

MODESTO IRRIGATION DISTRICT (MID)

WILDFIRE MITIGATION PLAN

INDEPENDENT EVALUATION REPORT

NOVEMBER 12, 2019

DISCLAIMER

California Senate Bill 901 (SB 901) mandates that local publicly owned electric utilities or electrical cooperatives shall, before January 1, 2020, prepare a Wildfire Mitigation Plan (WMP or Plan). Additionally, publicly owned electric utilities and electrical cooperatives are required to contract with a qualified independent evaluator with experience to assess the comprehensiveness of its WMP.

MID has requested Grid Subject Matter Experts (“GridSME”) to conduct a review and assessment of their WMP to ensure it meets the requirements outlined in SB 901. GridSME’s review and assessment is based on MID’s WMP alone and evaluates only the comprehensiveness of the Plan as it is written.

The information provided in this review and report represents GridSME’s analysis based only on the information available at the time the review was conducted. GridSME is not responsible for the success or failure of MID’s projects nor any potential ignition resulting therefrom. GridSME makes no representations or warranties expressed or implied regarding the reliability or thoroughness of MID’s WMP. Recipients of the assessment report assume all liabilities incurred by themselves, or third parties, resulting from their reliance on the report, or the data, information, and/or assessment contained therein.

Introduction:

Pursuant to California SB 901, and Section 8387 of the Public Utilities Code, and approved by Governor Jerry Brown on September 21, 2018, "Each local publicly owned electric utility and electrical cooperative shall construct, maintain, and operate its electrical lines and equipment in a manner that will minimize the risk of wildfire posed by those electrical lines and equipment". They will prepare a wildfire mitigation plan before January 1, 2020 and 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 website 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".

Company Overview:

MID is a California irrigation district organized in 1887 under the provisions of the California Water Code by vote of the people. MID has the powers under the Water Code to, among other things, provide irrigation and electric service. MID, a fully integrated electric utility, owns and operates its electric grid which includes generation, transmission, and distribution facilities.

MID is located in the San Joaquin Valley in Central California, approximately 90 miles east of San Francisco. MID provides electric service within a 560 square mile area, which includes Southern San Joaquin County, Northern Stanislaus County, and western Tuolumne County. For the year ended December 31, 2018, MID served approximately 128,630 customers and had a peak demand of 649 MW.

Independent Evaluation:

Following a review of MID's written WMP, GridSME has concluded that the Plan meets all the requirements of SB 901, section 8387 of the Public Utilities Code and is comprehensive. GridSME's evaluation of MID's Plan was based only on a review of the written WMP and not an audit of all of MID's programs, processes, and procedures. Additionally, GridSME met with MID's wildfire advisory staff to review and approve the Plan prior to final approval by the MID Board of Directors.

MID has defined their wildfire mitigation programs within the following key areas:

- Plan Overview and Objectives,
- Roles and Responsibilities,
- Wildfire Risk and Risk Drivers,
- Wildfire Prevention Strategies,
- Restoration of Service, and
- Plan Evaluation and Metrics.

Plan Overview and Objectives

MID's primary objective is to construct, maintain, and operate its electrical system in a safe and reliable manner that will minimize the risk of MID's facilities being the origin or contributing source for the ignition of a catastrophic wildfire. The vast majority of MID's service territory lies outside a High Fire-Threat District (HFTD) area, consisting mostly of farmland with crops, dry grass, and low growth bushes. Only 1.55 miles of a 60 kV overhead powerline is within the Tier 2 (elevated risk) area of the HFTD and no MID facilities are within the Tier 3 (extreme risk) area of the HFTD. MID's WMP not only outlines their programs to comply with SB 901 but also describes their programs to maintain compliance with regulations as they apply to the State Responsibility Areas (SRA) within their service territory where Cal Fire is the primary emergency response agency responsible for fire suppression and prevention.

Roles and Responsibilities

MID's Board of Directors set policies for MID and will review and approve the WMP. The General Manager has overall responsibility for the day to day operations of MID and for ensuring compliance with, and implementation of, the WMP. The Plan further outlines specific responsibilities that other departments have for Plan implementation to ensure compliance.

Risk and Risk Drivers

MID's service territory is located within a region of the State where there is very low risk for a catastrophic wildfire. MID has only 1.55 miles of line within a Tier 2 HFTD area that is subject to the requirements of SB 901. However, MID defines the risks and risk drivers, including topographic and climatological risk factors, that are applicable to their entire system and describe the process for review and remediation.

Prevention Strategies

In order to support its mission to operate their facilities in a safe and reliable manner, MID has developed a comprehensive plan for mitigating the risk of their facilities being a source of ignition for a wildfire.

MID maintains strict adherence to California Public Utilities General Orders for inspection and maintenance of their facilities (GO 95, 165, 174, etc.) and vegetation management program. MID conducts ground patrols to proactively identify any potential risks of failure and mitigate them to ensure the safe and reliable operation of their electrical facilities. Current and past MID programs to improve resiliency, reliability, and reduce the risk of their facilities being the origin or contributing source for a catastrophic wildfire are:

1. Replaced 16 wood poles with composite poles,
2. Replacing # 6 primary overhead copper conductor throughout MID service territory,

3. Replaced expulsion fuses with Cal Fire approved fuses in the SRA area,
4. Made pole modifications for avian protection in rural areas, and
5. Phasing out oil circuit breakers throughout MID service territory.

MID evaluates new technologies to support their existing programs with the goal of enhancing the overall safety and effectiveness of all their fire risk mitigation programs.

After considerable evaluation and due to the very low risk for a catastrophic wildfire within MID's service territory, MID has elected to not formally establish a Public Safety Power Shutoff (PSPS) program. Additionally, MID has not adopted a policy to proactively turn off the automatic reclosing function of a line during critical fire weather conditions. As mentioned, MID has only one facility, a 60 kV line, that runs through a Tier 2 HFTD area and this line has no automatic reclosing.

Restoration of Service

MID has a standard operating procedure that outlines the process for the safe restoration of service following an interruption. This same procedure will be utilized for the safe restoration of service if MID experiences more widespread interruptions as a result of real-time incidents.

MID has also detailed within its WMP the process and responsible department for communicating system conditions to the various stakeholders including governmental agencies and MID customers.

Plan Evaluation and Metrics

MID summarizes the metrics that will be used to measure the performance of their WMP programs. It includes tracking fire ignitions caused by MID facilities, tracking downed wires, and tracking vegetation management-caused incidents and inspections. MID will use all available data to evaluate the effectiveness of their Plan and continue pursuing opportunities for improvement. Although MID has very few facilities located within the HFTD, the aforementioned incident tracking will be

applicable to the entire MID service territory and not just to facilities within the HFTD.

Summary

MID's goal is to comply with California SB 901, Section 8387 of the Public Utilities Code, and to operate its electrical lines and equipment in a manner that will minimize the risk of wildfire posed by those electrical lines and equipment. Following a review of MID's WMP, GridSME has concluded that their Plan is comprehensive and meets the requirements of SB 901, Section 8387 of the Public Utilities Code.