

**Wildfire Mitigation Plan
Independent Evaluation
Trinity Public Utilities District (TPUD)**

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Table of Contents

Executive Summary	3
Analysis.....	3
A. Responsibilities of Persons Responsible for Executing Plan.....	3
B. Objectives of FMP	3
C. Preventative Strategies and Programs.....	3
D. Metrics	4
E. Application of Previously Identified Metrics	4
F. Public Safety Protocols	4
G. Notification of Customers.....	5
H. Vegetation Management	5
I. Inspection Plan.....	5
J. Identification of Risks	5
K. Identification of Higher Threat Areas.....	6
L. Wildfire Risk Methodology	6
M. Restoration of Service.....	7
N. Processes and Procedures	7
Conclusion	7

Executive Summary

The Trinity Public Utilities District (TPUD) Wildfire Mitigation Plan (WMP) was prepared by Chloeta for publication in 2023. In accordance with California Public Utilities Code Section 8387(c), this plan was reviewed and assessed by an independent evaluator to establish its comprehensiveness as legally defined. Chloeta is providing the independent evaluation of this WMP prior to publication. This evaluation was conducted independently from the team that created the WMP and was not involved with any part of developing the WMP. Chloeta is completely independent of TPUD.

Analysis

This WMP was reviewed for compliance with California Public Utilities Code Section 8387, which establishes the guidelines for the comprehensiveness of a utility's wildfire mitigation plan. Section 8387 delineates multiple criteria for establishing comprehensiveness. This independent evaluation will review each criteria established in Section 8387 and determine if they are met by the WMP provided by TPUD.

A. Responsibilities of Persons Responsible for Executing Plan

Section 8387 Requirement: *An accounting of the responsibilities of persons responsible for executing the plan.*

Plan Section Number: 3. E., 5. A.

The WMP identifies TPUD's management responsibilities regarding the implementation of the activities discussed in the WMP. Section 3. E. identifies the general manager (or his or her designee) as the primary party responsible for implementing the plan under the direct supervision of the Board of Directors. Section 5. Discusses the roles and responsibilities of TPUD staff with the accountability of plan information outlined in Table 3.

B. Objectives of FMP

Section 8387 Requirement: *The objectives of the wildfire mitigation plan.*

Plan Section Number: 3. B, 4.

The WMP establishes an overarching purpose in section 4 and clearly states the plan's objectives. A statutory cross-reference table is included in section 3. B., table 2.

C. Preventative Strategies and Programs

Section 8387 Requirement: *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.

Plan Section Number: 7.

Section 7 of the WMP lists mitigation programs and activities that TPUD will undertake to minimize wildfire risk. A high fire threat district map is included in Figure 3. Impacts of climate change are discussed in Section 7. C.

D. Metrics

Section 8387 Requirement: *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.*

Plan Section Number: 10.

Section 10 identifies the primary metrics used to measure the performance of the WMP and are shown in Table 5. Nine (9) metrics are identified in the WMP.

E. Application of Previously Identified Metrics

Section 8387 Requirement: *A discussion of how the application of previously identified metrics to previous wildfire mitigation plan performances has informed the wildfire mitigation plan.*

Plan Section Number: 10. B.

Section 10 includes the previous three (3) years of data on three (3) previously identified metrics. These 3 metrics are broken down in Table 6. The identified metrics show improvement from 2021 to 2022 but still are lower than the recommended targets. TPUD should ensure that data on the remaining metrics is collected going forward.

F. Public Safety Protocols

Section 8387 Requirement: *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.*

Plan Section Number: 7. H., 7. I.

Section 7. H. thoroughly discusses TPUD's reclosing policy and steps taken when reclosers occur. De-energization is discussed in section 7. I. Communication to affected customers is discussed in section 7. I.

G. Notification of Customers

Section 8387 Requirement: *Appropriate and feasible procedures for notifying a customer who may be impacted by the deenergizing of electrical lines. The procedures shall direct notification to all public safety offices, critical first responders, health care facilities, and operators of telecommunications infrastructure with premises within the footprint of potential de-energization for a given event.*

Plan Section Number: 7. H., 8.

Section 7. I. discusses how customers are notified during deenergization and provides several links on their company website. Section 8 further discusses the comprehensive public awareness communication plan in further detail.

H. Vegetation Management

Section 8387 Requirement: *Plans for vegetation management.*

Plan Section Number: 7. E.

The WMP establishes vegetation management goals and procedures to reduce wildfire risk. This plan states that vegetation management work is contracted out with TPUD's vegetation manager responsible for patrol, work plans, and quality control audits. The WMP discusses clearing and trimming trees and gives some specific perimeters in section 7. E. These parameters are also shown in figure 4 as a visual.

I. Inspection Plan

Section 8387 Requirement: *Plans for inspections of the local publicly owned electric utility's or electrical cooperative's electrical infrastructure.*

Plan Section Number: 7. F.

The WMP includes a dedicated section on infrastructure inspections and repair in section 7. F.

J. Identification of Risks

Section 8387 Requirement: *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.

Plan Section Number: 6.

Section 6. A. discusses the 5 primary risks drivers for wildfire. A risk factor bowtie analysis is included in section 5. B. Figure 1.

K. Identification of Higher Threat Areas

Section 8387 Requirement: *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.*

Plan Section Number: 7.

Figure 3 in section 7 is a map that clearly shows areas that are at a higher risk of wildfire threat. Section 7. A. discusses TPUD's management in these higher risk areas.

L. Wildfire Risk Methodology

Section 8387 Requirement: *A methodology for identifying and presenting enterprise wide safety risk and wildfire-related risk.*

Plan Section Number: 6.

The WMP does discuss situational awareness and having the ability to alter practices dependent on fire conditions. Figure 1 in section 6. B. is a risk factor bowtie analysis that shows risk factors and potential risk impacts.

M. Restoration of Service

Section 8387 Requirement: *A statement of how the local publicly owned electric utility or electrical cooperative will restore service after a wildfire.*

Plan Section Number: 9. A.

Section 9. A. discusses steps taken by TPUD work crews before power can be restored. It states that critical infrastructure facilities are prioritized during this process. Customer and media notification will be done throughout the restoration process.

N. Processes and Procedures

Section 8387 Requirement: *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.

Plan Section Number: 3. E., 10. C., 10 D., 10. E.

Section 10. C. states the WMP will be included as a discussion item on the agenda of regularly scheduled management meetings. The effectiveness of the plans will be submitted to the Board of Directors annually. Section 3. E. and 10. C. assigns overall responsibility to the general manager (or his or her designee) to ensure the plan is executed properly and submitted for monitoring and auditing.

Section 10. D. states that TPUD is committed to identifying and correcting deficiencies and assigns overall responsibility to the general manager (or his or her designee) to ensure deficiencies in the plan are monitored and corrected.

Section 10. E. discusses inspections and clearly states the electrical superintendent manages TPUD's assets and develops the comprehensive inspection and maintenance programs.

Conclusion

Following the independent evaluation, it is our conclusion that the TPUD WMP is sufficient in meeting the requirements for comprehensiveness as set forth by California Public Utilities Code Section 8387.