



OFFICE OF ENERGY INFRASTRUCTURE SAFETY
WILDFIRE SAFETY ADVISORY BOARD

**WILDFIRE SAFETY ADVISORY BOARD-
PUBLICLY OWNED ELECTRIC UTILITIES
AND RURAL ELECTRIC COOPERATIVES
WILDFIRE MITIGATION PLAN WORKING
GROUP SUMMARY REPORT**

JUNE 2024

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INTRODUCTION

1. Background

To minimize future devastating occurrences through risk-driven wildfire prevention, Public Utilities Code (P.U.C.) § 8387(b)(2) requires publicly owned electric utilities and rural electrical cooperatives (collectively “POUs”) to each annually prepare and present a wildfire mitigation plan (WMP) to their governing boards. The POUs submit their WMPs by July 1 of each year to the Wildfire Safety Advisory Board (WSAB) which reviews them and issues recommendations.

The WSAB issued its Advisory Opinion for the POU 2024 WMPs on December 4, 2023.¹

The WSAB recommended that POUs and their representative bodies including the California Municipal Utilities Association (CMUA), the Northern California Power Agency (NCPA), the Southern California Public Power Authority (SCPPA) and the Golden State Power Cooperative (GSPC) (collectively “Joint Associations”) participate in meetings or workshops as requested by the WSAB, to engage with the WSAB and to exchange information and ideas through discussions on topics including:

- POU progress and achievements;
- Performance metrics;
- QA/QC program;
- Independent Evaluator (IE) reports;
- Executive summaries;
- Late WMP submissions;
- Revision log;
- Digital accessibility; and
- Other items that come up during discussions.

The WSAB organized six meetings with the POUs and the Joint Associations from January 19, 2024 to April 5, 2024 to discuss the topics. This report represents the WSAB Staff’s summary of the working group’s discussions and outcomes and includes Staff’s preliminary recommendations to the WSAB on each of the topics from the meetings. The report also includes detailed summaries from each meeting in Appendix 1.

¹ California Wildfire Safety Advisory Board, “Advisory Opinion for the 2024 Wildfire Mitigation Plans of Electric Publicly Owned Utilities and Rural Electric Cooperatives” December 4, 2023, <https://energysafety.ca.gov/wp-content/uploads/2023/12//wsab-2024-wmp-pou-advisory-opinion.pdf>.

2. Working Group Attendees

There were no formal requirements to participate in this working group and attendance was open to all of the POUs, the Joint Associations, and the WSAB. The regular attendees were as follows:

- WSAB²
- CMUA
- GSPC
- NCPA
- SCPPA
- Sacramento Municipal Utilities District (SMUD)
- Los Angeles Department of Water and Power (LADWP)

² From the WSAB, the participants were Vice Chair Porter, Member Tim Haines, and the advisors Jonathan Frost and Sang Soble.

DISCUSSION TOPICS

1. Summary of Projects and Programs

Preliminary Recommendation

- The POU should include in their WMPs a standalone summary of key wildfire mitigation initiatives, which may include completion targets and cost estimates, for the reporting period by program categories (e.g., grid design and system hardening, community outreach and engagement), and accomplishments from the prior reporting period.
- Appendix 2 is a template that could be used, but other formats may be preferable.
- The POU may include this information in a table as an option.

Explanation

The WMPs describe the preventative strategies and programs adopted by the POU to minimize the risk of its electrical lines and equipment causing a catastrophic wildfire. Central to understanding utility risk mitigation are the projects and programs that utilities have underway and have accomplished. The WSAB finds that a summary of in-process and completed projects provides insight into the status of POU wildfire risk reduction.

2. Late WMP Submissions

Preliminary Recommendation

- If a POU determines they are likely to submit their WMP after the July 1 deadline, the POU should submit a letter to the docket or the WSAB email (wsab@energysafety.ca.gov) by the July 1 deadline, explaining the cause of the delay and the estimated time when they will be able to submit their WMP.

Explanation

POUs are required by P.U.C. §8387(b)(1) to submit their WMPs to the WSAB by July 1st every calendar year. Historically, most of the POU have complied with the statute but a small number do not. In 2023, approximately one-third of the POU submitted late WMP filings, representing a significant increase in the number of late submissions. In order to mitigate this issue going forward and to improve the communication and when POU anticipate that they

might submit a late WMP filing, the WSAB finds that this notification approach is both appropriate and reasonable.

3. Tracking Changes to WMPs

Preliminary Recommendation

- The POUs should include a summary of changes to indicate the year-to-year updates made on their WMPs, which could take the form of a redline, narrative description, or revision log.

Explanation

Many of the sections in the POU WMPs do not change significantly on a year-to-year basis or between triennial WMP revisions. To help the reader understand the changes that have occurred and how the WMPs overall have evolved, some POUs have included a revision log. An excellent and concise example can be seen in the City of Lodi's 2023 WMP which is included in Appendix 3 for reference.

4. Digital Accessibility

Preliminary Recommendation

- The POUs should include internal hyperlinks in the table of contents of their WMPs.
- The POUs should conduct digital accessibility checks of their WMPs prior to submittal and follow the accessible content guidelines set out by the Department of Rehabilitation (DOR), available at: <https://www.dor.ca.gov/Home/Accessibility>.

Explanation

Digital accessibility ensures that people with disabilities can access WMPs without barriers. California Government Code § 11546.7 specifies that content including documents on the State of California's websites are accessible to all users regardless of their abilities or disabilities. In support of this objective, State entities, including the Office of Energy Infrastructure Safety (Energy Safety) and the WSAB are encouraging stakeholders to review the accessibility requirements that the State adheres to and adopt these requirements if feasible.

The DOR has several helpful and publicly available resources on its website to improve the digital accessibility of documents. The WSAB recommends that the POUs to seek out this

information, as it will help improve the number of digitally accessible WMPs that are available on the WSAB docket for all audiences. Furthermore, hot links in the table of contents allow readers to navigate more quickly through a WMP document.

5. Areas That Exceed Minimum Standards in General Orders

Preliminary Recommendation

- The CPUC’s General Orders (GOs) specify minimum design, construction, and maintenance standards for overhead electric supply facilities and instruct utilities to take into consideration known local conditions to enable safe, proper, and adequate electric service. The POUs should include information in their WMPs about the decision-making process for how they assess if the known local conditions require the utility to exceed any of the applicable minimum design, construction, or maintenance standards for a particular facility.
- POUs should describe their experience utilizing this decision-making process, including observations to date (e.g. cost impacts, maintenance impacts, safety impacts, etc.) and any lessons learned.
- The WSAB should engage with the GO 95/128 Rules Committee (“Rules Committee”), which is made up of investor owned utilities (IOUs), POUs, communications companies, and associated labor unions from across California and considers state-of-the-art technologies and methods and changes to the CPUC Gos, to gain insight into the system design, construction, and maintenance requirements related to WSAB recommendations on POUs WMPs.

Explanation

The GOs cover a range of topics including the design, construction, and maintenance of electric grids and specify technical standards and intervals for inspections. Electric grids that are designed, constructed and maintained per the requirements set in the CPUC GOs are generally considered safe and reliable. The WSAB has identified areas where it has determined that the current GOs are insufficient and has issued two policy papers that make numerous recommendations for changes to the GOs to improve safety, particularly in areas with high wildfire risk.³

³ WSAB policy papers. [Search Docket# 2024-WSAB-WMP-GPSCA](#)

By providing information in their WMPs about how they determine instances where it is appropriate to exceed the minimum standard set out in the CPUC GOs, the POU can provide insights into benefits and limits of industry practices that influence utility wildfire risk management.

6. Independent Evaluator Reports

Preliminary Recommendation

- Where appropriate, the POU should include in the project scopes for independent evaluator (IE) reports an evaluation of WMP strategy and projects, to provide recommendations for improvements for the WMP overall and for specific initiatives/projects.

Explanation

P.U.C. §8387(c) requires POU to seek out an IE to assess the comprehensiveness of their WMPs. Relying on an independent evaluator to assure that an organization's risk management, governance and internal control processes are operating effectively is a practice used in the utility sector.

7. Alternative Reporting for POU Without Overhead Electric Supply Facilities in the High Fire Threat District

Preliminary Recommendation

- A POU that does not own or control any overhead electric supply facilities in the High Fire Threat District (HFTD), and that has no updates to its WMP, may utilize the CMUA alternative reporting template included as Appendix 4. Under the alternative approach, the POU submits its most recent WMP together with a letter stating that the POU does not own or control any overhead electric supply facilities in the HFTD, does not anticipate any changes to wildfire risks in its service territory in coming years, and has no update (or has a few simple updates) to its last WMP.
- POU without overhead electric supply facilities in the HFTD should still regularly evaluate their wildfire risk and update the WMPs according.

Explanation

Some POU's have completely underground transmission and distribution assets, others have some overhead assets but also have service territories that are urban, agricultural, or are nowhere near the State's high wildfire threat areas. P.U.C. §8387(b)(1) requires POU's to submit WMP's every year, regardless of the relative wildfire risk faced by the POU. Furthermore, they are subject to the same requirements for seeking out independent evaluations as the other utilities.

The WSAB finds that the recommended approach for POU's without overhead electric supply facilities in the HFTD to submit a supplemental letter describing their status and any updates with their base WMP is acceptable and would be helpful for the WSAB and other stakeholders. By taking this approach, these POU's would still take public comment on their WMP's and submit them to their governing boards and later submit them to the WSAB docket along with the letter. Short of changing the statute to exempt these POU's from submitting WMP's and IE reports, allowing a POU without overhead electric supply facilities in the HFTD to submit a supplemental letter describing the unchanged status of its WMP seems to be an acceptable compromise. It would be unreasonable to expect them to otherwise continue submitting new WMP's every year.

8. Progress and Achievements

Preliminary Recommendation

- The POU's should highlight their recent progress and achievements in their WMP programs by including more detailed information in the WMP regarding project targets, and timelines and progress updates for each project in each subsequent WMP.
- This information could be combined with other informational items, such as the summary of projects and programs (see Recommendation item 1), and could be in a narrative, table, or other format.

Explanation

Programs are often described in the WMP's at a high level and it can be difficult to understand the progress made to date, the risk reduction that has been achieved, the POU's targets for the end of the reporting period, or the overall goal of individual programs.

By providing this information about the progress and milestones of the WMP projects, it can help the reader better understand how projects are progressing each year, enhance transparency and accountability and put them into perspective of the POU's evolving risk landscape.

9. Quality Assurance/Quality Control Programs

Preliminary Recommendation

- The POUs should provide descriptions of their quality assurance/quality control (QA/QC) programs and the lessons learned for inspection and maintenance programs in the WMP.

Explanation

P.U.C. §8387(b)(2)(N) requires the POUs to describe the processes and procedures to monitor and audit the implementation of the WMP and the effectiveness of inspections, including work performed by third-party contractors. The POUs must also describe how they identify deficiencies and correct them. Work such as utility vegetation management (UVM) and asset inspections are performed by a mix of utility employees and contractors, often with contractors performing most of the work. Utilities develop QA/QC programs to ensure that the quality of UVM and asset inspections are consistent and meet standards.

By enhancing their reporting on QA/QC programs, the POUs can help readers better understand the processes used to systematically sample and audit their work, and the steps that they take to identify and correct issues.

10. Performance Metrics

Preliminary Recommendation

- The WSAB recommends that POUs use the CMUA's 2024 revised metrics template as the starting point for developing their own metrics table. It is expected that POUs will tailor the metrics to their unique circumstances. Furthermore, the WSAB recommends that the POUs use the latest Context Setting Template, which includes additional metrics for the impacts of PSPS events that are caused by third parties. See Appendix 5 for the CMUA Template and Appendix 6 for the updated section of the Context Setting Template.

Explanation

P.U.C. §8387(b)(2)(D) and §8387(b)(2)(E) require the POUs to include information describing how they use metrics in their WMPs and how these metrics from earlier plans have informed their plans. The statute does not specify the exact metrics to use, so the CMUA in its original 2020 POU WMP template suggested that the POUs include ignitions and wires down events.

Some POUs have expanded on those two to track and report on a variety of metrics. However, many have opted only to focus on those two metrics and even include them in their reports under circumstances where they would not make sense, such as including wires down in the WMP when the utility is completely underground.

This revised template provides a thorough baseline level of information on external risk factors, and the actions that the utility has taken to identify and address exogenous and endogenous risk factors. It also allows the POUs to expand on the template to report on additional metrics that they track and provide context for certain events that have occurred. Additionally, the modification to the Context Setting Template will help clarify the magnitude of impacts that the POUs face when they lose power due to a third-party PSPS event.

11. Other Topics

Preliminary Recommendation

- The WSAB recommends that POUs and the Joint Associations work with the WSAB to refine the list of future topics and develop an action plan of activities that could include Board action.

Explanation

During the course of discussions leading to the above preliminary recommendations in 1 – 10 of this report, the WSAB and POU representatives have raised other topics for future discussions. The Board’s POU Committee is currently considering the forums to discuss these and other topics. They currently include:

- Communication company risks;
- Issues with US Federal Agencies such as the US Forest Service;
- Inclusion of wildfire maps and the sharing of mapping data;
- Reporting guidelines and template(s) for WMP updates for POUs other than POUs without overhead electric supply facilities in the HFTD;
- Engagement with the GO 95/128 Rules Committee; and
- Identification and sharing of wildfire management practices at the local, state, regional and federal levels through utility-led meetings.

CONCLUSION

The WSAB appreciates the engagement of its counterparts in this working group process to help refine the preliminary recommendations that it presents today and make them actionable through consultation with the broader POU community and development of templates and example letters for the POUs to use. The WSAB looks forward to continuing its engagement with the POU community to further understand their challenges and perspectives and to appropriately lend its expertise.

APPENDIX 1 – WORKING GROUP MEETING SUMMARIES

January 19, 2024

This first WSAB-POU WMP working group focused on (i) Executive summaries; (ii) Late WMP submissions; (iii) Revision log; (iv) Digital accessibility, and initial feedback on the WSAB policy papers.⁴

- (i) **Executive summaries:** The meeting attendees discussed the WSAB proposal to include information in the WMP Executive Summary that provides a high-level overview of the progress that utilities have made toward reducing wildfire risk during the reporting period. For example, the section could summarize all of the key targets and cost estimates for the reporting period by program categories (e.g., grid design and system hardening, community outreach and engagement) and accomplishments. During the discussion, it was noted that the WMPs are written with two audiences in mind: (a) the WSAB and state government more broadly, and (b) the municipal governing boards and local communities/ratepayers. The executive summaries are often designed with the latter group in mind. Parties agreed to explore the option of an attachment or separate document for the WSAB, a sort of “Summary for Policymakers” that would better support the WSAB’s ability to analyze the programs. The Joint Associations also noted that cost estimates are not necessarily included in the WMPs, and particularly in executive summaries.

WSAB Preliminary Recommendation:

- The POU should include a standalone executive summary or “summary for policymakers” that includes all of the key targets and cost estimates for the reporting period by program categories (e.g., grid design and system

⁴ Feedback on policy papers: The 1/19 agenda was expanded for participants to provide high level feedback of the WSAB policy paper drafts that were available for public comment. The POU explained how they adopt the GOs and see themselves as subject to the CPUC’s standard of care and to CPUC safety audits. They described ongoing involvement with reviewing and providing periodic suggestions to the CPUC on the GOs through the Utility Rules Committee. Furthermore, they cautioned that the recommendations may not consider the 2014 and 2020 decisions from the recent CPUC GO 95 proceedings and the decision from the 2017 utility pole proceeding focused on establishing a pole database.

Takeaways: the POU see GO 95 and GO 128 as engineering standards that generally should remain stable. Certain procedural aspects of the GOs 95 and 128 may be appropriate for change. Additionally, the PUC Section 326(a)(7) regulatory review process may need to be linked somehow with the Rules Committee, which is a group of utilities and communications companies, which convenes to discuss recommendations for the GOs.

hardening, community outreach and engagement), and accomplishments from the prior reporting period.

- The POU may include this information in a table as an option.

Post Meeting Update and Action Items:

- The POU Joint Associations discussed these options and the WSAB's suggested program summary table with their members. The POU Joint Associations reported that their members that provided feedback were open to reporting summary information in a table format. They noted that cost data can be hard to report as it is difficult to tie dollars to projects that serve dual purposes like undergrounding. Some POU do this, but often not like the IOUs.

- (ii) Late WMP Submissions:** Public Utilities Code Section 8387 (b)(1) requires POU to submit WMPs annually to the WSAB by July 1st. Though most POU comply with the filing date, there are exceptions. 2023 may have been an aberration in terms of the large number of late submissions. Some POU experienced staff change which may have driven some of the late submissions. The WSAB proposed that POU which anticipate delays could file an explanation to the docket for the late submission and share public drafts, if available, to the docket in the interim.

WSAB Preliminary Recommendation:

- The POU should submit a justification letter to the docket or the WSAB email (wsab@energysafety.ca.gov) by the July 1 deadline, explaining the cause of the delay and the estimated time when they would be able to submit their WMPs.

Post Meeting Update and Action Items:

- The POU Joint Associations discussed these potential steps for late filings with their members and they reported back to the working group that the request for a notice to the WSAB was a reasonable request.
- In April the Joint Associations plan to identify single points of contact for each POU and check if they anticipate any delays in submitting their WMPs.
- The WSAB will also put a guide on their website to help make the docketing process easier.

- (iii) Revision Log:** WSAB shared the example of the City of Lodi's revision log.

WSAB Preliminary Recommendation

- The POU should include a revision log to indicate the year-to-year updates made on their WMPs.

Post Meeting Update and Action Items:

- CMUA shared the sample with its working group and reported back that they received positive feedback from the members that responded on this and are working on a template.

(iv) Digital Accessibility: The WSAB expressed an interest in WMPs being accessible to people with disabilities. It shared digital accessibility resources from the CA Department of Rehabilitation (DOR).

WSAB Preliminary Recommendation

- The POU should include hot links in the table of contents of their WMPs.
- The POU should conduct digital accessibility checks of their WMPs prior to submittal and follow the accessible content guidelines set out by the Department of Rehabilitation.

Post Meeting Update and Action Items:

- The POU Joint Associations shared the resources from the DOR with their members and asked if a training from the DOR on digital accessibility would be possible.
- WSAB Staff will inquire about a training on digital accessibility for the POUs.

Takeaways:

- Meeting every other Friday works well generally for everyone in the group. It allows the POU Joint Associations time to meet with their members and the POU wildfire mitigation working group to discuss proposals from this WSAB-POU working group.
- The group will need to return to issues after the POU Joint Associations have had the opportunity to discuss them with their members.

February 2, 2024

This second WSAB-POU WMP working group focused on (i) Independent Evaluator (IE) Reports; (ii) Reporting of Progress and Achievements; (iii) Areas that Exceed the CPUC General Orders (GOs); and (iv) POUs Without Overhead Electric Supply Facilities in the High Fire Threat District. The working group also reviewed updates from the previous meeting's agenda.⁵

⁵ The POU Joint Associations provided brief updates on the topics of (i) Executive summaries; (ii) Late WMP submissions; (iii) Revision log; and (iv) Digital accessibility. See the January 19 summary document for more information.

(i) **IE Reports:** The meeting attendees discussed how the POU could most effectively fulfill the requirements under Public Utilities Code Section 8387(c) for the POU to contract with independent evaluators to review their WMPs. The WSAB Staff highlighted the example of the IE reports that were prepared for Truckee-Donner and Burbank and inquired if other POU IE reports could have a similar evaluation of specific initiatives/projects with recommendations for improvement. The attendees acknowledged that there are varying levels of quality and cost among the IE services available. Some attendees questioned the value of the often expensive IE contracts for WMPs, particularly for POU that do not have significant changes in their WMPs year to year, for POU with minimal wildfire risk, or in instances where the POU have had a significant comprehensive IE in the past. The attendees also noted that costly IE reviews will reduce the funds that could otherwise be available for direct mitigation programs.

WSAB Preliminary Recommendation

- The POU should include in the IE report project scope an evaluation of WMP strategy and projects to provide recommendations for improvements for the overall plan and specific initiatives/projects.

Post Meeting Update and Action Items:

- There were no specific action items or updates on this item during the following 2/15 meeting.

(ii) **Reporting on Progress and Achievements:** The group discussed the WSAB's recommendation to include details on the progress and achievements for specific programs, including timelines, targets and progress updates. The POU Joint Associations and SMUD explained why this is not necessarily a straightforward task as numeric targets are not always used, some work is ongoing (like vegetation management and inspections), and some programs fit dual purposes. The group agreed that further discussion will likely be needed on this topic.

WSAB Preliminary Recommendation

- The POU should highlight their progress and achievements to date in their WMP programs by including more detailed information in the WMP regarding project targets, and timelines and progress updates for each project in the following WMPs.

Post Meeting Update and Action Items:

- The POU Joint Associations reported during the 2/15 meeting that they are looking for an example and noted that this information is mostly in narrative form right now.

(iii) Areas where the POU exceed the CPUC GOs: The WSAB mentioned its statutory mandate per Public Utilities Code Section 326(a)(7) to consider new and amended utility regulations in light of the dynamic risks of climate change and wildfires. The WSAB expressed how it is interested in learning from various examples from the POU exceeding the GOs and their lessons learned from implementing these designs or protocols that might be appropriate for wider spread adoption. CMUA suggested that it might make sense to include more information about the decision-making process for when POU decide to implement designs or protocols that exceed the minimum GO standards and provide more examples. The attendees noted that simply because a POU utilizes a design standard that exceeds the minimum strength or distance specified in the applicable GO standard for a specific project does not mean that the GO standard is inadequate generally, or that application of a different standard would even be appropriate outside of the specific instance.

WSAB Preliminary Recommendation

- The POU should include information in their WMPs about how their system design, construction and maintenance exceed the requirements set by the CPUC GOs.
- They should describe their decision-making process that drove these changes, experience implementing these changes and observations to date (e.g. cost impacts, maintenance impacts, safety impacts, etc.) and any lessons learned.

Post Meeting Update and Action Items:

- The POU Joint Associations reported to the working group in the 2/15 meeting that they did not find any examples where the POU consistently exceeded the GOs. They acknowledged that the WMPs could probably provide better explanations for the decision-making process to determine what local conditions require and whether it exceeds the minimum standard in the GOs. They recommended that the WSAB get in touch with the Utility Rules Committee and offered to look into contacts.

(iv) Alternative Reporting for POU Without Overhead Facilities in the HFTD: The working group discussed the WSAB’s reporting requirements for POU that do not own or control any overhead electric distribution or transmission supply facilities in areas of the state with elevated wildfire risk. Many POU have fully undergrounded

systems or have overhead lines in regions that have minimal wildfire risk, such as sparse desert or agricultural land. These POUs are unlikely to make substantive changes year to year in their WMP and generally do not have dedicated programs to report on that are targeted at reducing the risk of a catastrophic wildfires. The working group discussed a proposal for having these POUs submit their existing WMPs with a letter explaining their system characteristics and that they do not have any updates to their WMP from the prior year.

WSAB Preliminary Recommendation

- A POU that does not own or control any overhead supply facilities in the HFTD and that has no updates to its WMP should be able to submit the same WMP with a letter describing its system characteristics, that it does not anticipate any changes to wildfire risks in its service territory in coming years, and it has no update (or has few simple updates) to its last WMP.
- These POUs should regularly evaluate their relative wildfire risk and update the WMPs according.

Post Meeting Update and Action Items:

- The POU Joint Associations developed a letter template and shared it with their members, who are still considering the letter.

Takeaways:

- Local conditions may justify exceeding minimum GO requirements. For instance, the presence of fast-growing plant species may justify exceeding minimum vegetation clearance distances. Basing broad recommendations for regulatory changes on the local conditions specific to one or a few utilities could be problematic and potentially lead to an unreasonable burden to the utilities and their ratepayers.

February 15, 2024

This third WSAB-POU WMP working group focused on the reporting of quality assurance and quality control (QA/QC) protocols in the WMPs. The working group also reviewed updates from the previous meeting's agenda.⁶

⁶ The POU Joint Associations provided brief updates on the topics of (i) Independent Evaluator Reports; (ii) Reporting of Progress and Achievements; (iii) Areas where the POUs exceed the CPUC General Orders; and (iv) POUs Without Overhead Electric Supply Facilities in the High Fire Threat District. See the February 2 summary document for more information.

The working group discussed the WSAB preliminary recommendation that the POU provide descriptions of their QA/QC programs, the findings, and lessons learned for inspection and maintenance programs in the WMP. Representatives of LADWP, SMUD and the POU Joint Associations described the variation in how contractors are used among the POU, the hiring and payment of them, safety training/briefing provided to contractors, and how POU employees oversee and evaluate/review contractor work. Some POU may have policy documents describing QA/QC protocols. The WSAB staff requested that the POU provide such documents as attachments to the extent they do not contain sensitive or confidential information to the WMPs for reference. Board Member Tim Haines raised the example of SMUD’s description of its QA/QC programs in Section 9.2 of its 2023 WMP highlighting the continual review and learning process involved. He encouraged the working group to consider how lessons learned from the QA/QC programs could be reported out in the WMPs.

Action Items:

- The POU Joint Associations suggested that providing a narrative description of the QA/QC protocols in the WMP would be helpful and would check with their members about this.

Takeaways:

- The use of contractor work varies among the POU as well as the QA/QC protocols to ensure that the work is completed safely and satisfactorily.

March 8, 2024

This fourth WSAB-POU WMP working group focused on WMP performance metrics. There were no specific WSAB preliminary recommendations going into this meeting. The working group also reviewed updates from topics from previous meetings.⁷

The working group discussed WMP performance metrics at a high level: what could be achieved by enhancing the metrics, and how they can be part of a broader risk-informed decision-making framework. The POU Joint Associations explained that the two metrics in the 2020 CMUA WMP template (ignitions and wires down events) were never intended as a minimum standard. They recognized that there needed to be an appropriate balance of metrics, a separate template for POU without overhead supply facilities in the HFTD, and that they needed to separate out statistics that are not specific to wildfire mitigation, such as

⁷ The POU Joint Associations provided a brief update on the topics of reporting on QA/QC program and areas where the utility exceeds the GOs. The POU internal working group discussed the example of SMUD’s QA/QC reporting and LADWP’s description of exceeding the GOs in certain areas, but nothing was agreed upon. See the meeting summary documents from February 15 and February 2 for more information.

winter storm-related outages or statistics outside of the HFTD. They also acknowledged how it can be challenging to report on upgrades done on the system that have multiple purposes, which may also enhance wildfire risk reduction. SMUD emphasized the importance of providing context to the metrics. They also raised concern over potentially duplicative reporting of PSPS information between the context setting table and the metrics. Energy Safety staff provided additional perspective with how the metrics should be able to help isolate performance (risk reduction) and how they can be used as to further risk-informed decision-making by the POU's.

Action Items:

- WSAB staff circulated the WSAB and Energy Safety Metrics Templates.
- CMUA circulated the draft CMUA POU WMP metrics template.

Takeaways:

- There are clear challenges to translating underlying objectives of identifying external and internal risk factors and the utilities' actions to reduce these risks them into a robust set of metrics that would be suitable for a majority of the POU's. However, the process of preparing and understanding this information can help describe the evolving risk landscape and support the POU's' risk-informed decision-making frameworks.

March 15, 2024

The fifth WSAB-POU WMP working group focused on reviewing and providing feedback on the CMUA draft POU WMP metrics template. The WSAB provided two templates as well for reference in advance of the meeting but did not explicitly recommend either for adoption.⁸

The working group discussed the components of the CMUA WMP metrics template. CMUA explained that the template they developed considered the examples in the WSAB and Energy Safety templates and allows for flexibility to the POU to add any additional data and/or context beyond the items that are in the template. They mentioned that there was some uneasiness among the POU's for setting a baseline set of metrics. They also emphasized that the POU's may adopt the metrics differently depending on how they track and report their data. The WSAB Staff highlighted that the Table 3 Outcome Metrics, while helpful in separating out different types of events, does not identify events that occur during fire season (which differs depending on the area). Furthermore, Staff noted that it could be helpful to also separate out equipment failures from the category of "other". The Joint Associations

⁸ The WSAB shared the template from Energy Safety that is used for collecting metrics from the investor-owned electrical corporations and the WSAB's template which was developed based on inputs from both the POU's' and electrical corporations' metrics.

mentioned in response that additional thinking would be needed. The group revisited the matter of PSPS reporting and WSAB Staff asked if it would be possible to include additional information in the context setting template about the impact of third-party PSPS events specifically. The Working Group did not reach an agreement on that during the meeting.

Action Items:

- CMUA will circulate an updated version of the metrics template and any POU without overhead supply facilities in the HFTD version with the Working Group.
- The WSAB needs to evaluate final versions of both in order to arrive at a preliminary recommendation on the metrics.
- The Working Group will revisit the issue of POUs without overhead supply facilities in the HFTD during the next meeting.

Takeaways:

- There is expected to be variation in how the POUs will take the new CMUA metrics template and expand upon it and/or add additional context to their reported data.

April 5, 2024

The sixth WSAB-POU WMP working group focused on reviewing and providing feedback on (i) the CMUA draft template for a letter for POUs without overhead supply facilities in the HFTD, (ii) revisited the topic of performance metrics, and (iii) began discussing issues appropriate for a separate discussion track (Track 2) distinct from the WMP-specific topics that had been initially scoped out for the working group.⁹

- (i) POUs without overhead supply facilities in the HFTD: the working group discussed CMUA's template for a supplemental letter that POUs without overhead supply facilities in the HFTD would be able to submit with their base WMP to comply with Public Utilities Code Section 8387 which requires the POUs to submit WMPs by July 1st each year. The POUs without overhead supply facilities in the HFTD taking this approach would still take public comment on their WMPs and submit them to their governing boards and later submit them to the WSAB docket along with the letter. CMUA suggested that an Attachment C to the letter with the Base WMP might make sense.

⁹ These issues deemed appropriate were either broader than the WMPs or were WMP-related issues that were not initially scoped out among the original working group topics. These matters include coordination with U.S. federal agencies such as the U.S. Forest Service, coordination with communications providers, reporting requirements/template(s) for WMP updates for POUs with wildfire risk, reporting of POU maps and the sharing of map data, and wildfire mitigation practices that may be suitable for wider use.

- (ii) Performance Metrics: CMUA noted that some of the POUs were concerned about overhauling their existing reporting structure to fit to the template. CMUA told them that the POUs did not need to do this if it was not feasible. The working group agreed. SMUD also mentioned that they and likely many of the other POUs have already drafted their WMPs and it would be unlikely that they would adopt the new performance metrics template until 2025 or in 2026 with the next comprehensive review and update.
- (iii) Track 2 Issues: the working group briefly discussed some of the feedback from the POUs on some of the known coordination issues with communications companies. The group agreed that it would be beneficial to have the subject matter experts from the POUs available to have a more robust discussion on this topic and for issues working with US federal agencies. The group also brought up the idea of having separate, truncated reporting guidelines/template(s) for WMP updates (i.e. non-base year plans) for POUs not using the alternative reporting template. Additionally, the group began discussing the inclusion of POU maps in the WMPs and the sharing of mapping data with the WSAB. All these topics will require further consideration. The WSAB only offered the specific preliminary recommendation for the POUs to include maps of their service territory to illustrate their wildfire risk. While not mentioned during the meeting, the City of Anaheim on page 21 of its WMP provides a useful example for consideration.¹⁰ The WSAB also encouraged the POUs to provide GIS files with their service territory boundaries and any data that they think can assist the WSAB with its review of the POUs' risk. For the other topics, the WSAB did not have a preliminary recommendation but expressed interest in better understanding the issues, what roles the WSAB could have in relation to them and what opportunities there might be to broaden the discussion and engage other stakeholders.

Action Items:

- The WSAB will check with their legal if they think that the letter template could allow POUs Without Overhead Electric Supply Facilities in the High Fire Threat District to comply with P.U.C. §8387.
- The POU side needs to re-evaluate the metrics template to see if they can focus on events that occur during wildfire season (as declared by CAL FIRE).

¹⁰ City of Anaheim Public Utilities Department, "2023 Wildfire Mitigation Plan," June 13, 2023, <https://anaheim.net/DocumentCenter/View/49082/2023-Wildfire-Mitigation-Plan>.

Takeaways:

Many of the POUs have already finalized their draft WMPs for this year and would not be able to incorporate the proposed changes such as the metrics template or the POUs Without Overhead Electric Supply Facilities in the High Fire Threat District letter template into the WMPs until 2025.

APPENDIX 2 – SAMPLE SUMMARY TABLE

Sample Summary Table	
<p>Grid Design, Operations and Maintenance</p>	<p><u>Current Reporting Period Goals:</u></p> <ul style="list-style-type: none"> • <u>5 miles of undergrounding - \$XX million</u> • <u>30 wood-to-steel pole replacement - \$X million</u> • <u>80 miles of covered conductor - \$X million</u> <p><u>Prior Reporting Period Accomplishments:</u></p> <ul style="list-style-type: none"> • <u>35 miles of undergrounding - \$XX million</u> • <u>100 miles of covered conductor - \$X million</u> <p><u>Totals projected by end of reporting period:</u></p> <ul style="list-style-type: none"> • <u>100 underground circuit miles (700 pre-WMP efforts (\$XXX million, if known), 250 undergrounded since 2019 - \$XXX million, 50 forecasted 2026-2028 - \$XX million)</u> • <u>200 miles of covered conductor (1920 installed 2019-2022 - \$XX million, 100 miles forecasted 2026-2028 - \$XX million)</u>
<p>Vegetation Management and Inspections</p>	<p><u>Current Reporting Period Goals:</u></p> <ul style="list-style-type: none"> • <u>200 circuit miles of patrol inspections - \$X million</u> • <u>20 intrusive pole inspections - \$X thousand</u> • <u>200 miles of vegetation management - \$X million</u> <p><u>Prior Reporting Period Accomplishments:</u></p> <ul style="list-style-type: none"> • <u>35 miles of undergrounding - \$XX million</u> • <u>100 miles of covered conductor - \$X million</u>
<p>Situational Awareness and Forecasting</p>	<p><u>Current Reporting Period Goals:</u></p> <ul style="list-style-type: none"> • <u>10 weather stations - \$XXXXX</u> • <u>10 cameras - \$XXXXX</u> • <u>5 new inspection drones - \$XXXXX</u> <p><u>Prior Reporting Period Accomplishments:</u></p> <ul style="list-style-type: none"> • <u>5 weather stations added - \$XXXXX</u> • <u>3 cameras installed - \$XXXXX</u> <p><u>Totals projected by end of reporting period:</u></p>

	<ul style="list-style-type: none"> • <u>30 weather stations (5 pre-WMP efforts (\$XXXXX, if known), 17 added since 2019 - \$XXXXX, 8 forecasted 2026-2028 - \$XXXXX)</u> • <u>20 cameras (10 2019-2022 - \$XXXXX, 10 forecast 2026-2028 - \$XXXXX)</u>
Emergency Preparedness	<p><u>Current Reporting Period Goals:</u></p> <ul style="list-style-type: none"> • <u>1 table top exercise</u> <p><u>Prior Reporting Period Accomplishments:</u></p> <ul style="list-style-type: none"> • <u>1 table top exercise</u>
Community Outreach and Engagement	<p><u>Current Reporting Period Goals:</u></p> <ul style="list-style-type: none"> • <u>3 customer emergency alert tests</u> • <u>4 community wildfire safety meetings</u> <p><u>Prior Reporting Period Accomplishments:</u></p> <ul style="list-style-type: none"> • <u>3 customer emergency alert tests</u> • <u>4 community wildfire safety meetings</u>

APPENDIX 3 – REVISION LOG (CITY OF LODI)

REVISION LOG, KEY CHANGES

Date	Location	Description
12/7/2020	Sec. III	C: Updated with current staffing levels E: Updated infrastructure status
	Sec. IV.B	Eliminated redundant map
	Sec. V	C: Updated with latest vegetation crew information and adding tree-inventory. D: Added details of in-progress tree inventory
	Sec. VI	Replaced projected progress with dates of council presentations and other events which have since occurred
	Sec. V.G	Expanded list with additional de-energization consequences
	Sec. IX	Replaced planned Audit with actual Audit dates and findings and other updates subsequent to prior year's plan
	Sec. VIII	Updated metrics
11/30/2021	Sec I.D	Created new sub. sec. "Risk Profile" & consolidated related info
	Sec. VIII	Updated all metrics, Clarified reporting dates for metrics
	Sec. V.F	Updated Reclosing section to include trial device
11/2/2022	Sec. VIII A	Updated metrics for last one year.
7/17/2023	Sec. VIII A	Updated metrics.

APPENDIX 4 – CMUA TEMPLATE SUPPLEMENTAL LETTER FOR POUS WITHOUT OVERHEAD ELECTRIC FACILITIES IN THE HFTD

[POU Letterhead]

XXXXXX XX, 2025

Re: Notice of Public Meeting on [POU] Wildfire Mitigation Plan

Dear Wildfire Safety Advisory Board:

This letter notifies the Wildfire Safety Advisory Board (“WSAB”) that on _____, 2025, [POU] (“[POU]”) presented its existing Wildfire Mitigation Plan (“WMP”) to its [Governing Board/City Council] at a publicly noticed meeting, in accordance with Public Utilities Code section 8387(b). [POU]’s WMP was most recently adopted on _____, 2024. At the _____, 2025 meeting, [POU] provided an opportunity for public comment on its existing WMP and [POU]’s [Governing Board/City Council] verified that [POU]’s existing WMP complies with all applicable rules, regulations, and standards, as appropriate.

[POU] does not have any overhead electric supply facilities located in or near an area of the state that is designed as “extreme” or “elevated” in the California Public Utilities Commission’s High Fire Threat District Map. In consideration of this historical wildfire risk, [POU] has determined that its existing WMP adequately addresses the risk of a utility-caused, catastrophic wildfire occurring in [POU]’s service territory and that no substantive changes are merited for this reporting year. [POU] will continue to evaluate its existing WMP in relation to the wildfire risk posed by [POU]’s system on an annual basis.

In order to provide the WSAB with information on [POU]’s system and WMP performance, please find as Attachment A, an updated Informational Table, and Attachment B, an updated Metrics Table.

[POU] thanks the WSAB for their review and support in helping to mitigate wildfire risks in California.

Sincerely,

[Signature]



Attachment A

[POU] 2025 Informational Table



[Insert Informational Table]

Attachment B

[POU] 2025 Metrics Table

WMP Metrics

Performance Metrics

Metric type	Progress metric name	(Actual) 2021	(Actual) 2022	(Forecast) 2023	(Forecast) 2024	(Forecast) 2025	Unit(s)	Comments
1. Above-Ground, Utility-Owned Distribution System Components	Routine Inspections						#inspections	
2. Distribution Inspections	Patrol Inspections						# circuit miles	
<i>[Delete for fully undergrounded POU]</i>	Detailed Inspections						# circuit miles	
	Routine Vegetation Management						# circuit miles	
3. Transmission Inspections	Patrol Inspections						# circuit miles	
<i>[Delete for fully undergrounded POU]</i>	Detailed Inspections						# circuit miles	
	Routine Vegetation Management						# circuit miles	

Outcome Metrics

Event Category	Cause category	(Actual) 2019	(Actual) 2020	(Actual) 2021	(Actual) 2022	(To Date) 2023	Unit(s)	Comments
Outage Event	Distribution						# outages	
	Transmission						# outages	
Ignitions*	Distribution						# ignitions	
	Transmission						# ignitions	
[Level 1] Safety Hazards**	Distribution						# hazards discovered	
	Transmission						# hazards discovered	

Notes:

* An "ignition" is deemed to occur if each of the following conditions is met: (1) a utility owned or controlled facility was associated with the fire; (2) the fire was self-propagating and of a material other than electrical and/or communication facilities; (3) the resulting fire traveled greater than one linear meter from the ignition point; and (4) the utility has knowledge that the fire occurred.

** A [Level 1] Safety Hazard is defined as _____.

APPENDIX 5 – CMUA PERFORMANCE METRICS TEMPLATE



This document was developed by the CMUA Wildfire Preparedness Recovery and Response Working Group and is intended for general information only and is not offered or intended as legal advice. This document does not reflect minimum or mandatory elements for a wildfire mitigation plan, nor does this document reflect industry standards or best practices. Readers should seek the advice of an attorney when confronted with legal issues and attorneys should perform an independent evaluation of the issues raised in this document.

Wildfire Working Group

Potential Metrics for Consideration in POU WMPs

April 16, 2024

****NOTE: this is a discussion draft and is subject to change****

Introduction

This document is intended to provide a useful example for publicly owned electric utilities (POUs) and Electric Cooperatives (Co-ops) to consider when updating the metrics tracked in their WMPs. Each POU and Co-op is encouraged to adapt these tables as appropriate for their unique circumstances. Tables 1-4 are intended to be considered together, with each table covering a different category of metric. Tables 2 and 3 have alternate versions that remove the the High Fire Threat District (HFTD) columns. Table 5 is intended for use by a POU or Co-op with no overhead facilities in or near the HFTD.

Description of Tables

Table 1: External Risk Metrics - This table includes metrics that track the relative risks that impact the utility that are outside the control of the utility, such as red flag days, high wind events.

Table 2: Performance Metrics - Leading metrics that describe actions that are intended to reduce the risk of utility caused wildfires, such as inspections and routine vegetation management.

Table 3: Outcome Metrics - Lagging metrics that measure outcomes that may be associated with an increased risk of utility-caused wildfires, such as ignitions and outages.

Table 4: Planned Upgrade Metrics - This is an optional table for POUs or Co-ops that are implementing a new wildfire mitigation measure. This table will provide information on the planned rollout of the new measure.

Table 1: External Risk Metrics

Metric type	External Risk Event	2021	2022	2023	Unit(s)	Comments
1. Red Flag Warnings	Red Flags Warning Days* for Weather Zone that includes Utility Service Territory				#Days	
2. Wind Conditions	High Wind Warning Days* in Weather Zone that includes Utility Service Territory				#Days	
3. [Other Relevant Weather Metric]	[Other relevant weather pattern metrics tracked]				[unit]	
<p>Notes:</p> <p>* Red Flag Warnings and High Wind Warnings are declared by the National Weather Service.</p>						

Table 2: Performance Metrics

Metric type	Progress metric name	2021 In HFTD	2022 In HFTD	2023 In HFTD	Unit(s)	Comments
1. Distribution Inspections	Patrol Inspections Performed				# circuit miles	
	Detailed Inspections Performed				# circuit miles	
	Routine Vegetation Management Performed				# circuit miles	
2. Transmission Inspections	Patrol Inspections Performed				# circuit miles	
	Detailed Inspections Performed				# circuit miles	
	Routine Vegetation Management Performed				# circuit miles	
Notes:						

Table 3: Outcome Metrics

Event Category		2021	2022	2023	Unit(s)	Comments
		In HFTD during Fire Season*	In HFTD during Fire Season*	In HFTD during Fire Season*		
Outage Event - Distribution	Vegetation caused - Distribution				# outages	
	Other- Distribution				# outages	
	Unknown- Distribution				# outages	
Outage Event - Transmission	Vegetation caused - Transmission				# outages	
	Other- Transmission				# outages	
	Unknown- Transmission				# outages	
Ignitions** Distribution	Vegetation caused - Distribution				# ignitions	
	Other- Distribution				# ignitions	
	Unknown- Distribution				# ignitions	
Ignitions** Transmission	Vegetation caused - Transmission				# ignitions	
	Other- Transmission				# ignitions	
	Unknown- Transmission				# ignitions	
Safety Hazards - Distribution***	Level 1				# hazards discovered	
Safety Hazards - Transmission***	Level 1				# hazards discovered	
Vegetation Management	Offcycle Treatment - Distribution				# poles	
(No Outage/Ignition)	Offcycle Treatment - Transmission				# poles	

Notes:

* "Fire Season" is defined as the period from [May 1] until the later of [October 1] or the date on which [utility staff determines that the applicable region has received sufficient rainfall or winter storm weather to mitigate the likelihood of a catastrophic wildfire occurring].

** An "ignition" is deemed to occur if each of the following conditions is met: (1) a utility owned or controlled facility was associated with the fire; (2) the fire was self-propagating and of a material other than electrical and/or communication facilities; (3) the resulting fire traveled greater than one linear meter from the ignition point; and (4) the utility has knowledge that the fire occurred.

*** A Level 1 Safety Hazard is defined as _____. [Note: Rename or add categories to align with existing utility practices]

Table 4: Planned Mitigation Measures

Mitigation Measure	Measure Description	2024	2025	2026	2027	2028	Unit(s)	Comments
1. [Planned Mitigation Measure]	[Description of measure, including targeted location]						[unit]	

Notes:

APPENDIX 6 – UPDATED CONTEXT SETTING TEMPLATE PSPS SECTION

(See redline for new recommended addition)

<p>Customers have ever lost service due to an IOU PSPS event?</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p><u>If yes, then provide the following data for calendar year [____]:</u></p> <p><u>Number of shut-off events: [____]</u></p> <p><u>Customer Accounts that lost service for >10 minutes: [____]</u></p> <p><u>For prior response, average duration before service restored: [____]</u></p>
<p>Customers have ever been notified of a potential loss of service to due to a forecasted IOU PSPS event?</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>
<p>Has developed protocols to pre-emptively shut off electricity in response to elevated wildfire risks?</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>
<p>Has previously pre-emptively shut off electricity in response to elevated wildfire risk?</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>If yes, then provide the following data for calendar year [____]:</p> <p><i>Number of shut-off events: [____]</i></p> <p><i>Customer Accounts that lost service for >10 minutes: [____]</i></p> <p><i>For prior response, average duration before service restored: [____]</i></p>



**OFFICE OF ENERGY INFRASTRUCTURE SAFETY
CALIFORNIA WILDFIRE SAFETY ADVISORY BOARD**
www.energysafety.ca.gov

715 P Street
20th Floor
Sacramento, CA 95814
wsab@energysafety.ca.gov

