Changes to the Guidance Advisory Opinion for 2022 POU WMPs

In the final adopted version of the *Guidance Advisory Opinion for the 2022 Wildfire Mitigation Plans of Publicly Owned Electric Utilities and Rural Electric Cooperatives* changes were made to the posted, 2/10/2022 version in response to filed comments on four pages as described below (additions shown in red font). In addition, Appendix 4 was added to the final document providing a description of comments received and the Wildfire Safety Advisory Board response. Due to formatting changes, the pagination in the final document may differ from the 2/10/2022 version.

Paragraph on Page 6 of the posted 2/10/2022 document now reads:

> The Board encourages the POUs, particularly in the upcoming comprehensive WMP revisions, to question whether broader thought and strategies may be appropriate going forward. Once the appropriate source minimization actions are accomplished for a POU – strategic undergrounding, fuse replacement with non-expulsion fuses, pole replacements, replacement of standard lightning arrestors with CALFIRE approved equipment, ensuring fault duty capabilities of equipment exceeds fault amplitudes, elimination of tree attachment construction, etc. – attention must still be paid to ongoing vegetation management and how that is best accomplished and customer interactions to mitigate the impacts of any wildfire that yet gets triggered (in collaboration with and deference to existing emergency communication protocols). While the comprehensive revisions may be where these thoughts get full attention, the Board encourages POUs to start along this path as feasible in their 2022 WMP updates.

Paragraph on Page 9 of the posted 2/10/2022 document now reads:

> In the 2021 Guidance Advisory Opinion, the Board stated that in general IE Reports tended to be repetitive (across POUs) and general without fully addressing the specific POU's WMP. Again, the evaluator will not be providing additional benefit to the POU funding the evaluation unless the IE provides wildfire mitigation progress through a more

robust analysis of each POUs specific plan. The Board believes it is beneficial, for review and wildfire mitigation progress, for IE Reports to address comparison to industry standards that are relevant and applicable to POUs and to made recommendations on how the POU should improve its WMP to robustly meet its statutory obligations. In future WMPs, and in particular for the upcoming comprehensive revisions, the Board recommends IEs perform a robust evaluation of the contents and substance of the POU's WMP, in comparison to relevant industry standards, and provides useful recommendations for wildfire mitigation Improvements where applicable.

Paragraph on Page 15 in posted 2/10/2022 document now reads:

In a few cases the POUs indicated in 2021 WMPs that backup power existed to some extent for their customers, either through internal or nearby generation sources partially owned or controlled by the POU or by memorandums of understanding for generation to be provided as backup for an IOU PSPS cutoff by a local private generation facility. In general, the POUs have indicated that vital services and businesses have available backup generation on-site that is not owned by, supplied by, or controlled by the POU. The Board encourages additional attention to backup supplies, and coordination of those, in future WMPs for purposes of resiliency and wildfire recovery efforts, in addition to PSPS mitigation. Most existing backup generation is likely diesel-fired; examination of newer resiliency options like battery storage (as other utilities are doing) is encouraged for environmental and long-term resiliency reasons. While wildfire planning and mitigation efforts will generally affect broader utility resource planning, the Board is not asking POUs to engage in resource planning within WMPs. Rather, the Board wants to better understand the broader picture of resource availability and alternatives solely in the wildfire context.

California Wildfire Safety Advisory Board

APPENDIX 4

Comment-Response Table for 2022 POU Guidance Advisory Opinion

Commenting Entity	Comment	WSAB Comment Response
Anaheim	• Notes that Board document seeks to learn of progress in Anaheim's mitigation plans; promises to provide updates in 2022 WMP. • Agree with Board comment that WMP information should be clear on website to allow easy public tracking of progress.	• The Board appreciates Anaheim's recognition of the request and promise to include material in their 2022 WMP. **No change to document.** • The Board appreciates Anaheim's recognition of the Board's request and updating of the web site in response to add WMP material. **No change to document**.
Burbank	• Agrees with Joint Association comments • Will continue to review recommendations and incorporate where appropriate in future WMPs.	• The Board appreciates the agreement with JA comments. **No change to document.** • The Board appreciates Burbank's promise to reflect where appropriate changes in future WMPs. **No change to document**.

Joint Associations	• Development and adoption timing for WMPs may prevent some POUs from incorporating guidance in 2022; may be postponed to 2023 WMPs. • WMPs are not the proper forum for describing or developing emergency communication protocols. • Resource adequacy is not a topic that the WMPs should address and is not the typical expertise of WSAB members. • • • POUs have discretion in choice of Independent Evaluators and those entities serve a different function for POUs than for IOUs. Hence, an entity on the OEIS list of certified evaluators is not necessarily best and the list itself is small and potentially limiting.	• The Board has indicated understanding of the timing issue given the varying timeframes for POU development and adoption of 2022 WMPs, and potential for inclusion in 2023 WMPs. **No change to document**. • The Board understands and agrees that emergency communications are best left to the emergency structures in place. The Board only wishes to understand better the utility role in those instances, particularly with respect to power shutoffs to their customers. **Document clarified to acknowledge primacy of standard emergency communications**. • The Board is not attempting to engage in resource adequacy or integrated resource planning but wishes to understand how POUs think about and plan for the impact on customers, and potential risks, when a wildfire causes loss of power or a PSPS occurs. **Document clarified to indicate that the Board is not requesting resource planning within WMPs**. • The Board agrees that POUs have discretion and that the OEIS list may not provide sufficient alternatives for POU IEs. Nevertheless, the Board encourages robust Independent Evaluation Reports that cover the issues of utility interaction with wildfires. The Board is unsure that all local fire departments have this expertise, so continues to encourage augmentation of POU

Commenting Entity	Comment	WSAB Comment Response
	Local fire chiefs/departments may have the best expertise to evaluate. • Where a POU has not adopted a PSPS protocol or developed plans to order PSPS events battery backup systems are not within the scope of a WMP and should not be a required element of an WMP. • Transparency should be balanced against clarity and customer confusion. Only the most current WMPs should be easily accessible on POU websites. The Board could use redline documents to track progress.	IE efforts relying on these entities. **No change to Document.** • The Board agrees that there are many reasons for customer installation of battery backup systems that are unrelated to wildfires or PSPS events. Nevertheless, within WMPs the Board wishes to understand whether a POU has plans to develop, encourage, or rely on backup generation (not just batteries on-site) in wildfire conditions. Wildfire risks can be avoided or exacerbated in power shutoff situations, and the Board encourages POUs to consider these questions in their WMPs. PSPS events in neighboring utilities should also be part of the picture. **No change to Document.** • The Board agrees that the most current WMP is the most important to feature on a POU website and that redline information to the Board helps focus review. The Board disagrees that including links to older WMPs or to supplemental filings is potentially confusing to customers if described well. A POUs customers should have the option of tracking progress even more so than the Board if they so are inclined. **No change to Document.** • The Board agrees that POUs have differential resources to bring to bear in the fire science arena. Nevertheless, the Board believes

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	• POUs, particularly smaller POUs, are not fire scientists nor do they have the resources generally to employ technical experts in these areas. POUs would welcome organized expertise here from the Board or in webinars or workshops.	that fire and climate science expertise is highly important and increasing in importance. The Board is happy to work with the POU community to better inform and distribute fire science expertise. **No change to Document.**
LADWP	• IOUs and POUs differ greatly and so benefit from evaluation to differing appropriate standards. When referring to IEs, please add "… that are relevant and applicable to [POUs] after the words "… industry standards …"	• The Board understands the significant differences that exist amongst POUs and between the POUs and IOUs in general. **Phrase added to reflect POU-relevant standards.**

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SMUD	• SMUD will integrate the context setting template at the beginning of the 2022 WMP. • SMUD will include budget information in Chapter 10 of the 2022 WMP. • SMUD is reviewing and revising its WMP webpage to make links to background and historical material more accessible. • SMUD will provide a "plan to plan" summary of changes as a new appendix to the 2022 WMP. • SMUD made a couple of other comments that signal WMP and metric changes as appropriate and which do not require a Board response.	• The Board appreciates SMUD's response to the Board's request. **No change to Document.** • The Board appreciates SMUD's response to the Board's request. **No change to Document.** • The Board appreciates SMUD's response to the Board's request. **No change to Document.** • The Board appreciates SMUD's proposed inclusion of a "plan to plan" appendix. **No change to Document.**