



WILDFIRE MITIGATION PLAN

VERSION 1.0

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I. OVERVIEW

A. POLICY STATEMENT

The City of Shasta Lake ("City") Electric Department's overarching goal is to provide safe, reliable, and environmentally-friendly energy at the lowest possible cost consistent with sound business practices. In order to meet this goal, the City, through its Electric Department, 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

This Wildfire Mitigation Plan ("WMP" or "Plan") describes in detail the range of activities that the Electric Department is taking to mitigate the threat of power-line ignited wildfires, including its various programs, policies, and procedures. This Plan is subject to direct supervision by the City of Shasta Lake City Council and is implemented by the City Manager. This Plan complies with the requirements of Public Utilities Code section 8387 for publicly owned electric utilities to prepare a wildfire mitigation plan by January 1, 2020, and annually thereafter.

The policies described in this Plan describe the City's policies and preparedness in mitigating risks associated with power-line ignited wildfires. The Plan compliments other City planning documents, such as the City of Shasta Lake Hazard Mitigation Plan and other emergency planning documents administered by other departments within the City.

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 Strategies;
- Metrics for measuring the performance of the Plan and identifying areas for improvement;
- Community outreach and education.

II. OBJECTIVES OF THE WILDFIRE MITIGATION PLAN

A. MINIMIZING SOURCES OF IGNITION

The primary goal of this Wildfire Mitigation Plan is to minimize the probability that the City's transmission and distribution system may be an original or contributing source for the ignition of a fire. The City has evaluated the prudent and cost-effective improvements to its physical assets, operations, and training that can help to meet this objective, and has implemented those changes consistent with this evaluation.

B. RESILIENCY OF THE ELECTRIC GRID

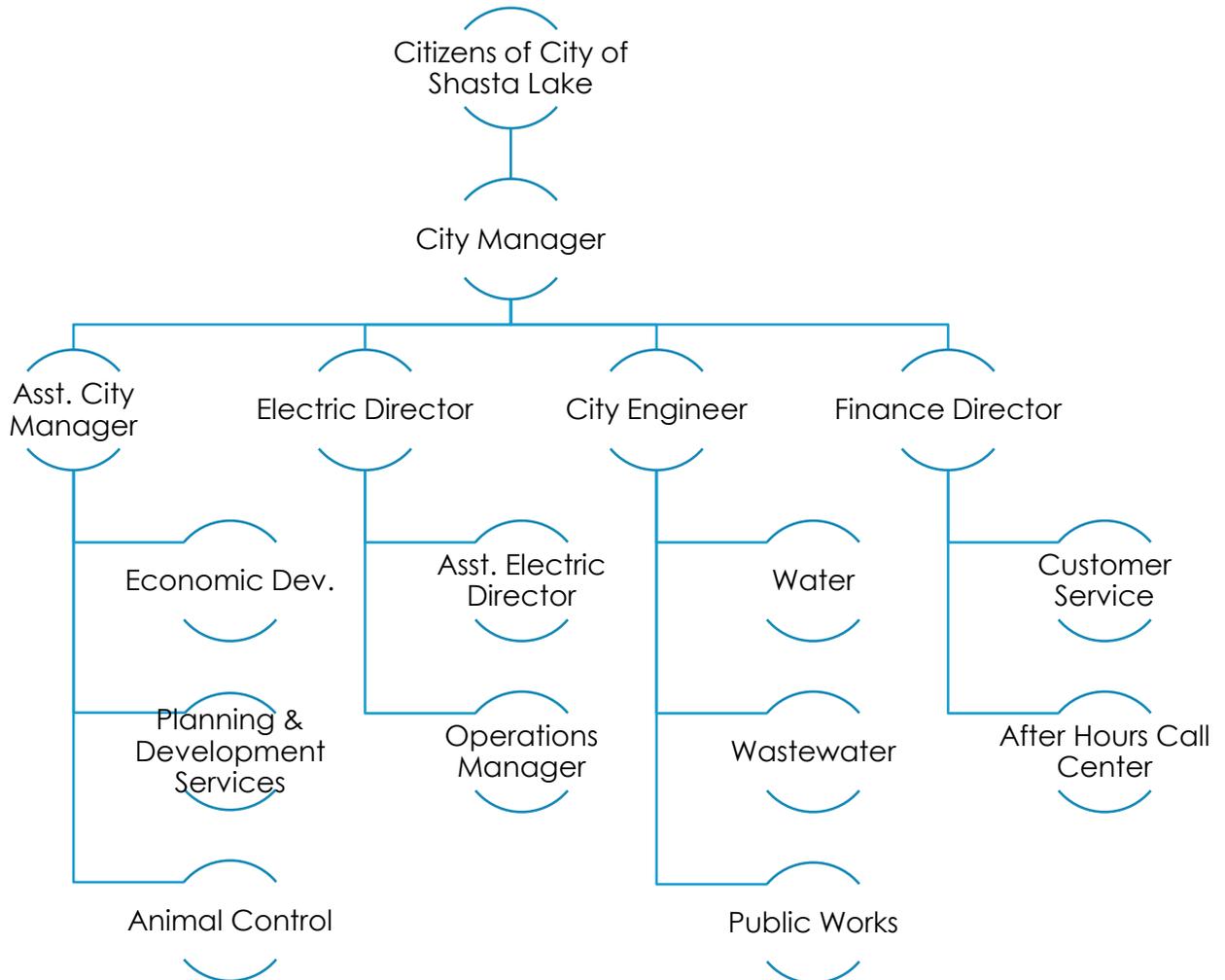
The secondary goal of this Wildfire Mitigation Plan is to improve the resiliency of the electric grid. As part of the development of this Plan, the City's Electric Department is assessing new industry practices and technologies that will reduce the likelihood of a disruption in service and improve the restoration of service.

C. MINIMIZING UNNECESSARY OR INEFFECTIVE ACTIONS

The final goal for this Wildfire Mitigation Plan is to measure the effectiveness of specific wildfire mitigation strategies. Where a particular action, program, or protocol is determined to be unnecessary or ineffective, the City will assess whether a modification or replacement is merited. This Plan will also help determine if more cost-effective measures would produce the same or better results.

III. ROLES AND RESPONSIBILITIES

A. SHASTA LAKE ROLES AND RESPONSIBILITIES



The City of Shasta Lake ("City") utilizes a City Council / City Manager reporting hierarchy. The 5-person City Council are elected by voters who reside within city limits to rotating 4-year terms. The Mayor and Vice Mayor positions are in title with these positions nominated and appointed every 2 years by the City Council. The City Council is responsible for the adoption of all policy and delegates the operational implementation of policy to the City Manager.

The City Manager has full operational authority of the City and operates as the Chief Executive, reporting directly to the City Council. The City Manager provides direction and management to all City staff while implementing City Council policy. A subset of the City organizational chart is

shown above to show reporting hierarchy of groups or positions that have customer-facing functions and/or roles in implementing this WMP or in emergency response.

The City Manager acts as the Public Information Officer (PIO) for general communication with the media and public and during emergency situations. The City Manager may delegate this role to the Assistant City Manager. The Assistant City Manager also assumes operational authority of the City Manager in the absence of the City Manager.

The Finance Director oversees customer-facing functions, including communications with customers regarding power outages, receiving and routing reports of potentially faulty City equipment, receiving and routing reports of potentially dangerous conditions, etc. The Finance Director administers the contract with the third-party after-hours call center service, which is activated outside normal business hours, holidays, and weekends. The operators at the after-hours call center are responsible for receiving and processing call details and forwarding to the appropriate on-call City personnel for further action.

The Electric Utility Director has overall functional management of the Electric Department and provides day-to-day oversight of the department. The Assistant Electric Director and Electric Operations Manager provide division oversight. The Electric Director reports to the City Manager.

The Assistant Electric Director oversees the design and engineering tasks associated with the distribution system, new service interconnections, engineering standards, SCADA communications, Advanced Metering Infrastructure communications and design, among other duties. The Assistant Electric Director assumes operational authority of the department in the absence of the Electric Director.

The Electric Operations Manager oversees the daily electric utility operations, including: construction, maintenance, vegetation management, and other daily duties. The Electric Operations Manager oversees all field personnel and reports to the Electric Utility Director.

Electric Department staff have the following responsibilities regarding fire prevention, response and investigation:

- Conduct work in a manner that will minimize potential fire dangers.
- Take all reasonable and practicable actions to prevent and suppress fires resulting from City electric facilities.
- Coordinate with federal, state, and local fire management personnel to ensure that appropriate preventative measures are in place.
- Immediately report fires, pursuant to specified procedures.
- Take corrective action when observing or having been notified that fire protection measures have not been properly installed or maintained.
- Ensure compliance with relevant federal, state, and industry standard requirements.
- Ensure that wildfire data is appropriately collected.
- Maintain adequate training programs for all relevant employees.

B. COORDINATION WITH OTHER CITY DEPARTMENTS

In addition to the electric utility, the City owns and operates a water utility and waste water utility, which are administered by their respective department staff and whose distribution infrastructure are administered by the City's Public Works department.

The Water Utility provides retail service to approximately 3,900 customers within the City's boundaries and to the Shasta Dam Visitor Center that is operated by the US Bureau of Reclamation. The City's "Fishermans Point Water Treatment Plant" (WTP) is the single source of all potable water supply within the City of Shasta Lake. This includes all water service to all homes, businesses, and industrial customers; all fire hydrants within City boundaries, and all water used to meet fire flow requirements pursuant to applicable laws and building codes. The WTP relies upon electric service from the City's Electric Department to function properly.

The City owns and operates a Waste Water Utility, including a Waste Water Treatment Plant (WWTP) and 4 sewage lift stations (Pump Stations). The Waste Water Utility staff operates the WWTP. The WWTP and all Pump Stations rely on electric service from the City's Electric Department to function properly.

The City's Public Works Department is responsible for operating and maintaining the water distribution system and sewage collection system, including all pump stations.

The WTP, WWTP, and 3 of 4 Pump Stations are each equipped with a diesel-powered backup generator that is designed to maintain each critical facility's vital functions during short-duration power outages. These units and the supporting infrastructure are not designed for prolonged power outages.

Recent events highlight the importance of City electric service to the water and wastewater facilities. The City suffered from city-wide power outage events on July 26, 2018 (Carr Fire) and on February 13, 2019 (winter storms), both events declared emergencies by the President of the United States.

- Carr Fire: Loss of electric service for 23-hours significantly impacted the WTP ability to produce water for the City's distribution system. Treated water supply in the City's main distribution storage tank fell to approximately 5 feet, which could supply the City's needs for approximately 3-7 hours. Had the outage continued, and had water supplies been depleted, all water services, including fire hydrants and building fire flows, would be inoperable exposing the community to substantial and diverse safety risks.
- February Winter Storms: Loss of electric service for 6-hours at a sewage pump station caused a temporary storage basin to fill. Raw sewage levels rose to approximately 1 foot from storage capacity before electric service had been restored allowing the pumps to operate to safely evacuate waste material. Had the power outage continued, and sewage levels continued to rise, raw sewage would have potentially spilled into local creeks and waterways that connect to critical wildlife habitat.

When electric operations could, or are known to impact the water utility, waste water utility, or public works, City utilities staffs will coordinate to mitigate, or where practical, eliminate impact to utility service continually. Electric Department staff collaborates proactively to notify City water, wastewater, and public works staff of planned outages and communicate as quickly as practical during energy power outages that impact one or multiple enterprises. This emergency notification will be extended to on-duty operator(s) or supervisor(s).

C. COORDINATION WITH COMMUNICATION INFRASTRUCTURE PROVIDERS

During emergency operations, City staff updates the customer-facing information websites or social media for power outage information, affected areas, and restoration updates.

D. STANDARDIZED EMERGENCY MANAGEMENT SYSTEM

As a local governmental agency,¹ the City 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 regularly coordinates and communicates with the relevant safety agencies as well as other relevant local and state agencies.

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

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.

organizations. Shasta County serves as the Operational Area and is guided by the Emergency Management Council that is made up of the County Sheriff, Fire Warden, Chair of the Board of Supervisors, and senior leadership positions from the County.

The Shasta County Sheriff's Office of Emergency Services (OES):

- Coordinates with Federal, State, and local agencies to prepare, respond, and recover from emergencies and natural disasters.
- Is responsible for maintaining and updating the County Emergency Operation Plan (EOP), which is an all hazards plan for Shasta County.
- Has a direct link to the CA Governor's Office of Emergency Services (Cal-OES) during disasters or any other critical incidents and can work with Cal-OES to obtain a Presidential emergency proclamation.
- Maintains the county Emergency Operation Center (EOC), which can be activated to address major incidents to carry out the functions of the EOP.
- Serves as a point of contact for the City of Shasta Lake, and other local agencies, to Cal-OES.

The City is a member of the California Utility Emergency Association, which plays a key role in ensuring communications between utilities during emergencies. The City also participate in the Western Energy Institute's Western Region Mutual Assistance Agreement, which is a mutual assistance agreement covering utilities across a number of western states.

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

- Extended drought;
- Vegetation type;
- High winds;
- Variable terrain;
- Lack of early fall precipitation;
- Restrictions on the City's ability to effectively manage vegetation around overhead electric assets that reside on Federal lands due to Federal policies.

B. ENTERPRISEWIDE SAFETY RISKS

The City will use a methodical approach to address and mitigate enterprise safety risks. This approach will consider the risk factors that each condition presents. The risk assessment will identify and manage potential risks that could undermine core business functions, threaten business continuity or impact recovery, including:

- Unavailability of Western Area Power Administration's (WAPA) transmission interconnections at Flanagan (primary feed) and/or Keswick (alternate feed);
- Unavailability of the City's distribution substations (i.e., Knauf and Central Valley);
- Loss of remote telemetry communications, including SCADA, AMI smart electric meter communications, and internet service;
- Loss of radio communications;
- Loss of cellular communications;
- Impacted roadways limiting movement of personnel and equipment and limiting access to electric points of interconnection to WAPA substations (Flanagan and Keswick);
- Impacted roadways limiting access to City facilities (Corporation Yard, City Hall, Water Treatment Plant, Waste Water Treatment Plant, Pump Stations);
- Coordination and information sharing on "joint poles" (i.e., where multiple utilities have infrastructure on a single pole) to ensure (a) proper maintenance of the pole by the joint pole owners and "setting utility" (i.e. the one entity responsible for installing the pole), (b) coordination and information sharing amongst joint-pole tenants (e.g., tenant electric/phone/cable disclosing material weight with joint pole owners and "setting utility" prior to installing on joint pole so proper load calculations can be evaluated), and (c) proper vegetation management by joint-pole tenants to ensure proper clearances to protect all joint-pole tenant assets.

- Fires and wildfires caused by sources other than power-lines and electric utility operations. This segment of fires and wildfires represent approximately 90% of ignitions on average.

C. CHANGES TO CPUC FIRE THREAT MAP

The City does not recommend any changes to the CPUC statewide Fire Threat Map, adopted January 19, 2018, at this time. Future changes in the City's knowledge or recommendations going forward will be communicated as required by statute.

V. WILDFIRE PREVENTATIVE STRATEGIES

A. HIGH FIRE THREAT DISTRICT

Personnel from the City's Electric Department directly participated in the development of the California Public Utilities Commission's (CPUC) Fire-Threat Map,⁴ which designates a High-Fire Threat District. In the map development process, City staff worked with local fire officials to identify the areas of the City's electric service territory that are at an elevated or extreme risk of power line ignited wildfire. The Electric Department has incorporated the High Fire Threat District into its construction, inspection, maintenance, repair, and clearance practices.

B. WEATHER MONITORING

The Electric Department monitors current and forecasted weather data from a variety of sources including:

- United States National Weather Service;
- United States Forest Service Wildland Fire Assessment System;
- National Fire Danger Rating System;
- National Interagency Fire Center – Predictive Services for Northern and Southern California;
- Local weather data sources;
- Internal knowledge of local conditions; and
- Electric Department weather station at the City Corporation Yard.

Each work day, Electric Department staff will review at least one weather data source and assign one of two operating conditions based on the relevant weather data and knowledge of local conditions, with the normal operation condition applied by default unless otherwise noted:

(1) Normal: During normal conditions, no changes are made to operations or work policy.

(2) Extreme: During extreme fire-risk conditions, including Red Flag Warning (RFW) as declared by the National Weather Service, the Electric Department may delay routine work on energized primary lines (12.47 kV) as determined by the Electric Operations Manager or designee. The Electric Department may perform necessary work to preserve facilities or property and may preposition fire suppression personnel to sites with elevated risk of wildfire ignition. Extreme weather is defined as: weather phenomena that are at the extremes of the historical distribution and are rare for a particular place and/or time and/or RFW conditions.

⁴ Adopted by CPUC Decision 17-12-024.

C. DESIGN AND CONSTRUCTION STANDARDS

The City's electric facilities are designed and constructed to meet or exceed the relevant federal, state, or industry standard. The Electric Department treats CPUC General Order (GO) 95 as a guideline for minimum design and construction standards for overhead electrical facilities. The Electric Department meets or exceeds guidelines in GO 95 and monitors and follows as appropriate the National Electric Safety Code. The Electric Department updates its construction standards from time to time.

D. VEGETATION MANAGEMENT

The Electric Department maintains a comprehensive Vegetation Management Plan (VMP) to establish and implement the standards for clearing vegetation around powerline assets, which meets or exceeds the statutes and guidelines identified below, and updates the VMP from time to time as practices and technology evolve.

The City meets or exceeds the minimum industry standard vegetation management practices. The Electric Department meets: (1) Public Resources Code section 4292; (2) Public Resources Code section 4293; (3) GO 95 Rule 35; and (4) the GO 95 Appendix E Guidelines to Rule 35. These standards require significantly increased clearances in the High Fire Threat District. The time-of-trim guidelines do not establish a mandatory standard, but instead provide useful guidance to utilities. The Electric Department will use specific knowledge of growing conditions and tree species to determine the appropriate time of trim clearance in each circumstance.

E. INSPECTIONS

The Electric Department maintains a comprehensive Asset Inspection Plan (AIP) to establish and implement the standards for inspection and maintenance of City-owned powerline assets, which meets or exceeds the statutes and guidelines identified below, and updates the AIP from time to time as practices and technology evolve.

The City meets or exceeds the minimum inspection guidelines provided in CPUC GO 165 and CPUC GO 95, Rule 18. Additionally, Electric Department staff use their knowledge of the specific environmental and geographical conditions to determine when areas outside of the High Fire Threat District require more frequent inspections.

If Electric Department staff discovers a facility in need of repair that is owned by an entity other than the City, Electric Department staff will issue a notice to repair to the facility owner to facilitate any necessary repairs.

F. WORKFORCE TRAINING

The Electric Department has implemented work rules and complementary training programs for its workforce to help reduce the likelihood of an ignition. All field staff will be: trained in the

content of the WMP; trained in proper use and storage of fire extinguishers; required during pre-job briefings to discuss: potential(s) for ignition, environmental conditions (current and forecasted weather that coincides with the duration of work for the day); and to identify the closest fire extinguisher.

Any ignition will be reported to the Electric Director for follow-up.

G. RECLOSER POLICY

For this first iteration of the WMP, the City will disable automatic reclosing functions on all substation and field reclosers from May 1 through November 30, or as otherwise determined necessary by the Electric Director.

H. DEENERGIZATION

The City will continue its long-standing practice to deenergize its electric system when directed to by personnel from fire, law enforcement, or other emergency responding agencies. The City generally will not proactively deenergize its electric system during high fire threat periods based on the following:

- The City's electric service territory is approximately 11 square miles, with local fire response located centrally within this area;
- De-energizing the City's electric system could put the community at higher risk to wildfire due to its potential impact to the City's water supply, including all water supplied to City fire hydrants, potential for increased call volume and subsequent impact to law enforcement and fire agencies, and changes in human activity during power outages that could increase the opportunity for fire;
- The City has fully deployed Advanced Metering Infrastructure and SCADA systems on its electric infrastructure which enables staff to monitor, assess, and act upon system events remotely in real-time;
- The City plans to gather real-time information from field personnel patrolling areas with higher fire risk and may preposition fire suppression assets with electric field crews

1. IMPACTS TO PUBLIC SAFETY

Proactively deenergizing the City's electric grid is expected to impact Law Enforcement and Fire Response agencies differently. Such outages are not expected to have a significant impact to local Law Enforcement as the local resources may draw from the larger resource pool of the Shasta County Sheriff's Office, which also serves as the Shasta County Emergency Operation Center (EOC). Local buildings are equipped with backup generators that have performed reliably in recent unplanned power outage events. Law Enforcement officials do not expect prolonged and geographically extensive power outages to impact their communications, availability of personnel, equipment usage, or response time to call volume.

Widespread (i.e., city-wide, region-wide) and prolonged (i.e., PPS events lasting 2-7 days) power outages are expected to have significant adverse impact to local Fire Response operations. Fire representatives note that the City of Shasta Lake has a disproportionately large population of people who rely on life-sustaining, electricity-dependent medical equipment and note that calls for services received under normal circumstances regularly include people from this population. During past power outage events, call volume increases markedly for Fire personnel and commits local resources to provide medical aid. Once on scene, Fire Response personnel cannot leave a patient in medical need unless relieved by other qualified personnel. Such increases in medical-related service calls served by Fire Response personnel will compete for resources with fire-related service calls, suggesting that proactive power shutoffs will significantly and adversely diminish local Fire Response capabilities to combat wildfires should one start during a proactive power shutoff (recall that 90% of wildfires are caused by ignition sources other than powerline issues).

2. CUSTOMER NOTIFICATION PROTOCOLS

In the event of a planned outage (i.e., knowledge of the outage at least 24-hours in advance), the City shall contact impacted customers by phone, email, or in person to inform affected customers, if known, the projected start and end time of the outage. In the event of an unplanned outage or an outage event that impacts a broad set of customers, the City shall notify customers via social media and website communication platforms to provide updates on impacted areas, number of customers impacted, and restoration times, if known.

VI. COMMUNITY OUTREACH AND PUBLIC AWARENESS

The City of Shasta Lake is a publicly owned electric utility and maintains extensive relationships across all organizations in the community, including public safety agencies that lead emergency response efforts within the City. City management maintains constant contact with local law enforcement and fire agencies, including the Shasta County Sheriff's Office (SCSO) and the Shasta Lake Fire Protection District (SLFPD). SCSO provides law enforcement services to the City by a contract arrangement, and the City provides a Sheriff substation that is centrally located within the City. The Sheriff substation commander reports directly to the City Manager. The City regularly collaborates with SLFPD through various forums, including a newly formed "Community Emergency Preparedness" committee, and the City recently agreed to help fund a new full-time SLFPD Fire Prevention Officer who reports directly to the Fire Chief and will be responsible for all fire prevention, fire safety, and education activities in the SLFPD boundaries. The SLFPD Fire Prevention Officer's primary duties include enforcement of state and local fire prevention regulations, coordinate with the City building official and code enforcement staff for fire code enforcement activities, and conduct fire prevention inspections, among other duties.

The public has the opportunity to engage the elected governing body of the City of Shasta Lake at each City Council meeting. All City Council meetings are publicly agendized and regularly scheduled meetings are televised and local television and available via the City's website. All members of the public have an opportunity to address the City Council during public comment periods.

The City is active in the community offering support to a number of local non-profit organizations, the Chamber of Commerce, and a number of community events, such as: Boomtown Festival, Veterans' Day Parade, and the Big Idea Science Bowl held at Shasta Dam. The City staffs booths to engage the public in discussions on energy, water, wastewater, public safety, wildfire prevention and preparedness, and the City's overall efforts to promote public safety.

VII. RESTORATION OF SERVICE

Power restoration generally follows the same protocol regardless of cause, but exact steps and order of restoring service depends on specific details of the outage event. Restoration of service begins with manual patrols of the affected portions of the system before any circuits are reenergized. Suspect equipment or distribution assets that cannot be patrolled will remain deenergized. System performance, outage intelligence, and system abnormalities will be monitored via the City's SCADA system and its AMI system.

VIII. EVALUATING OF THE PLAN

A. METRICS AND ASSUMPTIONS FOR MEASURING PLAN PERFORMANCE

The City will track two metrics to measure the performance of this Wildfire Mitigation Plan: (1) number of fire ignitions; and (2) transmission and primary distribution wires down within the service territory.

METRIC 1: FIRE IGNITIONS

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

- City electric 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
- City has knowledge that the fire occurred.

In future WMPs, the City 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 the City's electric service territory. For purposes of this metric, a wires down event includes any instance where an electric transmission (i.e., 115,000 volt) or primary distribution conductor (i.e., 12,000 volt) falls to the ground or on to a foreign object. The City will divide the wires down metric between wires down inside and outside of the High Fire Threat area (i.e., Tiers 2 and 3 vs. Tier 1, respectively).

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

B. IMPACT OF METRICS ON PLAN

The City anticipates that there will be relatively limited data gathered through these metrics, particularly in the initial years. Therefore, it will be difficult to draw meaningful conclusions based on this data. The City will evaluate modifying these metrics or adding additional metrics in future years.

C. MONITORING AND AUDITING THE PLAN

This Wildfire Mitigation Plan is subject to review by the City of Shasta Lake City Council. Electric department staff will present this Plan to the City Council on an annual basis. Additionally, a qualified independent evaluator will present a report on this Plan to the City Council.

D. IDENTIFYING AND CORRECTING DEFICIENCIES IN THE PLAN

Staff will have the role of evaluating current practices and procedures and recommending changes or enhancement to improve the Wildfire Mitigation Plan. If for unforeseen circumstances, regulatory changes, new technologies, or any other reason, any deficiencies of this WMP will be presented to the City Council in the form of an updated WMP at least on an annual basis.

The Electric Utility Director, or designee, will be responsible for presenting corrections of any deficiencies, if any, to the City Council for consideration.

E. MONITORING THE EFFECTIVENESS OF INSPECTIONS,

The City utilizes General orders 95 and 165 (GO95 and GO165, respectively) as its guide to inspect its system. Field staff routinely patrol the service territory and correct deficiencies as they are encountered. The City tracks deficiencies that are repaired upon discovery within its maintenance software, "Partner," consistent with the guidelines of GO95 and GO165. Deficiencies that cannot be repaired immediately are assigned into one of two possible categories: "attention needed" or 2 "immediate attention needed," with the discovery and remedy tracked in Partner.

IX. INDEPENDENT EVALUATOR

Public Utilities Code section 8387(c) requires the City 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 City Council at a public meeting.

The City will utilize a process consistent with the City's purchasing policies. Consideration will be given to the evaluator's relevant industry experience, similar work for other municipally owned utilities or special districts, expertise and experience in line construction and maintenance, responsiveness, and familiarity with relevant California statutes, regulations, and operational guidelines.

The City will seek an independent evaluator following the approval of the initial Wildfire Mitigation Plan, or as a time determined by the City Council, after independent evaluators become available. Staff anticipates retaining an evaluator and having the evaluator's findings available prior to the second iteration of the City's WMP.