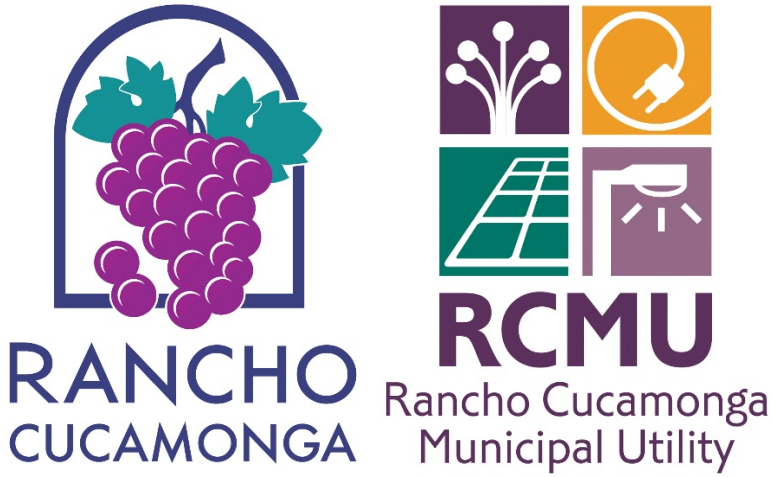

CITY OF RANCHO CUCAMONGA MUNICIPAL UTILITY'S LIMITED-RISK WILDFIRE MITIGATIONPLAN

VERSION 1.0 – FINAL

City Council Approved: December 18, 2019

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I. OVERVIEW

A. POLICY STATEMENT

The City of Rancho Cucamonga Municipal Utility's (RCMU's) overarching goal is to provide safe, reliable, clean and economic electric service to its local community. In order to meet this goal, RCMU constructs, maintains, and operates its underground 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

RCMU's 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, RCMU has determined that its electrical lines and equipment do not pose a significant risk of catastrophic wildfire.

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

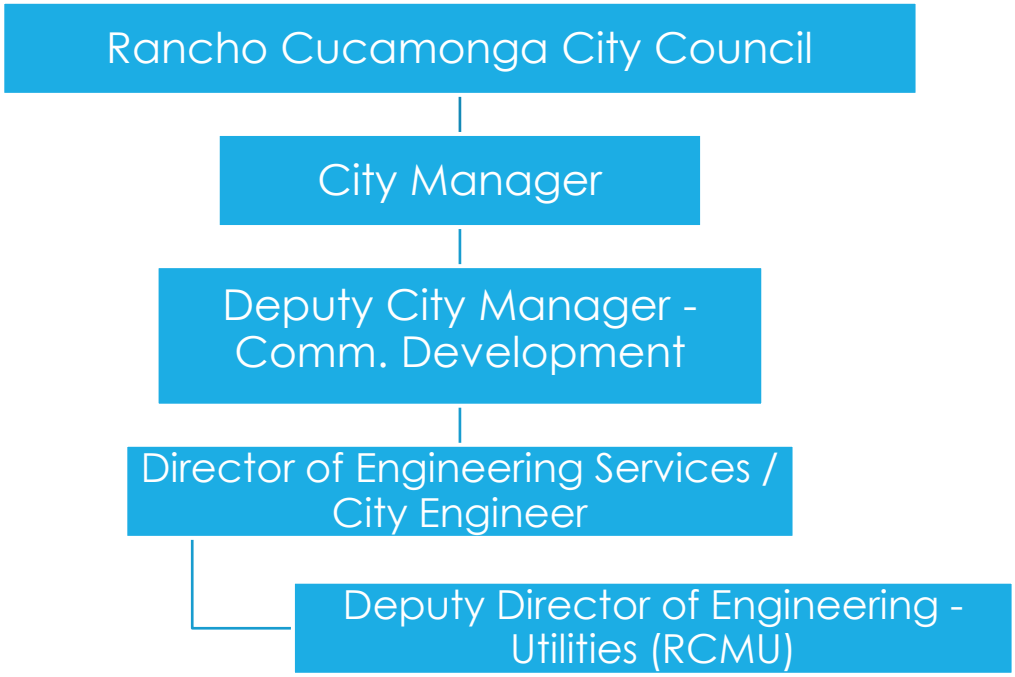
II. OBJECTIVES OF THE WILDFIRE MITIGATION PLAN

The primary goal of this Wildfire Mitigation Plan is to describe RCMU's existing programs, practices, and measures that effectively reduce the probability that RCMU's electric supply system could be the origin or contributing source for the ignition of a wildfire. To support this goal, RCMU 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, RCMU 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



B. WILDFIRE PREVENTION

RCMU's staff and contractor's roles and responsibilities for (1) electric facility design, maintenance, and inspection; and (2) vegetation management.

- Operate system 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 RCMU's electric facilities.
- Coordinate with federal, state, and local fire management personnel as necessary or appropriate to implement RCMU's Wildfire Mitigation Plan.
- Immediately report fires, pursuant to existing RCMU practices and the requirements of this Wildfire Mitigation Plan.
- 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

For the City and the Fire District, relevant lines of communication during emergencies include Landline, cell phone, text messaging and radio. During emergency scenes: same as above, plus radio communication via the 800 and VHF radios. In addition, during emergencies we can activate our Auxiliary Communications Service (ham radio) team to assist with first responders and the EOC during a wildfire incident

Regarding the utility's staff roles regarding fire prevention, response and investigation, other than providing an agency representative during an emergency involving RCMU facilities there are no other roles needed since RCMU's service area is outside of the wildfire threat area.

D. STANDARDIZED EMERGENCY MANAGEMENT SYSTEM

As a local governmental agency,[1] the City of Rancho Cucamonga has planning, communication, and coordination obligations pursuant to the California Office of Emergency Services' Standardized Emergency Management System ("SEMS") Regulations,[2] 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.[3] Pursuant to this structure, the City of Rancho Cucamonga annually coordinates and communicates with the relevant safety agencies as well as other relevant local and state agencies, to ensure that during emergencies that RCMU.

[1] As defined in Cal. Gov. Code § 8680.2.
[2] 19 CCR § 2407.
[3] 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.

Under the SEMS structure, a significant amount of preparation is done through advanced planning at the local level, including the coordination of effort of public, private, and nonprofit organizations. San Bernardino serves as the Operational Area and is guided by the San Bernardino County Operational Area Coordinating Council that is made up of representatives of all 24 Cities and Town's. The Operational Area includes local and regional organizations that bring relevant expertise to the wildfire prevention and recovery planning process. These participants include local school districts, utilities, first responder agencies, non-profits (such as the United Way and/or the American Red Cross), all regional Hospitals, special districts, communications providers, and other similar organizations.

Pursuant to the SEMS structure, the City of Rancho Cucamonga also participates in annual emergency training exercises. In September of 2019, the Fire District hosted a table top exercise with all City Department Directors including RCMU on a wildfire in our front country area. At a minimum, exercises will be provided on an annual basis by either the Rancho Cucamonga Fire Protection District or by invitation from another supporting agency such as the County Operational Area.

RCMU is a member of the California Utility Emergency Association, which is a State agency that plays a key role in ensuring communication and mutual aid between utilities during emergencies.

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

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

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

- High Temperature;
- Low Humidity;
- Hillside Terrain;
- Fire Weather Conditions;
- Prolonged Drought;
- Climate Change;
- Fire History

B. ENTERPRISEWIDE SAFETY RISKS

Fire risks due to topographical and climatological factors are determined to be "Low" (Tier 1 (i.e. low risk)) within RCMU's service area. The description of tiered fire threat zones is shown in Table 1 below.

Table 1

Description of tiered
fire threat zones

Zone	Category	Description
Tier 3	Extreme	Wildland areas where exposure to overhead power lines, the availability of water resources, and emergency responder circulation routes affect response times to combat wildland fires.
Tier 2	Elevated	Elevated risk due to vegetation, high voltage regional transmission lines crossing the area, and adjacency to Tier 3 fire threat zones.
Tier 1	Low	Well developed areas, typically with underground high voltage circuitry.

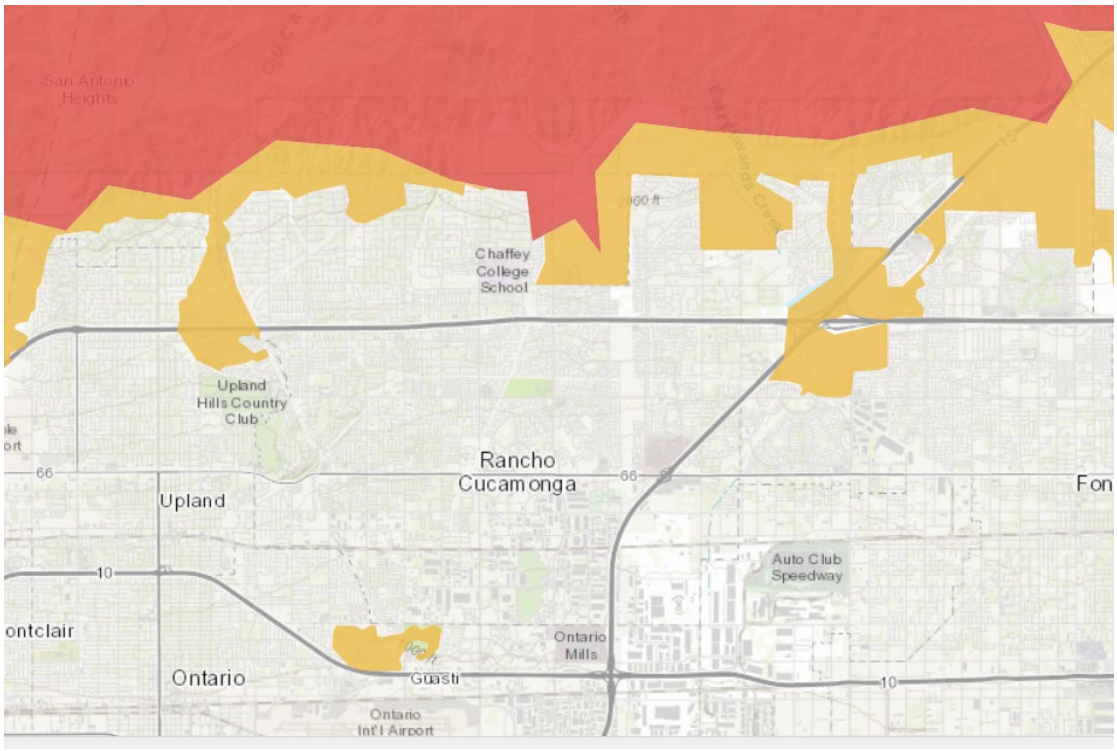
On September 19, 2018, the Rancho Cucamonga City Council adopted Resolution No. 18-103 which made a determination that RCMU's current service area is not located in an area that is considered an elevated or extreme risk of electric line wildfires; has 0 percent overhead electric lines and equipment and does not pose a significant risk of causing wildfires.

V. WILDFIRE PREVENTATIVE STRATEGIES

A. HIGH FIRE THREAT DISTRICT

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

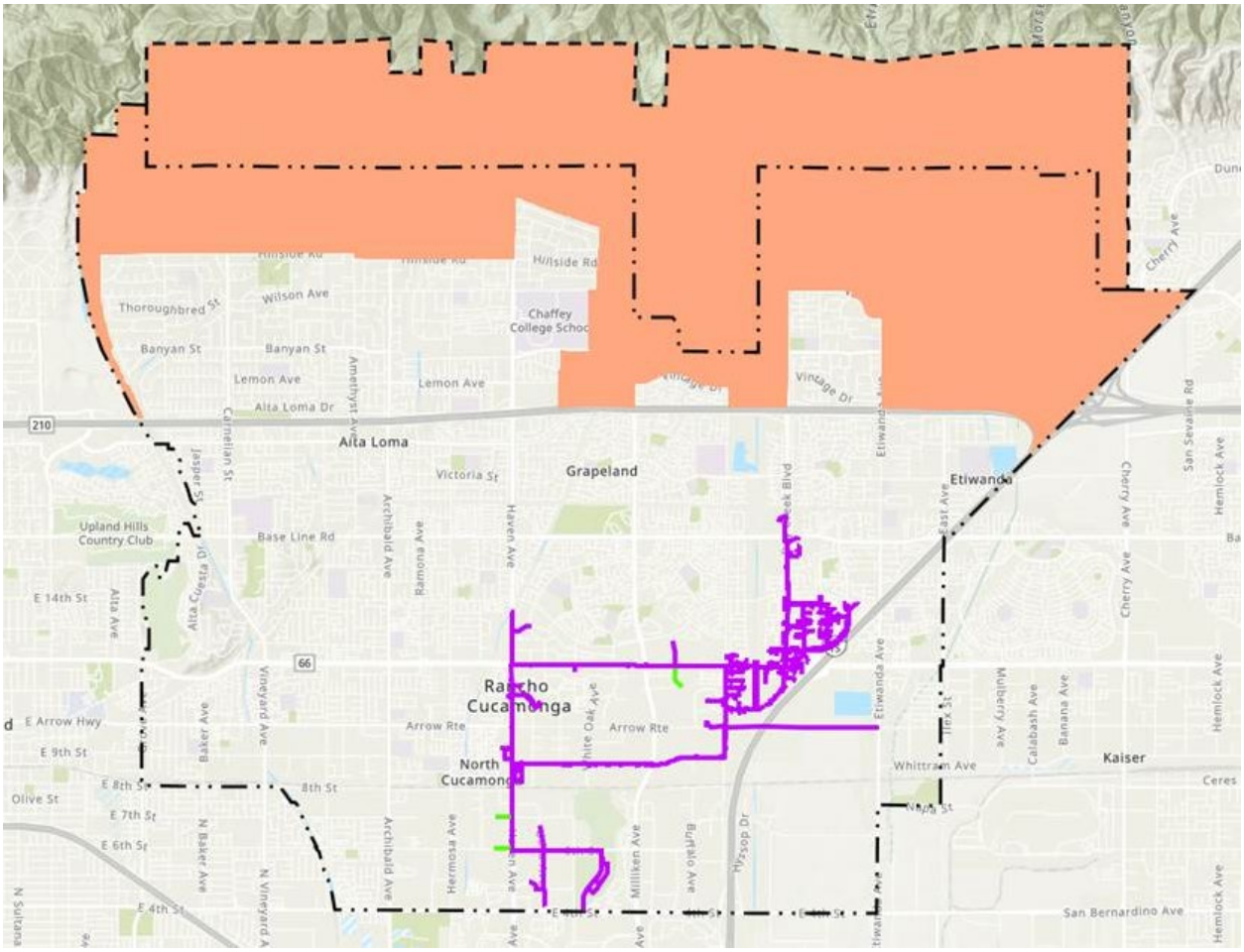
CPUC's Fire Threat Map



Additionally, the Rancho Cucamonga City Council, acting as the Board of Directors of the Fire District also adopted a Wildland Urban Interface Fire Area Map for the City (see the map below), referring to the zone where undeveloped, wildland vegetation transitions to developed land such as residential neighborhoods which are at risk of wildfires.

[4] Adopted by CPUC Decision 17-12-024.

Rancho Cucamonga Fire District's Wildland Urban Interface
Fire Area Map with RCMU Electrical Circuits



The Fire District's fire area map matches closely to the CPUC's Fire-Threat Map and the existing RCMU underground electrical circuits (shown in purple) are all located in the low-risk category.

B. DESIGN AND CONSTRUCTION STANDARDS

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

C. VEGETATION MANAGEMENT

RCMU has a 100% underground electric system, so the standard vegetation management practices do not apply to RCMU

D. INSPECTIONS

RCMU meets or exceeds the minimum inspection requirements provided in the CPUC's GO 165 (Inspection Requirements for Electric Distribution Facilities) by annually patrolling all pad mounted Transformers, Switches and Capacitors, with a detailed inspection every 5 years. 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, RCMU currently does not have any overhead powerlines located within or near the High-Fire Threat District within the CPUC's Fire Threat Map. However, RCMU staff uses their knowledge of the specific environmental and geographical conditions of RCMU's service territory to determine if any particular areas require more frequent inspections if necessary.

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

E. RECLOSING POLICY

RCMU does not have any automatic reclosers deployed downstream of RCMU's Arbors substation. All of RCMU's circuit breakers have reclosing functionality which is conducted manually by a lineman in the field. RCMU's system currently does not have this capability to be controlled by SCADA or other remote controls. RCMU has the capability, should it be deemed necessary, to change the relay or reclosing settings during adverse conditions.

F. DEENERGIZATION

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

VI. RESTORATION OF SERVICE

In the unlikely event of a wildfire or other emergency event caused by or affecting RCMU's electric system, that would require a public safety power shutoff, the City of Rancho Cucamonga will maintain a proactive plan to communicate with the community during high fire threat periods and disasters.

• Coordinate with the Fire District and the Rancho Cucamonga Police through the City's EOC during emergencies or large-scale outages;
• Expand social media for the public to see current outages and estimated restoration times in coordination with the City's Communications Team.
Communication plans through the City's EOC will allow RCMU to coordinate with applicable emergency service personnel along with maintaining open lines of communication with customers, media and internal City staff.

RCMU will work as quickly as possible to restore power safely, following an event, in cooperation with the City's Fire District, Police, and Public Works Departments. RCMU will also engage its on-call high voltage contractors as-needed.

RCMU staff and its contractors will ensure which circuits are to be brought up safely and that any vital loads are restored first followed by non-vital loads. In most cases, the following restoration priorities will be followed depending on the specific incident and available resources:

• Public safety in the affected areas;
• Worker safety in performing the restoration work;
• Life-support or critical customers;
• Critical infrastructure (Key City facilities, City Police and Fire Departments, other key utility facilities (e.g., fiber communications);
• Major commercial activities/accounts critical to continuity of community services (e.g., gas stations, food stores, home supply stores, repair shops, eateries and lodging facilities, financial institutions, etc.);
• To reduce the total number of customers affected;
• To reduce the length of time customers have been without power.

In directing restoration efforts to best achieve the above priorities, RCMU Staff will generally find it most efficient to dedicate restoration resources to the following types of facilities in the following order of priority to optimally restore electric services:
• Arbors Substation located on Rochester Ave and Stadium Way;
• Distribution circuits (12 kV);
• Distribution feeders;
• Distribution transformers;
• Service lines.

VII. EVALUATING OF THE PLAN

A. METRICS AND ASSUMPTIONS FOR MEASURING PLAN PERFORMANCE

RCMU will track two metrics to measure the performance of this Wildfire Mitigation Plan: (1) number of fire ignitions; and (2) wires down causing fires within the service territory.

METRIC 1: FIRE IGNITIONS

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

- RCMU 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
- RCMU has knowledge that the fire occurred.

In future Wildfire Mitigation Plans, RCMU 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.

METRIC 2: WIRES DOWN

The second metric is the number of distribution and transmission wires downed within RCMU's service territory. For purposes of this metric, a wires down event includes any instance where an electric transmission or primary distribution conductor falls to the ground or on to a foreign object. RCMU will divide the wires down metric between wires down inside and outside of the High Fire Threat District.

RCMU will not normalize this metric by excluding unusual events, such as severe storms. Instead, RCMU will supplement this metric with a qualitative description of any such unusual events.

B. IMPACT OF METRICS ON PLAN

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

C. MONITORING AND AUDITING THE PLAN

This Wildfire Mitigation Plan will be presented to the Rancho Cucamonga City Council and RCMU staff will present updates to this plan on an annual basis. Additionally, a qualified

independent evaluator will review this plan and determine its compliance to the Rancho Cucamonga City Council.

D. IDENTIFYING AND CORRECTING DEFICIENCIES IN THE PLAN

Based on the recommendations of the Rancho Cucamonga City Council, RCMU will correct any identified deficiencies.

E. MONITORING THE EFFECTIVENESS OF INSPECTIONS

A key mitigation measure against wildfires is vegetation management. Since RCMU has a 100% underground electric system, the standard vegetation management inspections do not apply to RCMU.

VIII. INDEPENDENT AUDITOR

Public Utilities Code section 8387(c) requires RCMU to contract with a qualified independent evaluator with experience in assessing the safe operation of electrical infrastructure to review and assess the comprehensiveness of this Wildfire Mitigation Plan. The independent evaluator must issue a report that is posted to the City's website. This report must also be presented to the Rancho Cucamonga City Council at a public meeting.

In evaluating and selecting an independent evaluator as required in PUC Section 8387(c), the City determined that the Fire District is the most qualified independent evaluator who understand the local conditions and fire risks for the City of Rancho Cucamonga and is aware that RCMU's service area is located in a low-risk fire threat zone with 100% underground electric wire equipment.

The City believes that the Fire District is qualified to review the comprehensiveness of the RCMU Wildfire Mitigation Plan.

RANCHO CUCAMONGA FIRE PROTECTION DISTRICT

INDEPENDENT EVALUATION OF THE RANCHO CUCAMONGA MUNICIPAL UTILITY'S WILDFIRE MITIGATION PLAN

City Council Approved: December 18, 2019

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I. WILDFIRE MITIGATION PLAN REQUIREMENTS

A. SENATE BILL 901

Senate Bill (SB) 901 (2018) requires all publicly owned electric utilities (POUs), including the City's Rancho Cucamonga Municipal Utility (RCMU) to prepare and present a wildfire mitigation plan (WMP) to its governing board prior to January 1, 2020, and annually thereafter. SB 901 identifies specific topics that must be addressed in each POU's WMP, including describing the POU's wildfire mitigation preventative strategies and programs. POUs must also have their plan reviewed by a qualified independent evaluator to assess the comprehensiveness of the plan.

This report serves as the independent evaluation of RCMU's WMP in compliance with SB 901.

B. AB 1054 & AB 111

Assembly Bill (AB) 1054 (2019) and AB 111 (2019) created a new state agency called the California Wildfire Safety Advisory Board ("Board"), which will be made up of seven members, five appointed by the Governor, one appointed by the Speaker of the Assembly, and one appointed by the Senate Rules Committee. AB 1054 requires that every POU must submit its WMP to the Board by July 1 of each year, starting in 2020. The Board will then review the POU WMP and provide comments and advisory opinions on the content and sufficiency of the WMP.

C. RCMU'S WMP REQUIREMENTS

California Public Utilities Code (PUC) § 8387(b)(2) lists the statutory requirements for RCMU's WMP. These are the specific elements that the Rancho Cucamonga Fire Protection District must review in order to make its determination for this report. The following list provides the specific elements that must be addressed in RCMU's WMP:

- **Responsibilities:** An accounting of the responsibilities of persons responsible for executing the plan. (PUC § 8387(b)(2)(A))
- **Objectives:** The objectives of the wildfire mitigation plan. (PUC § 8387(b)(2)(B))
- **Preventive Strategies:** A description of the preventive strategies and programs to be adopted by the local publicly owned electric utility or electrical cooperative to minimize the risk of its electrical lines and equipment causing catastrophic wildfires, including consideration of dynamic climate change risks. (PUC § 8387(b)(2)(C))

- **Evaluation Metrics:** A description of the metrics the local publicly owned electric utility or electrical cooperative plans to use to evaluate the wildfire mitigation plan's performance and the assumptions that underlie the use of those metrics. (PUC § 8387(b)(2)(D))

- **Impact of Metrics:** A discussion of how the application of previously identified metrics to previous wildfire mitigation plan performances has informed the wildfire mitigation plan. (PUC § 8387(b)(2)(E))

- **Recloser and/or De-energization Protocols:** Protocols for disabling reclosers and deenergizing portions of the electrical distribution system that consider the associated impacts on public safety, as well as protocols related to mitigating the public safety impacts of those protocols, including impacts on critical first responders and on health and communication infrastructure. (PUC § 8387(b)(2)(F))

- **Customer Notification Procedures:** Appropriate and feasible procedures for notifying a customer who may be impacted by the deenergizing of electrical lines. The procedures shall consider the need to notify, as a priority, critical first responders, health care facilities, and operators of telecommunications infrastructure.[1] (PUC § 8387(b)(2)(G))

- **Vegetation Management:** Plans for vegetation management. (PUC § 8387(b)(2)(H))

- **Inspections:** Plans for inspections of the local publicly owned electric utility's or electrical cooperative's electrical infrastructure. (PUC § 8387(b)(2)(I))

- **Prioritization of Wildfire Risks:** A list that identifies, describes, and prioritizes all wildfire risks, and drivers for those risks, throughout the local publicly owned electric utility's or electrical cooperative's service territory. The list shall include, but not be limited to, both of the following:

[1] On October 2, 2019, the Governor signed into law SB 560 (stats. 2019, ch. 410), which amends the language of this provision. As amended, this language states:

> Appropriate and feasible procedures for notifying a customer who may be impacted by the deenergizing of electrical lines. The procedures shall direct notification to all public safety offices, critical first responders, health care facilities, and operators of telecommunications infrastructure with premises within the footprint of potential deenergization for a given event.

Because the statute was amended after RCMU prepared its WMP and because this new language is not yet effective, RCMU's WMP reflects the prior statutory language. The Rancho Cucamonga Fire Protection District (Fire District) has determined that because RCMU is not adopting deenergization protocols, this statutory change does not impact the Fire District's review.

- Risks and risk drivers associated with design, construction, operation, and maintenance of the local publicly owned electric utility's or electrical cooperative's equipment and facilities. (PUC § 8387(b)(2)(J)(i))

- Particular risks and risk drivers associated with topographic and climatological risk factors throughout the different parts of the local publicly owned electric utility's or electrical cooperative's service territory. (PUC § 8387(b)(2)(J(ii))

- **CPUC Fire Threat Map Adjustments:** Identification of any geographic area in the local publicly owned electric utility's or electrical cooperative's service territory that is a higher wildfire threat than is identified in a commission fire threat map, and identification of where the commission should expand a high fire-threat district based on new information or changes to the environment. (PUC § 8387(b)(2)(K))

- **Enterprisewide Risks:** A methodology for identifying and presenting enterprisewide safety risk and wildfire-related risk. (PUC § 8387(b)(2)(L))

- **Restoration of Service:** A statement of how the local publicly owned electric utility or electrical cooperative will restore service after a wildfire. (PUC § 8387(b)(2)(M))

- **Monitor and Audit:** A description of the processes and procedures the local publicly owned electric utility or electrical cooperative shall use to do all of the following:

    - Monitor and audit the implementation of the wildfire mitigation plan. (PUC § 8387(b)(2)(N)(i))

    - Identify any deficiencies in the wildfire mitigation plan or its implementation, and correct those deficiencies. (PUC § 8387(b)(2)(N)(ii))

    - Monitor and audit the effectiveness of electrical line and equipment inspections, including inspections performed by contractors, that are carried out under the plan, other applicable statutes, or commission rules. (PUC § 8387(b)(2)(N)(iii))

II. DESCRIPTION OF RANCHO CUCAMONGA MUNICIPAL UTILITY

The Rancho Cucamonga Municipal Utility (RCMU) provides economic and reliable electricity to over 1,200 metered businesses and residents in a selected area within the Southeastern portion of the City of Rancho Cucamonga. RCMU's service area is located in an urban area that is categorized in the "Low" – Tier 1 (Low Risk) fire threat category. Additionally, RCMU's electric system is 100% undergrounded, which serves as an effective mitigation measure to reduce the potential of any power-line ignited wildfires.

Despite its low risk, RCMU has taken appropriate actions to help its region prevent and respond to the increasing risk of devastating wildfires by following all applicable design, construction, operation, and maintenance requirements that reduce safety risks associated with its electric system. This Wildfire Mitigation Plan (WMP) describes the safety-related measures that RCMU follows to reduce its risk of causing wildfires.

III. INDEPENDENT EVALUATION

A. INDEPENDENT EVALUATOR REQUIREMENT

SB 901 requires each POU to "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."[2] Additionally, the independent evaluator's assessment of the comprehensiveness of the POU WMP must be issued in a report that is both posted to the POU's website and presented at a public meeting of the POU's governing board.

B. RANCHO CUCAMONGA FIRE PROTECTION DISTRICT QUALIFICATIONS

SB 901 requires that the qualified independent evaluator that performs the assessment of RCMU's WMP must have experience in assessing the safe operation of electrical infrastructure. RCMU has determined that the Rancho Cucamonga Fire Protection District (Fire District) is the most qualified independent evaluator who understands the local conditions and fire risks for the City of Rancho Cucamonga and is aware of the RCMU service area. The Fire District has served the City of Rancho Cucamonga area since 1975.

C. EVALUATION METHODOLOGY

[2] Cal. Pub. Util.Code § 8387(c).

The Fire District will evaluate the comprehensiveness the RCMU's WMP on the following measures:

- **Statutory Compliance:** The Fire District will ensure that each required element specified in SB 901 (as listed in Section II.C. above) is either addressed in RCMU's WMP or RCMU has sufficiently described why that element is not applicable due to RCMU's size, geography, system, or other relevant factor.

- **Industry Comparison:** The Fire District is familiar with existing industry practices and has reviewed the Investor Owned Utility (IOU) WMPs previously filed with the California Public Utilities Commission (CPUC).[3] The Fire District has compared RCMU's WMP against existing practices and any comparable actions planned by the IOUs.

- **Physical Inspections:** Because of the Fire District's role in Rancho Cucamonga, the Fire District has access to and regularly inspects City facilities as needed, including electrical infrastructure. Therefore, the Fire District has access to all data on the fire mitigation decisions and performance of RCMU. The Fire District's evaluation of the RCMU WMP draws upon this historical data and expertise in fire prevention and safety.

D. METRICS

The RCMU WMP proposes the following metrics to measure performance of its wildfire mitigation measures: (1) number of fire ignitions,[4] and (2) wires down events.[5] The Fire District has determined that these are appropriate metrics for this initial WMP. The Fire District will evaluate the metrics selected in Phase 2 of the CPUC's current Wildfire Mitigation Plan rulemaking for the IOUs (R.18-10-007) and determine if any additional metrics should be incorporated into future RCMU WMPs.

[3] IOU WMPs are available at: https://www.cpuc.ca.gov/SB901/.

[4] For purposes of this metric, a fire ignition is defined as follows: (i) RCMU facility was associated with the fire; (ii) the fire was self-propagating and of a material other than electrical and/or communication facilities; (iii) the resulting fire traveled greater than one linear meter from the ignition point; and (iv) RCMU has knowledge that the fire occurred.

[5] For purposes of this metric, a wires down event includes any instance where an electric transmission or primary distribution conductor falls to the ground or on to a foreign object.

IV. EVALUATION OF RCMU'S WILDFIRE MITIGATION PLAN

A. MINIMIZING WILDFIRE RISKS

California Public Utilities Code section 8387(a) requires the following:

> 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.

The Fire District has determined that RCMU complies with this standard due to the construction of RCMU's equipment and resources not being located in an area that is considered an elevated or extreme risk of electric line wildfire. Also, with RCMU's electrical lines being entirely underground, this significantly decreases the opportunity for wildfires to occur above ground during high fire danger conditions. This was also addressed and discussed by the Rancho Cucamonga City Council via resolution No. 18-103 on September 19, 2018.

B. EVALUATION OF WMP ELEMENTS

The following table lists each required element for RCMU's WMPs and provides the Fire District's assessment of the comprehensiveness of that element within RCMU's WMP.

Required Element of WMP	Location in WMP	Summary of RCMU's WMP	Independent Evaluator's Assessment
PUC § 8387(b)(2)(A): An accounting of the responsibilities of persons responsible for executing the plan.	Section III	The Rancho Cucamonga City Council is responsible for executing RCMU's WMP.	***RCMU's WMP meets this requirement.***
PUC § 8387(b)(2)(B): The objectives of the wildfire mitigation plan.	Section II	RCMU's WMP provides measures that effectively reduce the probability that RCMU's electric system could be the origin or contributing source for the ignition of a wildfire.	***RCMU's WMP meets this requirement.***

Required Element of WMP	Location in WMP	Summary of RCMU's WMP	Independent Evaluator's Assessment
PUC § 8387(b)(2)(C): A description of the preventive strategies and programs to be adopted by the local publicly owned electric utility or electrical cooperative to minimize the risk of its electrical lines and equipment causing catastrophic wildfires, including consideration of dynamic climate change risks.	Section V	Even though RCMU's Service Area is not in the High Fire Threat Area, RCMU will ensure that its design and construction standards and inspections meets all requirements.	***RCMU's WMP meets this requirement.***
PUC § 8387(b)(2)(D): A description of the metrics the local publicly owned electric utility or electrical cooperative plans to use to evaluate the wildfire mitigation plan's performance and the assumptions that underlie the use of those metrics.	Section VII.A	Metric 1: Fire Ignitions Metric 2: Wires Down	***RCMU's WMP meets this requirement.***
PUC § 8387(b)(2)(E): A discussion of how the application of previously identified metrics to previous wildfire mitigation plan performances has informed the wildfire mitigation plan.	Section VII.B	Metric data will be collected as necessary.	***RCMU's WMP meets this requirement.***
PUC § 8387(b)(2)(F): Protocols for disabling reclosers and deenergizing portions of the electrical distribution system that consider the associated impacts on public safety, as well as protocols related to mitigating the public safety impacts of those protocols, including impacts on critical first responders and on health and communication infrastructure.	Section V. E and F	Protocols have been placed in the WMP.	***RCMU's WMP meets this requirement.***
PUC § 8387(b)(2)(G): Appropriate and feasible procedures for notifying a customer who may be impacted by the deenergizing of electrical lines. The procedures shall consider the need to notify, as a priority, critical first	Section VI	Protocols and procedures have been placed in the WMP.	***RCMU's WMP meets this requirement.***

Required Element of WMP	Location in WMP	Summary of RCMU's WMP	Independent Evaluator's Assessment
responders, health care facilities, and operators of telecommunications infrastructure.			
PUC § 8387(b)(2)(H): Plans for vegetation management.	Section V.C	N/A: This section is not applicable to RCMU.	***This element is Not Applicable to RCMU; therefore, it was not included in RCMU's WMP.***
PUC § 8387(b)(2)(I): Plans for inspections of the local publicly owned electric utility's or electrical cooperative's electrical infrastructure.	Section V.D	RCMU meets or exceeds the minimum inspection requirements provided in the CPUC's GO 165	***RCMU's WMP meets this requirement.***
PUC § 8387(b)(2)(J): A list that identifies, describes, and prioritizes all wildfire risks, and drivers for those risks, throughout the local publicly owned electric utility's or electrical cooperative's service territory. The list shall include, but not be limited to, both of the following: **(i)** Risks and risk drivers associated with design, construction, operation, and maintenance of the local publicly owned electric utility's or electrical cooperative's equipment and facilities. **(ii)** Particular risks and risk drivers associated with topographic and climatological risk factors throughout the different parts of the local publicly owned electric utility's or electrical cooperative's service territory.	Section IV.A	The primary risk drivers for wildfire in RCMU's Service Area are the following: • High Temperature; • Low Humidity; • Hillside Terrain; • Fire Weather Conditions; • Prolonged Drought; • Climate Change; • Fire History	***RCMU's WMP meets this requirement.***
PUC § 8387(b)(2)(K): Identification of any geographic area in the local publicly owned electric utility's or electrical cooperative's service territory that is a higher wildfire threat than is identified in a commission fire threat map, and	Section V.A	RCMU's service area is not located in a high fire threat district. However, the City's Wildland Urban Interface Fire Area Map and the CPUC's	***RCMU's WMP meets this requirement.***

Required Element of WMP	Location in WMP	Summary of RCMU's WMP	Independent Evaluator's Assessment
identification of where the commission should expand a high fire threat district based on new information or changes to the environment.		Fire-Threat Map is included as reference.	
PUC § 8387(b)(2)(L): A methodology for identifying and presenting enterprisewide safety risk and wildfire-related risk.	Section IV.B	This is identified in the WMP.	***RCMU's WMP meets this requirement.***
PUC § 8387(b)(2)(M): A statement of how the local publicly owned electric utility or electrical cooperative will restore service after a wildfire.	Section VI	This is identified in the WMP.	***RCMU's WMP meets this requirement.***
PUC § 8387(b)(2)(N): A description of the processes and procedures the local publicly owned electric utility or electrical cooperative shall use to do all of the following: (i) Monitor and audit the implementation of the wildfire mitigation plan. (ii) Identify any deficiencies in the wildfire mitigation plan or its implementation, and correct those deficiencies. (iii) Monitor and audit the effectiveness of electrical line and equipment inspections, including inspections performed by contractors, that are carried out under the plan, other applicable statutes, or commission rules.	Section VII.C-E	This is identified in the WMP.	***RCMU's WMP meets this requirement.***

V. RESULTS AND CONCLUSION

The Fire District concludes that RCMU's WMP comprehensively addresses all of the applicable statutorily required elements for the Publicly Owned Utilities' WMP as specified in California Public Utilities Code section 8387. The Fire District further finds that RCMU has taken reasonable actions to minimize the risk that its lines or equipment will cause a wildfire.