EASTSIDE POWER AUTHORITY WILDFIRE MITIGATION PLAN

2024 VERSION

May 15, 2024

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I. OVERVIEW

A. POLICY STATEMENT

Eastside Power Authority's (ESPA) overarching goal is to provide safe, reliable, and economic electric service to its local community. In order to meet this goal, ESPA intends to construct, maintain, and operate any ESPA-owned electrical lines and equipment in a manner that minimizes the risk of catastrophic wildfire posed by its electrical lines and equipment.

B. PURPOSE AND ADOPTION OF THE WILDFIRE MITIGATION PLAN

The Eastside Power Authority is a California Joint Powers Authority and Local Regulatory Authority comprised of five Irrigation and Water Districts. ESPA is in a region of the state with a very low wildfire risk. No part of ESPA's service territory is located in or near the High Fire Threat District designed in the California Public Utilities Commission's (CPUC) Fire Threat Map and all of ESPA's service territory is designated as "non-fuel" or "moderate" in the California Department of Forestry and Fire Protection's (CALFIRE) Fire and Resource Assessment Program (FRAP) Fire Threat Map.

Despite this low risk, ESPA takes appropriate actions to help its region prevent and respond to the increasing risk of wildfires. In its role as a public agency, ESPA closely coordinates with other local safety and emergency officials to help protect against fires and respond to emergencies. In its role as a utility, ESPA follows all applicable design, construction, operation, and maintenance requirements that reduce safety risks associated with any ESPA-owned system. This Wildfire Mitigation Plan describes the safety-related measures that ESPA follows to reduce its risk of causing wildfires.

Each year, ESPA's annual Wildfire Mitigation Plan is sent to its members ahead of the second quarterly board meeting for review. Members can raise concerns prior to and during the meeting. The WMP is voted upon for adoption and submittal to the CPUC at the second quarterly board meeting. For 2024, the WMP was sent to its members and voted for adoption on May 15, 2024.

C. ORGANIZATION OF THE WILDFIRE MITIGATION PLAN

This Wildfire Mitigation Plan included the following elements:

- Objectives of the plan;
- Roles and responsibilities for carrying out the plan;
- Identification of key wildfire risks and risk drivers;
- Description of wildfire prevention, mitigation, and response strategies and programs;
- Metrics for evaluating the performance of the plan and identifying areas for improvement;
- Review and validation of the plan; and

- Timelines.

Requirement	Statutory Language	Location in WMP
Persons Responsible	**PUC § 8387(b)(2)(A):** An accounting of the **responsibilities of persons** responsible for executing the plan.	Section III Page 5
Objectives of the Plan	**PUC § 8387(b)(2)(B):** The **objectives** of the wildfire mitigation plan.	Section II Page: 4
Preventive Strategies	**PUC § 8387(b)(2)(C):** A description of the **preventive strategies and programs to be adopted by the local publicly owned electric utility** or electrical cooperative to minimize the risk of its electrical lines and equipment causing catastrophic wildfires, including consideration of dynamic climate change risks.	Section V Page 11
Evaluation Metrics	**PUC § 8387(b)(2)(D):** A description of the **metrics the local publicly owned electric utility or electrical cooperative plans to use to evaluate the wildfire mitigation plan's performance** and the assumptions that underlie the use of those metrics.	Section VI Page 15
Impact of Metrics	**PUC § 8387(b)(2)(E):** A discussion of how the **application of previously identified metrics** to previous wildfire mitigation plan performances has informed the wildfire mitigation plan.	Section VI Page 15
Deenergization Protocols	**PUC § 8387(b)(2)(F): Protocols for disabling reclosers and deenergizing portions of the electrical distribution system** that consider the associated impacts on public safety, as well as protocols related to mitigating the public safety impacts of those protocols, including impacts on critical first responders and on health and communication infrastructure.	Section V Page 13
Customer Notification Procedures	**PUC § 8387(b)(2)(G):** Appropriate and feasible **procedures for notifying a customer** who may be impacted by the deenergizing of electrical lines. The procedures shall consider the need to notify, as a priority, critical first responders, health care facilities, and operators of telecommunications infrastructure.	Section V Page 13
Vegetation Management	**PUC § 8387(b)(2)(H):** Plans for vegetation management.	Section V Page 11
Inspections	**PUC § 8387(b)(2)(I): Plans for inspections** of the local publicly owned electric utility's or electrical cooperative's electrical infrastructure.	Section V Page 12

Requirement	Statutory Language	Location in WMP
Prioritization of Wildfire Risks	**PUC § 8387(b)(2)(J):** A list that **identifies, describes, and prioritizes all wildfire risks, and drivers for those risks, throughout the local publicly owned electric utility's or electrical cooperative's service territory**. The list shall include, but not be limited to, both of the following: **(i)** Risks and risk drivers associated with design, construction, operation, and maintenance of the local publicly owned electric utility's or electrical cooperative's equipment and facilities. **(ii)** Particular risks and **risk drivers** associated with topographic and climatological risk factors throughout the different parts of the local publicly owned electric utility's or electrical cooperative's service territory.	Section IV Page 7
CPUC Fire Threat Map Adjustments	**PUC § 8387(b)(2)(K):** Identification of any **geographic area in the local publicly owned electric utility's or electrical cooperative's service territory** that is a higher wildfire threat than is identified in a commission fire threat map, and identification of where the commission should expand a high fire threat district based on new information or changes to the environment.	Section IV Page 10
Enterprise wide Risks	**PUC § 8387(b)(2)(L):** A methodology for identifying and presenting **enterprise wide** safety risk and wildfire-related risk.	Section VII Page 15
Restoration of Service	**PUC § 8387(b)(2)(M):** A statement of how the local publicly owned electric utility or electrical cooperative will **restore service after a wildfire**.	Section V Page 14
Monitor and Audit	**PUC § 8387(b)(2)(N):** A description of the processes and procedures the local publicly owned electric utility or electrical cooperative shall use to do all of the following (i) **Monitor and audit** the implementation of the wildfire mitigation plan. (ii) **Identify any deficiencies** in the wildfire mitigation plan or its implementation, and correct those deficiencies. (iii) Monitor and audit the effectiveness of electrical line and equipment inspections, including inspections performed by contractors, that are carried out under the plan, other applicable statutes, or commission rules.	Section VII Page 16
Qualified Independent Evaluator	**PUC § 8387(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	Section VIII Page 17

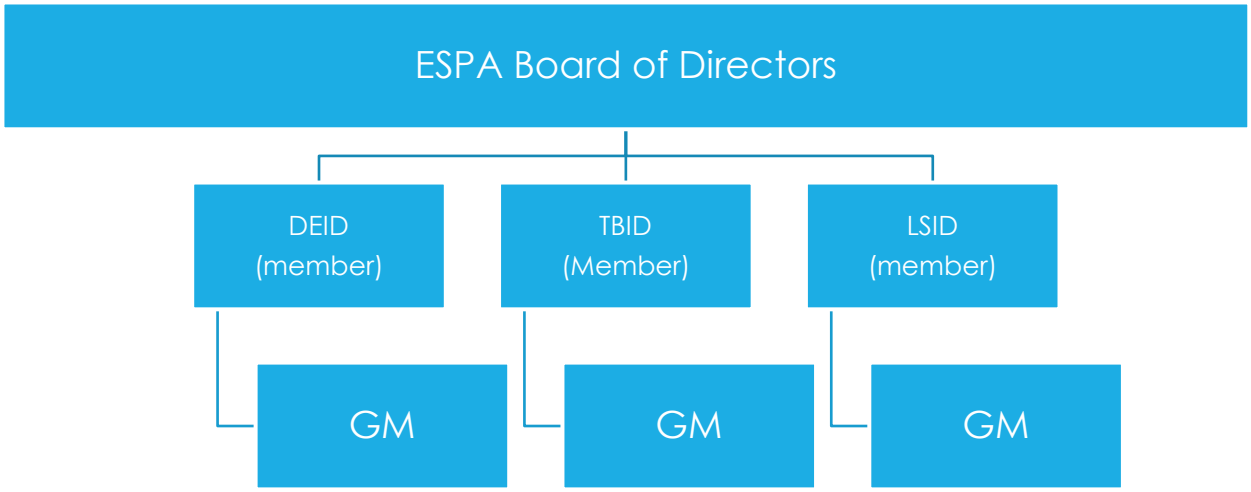
	local publicly owned electric utility or electrical cooperative, and shall present the report at a public meeting of the local publicly owned electric utility's or electrical cooperative's governing board.	

II. OBJECTIVES OF THE WILDFIRE MITIGATION PLAN

The primary goal of this Wildfire Mitigation Plan is to describe ESPA's existing programs, practices, and measures that effectively reduce the probability that any ESPA-owned electric supply system could be the origin or contributing source for the ignition of a wildfire. To support this goal, ESPA regularly evaluates prudent and cost-effective operations and training activities that can help reduce the risk of equipment-related fires. Though there are no present ESPA-owned facilities as applicable to California Public Utilities Code Section 8387(a), ESPA has nevertheless prepared this wildfire mitigation plan to support the wildfire planning efforts being conducted in California. Another goal of this Wildfire Mitigation Plan is to improve the resiliency of the electric grid and increase communication and collaboration among utility stakeholders. As part of the development of this plan and annual process, ESPA assesses new industry practices and standards that support wildfire prevention in the community and State of California.

III. ROLES AND RESPONSIBILITIES

A. UTILITY GOVERNANCE STRUCTURE



The Eastside Power Authority is governed by a Board of Directors comprised of a representative from each member district. This Board of Directors reviews, sets direction, and approves matters of utility governance.

B. WILDFIRE PREVENTION

ESPA recognizes the importance of wildfire prevention in California, and will conduct prevention planning and coordination with utility stakeholders concerning wildfire issues. Such activities include coordination with fire management personnel as necessary and appropriate to implement ESPA's wildfire mitigation plans.

If, at a later point, ESPA does own any facilities or equipment described in California Public Utilities Code Section 8387(a) or a standard in any future legislation, ESPA will engage in preventative efforts including the following:

- Operate ESPA electrical lines and equipment in a manner that will minimize potential wildfire risks.
- Take all reasonable and practicable actions to minimize the risk of a catastrophic wildfire caused by ESPA electric facilities.
- Coordinate with federal, state, and local fire management personnel as necessary or appropriate to implement ESPA's Wildfire Mitigation Plan.
- Immediately report fires, pursuant to existing utility practices and the requirements of this Wildfire Mitigation Plan.
- Take corrective action when ESPA becomes aware 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 applicable regulatory body.

Responsibilities for execution of the above described plans will rest with the acting manager of Eastside Power Authority under the direction and oversight of the Eastside Power Authority Board of Directors.

C. WILDFIRE RESPONSE AND RECOVERY

When a wildfire impacts ESPA's service territory, ESPA will correspond with appropriate fire prevention personnel during fire emergencies, such as state or local firefighters, to receive input. When appropriate, ESPA will further coordinate with SCE to the extent a wildfire would impact SCE's system and the safe delivery of electricity to ESPA customers. ESPA will also provide information on the wildfire to ESPA members to keep them apprised of response and recovery efforts.

If, at a later point, ESPA does own any facilities or equipment described in California Public Utilities Code Section 8387(a) or a standard in any future legislation, the ESPA Board of Directors will review and establish response roles related for that infrastructure in a reasonable timeframe, and describe those roles in the subsequent annual wildfire mitigation plan.

D. STANDARDIZED EMERGENCY MANAGEMENT SYSTEM

ESPA is not a local governmental agency as defined in California Government Code Section 8680.2.[1] Nevertheless, ESPA may evaluate future participation in an emergency management system structure, particularly if ESPA owns facilities or equipment described in California Public Utilities Code Section 8387(a) in the future. At that point, such emergency management system

[1] As defined in Cal. Gov. Code § 8680.2: "Local agency" means any city, city and county, county, county office of education, community college district, school district, or special district. (Amended by Stats. 1990, 1st Ex. Sess., Ch. 33, Sec. 1. Effective December 1, 1990.)

processes could entail ESPA training and wildfire prevention exercises, as well as coordination with associations such as the California Utility Emergency Association to stay informed on recent emergency response developments.

IV. WILDFIRE RISKS AND DRIVERS ASSOCIATED WITH DESIGN, CONSTRUCTION, OPERATION, AND MAINTENANCE

A. PARTICULAR RISKS AND RISK DRIVERS ASSOCIATED WITH TOPOGRAPHIC AND CLIMATOLOGICAL RISK FACTORS

Within ESPA's service territory and the surrounding areas, the primary risk drivers for wildfire are the following:

- Extended drought;
- Vegetation type;
- Vegetation Density;
- Weather;
- High winds;
- Terrain;
- Changing Weather Patterns (Climate Change);
- Communities at Risk;
- Fire History.

As noted above, ESPA is located in a specific region of the State with a very low wildfire risk. ESPA will continue to monitor the region for risk drivers associated with topographic and climatological risk factors.

B. ENTERPRISEWIDE SAFETY RISKS

ESPA's methodology for enterprise wide safety risks will entail identifying any future activities or facilities that may present a safety risk or wildfire-related risk, informed by wildfire risk factors, regional developments, prudent utility practice, and wildfire prevention standards. Since ESPA does not presently own any facilities described in California Public Utilities Code Section 8387(a), there are no issues to identify at this point. However, should an issue be identified in the future, such enterprise safety risks will be described in the subsequent wildfire mitigation plan and addressed by the ESPA Board of Directors in the interim as appropriate. ESPA's risk description may include safety process flowcharts, a table of enterprise wide safety compliance milestones for enforcement, and Gantt charts to track wildfire prevention efforts.

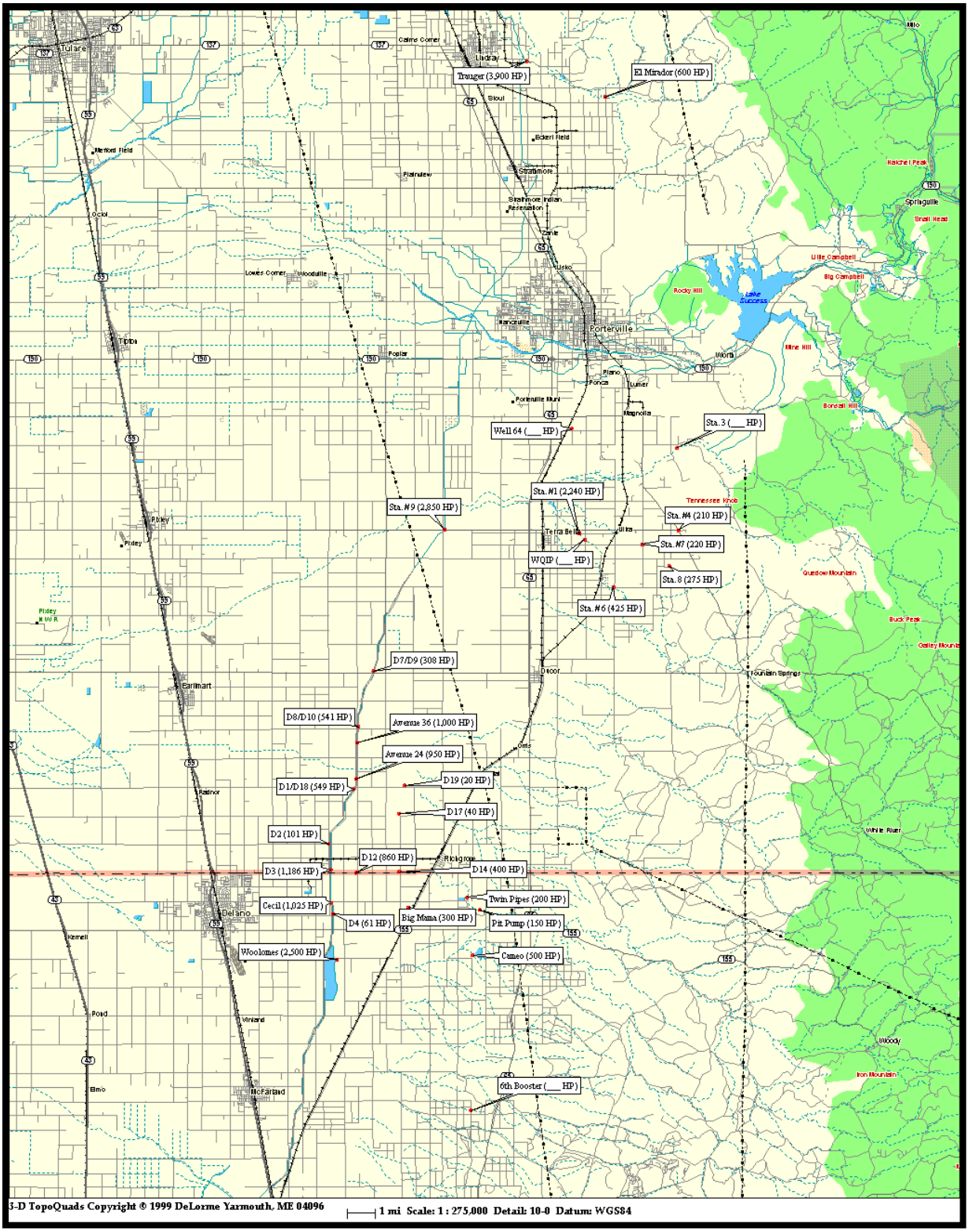
Utility Name	ESPA	
Service Territory Size	162.6 square miles	
Owned Assets	☐ Transmission ☐ Distribution ☐ Generation	
Number of Customers Served	30 customer accounts	
Population Within Service Territory	NA people	
Customer Class Makeup	*Number of Accounts*	*Share of Total Load (MWh)*
	[__]% Residential; [__]% Government; 100% Agricultural; [__]% Small/Medium Business; [__]% Commercial/Industrial	[__]% Residential; [__]% Government; 100% Agricultural; [__]% Small/Medium Business; [__]% Commercial/Industrial
Service Territory Location/Topography[2]	100% Agriculture [__]% Barren/Other [__]% Conifer Forest [__]% Conifer Woodland [__]% Desert [__]% Hardwood Forest [__]% Hardwood Woodland [__]% Herbaceous [__]% Shrub [__]% Urban [__]% Water	
Service Territory Wildland Urban Interface[3] **(based on total area)**	[__]% Wildland Urban Interface; [__]% Wildland Urban Intermix;	
Percent of Service Territory in CPUC High Fire Threat Districts (based on total area) **[Note: Some POUs may utilize the CalFIRE FRAP Map]**	☑ Includes maps Tier 2: 0% Tier 3: 0%	
Prevailing Wind Directions	☐ Includes maps	

[2] 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.

[3] 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.

& Speeds by Season	[Description]
Miles of Owned Lines Underground and/or Overhead	Overhead Dist.: 0 miles Overhead Trans.: 0 miles Underground Dist.: 0 miles Underground Trans.: 0 miles
	Explanatory Note 1 - *Methodology for Measuring "Miles":* [e.g., circuit miles, line miles.]
	Explanatory Note 2 – *Description of Unique Ownership Circumstances:* [____]
	Explanatory Note 3 – *Additional Relevant Context:* [e.g., percentage of lines located outside service territory]
Percent of Owned Lines in CPUC High Fire Threat Districts **[Note: Some POUs may utilize the CalFIRE FRAP Map]**	*Overhead Distribution Lines as % of Total Distribution System (Inside and Outside Service Territory)*
	Tier 2: 0% 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?	☐ Yes ☑ No
Customers have ever been notified of a potential loss of service to due to a forecasted IOU PSPS event?	☐ Yes ☑ No
Has developed protocols to pre-emptively shut off electricity in response to elevated wildfire risks?	☐ Yes ☑ No
Has previously pre-emptively shut off electricity in response to elevated wildfire risk?	☐ Yes ☑ No If yes, then provide the following data for calendar year 2020: *Number of shut-off events*: [____] *Customer Accounts that lost service for >10 minutes:* [____] *For prior response, average duration before service restored:* [____]

LOCATION AND SIZE OF DIRECT ACCESS LOADS



V. WILDFIRE PREVENTATIVE STRATEGIES

A. HIGH FIRE THREAT DISTRICT

ESPA reviewed the proposed boundaries of the High Fire Threat District and confirmed that, based on local conditions and historical fire data, all of ESPA's service territory was properly excluded (see CPUC Fire Map, below). Situational Awareness Technology is outside the budget constraints for ESPA, which serves agricultural load. ESPA's territory abuts SCE, which is monitored by over 160 fire alert cameras and over 1,400 weather stations (https://www.sce.com/wildfire/fire-weather).

B. DESIGN AND CONSTRUCTION STANDARDS

ESPA intends for any its future electric facilities to be designed and constructed to meet or exceed the relevant federal, state, or industry standard at that future time. Presently, ESPA treats CPUC General Orders (GO) 95 and 128 as a key industry standard for design and construction standards for overhead and underground electrical facilities. Additionally, ESPA monitors and follows, as appropriate, the National Electric Safety Code.

C. VEGETATION MANAGEMENT

ESPA recognizes that vegetation management standards may evolve and develop over time. Similar to design and construction standards, ESPA will refer to industry standard vegetation management practices at any future time that ESPA constructs and owns facilities described in California Public Utilities Code Section 8387(a). ESPA does track present vegetation management standards for reference at a later point, which includes radial clearances for certain facilities described in the tables below.

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

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

D. INSPECTIONS

ESPA intends to meet or exceed the minimum inspection requirements provided in CPUC GO 165 and CPUC GO 95, Rule 18 if at any future point it owns applicable facilities. Pursuant to these rules, utilities inspect electric facilities in the High Fire Threat District more frequently than the other areas of its service territory. As described above, ESPA currently does not have any overhead powerlines located within or near the High-Fire Threat District within the CPUC's Fire Threat Map. However, ESPA will use the specific environmental and geographical conditions of ESPA's service territory to determine if any particular areas require more frequent inspections.

E. RECLOSING POLICY

A reclosing policy is presently inapplicable to ESPA, but if at a later point ESPA does own such facilities it will within a reasonable timeframe develop protocols for the use of reclosers and other SCADA controlled reclosers.

F. DEENERGIZATION

ESPA does not have the ability to preemptively shut off power due to fire-threat conditions, as SCE exercises this authority for SCE's facilities utilized to serve ESPA members. ESPA will re-evaluate this determination in future updates to this Wildfire Mitigation Plan corresponding with any future ownership of new facilities. As Eastside does not own or operate any distribution assets, there aren't applicable customer notification procedures.

IV. RESTORATION OF SERVICE

ESPA does not have the ability to restore service to SCE's infrastructure. SCE exercises this authority for such facilities.

VII. EVALUATING OF THE PLAN

A. METRICS AND ASSUMPTIONS FOR MEASURING PLAN PERFORMANCE

ESPA will track two main metrics to measure the performance of this Wildfire Mitigation Plan: (1) number of fire ignitions; and (2) wires down within the service territory. In subsequent plans, ESPA may identify additional metrics to utilize.

METRIC 1: FIRE IGNITIONS

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

- ESPA 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
- ESPA has knowledge that the fire occurred.

In future Wildfire Mitigation Plans, ESPA will provide the number of fires that occurred that were less than 10 acres in size when meeting the criteria above. Any fires greater than 10 acres will be individually described.

METRIC 2: WIRES DOWN

The second metric is the number of distribution and transmission wires downed within ESPA's service territory associated with an ESPA facility. For purposes of this metric, a wires down event includes any instance where an electric transmission or primary distribution conductor falls to the ground or on to a foreign object. ESPA does not own or operate any of such wires presently.

Area transmission and distribution assets are owned by SCE. According to SCE's WMP, SCE tracks transmission assets in RT with weather monitoring, weather stations, HD cameras, and continuous monitoring sensors.

During a wires down event in SCE territory, ESPA's members can receive real-time updates by checking SCE's outage map: https://www.sce.com/outage-center/check-outage-status. Quarterly, SCE updates on its WMP Improvement Activities, such as grid hardening and monitoring, and reports any public safety power shutoff events that may have occurred https://www.sce.com/safety/wild-fire-mitigation.

B. IMPACT OF METRICS ON PLAN

In the initial years, ESPA anticipates that there will be relatively limited data gathered through these metrics. However, as the data collection history becomes more robust, ESPA will be able

to identify areas of its operations and service territory that are disproportionately impacted. ESPA will then evaluate potential improvements to the plan.

C. MONITORING AND AUDITING THE PLAN

This Wildfire Mitigation Plan will be presented to ESPA's Board of Directors and updates to this plan will be presented to ESPA's Board of Directors on an annual basis. Additionally, a qualified independent evaluator will present a report on this plan to ESPA's Board of Directors every three years.

D. IDENTIFYING AND CORRECTING DEFICIENCIES IN THE PLAN

Based on the recommendations of its Board of Directors, ESPA will correct any identified deficiencies in the plan.

E. MONITORING THE EFFECTIVENESS OF INSPECTIONS

There are presently no ESPA-owned facilities described in California Public Utilities Code Section 8387(a) to inspect and audit. ESPA will establish effectiveness monitoring in updates to this Wildfire Mitigation Plan corresponding with any future ownership of facilities.

VIII. INDEPENDENT AUDITOR

Public Utilities Code section 8387(c) requires a local publicly owned electric utility to contract with a qualified independent evaluator with experience in assessing the safe operation of its electrical infrastructure to review and assess the comprehensiveness of this Wildfire Mitigation Plan. The scoping of an independent evaluator's review for ESPA will coincide with the Board of Directors' review and approval of this Wildfire Mitigation Plan. An evaluator's review will be conducted ahead of the subsequent annual plan, or within a reasonable timeframe once there is applicable ESPA infrastructure for the independent evaluator to assess as part of a mitigation plan.