California Public Utilities Commission
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RE: California Public Utilities Commission (CPUC) Proceeding R. 18-10-007 Wildfire Mitigation Plans

The City of El Centro recognizes the importance of having local government representation in the review of wildfire mitigation plans developed by various stakeholders including publically owned utilities. We are in support of any further action that would enable local jurisdictions to participate in order to assess:

1. An accounting of the responsibilities of persons responsible for executing the plan.
2. The objectives of the plan.
3. A description of the preventive strategies and programs to be adopted by the electrical corporation to minimize the risk of its electrical lines and equipment causing catastrophic wildfires, including consideration of dynamic climate change risks.
4. A description of the metrics the electrical corporation plans to use to evaluate the plan's performance and the assumptions that underlie the use of those metrics.
5. How the application of previously identified metrics to previous plan performances has informed the plan.
6. 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.
7. 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.
8. Plans for vegetation management.

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9. Plans for inspections of the electrical corporation's electrical infrastructure.
10. A list that identifies, describes, and prioritizes all wildfire risks, and drivers for those risks, throughout the electrical corporation's service territory, including all relevant wildfire risk and risk mitigation information that is part of Safety Model Assessment Proceeding and Risk Assessment Mitigation Phase filings. The list shall include, but not be limited to, both of the following:
    a. Risks and risk drivers associated with design, construction, operations, and maintenance of the electrical corporation's equipment and facilities.
    b. Particular risks and risk drivers associated with topographic and climatological risk factors throughout the different parts of the electrical corporation's service territory.
11. A description of how the plan accounts for the wildfire risk identified in the electrical corporation's Risk Assessment Mitigation Phase filing.
12. A description of the actions the electrical corporation will take to ensure its system will achieve the highest level of safety, reliability, and resiliency, and to ensure that its system is prepared for a major event, including hardening and modernizing its infrastructure with improved engineering, system design, standards, equipment, and facilities, such as undergrounding, insulation of distribution wires, and pole replacement.
13. A showing that the utility has an adequate sized and trained workforce to promptly restore service after a major event, taking into account employees of other utilities pursuant to mutual aid agreements and employees of entities that have entered into contracts with the utility.
14. Identification of any geographic area in the electrical corporation's service territory that is a higher wildfire threat than is currently identified in a commission fire threat map, and where the commission should consider expanding the high fire threat district based on new information or changes in the environment.
15. A methodology for identifying and presenting enterprise-wide safety risk and wildfire- related risk that is consistent with the methodology used by other electrical corporations unless the commission determines otherwise.
16. A description of how the plan is consistent with the electrical corporation's disaster and emergency preparedness plan prepared pursuant to Section 768.6, including both of the following:
    a. Plans to prepare for, and to restore service after, a wildfire, including workforce mobilization and prepositioning equipment and employees.
    b. Plans for community outreach and public awareness before, during, and after a wildfire, including language notification in English, Spanish, and

the top three primary languages used in the state other than English or Spanish, as determined by the commission based on the United States Census data.

17. A statement of how the electrical corporation will restore service after a wildfire.
18. Protocols for compliance with requirements adopted by the commission regarding activities to support customers during and after a wildfire, outage reporting, support for low-income customers, billing adjustments, deposit waivers, extended payment plans, suspension of disconnection and nonpayment fees, repair processing and timing, access to utility representatives, and emergency communications.
19. A description of the processes and procedures the electrical corporation will use to do all of the following:
    a. Monitor and audit the implementation of the plan.
    b. Identify any deficiencies in the plan or the plan's implementation and correct those deficiencies.
    c. Monitor and audit the effectiveness of electrical line and equipment inspections, including inspections performed by contractors, carried out under the plan and other applicable statutes and commission rules.
20. Any other information that the commission may require.

While the City of El Centro does not have any areas of Wildland Urban Interface we do share a commitment to jurisdictions throughout the State of California through the State Master Mutual Aid Plan and routinely participate in deployments to large scale wildfire incidents. Again, we recognize the importance of and support local jurisdiction participation in the process of review.

Respectfully,

12/4/18

Kenneth Herbert
Fire Chief

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