat District

PPC will not normalize this metric by excluding unusual events, such as severe storms or vandalism – such as attempted copper theft and poles that have been vandalized in the past. Instead, PPC will supplement this metric with a qualitative description of any such unusual events.

9.3 IMPACT OF METRICS ON PLAN

In the initial years, PPC anticipates that there will be relatively limited data gathered through these metrics. However, as the data collection history becomes more robust, PPC will be able to identify areas of its operations and service territory that are disproportionately impacted. PPC will then evaluate potential improvements to the plan. Refer to Exhibit C – PPC Metrics FY 2022 – 2023.

9.4 MONITORING AND AUDITING THE PLAN

This Wildfire Mitigation Plan is developed by the utility Power Company Manager with initial review by his retained executive management professional. The plan is then forwarded to the PPC Executive Secretary for review, who also serves as the City of Pittsburg Deputy City Manager.

The PPC Executive Secretary may seek additional review from the Planning Department and the City Attorney's office. Upon completion of the internal review and all comments have been incorporated, a Staff Report is drafted along with a Resolution for adoption by the PPC Board of Directors.

The updated plan, along with the Staff Report and Resolution are presented to the PPC Board annually. The PPC Board will conduct a Public Hearing on the plan every three years, which will be noticed directly to customers and interested parties within the PPC service territory along with local media outlets and social media.

9.5 IDENTIFYING AND CORRECTING DEFICIENCIES IN THE PLAN

Deficiencies in the plan will be identified by ongoing distribution system safety reviews, field operations, and identified 'lessons learned' from other POU's.

Responsibility for correcting deficiencies within the plan and implementing corrective actions or plans will be the responsibility of the Power Company Manager.

9.6 MONITORING THE EFFECTIVENESS OF INSPECTIONS

PPC will monitor the effectiveness of its inspections through written reports and periodic field verification by others, including the Power Company Manager.

10.0 INDEPENDENT EVALUATOR

Public Utilities Code section 8387© requires PPC to engage 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. The Independent Evaluator must issue a report that is posted to PPC's website. This report must also be presented to PPC Board of Directors at a public hearing.

Going forward, PPC will utilize the City of Vallejo Fire Marshal as the qualified Independent Evaluator with experience in assessing the safe operation of electrical distribution infrastructure and related facilities on Mare Island Vallejo.

The Fire Marshal Independent Evaluator is physically located on Mare Island Vallejo and is familiar with the PPC service territory, utility operations and has worked with PPC on specific potential ignition hazards previously.

11.0 EXHIBITS

11.1 EXHIBIT A – PPC WOOD POLE INVENTORY

Island Energy
energy solutions for Mare Island

Subject: Wood Pole Overhead Inventory, Log

Revision: 16-May-2024

Club Drive

Pole #	Lat	Long	Service	Vegetation Status	Pole Status	Last Inspection	Actions Taken
D3-P1	- 122° 15' 58" W	38° 5' 14" N	Touro to Forest Service Offices, Streetlighting, Water Tank	No tree interference. Sidewalk, lawn adjacent.	Good Condition	7-May-2024	
D3-P2	- 122° 15' 58" W	38° 5' 13" N		No Tree interference. Sidewalk adjacent.	Good Condition	7-May-2024	
D3-P3	- 122° 15' 59" W	38° 5' 12" N		Tree Branch encroachment potential and light grassess.	Good Condition	7-May-2024	
D3-P4	- 122° 15' 59" W	38° 5' 12" N		Tree Branch encroachment potential and light grassess.	Good Condition	7-May-2024	
D3-P5	- 122° 15' 59" W	38° 5' 10" N		Light grasses	Good Condition	7-May-2024	Grasses Removal at base of pole per GO-95
D3-P6	- 122° 15' 58" W	38° 5' 9" N		Light grasses	Good Condition	7-May-2024	Grasses Removal at base of pole per GO-95
D3-P7	- 122° 15' 58" W	38° 5' 8" N		Tree Branch encroachment potential and light grassess.	Good Condition	7-May-2024	Grasses Removal at base of pole per GO-95
D3-P8	- 122° 15' 58" W	38° 5' 7" N		Tree Branch encroachment potential and light grassess.	Good Condition	7-May-2024	Grasses Removal at base of pole per GO-95
D3-P9	- 122° 15' 58" W	38° 5' 7" N		Light grasses	Good Condition	7-May-2024	Grasses Removal at base of pole per GO-95

South Island

Pole #	Lat	Long	Service	Vegetation Status	Pole Status	Last Inspection	Actions Taken
C1-P2	- 122° 15' 19" W	38° 4' 23" N	South Island Distribution	Light grasses	Good Condition	5/9/2023	Grasses removal at base of pole per GO.95
C1-P3	- 122° 15' 22" W	38° 5' 5" N		Light grasses	Good Condition	5/10/2024	Grasses removal at base of pole per GO.95
C1-P4	- 122° 15' 22" W	38° 5' 5" N		Light grasses	Good Condition	5/10/2024	Grasses removal at base of pole per GO.95
B1-P1	- 122° 15' 20" W	38° 5' 4" N		Light grasses	Good Condition	5/10/2024	Grasses removal at base of pole per GO.95
B1-P2	- 122° 15' 19" W	38° 5' 3" N		Light grasses	Good Condition	5/10/2024	Grasses removal at base of pole per GO.95
B1-P3	- 122° 15' 17" W	38° 5' 1" N		Light grasses	Good Condition	5/10/2024	Grasses removal at base of pole per GO.95
B1-P4	- 122° 15' 15" W	38° 4' 58" N		Light grasses	Good Condition	5/10/2024	Grasses removal at base of pole per GO.95
B1-P5	- 122° 15' 13" W	38° 4' 57" N		Light grasses	Good Condition	5/10/2024	Grasses removal at base of pole per GO.95
B1-P6	- 122° 15' 12" W	38° 4' 55" N		Light grasses	Good Condition	5/10/2024	Grasses removal at base of pole per GO.95
B1-P7	- 122° 15' 10" W	38° 4' 52" N		Light grasses	Good Condition	5/10/2024	Grasses removal at base of pole per GO.95
A1-P1	- 122° 15' 9" W	38° 4' 52" N		Light grasses	Good Condition	5/10/2024	Grasses removal at base of pole per GO.95
AA1-P1	- 122° 15' 0" W	38° 4' 22" N		Light grasses	Good Condition	5/10/2024	Grasses removal at base of pole per GO.95
AA2-P1	- 122° 15' 1" W	38° 4' 30" N		Light grasses	Good Condition	5/9/2024	Grasses removal at base of pole per GO.95
AA2-P2	- 122° 15' 2" W	38° 4' 29" N		Light grasses	Good Condition	5/9/2024	Grasses removal at base of pole per GO.95
AA2-P3	- 122° 15' 4" W	38° 4' 28" N		Light grasses	Good Condition	5/9/2024	Grasses removal at base of pole per GO.95
AA2-P4	- 122° 15' 6" W	38° 4' 27" N		Light grasses	Good Condition	5/9/2024	Grasses removal at base of pole per GO.95
AA2-P5	- 122° 15' 8" W	38° 4' 26" N		Light grasses	Good Condition	5/9/2024	Grasses removal at base of pole per GO.95
AA2-P6	- 122° 15' 10" W	38° 4' 26" N		Light grasses	Good Condition	5/9/2024	Grasses removal at base of pole per GO.95
AA3-P7	- 122° 15' 19" W	38° 4' 23" N		Light grasses	Good Condition	5/9/2024	Grasses removal at base of pole per GO.95

South Island cont'd

Pole #	Lat	Long	Service	Vegetation Status	Pole Status	Last Inspection	Actions Taken
A3-P8	- 122° 15' 23" W	38° 4' 24" N	South Island Distribution	Light grasses	Good Condition	5/13/2024	Grasses removal at base of pole per GO.95
A3-P1	- 122° 15' 23" W	38° 4' 24" N		Light grasses	Good Condition	5/13/2024	Grasses removal at base of pole per GO.95
A3-P2	- 122° 15' 24" W	38° 4' 24" N		Light grasses	Good Condition	5/13/2024	Grasses removal at base of pole per GO.95
A3-P4	- 122° 15' 26" W	38° 4' 25" N		Light grasses	Good Condition	5/13/2024	Grasses removal at base of pole per GO.95
A3-P5	- 122° 15' 25" W	38° 4' 28" N		Light grasses	Good Condition	5/13/2024	Grasses removal at base of pole per GO.95
A3-P6	- 122° 15' 26" W	38° 4' 31" N		Light grasses	Good Condition	5/13/2024	Grasses removal at base of pole per GO.95
K1-P2	- 122° 17' 12" W	38° 7' 1" N		Light grasses	Good Condition	5/6/2024	Grasses removal at base of pole per GO.95
K1-P1	- 122° 17' 14" W	38° 7' 0" N		Light grasses	Good Condition	5/6/2024	Grasses removal at base of pole per GO.95
K1-P10	- 122° 17' 13" W	38° 6' 59" N		Light grasses	Good Condition	5/6/2024	Grasses removal at base of pole per GO.95
K1-P9	- 122° 17' 16" W	38° 6' 59" N		Light grasses	Good Condition	5/6/2024	Grasses removal at base of pole per GO.95
K1-P8	- 122° 17' 16" W	38° 6' 59" N		Light grasses	Good Condition	5/6/2024	Grasses removal at base of pole per GO.95
K1-P50	- 122° 17' 16" W	38° 6' 59" N		Light grasses	Good Condition	5/6/2024	Grasses removal at base of pole per GO.95
K2-P49	- 122° 17' 16" W	38° 6' 58" N		Light grasses	Good Condition	5/6/2024	Grasses removal at base of pole per GO.95
K2-P48	- 122° 17' 15" W	38° 6' 57" N		Light grasses	Good Condition	5/6/2024	Grasses removal at base of pole per GO.95
K2-P13	- 122° 17' 15" W	38° 6' 55" N		Light grasses	Good Condition	5/6/2024	Grasses removal at base of pole per GO.95
K2-P14	- 122° 17' 15" W	38° 6' 54" N		Light grasses	Good Condition	5/6/2024	Grasses removal at base of pole per GO.95
K2-P15	- 122° 17' 14" W	38° 6' 52" N		Light grasses	Good Condition	5/6/2024	Grasses removal at base of pole per GO.95
K2-P16	- 122° 17' 13" W	38° 6' 51" N		Light grasses	Good Condition	5/6/2024	Grasses removal at base of pole per GO.95
K2-P17	- 122° 17' 12" W	38° 6' 50" N		Light grasses	Good Condition	5/6/2024	Grasses removal at base of pole per GO.95

North Island

Pole #	Lat	Long	Service	Vegetation Status	Pole Status	Last Inspection	Actions Taken
K2-P18	- 122° 17' 10" W	38° 6' 48" N	Cal Trans	Light grasses	Good Condition	5/6/2024	Grasses removal at base of pole per GO.95
K2-P19	- 122° 17' 9" W	38° 6' 47" N	Cal Trans	Light grasses	Good Condition	5/6/2024	Grasses removal at base of pole per GO.95
J2-P1	- 122° 17' 15" W	38° 6' 43" N	COV Street Light	Light grasses	Good Condition	5/7/2024	Grasses removal at base of pole per GO.95
J2-P2	- 122° 17' 13" W	38° 6' 44" N	COV Street Light	Light grasses	Good Condition	5/7/2024	Grasses removal at base of pole per GO.95
J2-P3	- 122° 17' 11" W	38° 6' 46" N	COV Street Light	Light grasses	Good Condition	5/7/2024	Grasses removal at base of pole per GO.95
J2-P4	- 122° 17' 9" W	38° 6' 47" N	COV Street Light	Light grasses	Good Condition	5/7/2024	Grasses removal at base of pole per GO.95
J2-P5	- 122° 17' 8" W	38° 6' 46" N	COV Street Light	Light grasses	Good Condition	5/7/2024	Grasses removal at base of pole per GO.95
J2-P6	- 122° 17' 7" W	38° 6' 45" N	COV Street Light	Light grasses	Good Condition	5/7/2024	Grasses removal at base of pole per GO.95
J2-P7	- 122° 17' 6" W	38° 6' 44" N	COV Street Light	Light grasses	Good Condition	5/7/2024	Grasses removal at base of pole per GO.95
J2-P8	- 122° 17' 5" W	38° 6' 43" N	COV Street Light	Light grasses	Good Condition	5/7/2024	Grasses removal at base of pole per GO.95
J2-P9	- 122° 17' 3" W	38° 6' 40" N	COV Street Light	Light grasses	Good Condition	5/7/2024	Grasses removal at base of pole per GO.95
J2-P10	- 122° 17' 0" W	38° 6' 38" N	COV Street Light	Light grasses	Good Condition	5/7/2024	Grasses removal at base of pole per GO.95
J2-P11	- 122° 16' 59" W	38° 6' 37" N	COV Street Light	Light grasses	Good Condition	5/7/2024	Grasses removal at base of pole per GO.95
J2-P12	- 122° 16' 58" W	38° 6' 35" N	COV Street Light	Light grasses	Good Condition		Grasses removal at base of pole per GO.95

11.2 EXHIBIT B – WOOD POLE SEGMENTS

SOUTH ISLAND

The 12kV overhead distribution line on South Island is a combination of underground conduit and overhead wood poles and serves US Coast Guard telecommunications and ship traffic radar. There are a total thirty-eight (38) poles in this circuit.

Of the 38 poles, 34 are in areas of light grasses or gravel. Four (4) poles are located adjacent to areas of light vegetation, brush and trees.

CLUB DRIVE

The 12kV overhead distribution line on Club Drive originates in an underground vault at Touro University and travels south to serve the USDA Forest Service office building and street lighting. There are a total of nine (9) wood poles on this circuit.

There are trees encroaching on the right-of way, and periodic tree maintenance is performed to prevent branches from impacting the overhead lines. Please refer to Exhibit C – PPC Metrics FY 2022 – 2023.

NORTH ISLAND

The North Island overhead is a 2.4kV circuit serving street lighting and a flood control district pump. There are a total of fourteen (14) wood poles on this circuit.

The poles are in light to moderate grasses, shrubs and in proximity to several trees. The area is regularly maintained by the Mare Island Master Developer including mowing and weed / grasses abatement. Three (3) poles are located near trees, which are regularly inspected and maintained as necessary.

11.3 EXHIBIT C – PPC METRICS FY 2022-2023

#	Metric:	No.	Date:	Explanation:
1	PPC Ignitions	0		
2	Downed Wires	0		
3	Non-PPC Ignitions	0		
4	Vandalism	0		Vandalism to overhead distribution lines and wood poles, or other facilities with the potential for ignitions.
	Inspections:			
5	Fall	1	10/1/2023	Grasses acceptable – defer tree abatement until spring.
6	Spring	1	2/14/2023	Tree Trimming required on Club Drive, pole base grasses removal.
	Abatement:			
7	Tree Trimming	1	2/18/2023	Tree branches, brush removal and ROW clearing on Club Drive.
8	Grasses, Brush Removal	1	May 2023	Around all wood poles per GO 95 – 2 weeks duration.

12.0 REVISION HISTORY

Version	Revisions	Section
2023	Comprehensive revision to comply with WSAB Staff Reports.	
2024	- Added Revision History	12
	- was: 59 low and medium… is: 61 active low and medium…	1.2 & 3.1
	- was: Plan Section 7.4 is: Plan Section 7.0	Table 1 b (2) (G)
	- Plan Section was: 7.3, 1.3 is: 7.0, 1.3	Table 1 b(3)
	- Plan Section was: 9.2 is: 9.4	Table 1 b (2) (N) (i)
	- Plan Section was: 9.4 is: 9.5	Table 1 b (2) (N) (ii)
	- Plan Section was: 9.5 is: 9.6	Table 1 b (2) (N) (iii)
	- Table 2 Number of Customers Served: was: 584 is: 600 Population Within Service Territory: was: 1,056 people is: 1,000 residents 1,500 work population	1.4
	- Updated staff numbers. was: The utility has a staff of four (4) Utility Technicians three (3) dedicated to electric operations, one (1) to gas operations. In addition to the Utility Technicians, a Lineworker position supports the electric and gas operation. is: The utility has a staff of three (3) Utility Technicians dedicated to electric operations. In addition to the utility Technicians, three (3) Lineworker positions support the electric and gas operations. was: The Mare island master developer employes a contracted goat… is: The Mare Island master developer employes employs both mechanical methods and a contracted goat… Deleted: This will be a fulltime, year-round reduction activity starting in 2024.	3.4

Version	Revisions	Section
2024 cont'd	- was: …vehicle patrols of the system's 59 poles. is: … vehicle patrols of the system's 61 poles.	6.2
	- was: Please refer to Exhibit C, PPC Metrics FY 2021 – 2022 is: Please refer to Exhibit C, PPC Metrics FY 2022 – 2023 - was: PC performs more frequent and detailed … is: PPC performs more frequent and detailed …	6.4
	- was: contains 26 wood poles… is: contains 14 wood poles…	6.9
	- Deleted Table 6. Redundant as this was already Exhibit C. Added to end of section: Refer to Exhibit C – PPC Metrics FY 2022 – 2023.	9.3
	- Updated PPC Wood Pole Inventory with May 2024 data	11.1 Exhibit A
	- was: twenty-four (24) poles in this circuit. is: thirty-eight (38) poles in this circuit. was: of the 24 poles… is: of the 38 poles…	11.2 South Island
	- Corrected exhibit reference: was: Please Refer to Exhibit D – PPC Metrics FY 2021 – 2022 is: Please refer to Exhibit C – PPC Metrics FY 2022 – 2023	11.2 Club Drive
	- PPC Metrics was: 2021 – 2022 is: 2022 – 2023 Updated dates to reflect 2023 Inspections and Abatement	11.3 Exhibit 3