



Maximo M. Fuentes
Max Fuentes Consulting
maxfuentes@icloud.com
(916)505-7298
Gridresources.net

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Board of Directors
Pittsburg Power Company
City of Pittsburg
65 Civic Drive
Pittsburg, CA 94565

To the Board of Directors of Pittsburg Power Company:

As introduction, I am the owner and president of Max Fuentes Consulting, a utility consulting business that focuses on providing technical, subject matter expertise and litigation opinions to the electric transmission and distribution utility industry.

I have over 35 years of experience in the utility industry, including the Sacramento Municipal Utility District as a Grid Assets Line Supervisor of Business Operations. My professional focus has been utility operations, safety initiatives and developing related training programs.

I am presently engaged in assisting utilities in the development of and review of their California state legislature mandated "Wildfire Mitigation Plan" (WMP) in accordance with Public Utilities Code 8387. My most recent client is the Imperial Irrigation District (IID), with WMP consulting services that include, but are not limited to:

- Reviewing drafts of IID's WMP
- Identify Plan improvements
- Submitting an independent review to the IID Board of Directors
- Identify areas of ecological system change / risk areas

Max Fuentes Consulting has been retained by Pittsburg Power Company (PPC) to provide an independent professional consultant review of their required Wildfire Mitigation Plan as it relates to their electric utility operations on Mare Island, Vallejo. My comments and recommendations are listed below.

In Summary:

PPC's Wildfire Mitigation Plan contains the required elements listed in the provision of Public Utilities Code Section 8387. The programs that will take the greatest amount of time and effort within PPC's WMP involve vegetation management, preventative strategies and inspections.



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Inspection and Maintenance

Public Utilities Code Section 8387 requires an electrical utility's WMP to contain a description of its plans for inspection and maintenance of the electric infrastructure.

Inspection and maintenance include conducting distribution system patrols, using technological inspection tools, managing maintenance, and conducting vegetation inspections and management. These activities play an important role in wildfire mitigation.

PPC's inspection and maintenance plan is predicated on its CPUC General Order 165 plan which is in place and currently being utilized and updated regularly.

Vegetation Management

PPC's vegetation management practice as outlined in the WMP is to perform periodic and on-demand patrols to identify vegetation in and adjacent to, energy infrastructure. These inspections are a trigger for pruning jobs, vegetation removals, and the application of herbicides.

Powerline Inspections

PPC performs inspections following the General Order 95 for construction and General Order 165 for inspections.

System Hardening

In discussions with PPC, there are no near or long-term plans further "harden" the system other than maintaining existing security fencing and lighting. PPC's infrastructure has little to no exposure to wildfire ignitions by virtue of the system configuration. Current processes and inspections that are in place as outlined in the WMP provide adequate system reliability without expending additional capital for system hardening.

Note: We have been made aware that a recent criminal act – cutting down of a live power pole presumably for the copper wire – did ignite a brush fire. PPC indicates it will increase the placement of warning signage and increase patrols. Local law enforcement is also engaged.

Wildfire Preventative Strategies

Mare Island has a "non-designation" in the areas of the CPUC's fire threat map. However, PPC has implemented its inspection and maintenance plan to ensure that equipment and infrastructure is inspected, repaired or replaced as needed in accordance with the WMP and prudent utility operations.



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Recommendations

- Island Energy to continue to integrate its General Order 165 inspection and maintenance program using technology to inspect, track, process data and create jobs to perform key work in areas that have been prioritized.

Sincerely,

Maximo M. Fuentes