

EASTSIDE POWER AUTHORITY WILDFIRE MITIGATION PLAN

2020 VERSION

May 22, 2019

TABLE OF CONTENTS

I.	Overview	1
A.	Policy Statement	1
B.	Purpose of the Wildfire Mitigation Plan	1
C.	Organization of the Wildfire Mitigation Plan	1
II.	Objectives of the Wildfire Mitigation Plan	2
III.	Roles and Responsibilities	2
A.	Utility Governance Structure	2
B.	WILDFIRE PREVENTION	2
C.	WILDFIRE RESPONSE AND RECOVERY	3
D.	Standardized Emergency Management System	3
IV.	Wildfire Risks and Drivers associated with design, construction, operation, and maintenance	4
A.	Particular Risks and Risk Drivers Associated With Topographic and Climatological Risk Factors	4
B.	Enterprisewide Safety Risks	4
V.	Wildfire Preventative Strategies	5
A.	High fire threat district	5
B.	design and Construction Standards	5
C.	Vegetation Management	5
D.	Inspections	6
E.	Reclosing Policy	6
F.	Deenergization	6
IV.	Restoration of Service	8
Vii.	Evaluating of the Plan	9
A.	Metrics and Assumptions for Measuring Plan Performance	9

Metric 1: Fire Ignitions	9
Metric 2: Wires Down	9
B. Impact of Metrics on Plan.....	9
C. Monitoring and Auditing the Plan	9
D. Identifying and correcting Deficiencies in the Plan	9
E. Monitoring the effectiveness of inspections	10
VIII. Independent Auditor.....	11

I. OVERVIEW

A. POLICY STATEMENT

Eastside Power Authority's (ESPA) overarching goal is to provide safe, reliable, and economic electric service to its local community. In order to meet this goal, ESPA intends to construct, maintain, and operate any ESPA-owned 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

ESPA is located in a region of the state with a very low wildfire risk. No part of ESPA's service territory is located in or near the High Fire Threat District designed in the California Public Utilities Commission's (CPUC) Fire Threat Map and all of ESPA'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.

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

C. ORGANIZATION OF THE WILDFIRE MITIGATION PLAN

This Wildfire Mitigation Plan included the following elements:

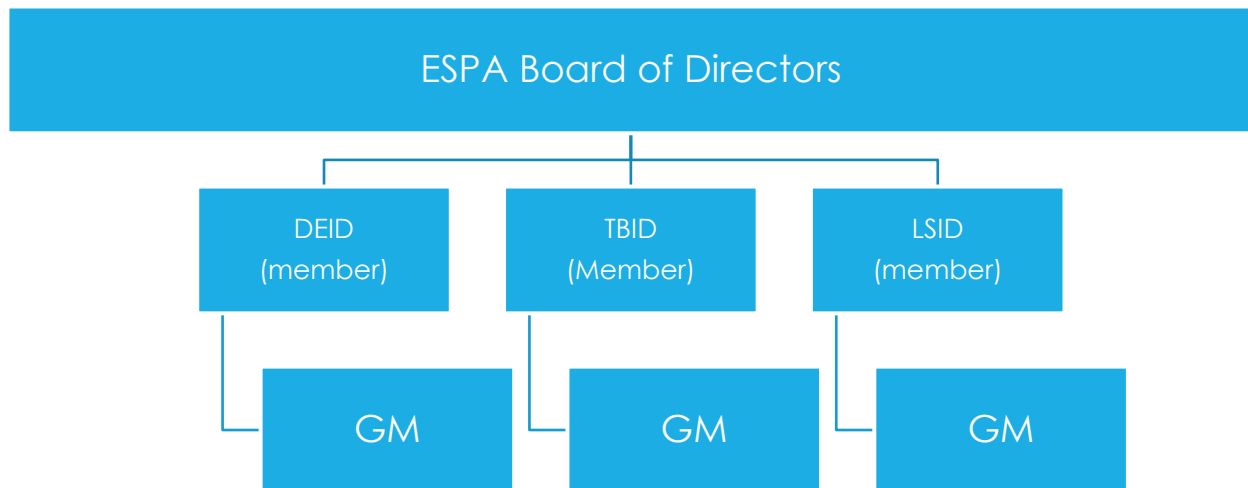
- Objectives of the plan;
- Roles and responsibilities for carrying out the plan;
- Identification of key wildfire risks and risk drivers;
- Description of wildfire prevention, mitigation, and response strategies and programs;
- Metrics for evaluating the performance of the plan and identifying areas for improvement;
- Review and validation of the plan; and
- Timelines.

II. OBJECTIVES OF THE WILDFIRE MITIGATION PLAN

The primary goal of this Wildfire Mitigation Plan is to describe ESPA's existing programs, practices, and measures that effectively reduce the probability that any ESPA-owned electric supply system could be the origin or contributing source for the ignition of a wildfire. To support this goal, ESPA regularly evaluates prudent and cost-effective operations and training activities that can help reduce the risk of equipment-related fires. Though there are no present ESPA-owned facilities as applicable to California Public Utilities Code Section 8387(a), ESPA has nevertheless prepared this wildfire mitigation plan to support the wildfire planning efforts being conducted in California. Another goal of this Wildfire Mitigation Plan is to improve the resiliency of the electric grid and increase communication and collaboration among utility stakeholders. As part of the development of this plan and annual process, ESPA assesses new industry practices and standards that support wildfire prevention in the community and State of California.

III. ROLES AND RESPONSIBILITIES

A. UTILITY GOVERNANCE STRUCTURE



The Eastside Power Authority is governed by a Board of Directors comprised of a representative from each member district. This Board of Directors reviews, sets direction, and approves matters of utility governance.

B. WILDFIRE PREVENTION

ESPA recognizes the importance of wildfire prevention in California, and will conduct prevention planning and coordination with utility stakeholders concerning wildfire issues. Such activities include coordination with fire management personnel as necessary and appropriate to implement ESPA's wildfire mitigation plans.

If, at a later point, ESPA does own any facilities or equipment described in California Public Utilities Code Section 8387(a) or a standard in any future legislation, ESPA will engage in preventative efforts including the following:

- Operate ESPA electrical lines and equipment in a manner that will minimize potential wildfire risks.
- Take all reasonable and practicable actions to minimize the risk of a catastrophic wildfire caused by ESPA electric facilities.
- Coordinate with federal, state, and local fire management personnel as necessary or appropriate to implement ESPA's Wildfire Mitigation Plan.
- Immediately report fires, pursuant to existing utility practices and the requirements of this Wildfire Mitigation Plan.
- Take corrective action when ESPA becomes aware or is notified that fire protection measures have not been properly installed or maintained.
- Comply with relevant federal, state, and industry standard requirements, including the industry standards established by the applicable regulatory body.

Responsibilities for execution of the above described plans will rest with the acting manager of Eastside Power Authority under the direction and oversight of the Eastside Power Authority Board of Directors.

C. WILDFIRE RESPONSE AND RECOVERY

When a wildfire impacts ESPA's service territory, ESPA will correspond with appropriate fire prevention personnel during fire emergencies, such as state or local firefighters, to receive input. When appropriate, ESPA will further coordinate with SCE to the extent a wildfire would impact SCE's system and the safe delivery of electricity to ESPA customers. ESPA will also provide information on the wildfire to ESPA members to keep them apprised of response and recovery efforts.

If, at a later point, ESPA does own any facilities or equipment described in California Public Utilities Code Section 8387(a) or a standard in any future legislation, the ESPA Board of Directors will review and establish response roles related for that infrastructure in a reasonable timeframe, and describe those roles in the subsequent annual wildfire mitigation plan.

D. STANDARDIZED EMERGENCY MANAGEMENT SYSTEM

ESPA is not a local governmental agency as defined in California Government Code Section 8680.2.¹ Nevertheless, ESPA may evaluate future participation in an emergency management system structure, particularly if ESPA owns facilities or equipment described in California Public

¹ As defined in Cal. Gov. Code § 8680.2: "Local agency" means any city, city and county, county, county office of education, community college district, school district, or special district. (Amended by Stats. 1990, 1st Ex. Sess., Ch. 33, Sec. 1. Effective December 1, 1990.)

Utilities Code Section 8387(a) in the future. At that point, such emergency management system processes could entail ESPA training and wildfire prevention exercises, as well as coordination with associations such as the California Utility Emergency Association to stay informed on recent emergency response developments.

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

- Extended drought;
- Vegetation type;
- Vegetation Density;
- Weather;
- High winds;
- Terrain;
- Changing Weather Patterns (Climate Change);
- Communities at Risk;
- Fire History.

As noted above, ESPA is located in a specific region of the State with a very low wildfire risk. ESPA will continue to monitor the region for risk drivers associated with topographic and climatological risk factors.

B. ENTERPRISEWIDE SAFETY RISKS

ESPA's methodology for enterprise wide safety risks will entail identifying any future activities or facilities that may present a safety risk or wildfire-related risk, informed by wildfire risk factors, regional developments, prudent utility practice, and wildfire prevention standards. Since ESPA does not presently own any facilities described in California Public Utilities Code Section 8387(a), there are no issues to identify at this point. However, should an issue be identified in the future, such enterprise safety risks will be described in the subsequent wildfire mitigation plan and addressed by the ESPA Board of Directors in the interim as appropriate. ESPA's risk description may include safety process flowcharts, a table of enterprisewide safety compliance milestones for enforcement, and Gantt charts to track wildfire prevention efforts.

V. WILDFIRE PREVENTATIVE STRATEGIES

A. HIGH FIRE THREAT DISTRICT

ESPA reviewed the proposed boundaries of the High Fire Threat District and confirmed that, based on local conditions and historical fire data, all of ESPA's service territory was properly excluded.

B. DESIGN AND CONSTRUCTION STANDARDS

ESPA intends for any its future electric facilities to be designed and constructed to meet or exceed the relevant federal, state, or industry standard at that future time. Presently, ESPA treats CPUC General Orders (GO) 95 and 128 as a key industry standard for design and construction standards for overhead and underground electrical facilities. Additionally, ESPA monitors and follows, as appropriate, the National Electric Safety Code.

C. VEGETATION MANAGEMENT

ESPA recognizes that vegetation management standards may evolve and develop over time. Similar to design and construction standards, ESPA will refer to industry standard vegetation management practices at any future time that ESPA constructs and owns facilities described in California Public Utilities Code Section 8387(a). ESPA does track present vegetation management standards for reference at a later point, which includes radial clearances for certain facilities described in the tables below.

GO 95, Rule 35, Table 1					
Case	Type of Clearance	Trolley Contact, Feeder and Span Wires, 0-5kv	Supply Conductors and Supply Cables, 750 - 22,500 Volts	Supply Conductors and Supply Cables, 22.5 - 300 kV	Supply Conductors and Supply Cables, 300 - 550 kV (mm)
13	Radial clearance of bare line conductors from tree branches or foliage	18 inches	18 inches	¼ Pin Spacing	½ Pin Spacing
14	Radial clearance of bare line conductors from vegetation in the Fire-Threat District	18 inches	48 inches	48 inches	120 inches

Appendix E Guidelines to Rule 35

The radial clearances shown below are recommended minimum clearances that should be

established, at time of trimming, between the vegetation and the energized conductors and associated live parts where practicable. Reasonable vegetation management practices may make it advantageous for the purposes of public safety or service reliability to obtain greater clearances than those listed below to ensure compliance until the next scheduled maintenance. Each utility may determine and apply additional appropriate clearances beyond clearances listed below, which take into consideration various factors, including: line operating voltage, length of span, line sag, planned maintenance cycles, location of vegetation within the span, species type, experience with particular species, vegetation growth rate and characteristics, vegetation management standards and best practices, local climate, elevation, fire risk, and vegetation trimming requirements that are applicable to State Responsibility Area lands pursuant to Public Resource Code Sections 4102 and 4293.

Voltage of Lines	Case 13	Case 14
Radial clearances for any conductor of a line operating at 2,400 or more volts, but less than 72,000 volts	4 feet	12 feet
Radial clearances for any conductor of a line operating at 72,000 or more volts, but less than 110,000 volts	6 feet	20 feet
Radial clearances for any conductor of a line operating at 110,000 or more volts, but less than 300,000 volts	10 feet	30 feet
Radial clearances for any conductor of a line operating at 300,000 or more volts	15 feet	30 feet

D. INSPECTIONS

ESPA intends to meet or exceed the minimum inspection requirements provided in CPUC GO 165 and CPUC GO 95, Rule 18 if at any future point it owns applicable facilities. Pursuant to these rules, utilities inspect electric facilities in the High Fire Threat District more frequently than the other areas of its service territory. As described above, ESPA currently does not have any overhead powerlines located within or near the High-Fire Threat District within the CPUC's Fire Threat Map. However, ESPA will use the specific environmental and geographical conditions of ESPA's service territory to determine if any particular areas require more frequent inspections.

E. RECLOSING POLICY

A reclosing policy is presently inapplicable to ESPA, but if at a later point ESPA does own such facilities it will within a reasonable timeframe develop protocols for the use of reclosers and other SCADA controlled reclosers.

F. DEENERGIZATION

ESPA does not have the ability to preemptively shut off power due to fire-threat conditions, as SCE exercises this authority for SCE's facilities utilized to serve ESPA members. ESPA will

coordinate with SCE concerning deenergization issues when appropriate. ESPA will also re-evaluate this determination in future updates to this Wildfire Mitigation Plan corresponding with any future ownership of new facilities.

IV. RESTORATION OF SERVICE

ESPA does not have the ability to restore service to SCE's infrastructure. SCE exercises this authority for such facilities. ESPA will coordinate with SCE concerning restoration of service issues when appropriate.

VII. EVALUATING OF THE PLAN

A. METRICS AND ASSUMPTIONS FOR MEASURING PLAN PERFORMANCE

ESPA will track two main metrics to measure the performance of this Wildfire Mitigation Plan: (1) number of fire ignitions; and (2) wires down within the service territory. In subsequent plans, ESPA may identify additional metrics to utilize.

METRIC 1: FIRE IGNITIONS

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

- ESPA 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
- ESPA has knowledge that the fire occurred.

In future Wildfire Mitigation Plans, ESPA will provide the number of fires that occurred that were less than 10 acres in size when meeting the criteria above. 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 ESPA's service territory associated with an ESPA facility. For purposes of this metric, a wires down event includes any instance where an electric transmission or primary distribution conductor falls to the ground or on to a foreign object. ESPA does not own or operate any of such wires presently.

B. IMPACT OF METRICS ON PLAN

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

C. MONITORING AND AUDITING THE PLAN

This Wildfire Mitigation Plan will be presented to ESPA's Board of Directors and updates to this plan will be presented to ESPA's Board of Directors on an annual basis. Additionally, a qualified independent evaluator will present a report on this plan to ESPA's Board of Directors.

D. IDENTIFYING AND CORRECTING DEFICIENCIES IN THE PLAN

Based on the recommendations of its Board of Directors, ESPA will correct any identified deficiencies in the plan.

E. MONITORING THE EFFECTIVENESS OF INSPECTIONS

There are presently no ESPA-owned facilities described in California Public Utilities Code Section 8387(a) to inspect and audit. ESPA will establish effectiveness monitoring in updates to this Wildfire Mitigation Plan corresponding with any future ownership of facilities.

VIII. INDEPENDENT AUDITOR

Public Utilities Code section 8387(c) requires a local publicly owned electric utility to contract with a qualified independent evaluator with experience in assessing the safe operation of its electrical infrastructure to review and assess the comprehensiveness of this Wildfire Mitigation Plan. The scoping of an independent evaluator's review for ESPA will coincide with the Board of Directors' review and approval of this Wildfire Mitigation Plan. An evaluator's review will be conducted ahead of the subsequent annual plan, or within a reasonable timeframe once there is applicable ESPA infrastructure for the independent evaluator to assess as part of a mitigation plan.

STRATHMORE FIRE PROTECTION DISTRICT

22908 Ave 196 • PO Box 344 • Strathmore California 93267 • (559) 568-2415 • Fax (559) 568-0240

October 3, 2019

Eastside Power Authority
PO Box 846
Lindsay Ca. 93267

RE: Review and recommendation of the Eastside Power Authority Wildfire Mitigation Plan

To whom it may concern,

On Thursday September 26, 2019 the Eastside Power Authority Wildfire Mitigation Plan was disbursed to Tulare County Fire Company for their review. At the October 2, 2019 meeting of the Strathmore Fire Protection District the plan was evaluated by the commissioners of the Strathmore Fire Protection District. Based on the recommendation of Tulare County Fire Chief Duffy (an expert in wildfire mediation) the plan was accepted as presented with no recommendations for change.

If you require any further information, feel free to contact Adele Sanchez Bookkeeper/Secretary of the Strathmore Fire Protection District (559) 306-7661.

Very truly yours,

A handwritten signature in black ink, appearing to read 'Adele Sanchez', with a long, sweeping horizontal line extending to the right.

Adele Sanchez
Strathmore Fire Protection District,
Clerk/Bookkeeper
(559) 306-7661