

Wildfire Mitigation Plan Update

Wildfire Safety Advisory Board

June 24, 2020

2020 Wildfire Mitigation Plans: Draft resolutions issued 5/7 propose approval with conditions for all utilities; WSD issued final approval Action Statements (6/10); CPUC ratified resolutions (6/11)

Today

CPUC submission drafting (December–February)

Utilities draft **wildfire mitigation plan (WMP),** which includes



Utility plan to reduce wildfire risk



Outcome and progress metrics

Utilities also complete a maturity survey to assess capabilities for managing wildfire risk

WMP review (February–May)

Wildfire Safety Division (WSD) **reviews WMPs** and **assesses maturity** via survey and WMPs

Deep and broad **subject expertise** required to review WMPs, including from CPUC SED, CAL FIRE, and a range of other experts

An **approved WMP** is required for safety certification

Implementation and learning (June–November)

Utilities **implement mitigation plans and develop lessons learned** that should be included in annual updates

WSD **monitors for compliance** with WMPs, and **incorporates lessons learned** into next year's guidelines

2020 WMP Guidelines Revised to Support Broader Vision

Improvements to be incorporated in 2021 and beyond

Guideline revisions had 3 objectives:

Increased standardization



Standardize information collected on utility wildfire risk exposure and mitigation initiatives

Improved objectivity



Enable systematic and uniform review of qualitative information

Forward-looking focus



Move utilities towards an effective long-term wildfire mitigation strategy, with systematic tracking of improvements against long term targets

WMP Evaluation Rubric

Four factors to consider

1. WMP ***comprehensively*** responds to guidelines and utility survey is ***complete***

2. Initiatives in WMP are deemed ***technically feasible and effective*** in reducing wildfire risk

3. Initiatives in WMP are an ***efficient use of resources***

4. ***Sufficient forward-looking ambition for*** maturity growth

Evaluation Team

Evaluation Team consisted of 27 members

- 18 subject matter, writing and project management experts from across the CPUC
- 9 subject matter experts from CAL FIRE

Evaluation Process Results

1. **Approve**
2. **Approve with Conditions**
3. **Bear Valley- made no determination**

Class A Deficiency: Aspect of a plan is lacking or flawed. Remedy: Provide a Remedial Compliance Plan in 45 days

Class B Deficiency: Insufficient Detail or justification provided in plan. Remedy: submit a resolution to deficiency in a Quarterly Report within 90 days

Class C Deficiency: Gaps in baseline or historical data. Remedy: Resolve by or within 2021 WMP Plan Update

2020 Wildfire Mitigation Plans: Common themes across 6 categories



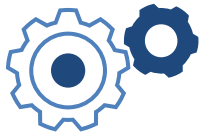
Risk assessment and mapping

Little discussion of how models assess **consequences of a given ignition** and how outputs are **leveraged for decision-making**



Grid hardening and asset management

Unclear from WMPs **how significantly these initiatives reduce risk** in terms of ignitions and PSPS events



PSPS

Unclear from WMPs how VM and hardening work will **quantifiably reduce scale / scope of PSPS** by increasing wind threshold for initiating PSPS



Vegetation Management

Labor constraints and recurring costs may impede planned efforts

Little to no analysis presented to show how **"enhanced" programs** reduce ignitions over detailed and patrol inspections



Risk spend efficiency

WMPs do not sufficiently demonstrate that they are **allocating finite resources** to initiatives that **most effectively reduce wildfire and PSPS risk**



Timelines

Hard to assess utility compliance and progress if **timelines and deployment plans are not described clearly**

Guidance Resolution (WSD-002)

Guidance Resolution Deficiencies

- **One** Class A Deficiency: Lack of risk modeling to inform decision-making
- **10** Class B Deficiencies
- **One** Class C Deficiency

Note: Additional Class A Deficiency common to 3 Large IOUs that require demonstration of effectiveness of increased vegetation management clearances

PG&E, SCE and SDG&E Summary

Pacific Gas and Electric Company

7 Class A Deficiencies
- Aggregation of Initiatives
- Personnel shortages
- High incidence of conductor failure

20 Class B Deficiencies

2 Class C Deficiencies

PG&E's Plan met minimum requirements, demonstrated an understanding of top ignition drivers and actions to address those drivers

Areas of Concern (selected):
- Unclear use of risk models to drive prioritization of mitigation activities to reduce wildfire risk and PSPS

Edison International

3 Class A Deficiencies
- Near Misses
- Vegetation management clearances
- Advancement in vegetation management

18 Class B Deficiencies

1 Class C Deficiencies

SCE's Plan met minimum requirements and presented activities to drive down wildfire risk

Areas of Concern (selected):
- Scale and scope of PSPS
- Large allocation of spend on covered conductor

SDG&E

1 Class A Deficiencies
- Vegetation management clearances

14 Class B Deficiencies

1 Class C Deficiencies

SDG&E's Plan met minimum requirements, demonstrated understanding of risk, and presented initiatives to drive down wildfire risk

Areas of Concern (selected):
- Efficient use of resources
- Diminishing returns

Liberty, PacifiCorp and Bear Valley Summary

0 Class A Deficiencies

4 Class B Deficiencies

1 Class C Deficiencies

Liberty's Plan met minimum requirements, initiatives addressed major risk drivers, good-faith effort to address risk given exemption to date from S-MAP and RAMP requirements.

Liberty expects to have a process for evaluating new initiatives' performance by 2023

Areas of Concern (selected):

- Risk-informed decision-making to deploy initiatives

0 Class A Deficiencies

5 Class B Deficiencies

2 Class C Deficiencies

PacifiCorp's Plan met minimum requirements, initiatives addressed major risk drivers, good-faith effort to address risk given exemption to date from S-MAP and RAMP requirements.

PacifiCorp expects to have tools to quantitatively estimate ignition risk by 2023

Areas of Concern (selected):

- Continued development towards maturity

Wildfire Safety Division did not act on Bear Valley's WMP.

Wildfire Safety Division issued statement extending evaluation time period.

Bear Valley submitted errata on May 22, 2020 that substantially altered the contents of their plan.

Overall plan spend decreased from 247 million to 46 million

Plans Approved Without Conditions

Horizon West undergrounding initiative faces delays



End