



Wildfire Mitigation Plan Independent Evaluation

Prepared for:

Alameda Municipal Power



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DISCLAIMER

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¹ On October 11, 2019, Guidehouse LLP completed its previously announced acquisition of Navigant Consulting Inc. In the months ahead, we will be working to integrate the Guidehouse and Navigant businesses. In furtherance of that effort, we recently renamed Navigant Consulting Inc. as Guidehouse Inc.



EXECUTIVE SUMMARY

Alameda Municipal Power (“AMP”) contracted with Guidehouse, Inc. f/k/a Navigant Consulting, Inc. (“Guidehouse”) to engage in an independent evaluation of its Wildfire Mitigation Plan (“Plan” or “WMP”). This independent evaluation report (“Report”) describes the technical review and evaluation provided by Guidehouse. Guidehouse performed this evaluation. Guidehouse’s project team reviewed detailed information related to the Plan and assessed AMP’s procedures related to the Plan. This plan is also posted to AMP’s public website.

The Plan was prepared as a response to SB 901, which was signed into law on September 21, 2018. SB 901 resulted in a number of provisions and directives, among which includes the requirement for electric utilities to prepare and adopt plans and revise and update the plan annually thereafter. These requirements are codified in the California Public Utilities Code (“PUC”) Section 8387 for publicly owned utilities (“POUs”).

Guidehouse evaluated AMP’s wildfire mitigation plan based on the statutory requirements of PUC Section 8387 as it relates to POUs. This PUC Section was amended on July 12, 2019 as a result of the signing of California’s Assembly Bill (AB) 1054 into law. AB 1054 amended Section 8387(b)(1) to include a provision that requires POU’s to “submit the plan to the California Wildfire Safety Advisory Board on or before July 1 of each year” (beginning in 2020) and conduct mandatory cyclical revisions. The required elements for a plan have not been modified by this new legislation. This Report meets the requirement imposed on AMP under PUC Section 8387(c), which mandates an independent evaluation of AMP’s Plan. The Report was developed to satisfy the statutory requirement for public review. This Report underlies the required evaluation by the governing body of AMP at a public meeting, scheduled for June 15, 2020. The Report includes the following:

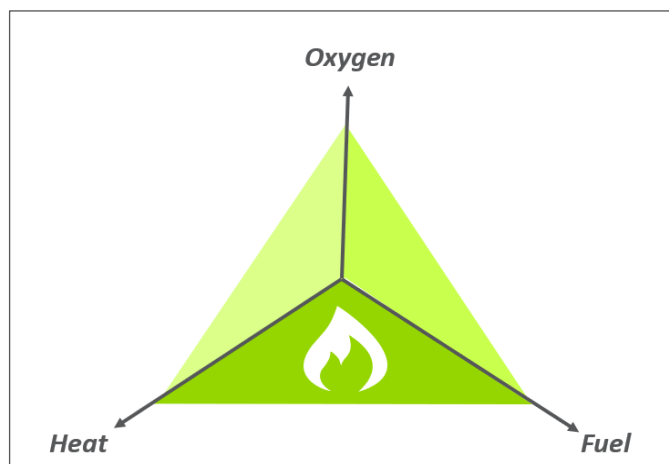
- Background of the legislative history requiring wildfire mitigation plans and their independent evaluations
- Approach and methodology evaluating a plan’s comprehensiveness
- AMP’s Plan elements and their compliance with SB 901 and PUC Section 8387 wildfire mitigation plans elements and directives
- An evaluation of the Plan’s presented metrics to assess the effectiveness of the overall Plan
- Determinations and results

Based on relevant experience in grid hardening and resiliency, natural disaster response, prior experience in wildfire mitigation plan development, and active tracking of wildfire legislative and regulatory proceedings Guidehouse has concluded that AMP’s WMP is comprehensive and meets the statutory requirements in accordance with PUC section 8387.

1. BACKGROUND

In recent years, California has seen an increase in utility equipment-involved, catastrophic wildfires. The unique geographic profile of California and the impacts of climate change, including continued dry conditions, high winds, and elevated heat index risk from global rising temperatures, have led to elongated fire seasons. The state is also experiencing increased levels of vegetation fuel due to the wet winters, hotter summers following a seven-year drought, and past fire suppression efforts. This increasingly abundant dry vegetation is the leading driver of wildfires. The levels of dry vegetation fuel have been aggravated by a destructive bark beetle infestation that continues to impact the health of the state's forested areas, further increasing fire risk. These fuel-rich environments, coupled with intensified climatological conditions with high wind gusts and natural electrical infrastructure risks, produce the conditions conducive to potential wildfire ignition. The three attributes that provide optimal conditions for a fire ignition are illustrated through the graphic in Figure 1: Fire Triangle.

Figure 1: Fire Triangle



Disastrous wildfire threat is a well-known and shared priority among electric utilities in California. The recent spike in utility-involved wildfire incidents since the 2015 wildfire season and the significant financial and livelihood impacts associated with them have led to more formalized efforts to ensure safe operations of electric utility equipment and greater investment in wildfire mitigation efforts.² Specifically, the state has approved legislation that strengthens governmental and regulatory oversight of wildfire prevention implementation activities, utility wildfire mitigation plans, and proper dispersal of state funds to wildfire victims. In an effort to minimize future devastating occurrences through risk-driven

² California Public Utilities Commission, 2019. "Fire Incident Data Reports for Investor-Owned Utilities," <https://www.cpuc.ca.gov/fireincidentsdata/>.



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wildfire prevention, electric utilities, including cooperatives, were mandated, by SB 901 (Senator Bill Dodd, 2018), to prepare and annually adopt a wildfire mitigation plan before January 1, 2020. This effort is foundational to the state's prioritized goal of minimizing the potential of devastating fires in future years.

1.1 SB 901 – Wildfire Mitigation Plans

On September 21, 2018, Governor Jerry Brown signed SB 901 into law. The bill directs electrical utilities to annually prepare wildfire mitigation plans that include several mitigation and response elements in each utility's strategies, protocols, and programs. Each electric utility is to prepare and adopt a comprehensive wildfire mitigation plan before January 1, 2020. The requirements for publicly owned utilities (POUs) are presented in Public Utilities Code (PUC) Section 8387. Details relating to POU requirements are discussed in Section 2 of this Report.

1.2 Alameda Municipal Power Plan Preparation

Alameda Municipal Power (AMP) is the City of Alameda's municipally owned electric utility. AMP was founded in 1887 and is the oldest municipal electric utility in California. The city has a population of 78,338 and comprises 22.8 square miles. AMP serves 34,979 total customer accounts or which 30,808 are residential accounts and 4,171 are commercial accounts. AMP's assets include 178.1 circuit miles of underground distribution lines, 86.1 pole miles of overhead distribution lines, 6.8 miles of overhead transmission lines and 1.9 circuit miles of underground transmission lines.

AMP is a department of the City of Alameda (City). The 2019 City of Alameda Emergency Operation Plan (EOP) is the foundation for disaster response and recovery operations for the City. AMP coordinates closely with local safety and emergency officials to help protect against fires and respond to emergencies. In its role as a utility, AMP follows all applicable design, construction, operation, and maintenance requirements that reduce safety risk associated with its system. This Wildfire Mitigation Plan describes the safety-related measures that AMP follows to minimize its risk of causing wildfires.

AMP is located in a region of the state with a very low wildfire risk. No part of AMP's service territory is located in or near any areas designated by the California Public Utilities Commission's (CPUC) Fire Threat Map as High Fire Threat District Tier 2 (elevated) or Tier 3 (extreme). All of AMP's service territory is designated as "non-fuel" or "moderate" in the California Department of Forestry and Fire Protection's (CALFIRE) Fire and Resource Assessment Program (FRAP) Fire Threat Map. Alameda is an urban island city which has no urban-wildland interface resulting in an extremely low threat of utility associated wildfire. In addition, Alameda is not adjacent to wilderness or a rural area and therefore, AMP's overhead electrical lines and equipment do not have a significant risk of coming in contact with combustible vegetation. Based on a review of local conditions and historical fires, AMP has determined that its electrical lines and equipment do not pose a significant risk of catastrophic wildfire.



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1.2.1 Independent Evaluation Services

PUC Section 8387(c) directs POUs to procure services for an independent evaluation (IE) of the comprehensiveness of their wildfire mitigation plans. In 2020, upon commencement of the California Wildfire Safety Advisory Board, guidelines and further details related to the scope and timelines of future IEs will be discussed and reviewed. In its present form, the provisions of PUC Section 8387 state that the independent evaluator shall be experienced in “assessing the safe operation of electrical infrastructure” and will perform an assessment to determine the comprehensiveness of wildfire mitigation plans.³

AMP sought IE services to assess the comprehensiveness of its WMP pursuant to PUC Section 8387(c) prior to presenting the final updated WMP to its Public Utilities Board. In April 2002, AMP contracted with Guidehouse Consulting, Inc., n/k/a Guidehouse Inc. (Guidehouse) to undertake an assessment of its Plan based on Guidehouse's prior experience with assessing the safe operation of electrical infrastructure, including grid-hardening and wildfire mitigation plans, with an emphasis on electrical equipment, public, and personnel safety.

Emergent practices will materialize as evolving legislative action and technology advances continue to shape wildfire mitigation and safety efforts. Understanding this, Guidehouse performed a comparison of the wildfire mitigation investments undertaken by other utilities throughout California as well as relied on the team's experience in working directly with utilities to develop their wildfire mitigation plans and data collection practices along with prior experience related to grid hardening and electric safety assessments. This Report presents the results of Guidehouse's IE of the WMP. The following section describes the methodology in executing this evaluation.

Guidehouse Identification of Qualifications

Guidehouse provides IE services throughout the United States. Guidehouse's grid-related IE projects include storm hardening, wildfire mitigation, resiliency assessments, advanced technology suitability, among others. Our approach includes an evaluation of data considered, suitability of tracking metrics – both frequency and trends analysis - and an evaluation of key performance indicators. Guidehouse assesses the efficacy of tools for creating sufficient awareness and for effectiveness of understanding overall wildfire mitigation plan's intended and actual impacts. Guidehouse also leverages experience developing “Metrics and Benefits Reporting Plans” to gauge cost-effectiveness of activities and alignment of plans to intentions.

Guidehouse continues to track proceedings, pending legislation, and other developments surrounding utility wildfire risk. Our team remains active with wildfire mitigation plan engagements across jurisdictions and risk profiles. As part of maintaining high acumen of prudent mitigation strategies, Guidehouse participates in forums focused on innovative wildfire mitigation strategies—further expanding our industry knowledge. Guidehouse provides thought leadership and advisory wildfire mitigation plan services related to wildfire mitigation plans and other resiliency innovative technologies to the California Energy Commission and has supported their system hardening and fire prevention efforts since 2008. Additionally, Guidehouse's reach into grid resiliency and disaster-related hardening extends across the United States including island grids, such as Puerto Rico, recovering from recent, weather-related catastrophes.

³ It is recognized that this requirement does not yet include a clear definition of comprehensiveness.

2. EVALUATION SCOPE AND APPROACH

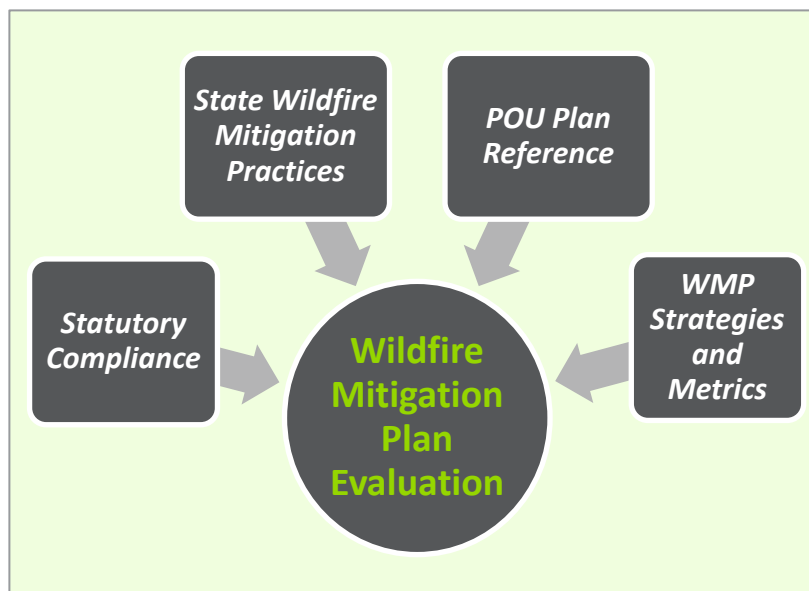
Guidehouse completed this evaluation based on industry standard practices, our experience developing and reviewing wildfire mitigation plans and other grid hardening activities, our active tracking of wildfire legislative and regulatory proceedings and, most importantly, a comparison of the specific criteria in PUC Section 8387(b)(2) to the specific wildfire-related plans outlined in AMP's WMP.

The state's priority towards abating future catastrophic wildfire events is demonstrated through aggressive measures, directing utilities to enhance their protocols for fire prevention, public communications, and response. That collection of information is presented in a comprehensive wildfire mitigation plan. Guidehouse has tracked docketed proceedings and maintains a presence in state activities and workshops surrounding wildfire prevention. Understanding that AMP is not subject to CPUC regulations, the insight gained from this related experience is leveraged in assessing AMP's Plan relative to its risk profile and industry position.

2.1 Evaluation Parameters

Figure 2 represents the attributes comprising the methodology and approach of the evaluation.

Figure 2: Contributing Factors to Evaluate the Plan



As mentioned above, the requirement for electric utilities and corporations to develop wildfire mitigation plans emerged from the directives of SB 901 and associated statutory modifications. See Table 1 for the complete statutory compliance list for POU.

Table 1: POU Requirements for the WMP

PUC Section 8387 <i>(as amended on July 12, 2019)</i>	
(a)	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.
(b) (1)	The local publicly owned electric utility or electrical cooperative shall, before January 1, 2020, prepare a wildfire mitigation plan. After January 1, 2020, a local publicly owned electric utility or electrical cooperative shall prepare a wildfire mitigation plan annually and shall submit the plan to the California Wildfire Safety Advisory Board on or before July 1 of that calendar year. Each local publicly owned electric utility and electrical cooperative shall update its plan annually and submit the update to the California Wildfire Safety Advisory Board by July 1 of each year. At least once every three years, the submission shall be a comprehensive revision of the plan.
(2)	The wildfire mitigation plan shall consider as necessary, at minimum, all of the following:
(A)	An accounting of the responsibilities of persons responsible for executing the plan.
(B)	The objectives of the wildfire mitigation plan.
(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.
(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.
(E)	A discussion of how the application of previously identified metrics to previous wildfire mitigation plan performances has informed the wildfire mitigation plan.
(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.



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(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 responders, health care facilities, and operators of telecommunications infrastructure.
(H) Plans for vegetation management.
(I) Plans for inspections of the local publicly owned electric utility's or electrical cooperative's electrical infrastructure.
(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.
(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 identification of where the commission should expand a high fire-threat district based on new information or changes to the environment.
(L) A methodology for identifying and presenting enterprise wide safety risk and wildfire-related risk.
(M) A statement of how the local publicly owned electric utility or electrical cooperative will restore service after a wildfire.
(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.
(3) The local publicly owned electric utility or electrical cooperative shall, on or before January 1, 2020, and not less than annually thereafter, present its wildfire mitigation plan in an appropriately noticed public meeting. The local publicly owned electric utility or electrical cooperative shall accept comments on its wildfire mitigation plan from the public, other local and state agencies, and interested parties, and shall verify that the wildfire mitigation plan complies with all applicable rules, regulations, and standards, as appropriate.



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(c) The local publicly owned electric utility or electrical cooperative shall contract with a qualified independent evaluator with experience in assessing the safe operation of electrical infrastructure to review and assess the comprehensiveness of its wildfire mitigation plan. The independent evaluator shall issue a report that shall be made available on the internet website of the local publicly owned electric utility or electrical cooperative and shall present the report at a public meeting of the local publicly owned electric utility's or electrical cooperative's governing board.

2.2 Evaluation Approach

To perform an assessment of the comprehensiveness of the Plan, Guidehouse used the following described approach.

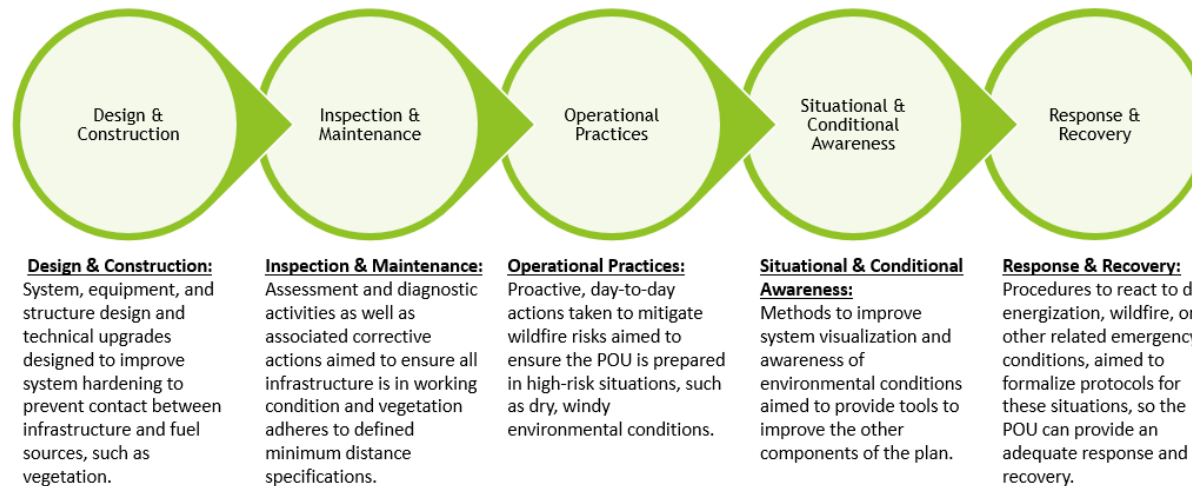
2.2.1 Statutory Compliance

Guidehouse sought to determine compliance with the provisional requirements laid out in SB 901 as codified in PUC Section 8387. The Plan's alignment with the statutory requirement is presented in Appendix A. Mitigation measures are not required to exceed the statutory requirements.

2.2.2 Industry Wildfire Mitigation Practices Comparison

Accepted practices for wildfire mitigation have been discussed and presented at numerous events. Additionally, wildfire mitigation plans approved by the CPUC have garnered significant insight from the industry at large. Guidehouse's understanding of an effective wildfire mitigation plan draws on comparisons from existing wildfire mitigation plans and industry practices and is summarized according to business practice categories described in Figure 3: Mitigation Strategy Overview.

Figure 3: Mitigation Strategy Overview



Expertise in these critical elements facilitated Guidehouse's review of the comprehensiveness of AMP's WMP. While not all of these strategies need to be present in or applicable to in any POU's wildfire mitigation plan, due to that POU's size, location, and system or operational characteristics, Guidehouse's understanding of collected utility strategies demonstrated throughout the state are summarized below:

- **Inspection and maintenance of distribution transmission and substation assets** including conducting system patrols and ground inspections, using technological inspection tools, managing predictive and electrical preventative maintenance, and conducting vegetation inspections and management, vulnerability detection such as Light Detection and Ranging (LiDAR) inspection; and geospatial and topography identification, geographic information system (GIS) mapping data. A key component is identifying collected data elements through each program and understand how that data is used and shared to improve utility practices.
- **Vegetation management** that includes routine preventative vegetation maintenance; corrective vegetation management and off-cycle tree work; emergency vegetation clearance, prioritized for portions of the service territory that lie in high hazard zones, quality control processes; and resource protection plan, including animal and avian mitigation programs.
- **System hardening** that includes pole replacement, non-expulsion equipment, advanced fuses, tree attachment removal, less flammable transformer oil, covered wire and wire wrap, and undergrounding where cost beneficial.
- **Operational practices** including communications and mustering plans under varying degrees of wildfire risk. Plans to deactivate automatic reclosers, de-energization of "at risk" area powerlines based on type of facility (overhead bare conduction, high voltage, etc.), tree and vegetation density, available dry fuel, and other factors that make certain locations vulnerable to wildfire risk.



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- **Situational awareness** including obtaining information from devices and sensors on actual system, weather and other wildfire conductivity conditions, two-way communication with agencies and key personnel. Programs such as online feeds and websites such as the National Fire Danger Rating System. Situational awareness should help achieve a shared understanding of actual conditions and serve to improve collaborative planning and decision making.
- **De-Energization actions** triggered and prioritized by forecasted extreme fire weather conditions; imminent extreme fire weather conditions; validated extreme fire weather conditions; and plans for re-energization when weather subsides to safe levels. Manual or automatic capabilities exist for implementation.
- **Advanced Technologies** including Distribution Fault Anticipation technology, tree growth regulators, pulse control fault interrupters, oblique and hyper-spectral imagery; advanced transformer fluids; advanced LiDAR, and advanced SCADA, to reduce electrical ignition while also helping to mitigate power outages and equipment damage.
- **Emergency Preparedness, Outreach and Response communications** before, during, and after emergencies including but not limited to engaging with key stakeholders that include critical facilities and served customers; local governments, critical agencies such as California Department of Forestry and Fire Protection (CAL FIRE), local law enforcement agencies and other first responders, hospitals, local emergency planning committees, other utility providers, California Independent System Operator, and the utility's respective Board. Coordination agreements such as Mutual Assistance should be leveraged. Community outreach plan should inform and engage first responders, local leaders, land managers, business owners and others.
- **Customer support programs** including financial assistance and support for low-income customers; billing adjustments; deposit waivers; extended payment plans; suspension of disconnection and non-payment fees; repair processing and timing; access to utility representatives; and access to outage reporting and emergency communications. Consideration of languages in addition to English. Identification of priority customers, such as first responders and local agencies, health care providers, water and telecommunication facilities, groups that assist children, elderly, mobility impaired, and other vulnerable populations.

2.2.3 Value Determination of Plan Metrics

Metrics for tracking the wildfire mitigation plan's progress intend to allow the utility to refresh information as trends become clearer. Based upon the discussion included in the CPUC's Phase 2 of the SB 901 proceeding docket, interests in metric development and underlying data collection are beginning to take shape. While these determinations do not directly influence the public power sector, insight has been leveraged to employ and evaluate effective metrics.⁴

⁴ CPUC Order Instituting Rulemaking to Implement Electric Utility Wildfire Mitigation Plans Pursuant to SB 901 (2018) (Rulemaking 18-10-007) https://apps.cpuc.ca.gov/apex/f?p=401:56:0::NO:RP,57,RIR:P5_PROCEEDING_SELECT:R1810007.

3. AMP WMP PLAN ELEMENTS

Guidehouse reviewed the Plan elements to determine whether the activities supported the intention to deploy an effective wildfire mitigation plan. This determination incorporated individual elements as well as underlying data sources that further described data collection methodologies and implementation procedures to ensure measures are carried out and also tracked. This understanding also informs internal reviews and subsequent updates for future Plan iterations.

Guidehouse found that AMP's WMP meets the statutory requirements of comprehensiveness per PUC Section 8387. In this section, we review the WMP's elements and their purpose relative to the development and successful execution of the WMP. A table comparing each subsection of PUC Section 8387 to the significant sections of the WMP can be found in Appendix A.

3.1 Review of Statutory Elements

3.1.1 Objectives and Overview of Preventative Strategies and Programs

PUC Section 8387

(B) The objectives of the wildfire mitigation plan.

(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.

3.1.1.1 Objectives

AMP states the primary goal of their WMP "is to describe AMP's existing programs, practices, and measures that effectively reduce the probability that AMP's electric supply system could be the origin or contributing source for the ignition of a wildfire." AMP's secondary goal is to improve the resilience of the electric grid for their service territory to reduce service interruptions and reduce the length of time of such interruptions, by improving their restoration.

3.1.1.2 Preventive Strategies

AMP elaborates upon its preventive strategies for mitigating wildfire in section V of the Plan. In this section, AMP notes that its service territory does not include any high fire threat districts, they monitor local weather including for Red Flag Warnings issued by the national weather service, and utilize design and construction standards, vegetation management, and inspections in a manner that meets all relevant federal, state, and industry standards (including CPUC General Orders (GOs) 95, 128, and 165).

3.1.2 Risks, Risk Drivers, and Risk Assessment

PUC Section 8387

(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.

(L) A methodology for identifying and presenting enterprise-wide safety risk and wildfire-related risk.

3.1.2.1 Identification of Risks and Risk Drivers

AMP identifies and describes all wildfire risks and drivers for those risks in Sections IV of the Plan. Section IV includes a Table (Table 2) that clearly identifies all potential risk drivers and their probability for creating wildfire conditions in AMP's service territory. AMP considered topology, adverse weather, vegetation, and equipment as risk drivers and found these to be either extremely low or not applicable to AMP.

Sections IV.A and IV.B of the WMP explain why there is no significant risk of wildfire in AMP's service territory. In section IV.A the Plan describes that the City of Alameda adopted a Local Hazard Mitigation Plan which stated, "wildfire is an unlikely event as Alameda Island is an island separated from the mainland by the Oakland Estuary. [Further,] Bay Farm Island lies at the end of a peninsula bordered by Metropolitan Oakland International Airport and Metropolitan Golf Links, neither of which has the kind of vegetation needed for a wildland fire." Therefore, Alameda is protected by its natural geography and topography from any undeveloped areas or high fuel loading zones. Alameda is further protected by its substantial development and undergrounding of system lines and equipment. Accordingly, wildfire is not considered an enterprise-wide safety risk as described in section IV.B.

3.1.2.2 Methodology for identifying and presenting enterprise-wide safety risk and wildfire-related risk

AMP identified and presented enterprise-wide safety risks and wildfire-related risk, or more accurately, the lack of such risks by reviewing the CPUC map which identified all of AMP's service territory as Tier 1 on the CPUC Fire Threat Map, the Local Hazard Mitigation Plan which stated that wildfire events are unlikely, and staff's knowledge of the service territory's facilities, equipment, terrain, vegetation management, construction standards, operational practices, and climate none of which presents any notable fire or safety risks.

3.1.3 Asset Overview & Service Territory

PUC Section 8387

(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 identification of where the commission should expand a high fire-threat district based on new information or changes to the environment.

All of AMP's service territory is in Tier 1 and is surrounded by water, estuary, or airport. There are no areas within AMP's service territory that warrant a higher wildfire threat rating than Tier 1. Accordingly, AMP has not identified any areas in its Plan that recommend a change to the CPUC Fire Threat Map.

3.1.4 Wildfire Prevention Strategies

PUC Section 8387

(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.

(H) Plans for vegetation management.

(I) Plans for inspections of the local publicly owned electric utility's or electrical cooperative's electrical infrastructure.

3.1.4.1 Disabling Reclosers

Section V.F. of the WMP outlines its reclosing policies. Supervisory Control and Data Acquisition (SCADA) control has been installed on overhead distribution line reclosers and reclosing relays in AMP's substations. The reclosing policies for both line reclosers and substation breakers opened by a reclosing relay state that patrols inspections / line patrols are triggered for permanent faults. These policies represent baseline utility practices for protection of the public and the distribution system. Due to the low wildfire risk within the AMP service territory, fast tripping relay setting have not been adopted.

Guidehouse believes that the AMP reclosing policies reflect common utility practices and satisfy the intent of PUC 8387 (b)(2)(F)

3.1.4.2 De-Energization Protocols

Section V.G. of the WMP indicates that due to the minimal risk of AMP's electrical supply facilities causing a power-line ignited wildfire, specific de-energization protocols have not been adopted. AMP will re-evaluate this determination in future updates to its Wildfire Mitigation Plan.

3.1.4.3 Vegetation Management

Section V.D. contains an overview of AMP's distribution tree trimming program. AMP states that it meets the minimum industry standard vegetation management practices. For transmission-level facilities, AMP has stated it complies with NERC FAC-003-4, where applicable. For both transmission and distribution level facilities, AMP has stated it meets: (1) Public Resources Code section 4292; (2) Public Resources Code section 4293; (3) GO 95 Rules 35; and GO 95 Appendix E Guidelines to Rules 35. The city of Alameda's Public Works Department contracts tree trimming contractors to perform routine vegetation management, such as pruning and removal, on an annual basis. Public Works (PW) has divided AMP's service territory into five zones. Each year, Public Works (PW) oversees tree trimming in one of the five zones, including line clearances. The city's tree trimming contractors trim a minimum of 12 feet clearance and are knowledgeable about work near energized electric lines, tree growth rates, and pruning methods to maintain tree health. In addition, AMP inspectors perform annual field patrols to inspect trees and identify hazard trees. Throughout the year, AMP inspectors work with PW to coordinate required line clearances when located outside of the designated zone for that year.

As indicated in the WMP, AMP meets the intent PUC 8387 (b)(2)(H). Additionally, AMP provided documentation to support meeting minimum industry standard vegetation management practices.

3.1.4.4 Infrastructure Inspections

Section V.E. contains an overview of AMP's electrical infrastructure patrol inspections. Section VII.E. reviews AMP's monitoring of the effectiveness inspections. Table 3 provides an overview of facility inspection cycles. AMP indicates that inspections are performed on a cycle that meets the timeframes given in General Order 165 (GO 165). During these inspections, problems are identified and prioritized. If AMP staff

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

On a three-year cycle, AMP performs detailed inspections on 1/3 of its electric utility system and assets and visual inspections on 2/3 of its electric utility system. Detailed testing on all electric utility poles in the system is performed every 10 years. During these inspections, AMP examines each component of the electrical system to check for abnormalities. AMP indicates that the Line Superintendent has oversight of the inspection program which includes prioritizing and assigning resources for follow-up corrective maintenance and regular evaluation of the inspection program performance and effectiveness. Table 4 contains Maintenance Tag Priority Levels for corrective maintenance identified during inspections.

As indicated in the WMP, AMP meets the intent of PUC 8387 (b)(2)(I). Additionally, AMP provided documentation to support meeting GO 95 and GO 165.

3.1.5 Response & Restoration

PUC Section 8387

(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 responders, health care facilities, and operators of telecommunications infrastructure.

(M) A statement of how the local publicly owned electric utility or electrical cooperative will restore service after a wildfire.

3.1.5.1 Event Communication

Due to the low wildfire risk within the AMP service territory, no Public Safety Power Shut-Off (PSPS) and related PSPS communications plans have been developed. Section III. C. provides a summary of Wildfire Response & Recovery responsibilities of key AMP leadership positions. At the discretion of the AMP General Manager (GM), this position is responsible for communications to Public Utilities Board Members and key City offices to provide updates related to outages, system events, and emergencies. Additionally, the AMP GM has responsibility for communicating electric utility system status information throughout an event to the City of Alameda EOC. The Assistant General Manager - Engineering & Operations (AGM O&E) provides event debriefings to key AMP personnel timely during emergencies and coordinates electric utility system status information throughout an event to the AMP GM at the City of Alameda EOC. The Assistant General Manager - Customer Resources (AGM CR) is responsible for responding to outage inquiries from customers and key accounts, notifying System Control of social media outage cause reports, updating online media information updates, phone Interactive Voice Response (IVR) updates and coordinating media communications.



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In Section III.D., AMP states that the 2019 City of Alameda (City) Emergency Operations Plan (EOP) is the foundation for disaster response and recovery operations for the City. AMP also notes the existence of a department Emergency Management Plan (EMP). The EMP outlines how AMP will respond to emergencies and establishes emergency preparedness measures, organization structure, Department Operations Centers (DOC) activation procedures, response priorities, communication requirements, and restoration priorities during emergencies and disasters. The EMP defines the Emergency Management Organization, and employee roles and responsibilities during restoration efforts. The EMP further establishes that whenever the City's EOC is activated, AMP's DOC is also activated to manage the restoration of the electric systems and high numbers of customers impacted.

Guidehouse believes that the AMP emergency event communications protocols satisfy the intent of PUC 8387 (b)(2)(G). Guidehouse encourages AMP to consider updating their EMP to include response actions specific to wildfire response.

3.1.5.2 Restoration

Section VI. of the WMP provides an overview of the Restoration of Service. The summary indicates that AMP personnel are expected to respond to emergencies and complete an initial comprehensive assessment of outages and system conditions to ensure make-safe and restoration priorities are followed. This plan section also provides a summary of general restoration priorities, other restoration priority criteria and descriptions of service restoration steps during normal business hours and outside normal business hours.

Given the low probability of a wildfire within the AMP service territory, Guidehouse believes the restoration process satisfies the intent of PUC 8387 (b)(2)(M).

3.1.6 Plan Execution, Monitoring, & Metrics

PUC Section 8387

(A) An accounting of the responsibilities of persons responsible for executing the plan.

(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.

(E) A discussion of how the application of previously identified metrics to previous wildfire mitigation plan performances has informed the wildfire mitigation plan.

(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:



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- (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.
-

3.1.6.1 Responsibilities of Persons Responsible for Executing the Plan

Section III A. provides an organizational chart of the utility governance structure. Section III.B. provides a high-level overview of the roles and responsibilities for AMP general management and major divisions. The AMP GM is responsible for the overall development of the WMP and assurance of implementation, testing and updating of the plan. Other plan sections provide details regarding general plan implementation oversight.

Guidehouse believes the accounting of responsibilities of persons responsible for executing the AMP WMP have been indicated in accordance with the intent of PUC 8387 (b)(2)(A).

3.1.6.2 AMP Metrics

AMP provides a summary of two metrics to be tracked to measure the performance of the WMP, in Section VII.A. of the plan.

Table 2: AMP Proposed Metrics

Specific metric	Indicator	Measure of effectiveness	Criteria
Fire ignitions	Number of events	Not stated	- AMP 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 - AMP has knowledge that the fire occurred.
Distribution and transmission wires downed within AMP's service territory	Number of events	Not stated	- Any instance where an electric transmission or primary distribution conductor falls to the ground or on to a foreign object. - AMP will not normalize this metric by excluding unusual events, such as severe storms. Instead, AMP will supplement this metric with a qualitative description of any such unusual events.

In future Wildfire Mitigation Plans, AMP 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.

Guidehouse believes the AMP metrics to evaluate the effectiveness of the WMP meet the minimum requirements of the intent of PUC 8387 (b)(2)(D). Further, since metrics have been first introduced in this initial WMP, metrics from a prior WMP did not inform this plan (PUC 8387 (b)(2)(E)). Guidehouse encourages AMP in future WMPs to explore additional WMP effectiveness metrics and provide the assumptions that underlie the metrics.

3.1.6.3 Monitoring and Auditing and Correcting Deficiencies of the Plan

Sections VII.C. and D. provide statements regarding monitoring and auditing of the plan and correcting deficiencies. The AGM E&O will evaluate the reported plan deficiencies plan on an annual basis and update the plan accordingly. An annual presentation and review of the WMP will be performed by the Alameda Public Utilities Board. Section III. B. provides a high-level overview of the roles and responsibilities of AMP leadership staff responsible for WMP monitoring and auditing.

Guidehouse believes that the WMP meets the minimum requirements of the intent of PUC 8387 (b)(2)(N)(i).



4. RESULTS & DISCUSSION

Guidehouse concluded this assessment on May 22, 2020. Over the course of reviewing AMP's WMP and supporting documentation, Guidehouse captured takeaways and findings that align the Plan with state laws and effective wildfire measure demonstration. AMP

Report Conclusions

After internal review of the latest version of the WMP and associated data collection products, Guidehouse concludes this Report with the following:

1. AMP's WMP aligns appropriately with PUC Section 8387 and includes all required elements.⁵
2. AMP's Plan is determined to be comprehensive as described throughout this Report.

⁵ Following acceptance of this Report, AMP will post the Report online for public view. The Report is scheduled for presentation to the, 2020.

APPENDIX A. STATUTORY COMPLIANCE MATRIX

Required Statutory Element	Plan Section Reference(s)	AMP Plan Elements (Summarized)	Meets Section Elements (Determination)
(a) 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.			
(b) (1) The local publicly owned electric utility or electrical cooperative shall, before January 1, 2020, prepare a wildfire mitigation plan. After January 1, 2020, a local publicly owned electric utility or electrical cooperative shall prepare a wildfire mitigation plan annually and shall submit the plan to the California Wildfire Safety Advisory Board on or before July 1 of that calendar year. Each local publicly owned electric utility and electrical cooperative shall update its plan annually and submit the update to the California Wildfire Safety Advisory Board by July 1 of each year. At least once every three years, the submission shall be a comprehensive revision of the plan.			
(2) The wildfire mitigation plan shall consider as necessary, at minimum, all of the following:			

(A) An accounting of the responsibilities of persons responsible for executing the plan.	Section III	The AMP GM is responsible for the overall development of the WMP and assurance of implementation, testing and updating of the plan. Other plan sections provide details regarding general plan implementation oversight. Specifically, Section III.A. of AMP's WMP provides the organizational chart of the utility governance structure and Section III.B. provides a high-level overview of the roles and responsibilities for AMP general management and major divisions.	Yes
(B) The objectives of the wildfire mitigation plan.	Section II	AMP 's primary objective "is to describe AMP's existing programs, practices, and measures that effectively reduce the probability that AMP's electric supply system could be the origin or contributing source for the ignition of a wildfire." AMP's stated secondary objective is to improve the resilience of the electric grid for their service territory.	Yes
(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	AMP details its preventive strategies for mitigating wildfire in section V of the Plan. In this section, AMP notes that its service territory does not include any high fire threat districts, they monitor local weather including for Red Flag Warnings issued by the national weather service, and utilize design and construction standards, vegetation management, and inspections in a manner that meets all relevant federal, state, and industry standards (including CPUC General Orders (GOs) 95, 128, and 165).	Yes
(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	AMP provides a summary of two metrics to be tracked to measure the performance of the WMP, in Section VII.A. of the plan 1. fire ignitions and 2. wires down events.	Yes
(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	AMP does not discuss the application of metrics prior to the development of the initial WMP. Future iterations will discuss how the metrics tracked inform the WMP and its activities.	Yes

(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	Supervisory Control and Data Acquisition (SCADA) control has been installed on overhead distribution line reclosers and reclosing relays in AMP's substations. The reclosing policies for both line reclosers and substation breakers opened by a reclosing relay state that patrols inspections / line patrols are triggered for permanent faults. These policies represent baseline utility practices for protection of the public and the distribution system. Due to the low wildfire risk within the AMP service territory, fast tripping relay setting have not been adopted.	Yes
(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 responders, health care facilities, and operators of telecommunications infrastructure.	Section III	While AMP does not plan to use PSPS as a safety strategy and is not subject to an external PSPS, AMP does have existing emergency communication structures and provisions. Section III. C. provides a summary of Wildfire Response & Recovery responsibilities of key AMP leadership positions. Additionally, the AMP GM has responsibility for communicating electric utility system status information throughout an event to the City of Alameda EOC. The Assistant General Manager - Engineering & Operations (AGM-O&E) provides event debriefings to key AMP personnel timely during emergencies and coordinates electric utility system status information throughout an event to the AMP GM at the City of Alameda EOC. The Assistant General Manager - Customer Resources (AGM-CR) is responsible for responding to outage inquiries from customers and key accounts, notifying System Control of social media outage cause reports, updating online media information updates, phone Interactive Voice Response (IVR) updates and coordinating media communications. Further, AMP states that the 2019 City of Alameda (City) Emergency Operations Plan (EOP) is the foundation for disaster response and recovery operations for the City. AMP also notes the existence of a department Emergency Management Plan (EMP). The EMP outlines how AMP responds to emergencies and establishes emergency preparedness measures, organization structure, Department Operations Centers (DOC) activation procedures, response	Yes

		priorities, communication requirements, and restoration priorities during emergencies and disasters.	
(H) Plans for vegetation management.	Section V.C	AMP states that it meets the minimum industry standard vegetation management practices. For its transmission-level facilities, AMP complies with NERC FAC-003-4, where applicable. For both transmission and distribution level facilities, AMP has stated it meets: (1) Public Resources Code section 4292; (2) Public Resources Code section 4293; (3) GO 95 Rules 35; and GO 95 Appendix E Guidelines to Rules 35. The city of Alameda's Public Works Department contracts tree trimming contractors to perform routine vegetation management, such as pruning and removal, on an annual basis. The city's tree trimming contractors trim a minimum of 12 feet clearance and are knowledgeable about work near energized electric lines, tree growth rates, and pruning methods to maintain tree health. In addition, AMP inspectors perform annual field patrols to inspect trees and identify hazard trees. Throughout the year, AMP inspectors work with PW to coordinate required line clearances when located outside of the designated zone for that year.	Yes
(I) Plans for inspections of the local publicly owned electric utility's or electrical cooperative's electrical infrastructure.	Section V.D	AMP indicates that inspections are performed on the timeframes set forth in GO 165. During inspections, problems are identified and prioritized. If AMP staff discovers a facility in need of repair owned by an entity other than AMP, AMP will issue a notice to repair to the facility owner and work to ensure that necessary repairs are completed promptly. On a three-year cycle, AMP performs detailed inspections on 1/3 of its electric utility system and assets and visual inspections on 2/3 of its electric utility system. Detailed testing on all electric utility poles in the system is performed every 10 years. During these inspections, AMP examines each component of the electrical system to check for	Yes

		abnormalities.	
(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:	Section IV	AMP identifies and describes all wildfire risks and drivers for those risks in Sections IV of the Plan.	Yes
(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.	Section IV	Sections IV.A and IV.B of the WMP explain why there is no significant risk of wildfire in AMP's service territory. In section IV.A., the Plan describes that the City of Alameda adopted a Local Hazard Mitigation Plan which stated, "wildfire is an unlikely event." Therefore, Alameda is protected by its natural geography and topography from any undeveloped areas or high fuel loading zones. Alameda is further protected by its substantial development and undergrounding of system lines and equipment. Accordingly, wildfire is not considered an enterprise-wide safety risk as described in section IV.B.	Yes
(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	Section IV includes a table (Table 2) that clearly identifies all potential risk drivers and their probability for creating wildfire conditions in AMP's service territory. AMP looked at topology, adverse weather, vegetation, and equipment as risk drivers and found these to be either extremely low or not applicable to AMP.	Yes
(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 identification of where the commission should expand a high fire-threat district based on new information or changes to the environment.	N/A	Due to the very low risk presented in all parts of AMP's service territory, AMP did not identify any areas where the commission should expand the high fire-threat districts into AMP's territory.	Yes

(L) A methodology for identifying and presenting enterprise wide safety risk and wildfire-related risk.	Section IV	AMP identified and presented enterprise-wide safety risks and wildfire-related risk, or more accurately, the lack of such risks by reviewing the CPUC map which identified all of AMP's service territory as Tier 1 on the CPUC Fire Threat Map, the Local Hazard Mitigation Plan which stated that wildfire events are unlikely, and staff's knowledge of the service territory's facilities, equipment, terrain, vegetation management, construction standards, operational practices, and climate none of which presents any notable enterprise-wide wildfire or safety risks.	Yes
(M) A statement of how the local publicly owned electric utility or electrical cooperative will restore service after a wildfire.	Section VI	AMP is unlikely to have its service interrupted by a wildfire. Any interruption in service would follow normal service restoration procedures. Specifically, AMP personnel are expected to respond to emergencies and complete an initial comprehensive assessment of outages and system conditions to ensure make-safe and restoration priorities are followed. This plan section also provides a summary of general restoration priorities, other restoration priority criteria and descriptions of service restoration steps during normal business hours and outside normal business hours.	Yes
(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.	Section VII.	Sections VII.C. and D. provide statements regarding monitoring and auditing of the plan and correcting deficiencies. The AGM E&O will evaluate the reported plan deficiencies plan on an annual basis and update the plan accordingly. An annual presentation and review of the WMP will be performed by the Alameda Public Utilities Board. Section III. B. provides a high-level overview of the roles and responsibilities of AMP leadership staff responsible for WMP monitoring and auditing.	Yes
(ii) Identify any deficiencies in the wildfire mitigation plan or its implementation and correct those deficiencies.	Section VII	Sections VII.C. and D. provide statements regarding monitoring and auditing of the plan and correcting deficiencies. The AGM E&O will evaluate the reported plan deficiencies plan on an annual basis and update the plan accordingly. An annual presentation and review of the WMP will be performed by the Alameda	Yes



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		Public Utilities Board. Section III. B. provides a high-level overview of the roles and responsibilities of AMP leadership staff responsible for WMP monitoring and auditing.	
(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	Sections VII.C. and D. provide statements regarding monitoring and auditing of the plan and correcting deficiencies. The AGM E&O will evaluate the reported plan deficiencies plan on an annual basis and update the plan accordingly. An annual presentation and review of the WMP will be performed by the Alameda Public Utilities Board. Section III. B. provides a high-level overview of the roles and responsibilities of AMP leadership staff responsible for WMP monitoring and auditing.	Yes
(3) The local publicly owned electric utility or electrical cooperative shall, on or before January 1, 2020, and not less than annually thereafter, present its wildfire mitigation plan in an appropriately noticed public meeting. The local publicly owned electric utility or electrical cooperative shall accept comments on its wildfire mitigation plan from the public, other local and state agencies, and interested parties, and shall verify that the wildfire mitigation plan complies with all applicable rules, regulations, and standards, as appropriate.		AMP first presented its Plan to the Public Utilities Board at a public meeting on November 18, 2019. AMP will present its revised WMP to the Public Utilities Board on June 24, 2020.	Yes
(c) The local publicly owned electric utility or electrical cooperative shall contract with a qualified independent evaluator with experience in assessing the safe operation of electrical infrastructure to review and assess the comprehensiveness of its wildfire mitigation plan. The independent evaluator shall issue a report that shall be made available on the internet website of the local publicly owned electric utility or electrical cooperative and shall present the report at a public meeting of the local publicly owned electric utility's or electrical cooperative's governing board.		AMP contracted with Guidehouse Inc. to perform an independent evaluation of its WMP. Guidehouse's qualifications are described in Section 1. Guidehouse will present to the Public Utilities Board on June 24, 2020 and this report will be made available on AMP's website along with the revised WMP.	Yes