



# WILDFIRE MITIGATION PLAN

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VERSION 1.0

*October 15, 2019*



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## I. OVERVIEW

### A. POLICY STATEMENT

Moreno Valley Utility's overarching goal is to provide safe, reliable, and economic electric service to its local community. In order to meet this goal, Moreno Valley Utility constructs, maintains, and operates its electrical lines and equipment in a manner that minimizes the risk of catastrophic wildfire posed by its electrical lines and equipment.

### B. PURPOSE OF THE WILDFIRE MITIGATION PLAN

Moreno Valley Utility's (MVU) entire electric supply system is located underground in conduit and vaults. Historically, undergrounded electric lines have not been associated with catastrophic wildfires. The undergrounding of electric lines serves as an effective mitigation measure to reduce the potential of power-line ignited wildfires. Based on a review of local conditions and historical fires, MVU has determined that its electrical lines and equipment do not pose a significant risk of catastrophic wildfire.

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

### 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.

## II. OBJECTIVES OF THE WILDFIRE MITIGATION PLAN

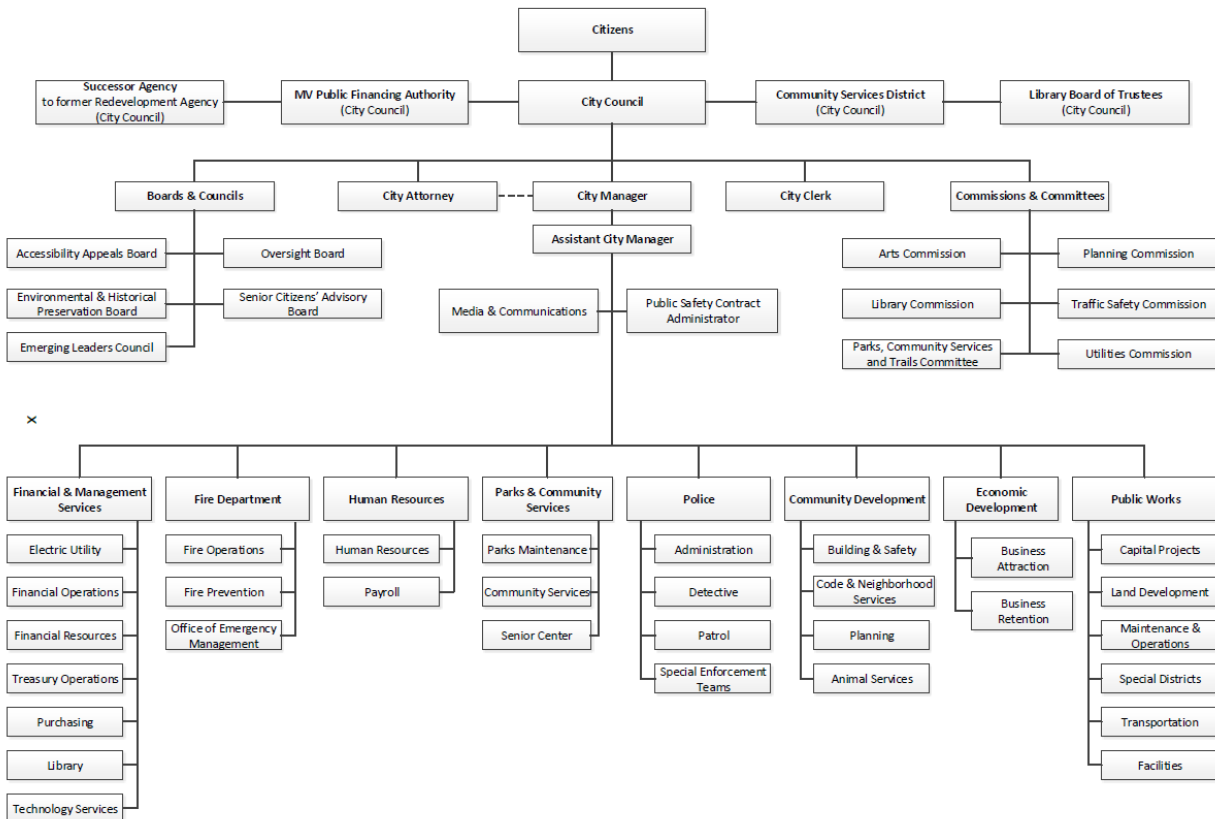
The primary goal of this Wildfire Mitigation Plan is to describe MVU's existing programs, practices, and measures that effectively reduce the probability that MVU's electric supply system could be the origin or contributing source for the ignition of a wildfire. To support this goal, MVU regularly evaluates the prudent and cost-effective improvements to its physical assets, operations, and training that can help reduce the risk of equipment-related fires.

The secondary goal of this Wildfire Mitigation Plan is to improve the resiliency of the electric grid. As part of the development of this plan, MVU assesses new industry practices and technologies that will reduce the likelihood of an interruption (frequency) in service and improve the restoration (duration) of service.

## III. ROLES AND RESPONSIBILITIES

### A. UTILITY GOVERNANCE STRUCTURE

City of Moreno Valley Organization Chart



The City of Moreno Valley is a general law city that operates under a Council-Manager form of government. MVU is governed by a five-member City Council. Four Council Members are elected by district to staggered, four-year terms, while the Mayor is directly elected. The council appoints the City Manager, who oversees the daily operations of the City. Volunteer Commissions and Boards, as well as several Citizen Advisory Committees help guide the Council in its decisions. The City Council formed a five-member Utilities Commission, whose purpose is to provide additional review for all matters pertaining to MVU. Commissioners are citizen volunteers, appointed by the City Council for three-year terms.

## B. WILDFIRE PREVENTION

MVU staff, in partnership with its maintenance and operations provider, is responsible for electric facility design, maintenance, and inspection, including vegetation management. Although MVU's electrical distribution system is 100% underground, MVU follows best practices to prevent ignition of wildfires from its equipment. These items include:

- MVU performs routine maintenance of all distribution facilities.
- MVU adheres to a seasonal weed abatement and vegetation management schedule to maintain at-risk sites.
- MVU contracts for seasonal weed abatement services. As well as maintains GO95, GO165, and GO174 standard clearances as part of regular maintenance cycles.
- MVU abides by Municipal Code 6.40 to abate trees, shrubs, weeds, and grass at all MVU facilities.
- Electric system operates 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 MVU electric facilities.
- Coordinate with federal, state, and local fire management personnel as necessary or appropriate to implement MVU's Wildfire Mitigation Plan.
- Immediately report fires to local fire department, Emergency Management Program Manager, MVU administration, and other City Officials, pursuant to existing MVU practices and the requirements of this Wildfire Mitigation Plan.
- Coordinate with City Emergency Operations Center to disseminate safety warnings, emergency public information, and evacuation notices to local residents.
- MVU adheres to City of Moreno Valley personnel policy 5.11 for Employee Disaster Notification and Reporting.
- 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.

## C. WILDFIRE RESPONSE AND RECOVERY

Internally, MVU's distribution system is controllable remotely through a Supervisory Control and Data Acquisition (SCADA) system networked to all substations and circuits. MVU field

staff utilize hard line telephones, cellular telephones, and portable radios to communicate with internal and external stakeholders during an outage or emergency. MVU's Outage Manage System, Utility Maintenance Management System, and Dispatching System all auto-generate notifications to field, office, and administrative staff. MVU is enrolled in several mutual aid networks (APPA, CA Disaster & Civil Defense, CA Utilities Emergency Association) to facilitate expedited response and recovery from severe storms, natural disasters, or mass outages.

The City of Moreno Valley maintains a two-way (LF, HF, VHF, and UHF) mobile and base stations for communications enhanced by repeater system to extend the coverage area. This includes three repeater channels and three unit-to-unit/talk-around channels in the 800 MHz Public Safety band. The City of Moreno Valley owns ten iridium satellite phones that are issued to key personnel in the city during an emergency. Mobile radio communications are available utilizing the Moreno Valley Police Mobile Command Center (MCC). The command center has the capability of patching Sheriff, California Highway Patrol (CHP), Riverside Police, CALFIRE, March Air Reserve Base and Moreno Valley Park Rangers all on the same frequency at the same time. Moreno Valley has an Amateur Civil Emergency Services/Radio Amateur Civil Emergency Services (MV ACES/RACES) group, which operates on ham radio frequencies in support of governmental emergency communications. MV ACES/RACES can augment existing systems and establish communication links with otherwise inaccessible areas. They are also capable of sending live video and audio from an incident site to our City's emergency operations center via the ham radio.

At the county level, a Riverside County Emergency Operations Center (EOC) talk group is programmed into the Omniquest radio and is used to communicate with EOCs within Riverside County during a disaster or emergency. The City of Moreno Valley also has low-band disaster net radios to communicate with all EOCs within Riverside County during a disaster or emergency. This system uses low frequency bands and has several back up channels in case of an outage. Additionally, the City has a portable disaster case radio system. This system allows communications with other agencies such as County Emergency Services, County Fire, County Police, Hospitals, Cities within Riverside County, Moreno Valley Unified School District and Valley View Unified School District.

MVU adheres to California Public Utility Commission GO 95, 165, and 174 for all system infrastructure inspection, maintenance, and reporting.

City of Moreno Valley Office of Emergency Management maintains a city-wide Hazard Mitigation Plan identifying potential fire hazards and mitigation strategies.

City of Moreno Valley also maintains a reporting hotline for all employees to properly notify the city for code violations, hazards, safety concerns, and overgrown landscaping and weeds.



## D. STANDARDIZED EMERGENCY MANAGEMENT SYSTEM

As a local governmental agency,<sup>1</sup> MVU has planning, communication, and coordination obligations pursuant to the California Office of Emergency Services' Standardized Emergency Management System ("SEMS") Regulations,<sup>2</sup> adopted in accordance with Government Code section 8607. The SEMS Regulations specify roles, responsibilities, and structures of communications at five different levels: field response, local government, operational area, regional, and state.<sup>3</sup> Pursuant to this structure, MVU annually coordinates and communicates with the relevant safety agencies as well as other relevant local and state agencies. When activated, MVU serves as the Utilities Unit Leader under the Operations Section Chief as part of the City of Moreno Valley's Emergency Operations Center. In the event that the incident centered on MVU facilities, MVU would serve as the Operations Section Chief.

Under the SEMS structure, a significant amount of preparation is done through advanced planning at the county level, including the coordination of effort of public, private, and nonprofit organizations. Riverside County serves as the Operational Area and is guided by the California Office of Emergency Services, Southern Region. The Operational Area includes local and regional organizations that bring relevant expertise to the wildfire prevention and recovery planning process. These participants include:

Agency/ Dept.	Mailing Address	Contact	Phone	Fax
AMR American Medical Response	879 Marlborough Ave. Riverside, CA. 92507		951.782.5234	951.782.5617

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<sup>1</sup> As defined in Cal. Gov. Code § 8680.2.

<sup>2</sup> 19 CCR § 2407.

<sup>3</sup> Cal. Gov. Code § 2403(b):

- (1) "Field response level" commands emergency response personnel and resources to carry out tactical decisions and activities in direct response to an incident or threat.
- (2) "Local government level" manages and coordinates the overall emergency response and recovery activities within their jurisdiction.
- (3) "Operational area level" manages and/or coordinates information, resources, and priorities among local governments within the operational area and serves as the coordination and communication link between the local government level and the regional level.
- (4) "Regional level" manages and coordinates information and resources among operational areas within the mutual aid region designated pursuant to Government Code §8600 and between the operational areas and the state level. This level along with the state level coordinates overall state agency support for emergency response activities.
- (5) "State level" manages state resources in response to the emergency needs of the other levels, manages and coordinates mutual aid among the mutual aid regions and between the regional level and state level, and serves as the coordination and communication link with the federal disaster response system.

AMR American Medical Response	879 Marlborough Ave. Riverside, CA. 92507	Dispatch	877.267.6622	951.782.5605
Kaiser Permanente: Medical Center	12815 Heacock Moreno Valley, CA. 92552	Administration	951.601.6327	951.601.6181
Kaiser Foundation Moreno Valley: Community Hospital	27300 Iris Ave. Moreno Valley, CA. 92555	Facilities Services Manager	951.251.6594	951.251.6601
Moreno Valley Fire/Office of Emergency Management	14177 Frederic St. Moreno Valley, CA 92553	Emergency Management Program Manager	951.413.3800	951-413-3801
Moreno Valley Utility	14331 Frederick Street, Moreno Valley, CA 92253	Utility Division Manager	951-413-3500	951-413-3589
Moreno Valley: Special Districts	14331 Frederick Street, Moreno Valley, CA 92253	Division Manager	951.413.3480	
Moreno Valley: Fire Dept.	14177 Frederick Street Moreno Valley, CA. 92553	Fire Marshal	951.413.3370	
Moreno Valley: Fire Dept.	22850 Calle San Juan De Los Lagos Moreno Valley, CA 92553	Fire Chief	951.486.6780	951.486.6790
Moreno Valley: Operations & Maint.	14177 Frederick Street Moreno Valley, CA. 92553	Manager	951.413.3160	951.413.3141
Moreno Valley: Police Dept.	22850 San Juan De Los Lagos Moreno Valley, CA. 92552	Police Chief	951.486.6700	
Moreno Valley: Public Works	14177 Frederick Street Moreno Valley, CA. 92553	Public Works Director	951.413.3100	951.413.3141
Moreno Valley Traffic & Transportation	14177 Frederick Street Moreno Valley, CA. 92553	City Traffic Engineer	951.413.3140	951.413.3140
Moreno Valley: City Management	14177 Frederick Street Moreno Valley, CA. 92553	City Manager	951.413.3020	
Moreno Valley: Facilities Management	14177 Frederick Street Moreno Valley, CA. 92553	Division Manager	951.413.3740	
Moreno Valley: TV3	14177 Frederick Street Moreno Valley, CA. 92553	Media & Production Supervisor	951.413.3056	951.413.3053
Moreno Valley: Unified School District	25634 Alessandro Blvd. Moreno Valley, CA. 92553	Maintenance Supervisor	951.571.7865	951.571.7811
Riverside Medical Clinic: Canyon Springs Plaza	6405 Day Street Moreno Valley, CA. 92552	Facilities	951.321.6331	951.248.6703
Riverside County: Dept. of Environmental Health	4065 County Circle Riverside, CA.	Deputy Director	951.358.5172	951.358.5017
Riverside County: Dept. of Environmental Health	4065 County Circle Riverside, CA.	Supervising Environmental Health Specialist	951.358.5172	951.358.5017
Riverside County: Dept. of Environmental Health	800 S. Sanderson Ave. #200, Hemet, CA. 92545	Supervising Environmental Health Specialist	951.766.2824	

County of Riverside Human Resources	4080 Lemon St., 7th floor Riverside, CA 92501		951.955.9016	
Riverside Regional: Medical Center	26520 Cactus Ave. Moreno Valley, CA. 92552	Deputy Director	951.955.4878	951.955.8405
Riverside Regional: Medical Center	26520 Cactus Ave. Moreno Valley, CA. 92555	Chief of Hospital Plant Op.	951.486.4066	951.486.4105
Val Verde: Unified School District	975 W. Morgan Street Perris, CA. 92581	Emergency Services	951.940.6100 ext. 10672	951.940.6118
Val Verde: Unified School District - March Middle School	15800 Indian Ave	Director of Facilities, Maintenance, & Purchasing	951.940.6136 ext. 10652	
Verizon Public Relations		Director of Public Relations	(213) 800-3184	
Eastern Municipal Water District	Central Control 2270 Trumble Road Perris, CA 92572-8300		951.928.3777 ext. 6265	951.928.6170
Davita Canyon Springs Dialysis	22555 Alessandro Blvd Bldg. 5		951.653.6400	
Kaiser Permanente	27200 Iris Ave Medical Bldg		951.353.4359	
United States Postal Services	23800 Cactus Ave	Facility Manager	951.697.4661	
Waste Management	17700 Indian St	Fleet Manager - Fleet Maintenance	951.601.1129 951.339.6681	

Pursuant to the SEMS structure, MVU participates in annual training exercises. Training exercises include workshops, tabletop exercises, and field drills. A sample of topics covered include; earthquake safety, disaster response & management, active shooter, crisis leadership, and NIMS/SEMS/ICS compliance.

MVU is a member of the California Utility Emergency Association, which plays a key role in ensuring communications between utilities during emergencies and provides mutual aid. MVU also participates in the American Public Power Association Mutual Assistance Agreement, which covers public utilities across the United States. The City of Moreno Valley is a participant in the California Disaster and Civil Defense Mutual Aid Agreement which allocates state resources to cope with any type of disaster.

## 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

Due to MVU's distribution system being 100% underground, the primary risk drivers for wildfire within MVU's service territory are the following:

- Earthquake
- Flooding

### B. ENTERPRISEWIDE SAFETY RISKS

Earthquake profile - There are three major faults/fault zones that directly affect Moreno Valley. They are the southern section of the San Andreas Fault, the San Jacinto Fault Zone, and the Elsinore Fault Zone. The San Jacinto Fault Zone is considered to be the most active fault in Southern California. It is the closest fault to Moreno Valley and runs through the eastern portion of the city, followed by the Elsinore Fault Zone which is located approximately 12-18 miles south of Moreno Valley. The San Andreas Fault Zone is located approximately 15-20 miles north of Moreno Valley. The largest earthquake to occur within 100 miles of Moreno Valley was the 7.4 magnitude Hector Mine earthquake in 1999.

The City of Moreno Valley could be affected by large earthquakes occurring in many parts of the Southern California region. However, the degree to which the earthquakes are felt, and the damages associated with them may vary. At risk from earthquake damage are critical facilities, buildings, bridges, highways and roads; hazardous materials facilities; sewer, water, and natural gas pipelines; earth dams; petroleum pipelines; and private property located in the city. The relative or secondary earthquake hazards, which are liquefaction, ground shaking, amplification, and earthquake-induced landslides, can be just as devastating as the earthquake. The USGS estimates that there is a greater than 99% chance of a major earthquake occurring within 31 miles of Moreno Valley within the next 50 years.

Flooding profile - There are four types flooding conditions that exist within the Moreno Valley area: flooding in defined watercourses; ponding; sheet flow; and dam inundation. Flooding within defined watercourses occurs within drainage channels and immediately adjacent floodplains. Ponding occurs when water flow is obstructed due to manmade obstacles such as the embankments of SR-60 and other roadways, where they cross-defined watercourses. Sheet flow occurs when capacities of defined watercourses are exceeded and water flows over broad areas.

Known flood-prone areas as noted in the General Plan as well as recorded in city maintenance files, include:

- Along the Quincy Channel between Cottonwood Avenue and Cactus Avenue.
- An extensive floodplain that extends along the Oliver Street alignment from a point north of Alessandro Boulevard to John F. Kennedy Drive and extending in a southwesterly direction as far

as the northeast corner of Morrison Street and Filaree Avenue and the northeast corner of Nason Street and Iris Avenue.

- Along Heacock Street and Lateral A of the Perris Valley Channel between Cactus Avenue and a point north of the intersection of Lateral A and Indian Street (next to March Air Reserve Base).
- Along Sunnymead Boulevard between Frederick Street and Graham Street.
- Along Pigeon Pass Road, between Sunnymead Ranch Parkway and Lawless Road.
- Along Moreno Beach Boulevard, between Juniper Avenue and Locust Avenue.
- Along Highland Avenue, between Redlands Boulevard and Alessandro Boulevard.
- Along Locust Avenue, between Moreno Beach Boulevard and northerly city Limits.
- Along Heacock Street, between Lake Summit Drive and Reche Vista Drive.
- Along Hubbard Street, between Skyland Drive and Ironwood Avenue.
- Along Cottonwood Avenue, between Nason St and Martha Crawford Street.
- Alessandro Boulevard, between Gilman Springs Road and Theodore Street.
- Neighborhood bounded by Alessandro Boulevard, Brodiaea Avenue, Redlands Boulevard, and Merwin Street.
- Miramontes Court, north of Via Solana Court.
- Easterly side of neighborhood east of Perris Boulevard, between Covey Road and Manzanita Avenue.

## V. WILDFIRE PREVENTATIVE STRATEGIES

### A. HIGH FIRE THREAT DISTRICT

MVU directly participated in the development of the CPUC's Fire-Threat Map,<sup>4</sup> which designates a High-Fire Threat District. In the map development process, MVU coordinated with Southern California Edison Company(SCE) and determined that because MVU's system is entirely undergrounded, that SCE would serve as territory lead for the region served by MVU. MVU has incorporated the High Fire Threat District into its construction, inspection, maintenance, repair, and clearance practices, where applicable.

### B. DESIGN AND CONSTRUCTION STANDARDS

MVU's electric facilities are designed and constructed to meet or exceed the relevant federal, state, or industry standard. MVU treats CPUC General Orders (GO) 95 and 128 as a key industry standard for design and construction standards for underground electrical facilities. MVU meets or exceeds all standards in GO 95 and 128. Additionally, MVU monitors and follows, as appropriate, the National Electric Safety Code.

### C. VEGETATION MANAGEMENT

MVU meets or exceeds the minimum industry standard vegetation management practices. For transmission-level facilities, MVU complies with NERC FAC-003-4, where applicable. For both transmission and distribution level facilities, MVU meets: (1) Public Resources Code section 4292; (2) Public Resources Code section 4293; (3) CPUC GO 95, 128, 165, and 174.

### D. INSPECTIONS

MVU meets or exceeds the minimum inspection requirements provided in CPUC GO 165 and 174. 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, MVU currently does not have any overhead power lines located within or near the High-Fire Threat District within the CPUC's Fire Threat Map. However, MVU staff uses their knowledge of the specific environmental and geographical conditions of MVU's service territory to determine if any particular areas require more frequent inspections.

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

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<sup>4</sup> Adopted by CPUC Decision 17-12-024.

## E. RECLOSING POLICY

MVU's system is 100% underground. Reclosers are not installed on underground circuits. MVU does not change substation relay settings.

## F. DEENERGIZATION

MVU has the authority to preemptively shut off power due to fire-threat conditions, however, this option will only be used in extraordinary circumstances. Due to the minimal risk of MVU's electrical supply facilities causing a power-line ignited wildfire, MVU is not adopting specific protocols for de-energizing any portions of its electric distribution system. MVU will re-evaluate this determination in future updates to this Wildfire Mitigation Plan.

## VI. RESTORATION OF SERVICE

MVU's electric distribution system is completely underground. However, we are interconnected with SCE's transmission and distribution systems, much of which is overhead and exposed to wind, rain and lightning. This is our primary source of vulnerability to potential electrical service interruptions during rain and wind storms such as the ones that can be precipitated by El Nino.

Our underground electric distribution system is designed, and has been constructed, with redundant sources of feed. These do not guarantee the elimination of outages but can facilitate service restoration and reduce the duration of such outages.

Preparation in advance of predicted storms: Since, as discussed in the introduction, our primary trouble source during storms is outages on SCE's transmission and distribution lines, many of which are overhead, we will patrol, to the extent practical, SCE's primary interconnect lines for any potential trouble spots including but not limited to broken tree limbs or other vulnerabilities. We will also double check the loading conditions of our underground lines to satisfy ourselves that alternate sources have the capacity to serve the electric load (customers) in the event that it is necessary.

Our underground system will be patrolled in advance of storms for any open trenches or excavations at construction sites to minimize water intrusion into the underground system. Although the underground system is designed to operate under such conditions, small pinholes in splices or cable can cause problems, including possible electrical shorts/faults, that can interrupt service to customers. Likewise, after the storm, each underground vault, manhole or other structure will be inspected for water intrusion and pumped, when necessary, in accordance proper utility practice and environmental guidelines.

All vehicular equipment, man-lifts, tools and appurtenances will be thoroughly inspected for proper operation. All operating personnel will be placed on standby in the event of weather related problems.

The MVU Operations and Call Centers will be appropriately staffed for handling of trouble calls from customers and dispatching to field personnel.

Call Center support includes:

- Outage Management System (OMS)
- Field Dispatching
- Customer Callbacks

Response Prioritization:

- First Priority: Response to imminent threats to life and/or public property
- Second Priority: Removals of immediate hazards (fallen trees, power poles, etc.)
- Third Priority: Clearing of arterial roadways
- Fourth Priority: Maintenance of traffic control/closures to prevent potential accidents
- Fifth Priority (Post Storm Activity): Follow-up work such as addressing storm-related potholes and residual clean-up of all streets that have remained in a "passable and drivable" state

Referral Protocol:

- Flooding of structures on private property- Residents will be advised to call 911 for Fire Department assistance
- Facilities associated with other government agencies (RCFCD) or private utilities will be referred to appropriate agencies/company
- All storm related issues involving streets, curbs and gutters, sidewalks, residential trees in the right of way, catch basins, and miscellaneous drainage facilities will be referred to the City's Maintenance and Operations Division.

During EOC activation period, all routine maintenance programs and requests will be suspended and deferred.



## VII. EVALUATING OF THE PLAN

### A. METRICS AND ASSUMPTIONS FOR MEASURING PLAN PERFORMANCE

MVU will track the following metric to measure the performance of this Wildfire Mitigation Plan: (1) number of fire ignitions caused by utility equipment.

#### METRIC 1: FIRE IGNITIONS

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

- MVU 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
- MVU has knowledge that the fire occurred.

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

### B. IMPACT OF METRICS ON PLAN

In the initial years, MVU anticipates that there will be relatively limited data gathered through the metric. However, as the data collection history becomes more robust, MVU will be able to identify areas of its operations and service territory that are disproportionately impacted. MVU will then evaluate potential improvements to the plan.

### C. MONITORING AND AUDITING THE PLAN

This Wildfire Mitigation Plan will be presented to the MVU Utilities Commission and the Moreno Valley City Council. MVU will present updates to this plan to the MVU Utilities Commission on an annual basis.

### D. IDENTIFYING AND CORRECTING DEFICIENCIES IN THE PLAN

Based on the recommendations of the MVU Utilities Commission and the Moreno Valley City Council, MVU will correct any identified deficiencies.

### E. MONITORING THE EFFECTIVENESS OF INSPECTIONS

MVU reviews and evaluates its reliability indices regularly to monitor inspection and maintenance procedures. SAIDI, SAIFI, CAIDI, and MAIFI statistics show that MVU maintains an electric system that operates well below the State and National averages for outage incidents per the American Public Power Association's eReliability Tracker program. MVU's Utility

Maintenance Management System (UMMS) is used to collect all data subject to GO165. The UMMS prepares monthly inspection and maintenance reports for all electric distribution facilities. Maintenance history for each piece of equipment is archived in the UMMS. Additionally, MVU's substation inspection and maintenance program complies with GO174 guidelines as well as manufacturer specifications, standards, and recommendations. MVU performs monthly inspections of all substation components including recording and analysis of all alarms, fluid levels, meters, and Load Tap Changer settings.

Although MVU does not fall under the jurisdiction of the California Public Utilities Commission (CPUC), MVU has cooperated with the CPUC's Utilities Safety and Reliability Branch and their requests for periodic audits. The audit in October 2008 noted no GO 95 infractions, and identified two GO 128 infractions to MVU Pad Mounted Electric structures. Repairs were made to correct the violation the day they were identified by the CPUC. Again in March of 2013 the CPUC audit identified three vegetation obstructions that were immediately corrected in the field as they were identified. No additional infractions have been identified by the CPUC.

