

**Wildfire Mitigation Plan
Independent Evaluation
TRINITY PUBLIC UTILITIES DISTRICT**

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2501 Liberty Pkwy, Ste 176
Midwest City, OK 73110
+1 877 245 6382
chloeta.com
info@chloeta.com

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Executive Summary

The Trinity Public Utilities District (TPUD) Wildfire Mitigation Plan (WMP) was prepared by Brown & Kysar, Inc. for publication in December 2019. 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 Fire, LLC is providing the independent evaluation of this WMP prior to publication. Chloeta Fire, LLC is completely independent of both the TPUD and Brown & Kysar, Inc.

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 Brown & Kysar.

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: 8.1, 8.1.1

The WMP identifies TPUD's management responsibilities regarding the implementation of the activities discussed in the WMP. Table 8 on page 70 identifies action items outlined in the WMP and the responsible department and workgroup in TPUD responsible for implementation.

B. Objectives of FMP

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

Plan Section Number: 1.2, 1.3

The WMP establishes an overarching purpose in Section 1.2 and clearly states primary and secondary objectives in Section 1.3.

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: 3

Section 3 of the WMP lists mitigation programs and activities that TPUD will undertake to minimize wildfire risk. Impacts of climate change are discussed in Section 4.3.

The WMP does not provide estimated timelines or costs on implementation of the preventative strategies and programs.

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: 8.2

Metrics and assumptions for measuring WMP performance are summarized in Table 9 and include the rationale, indicator, and measure of effectiveness. Programmatic metrics are discussed in Table 10 and include target goals. Goals outlined in the WMP will be monitored by the GM and Electric Superintendent.

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: 8.2.1

As noted in Section 8.2.1 the WMP is in its initial implementation and existing data is limited. The WMP establishes that as metrics are analyzed in subsequent years the WMP will be updated based on data collected.

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: 6.1.1, 6.1.2

Protocols for de-energization and disabling reclosers are described in Sections 6.1.1 and 6.1.2, respectively. Public safety impacts discussed include loss of water infrastructure, disruption in communications, and loss of community infrastructure and operational efficiency due to a power shut down. We recommend the following additional public safety impacts also be discussed:

- Loss of power can lead to medical emergencies for members of the community requiring powered medical equipment or refrigerated medication. Additionally, lack of air conditioning can negatively impact medically vulnerable populations.
- Traffic congestion resulting from the public evacuating de-energized areas can lengthen response times for emergency responders.
- Negative economic impacts from local businesses forced to close during the shut down.
- Inability to open garage doors during a wildfire event can lead to injuries and fatalities.

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 consider the need to notify, as a priority, critical first responders, health care facilities, and operators of telecommunications infrastructure.*

Plan Section Number: 7.1, 7.2

Key first responder infrastructure, health care facilities, and operators of telecommunications infrastructure are identified in the WMP. TPUD will follow California OES SEMS regulations for the planning, communication, and coordination of power shut down incidents. TPUD will use multiple channels for communicating PSPS events to customers, including through traditional media, the CodeRED app, the IPAWS system, and Facebook, among others. TPUD has specific personnel assigned for contacting elected officials and agencies and critical customers, however these personnel are not delineated in the WMP.

H. Vegetation Management

Section 8387 Requirement: *Plans for vegetation management.*

Plan Section Number: 6.3

The WMP establishes vegetation management goals and procedures to reduce wildfire risk. A metric of 95-100% compliance annually is established in Table 10.

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: 6.2

The WMP includes a dedicated section on infrastructure inspections and maintenance (Section 6.2). Inspection protocols for transmission lines, transmission and distribution lines, and substations are delineated.

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: 4, 4.5.1, 4.5.2, 4.5.3

Risks faced by TPUD are discussed in depth in Chapter 4 of the WMP. An Enterprise Risk Management strategy is implemented to identify, assess, respond and control, monitor, and report risk.

Particular risks and risk drivers associated with topographical and climatological risk factors are described in Sections 4.4 and 4.5.2.

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: 5.1

TPUD is primarily in a Tier 2 HFTD and includes no T&D lines in the extreme fire threat area. Maps within the WMP detail TPUD infrastructure across the service area with inset maps in populated areas.

L. Wildfire Risk Methodology

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

Plan Section Number: 4.1

TPUD uses an Enterprise Risk Management process for assessing risk. The methodology includes review of the Trinity County Community Wildfire Protection Plan and the Trinity County Hazard Mitigation Plan. A bow tie analysis links key wildfire risk drivers with outcomes and consequences. Consequences from all wildfire outcomes are the same, but this is not unreasonable as similar consequences follow both large and small wildfires, with the difference being the degree of severity.

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: 7.4

The service restoration process following a wildfire is detailed in Section 7.4.1. Critical infrastructure facilities are prioritized during this process. Customer and media notification is done once electric service is restored. Periodic updates of restoration status prior to full restoration is recommended.

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: 8.3, 8.3.3, 8.3.2, 8.2.3

WMP efforts will be monitored quarterly and reported to the Board of Directors annually. Budgeting and strategic planning of WMP initiatives will coincide with TPUD's existing practice of planning on a 3-5 year out cycle. A CPUC approved evaluator will annually review and assess TPUD's compliance with the WMP.

The TPUD GM will ensure that the WMP is reviewed annually and that any deficiencies identified are corrected.

Guidelines for monitoring and auditing the effectiveness of inspections are established in Section 8.3.3.

Section 8.2.3 is identified in Table 1 as corresponding with PUC Section 8387(b)(2)(N)(iii), but this section does not appear in the text and should instead be Section 8.3.3.

Conclusion

The TPUD WMP prepared by Brown & Kysar, Inc., is comprehensive and meets all requirements set forth by California Public Utilities Code Section 8387. Following review of the WMP we recommend the following concerns be implemented in future WMP updates:

- Preventative measures discussed in Section 3 do not have projected timelines or costs listed. These should be added at minimum following TPUD's normal business planning process.
- Additional public safety impacts of PSPS events should be considered.
- Specific personnel responsible for customer notification should be identified.
- Updates on power restoration status should be provided prior to full power restoration.