



Independent Review: 2023-2025 Wildfire Mitigation Plan



Power & Water Resources Pooling Authority
(PWRPA)

Anser Advisory's Independent Evaluation

June 29, 2023





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A. Executive Summary

Pursuant to California Senate Bill (SB) 901 enacted September 21, 2018, and Assembly Bill (AB) 1054 enacted July 12, 2019, a Wildfire Mitigation Plan (WMP) must be updated annually and comprehensively every three years to comply with Public Utilities Code Section §8387 (PUC §8387) regarding wildfire mitigation for publicly owned utilities (POUs). In response to this legislation, the Power & Water Resources Pooling Authority (PWRPA) contracted with Anser Advisory Management LLC (Anser) as the independent evaluator (IE) of its 2023-2025 WMP in June 2023 when their WMP was ready for review. The WMP and IE report are to be filed with the California Wildfire Safety Advisory Board (WSAB) who provides the POUs oversight with their WMPs.

Anser performed an independent evaluation of PWRPA's 2023-2025 WMP to determine compliance with the comprehensive requirements established by PUC §8387(c), and to produce an IE report to:

- Present to either the PWRPA Wildfire Mitigation Committee (WMC) or the PWRPA Governing Board at a public meeting
- File with the WSAB
- Publish on PWRPA's website

Anser employed the following methods to complete the evaluation:

- Assessed PWRPA's compliance with PUC §8387's WMP statutory requirements
- Reviewed PWRPA's 2022 WMP Update
- Reviewed and assessed WSAB's feedback on PWRPA's 2022 WMP Update
- Benchmarked PWRPA's WMP elements against industry practices and standards for similarly situated utilities (i.e., limited or no electrical infrastructure in High Fire Threat Districts)

As a result of this evaluation, the Anser team deems PWRPA's 2023-2025 WMP to be comprehensive and finds that the plan meets all requirements of PUC §8387.

Recommendations from this evaluation have been included in Section G - Benchmarking Industry Practices and Standards, which provide considerations for future WMPs.

B. Independent Evaluation

Pursuant to California SB 901 enacted September 21, 2018, and AB 1054 enacted July 12, 2019, a WMP must be updated annually and comprehensively every three (3) years to comply with PUC §8387 regarding wildfire mitigation for POUs. This legislation requires all POUs to prepare and present a WMP to its governing body annually, to comprehensively update its WMP every three (3) years, and to submit their WMP to the WSAB by July 1st of every year, in addition to posting the WMP to its website. Additionally, PUC §8387 requires POUs to contract with an independent evaluator (IE) to review and assess the comprehensiveness of its WMP, present the IE report to its governing board, and publish the IE's report on its website. Although PUC §8387 imposes no specific deadline for meeting these obligations, nor a clear frequency for the IE review, PWRPA has chosen to match the IE review frequency to the comprehensive update cycle of the WMP to ensure compliance and to verify mitigation methods are consistent with industry best practices. This 3-year IE review cycle also complies with WSAB recommendations.

A single statewide fire-threat map was adopted in 2018 by the California Public Utilities Commission (CPUC) to define different high fire-threat districts (HFTD). The CPUC's HFTD Map includes three (3) Tiers/Levels of fire threat risk:

- Tier 1 (White) consists of areas that have the lowest hazards and risks
- Tier 2 (Orange) consists of areas where there is an *elevated risk* for destructive utility-associated wildfires
- Tier 3 (Red) consists of areas where there is an *extreme risk* for destructive utility-associated wildfires

No portions of PWRPA's electrical infrastructure are located in designated Tier 2 or 3 wildfire threat areas.

C. Evaluator Qualifications

Anser was retained by PWRPA to be the IE of their 2023-2025 WMP, as stipulated under PUC §8387(c). Anser is a qualified and certified Independent Evaluator¹ for California utility WMPs. Anser has been on the front lines supporting utilities with all elements of wildfire mitigation efforts since 2018. Their team of program managers and technical experts possess in-depth knowledge, along with hands-on experience, to provide wildfire mitigation solutions and independent evaluations. Anser supports utilities that must continuously monitor and evaluate their wildfire mitigation strategies and outcomes. Anser partners with utilities to review for compliance, track quality and progress of mitigations, advise on findings, and identify areas of improvement.

PWRPA selected Anser as their 2023-2025 WMP IE based on their level of experience with wildfire mitigation plans, familiarity with similar type and size utilities, and knowledge of utility's design and construction standards.

D. Evaluation Methodology

Anser reviewed the WMP in its entirety for comprehensiveness, including a statutory compliance review against the PUC §8387 requirements. Anser also reviewed their 2022 WMP Update and WSAB's specific feedback. During the IE review, the Anser team drew upon their knowledge of wildfire mitigation best practices and benchmarking with peer utilities.

¹ See Energy Safety's "Independent Evaluator List for 2022 Wildfire Mitigation Plans," p. 2.



Anser reviewed a first draft of its IE findings on June 27, 2023, with PWRPA's General Manager. PWRPA provided an updated WMP on June 28, 2023. The final 2023-2025 WMP and its IE report are to be presented on June 29, 2023, to PWRPA's Board and the public.



E. Analysis of Required WMP Elements

As instructed in PUC §8387(b)(2), PWRPA’s wildfire mitigation plan shall consider as necessary, at minimum, all of the following requirements in Table 1 below. Anser has provided their IE review findings for each requirement and whether PWRPA meets the requirement.

Table 1: PUC §8387 Statutory Requirements for Comprehensiveness of PWRPA’s 2023-2025 WMP

Requirements for a POU's WMP per PUC §8387(b)(2)	Anser's IE Review	Section(s) in PWRPA's 2023-2025 WMP
(A) An accounting of the responsibilities of persons responsible for executing the plan.	In Section V(A), PWRPA explains their General Manager has overall responsibility of executing their WMP. Further, in table in Section V(B), PWRPA provides the lead/responsible party of each of their wildfire mitigation strategies or programs.	Sections V(A), (B) <input checked="" type="checkbox"/> Meets Requirement
(B) The objectives of the wildfire mitigation plan.	In Section IV, PWRPA identifies three (3) primary objectives of its WMP: <ol style="list-style-type: none"> 1. Minimizing Sources of Ignition - Section IV(A) 2. Resiliency of the Water-Related Infrastructure - Section IV(B) 3. Minimizing the Spread of Wildfire - Section IV(C) <p>PWRPA has updated the objectives from their previous 2022 WMP Update, and it should be noted that these objectives and descriptions are built upon the 2020-2022 WMP strategies and programs.</p>	Section IV <input checked="" type="checkbox"/> Meets Requirement
(C) 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	In Section VII(A), PWRPA explains that no portion of their electrical infrastructure is located in designated Tier 2 or 3 wildfire threat district. Their nine (9) Covered PODs are all designated as Tier 1 ² and are in non-vegetated or agricultural areas. Within the areas that could possibly be affected by PWRPA’s electrical infrastructure, the primary risk drivers associated with geography and climate for wildfire are the following: extended drought; vegetation type and density; extreme weather events; lightning; low humidity; and high winds.	Section VII <input checked="" type="checkbox"/> Meets Requirement

² The CPUC’s Fire Threat Map includes three Tiers/Levels of fire threat risk. Tier 1 (White) consists of areas that have the lowest hazards and risks. Tier 2 (Orange) consists of areas where there is an *elevated risk* for destructive utility-associated wildfires. Tier 3 (Red) consists of areas where there is an *extreme risk* for destructive utility-associated wildfires.



<p>consideration of dynamic climate change risks.</p>	<p>PWRPA describes the range of activities that they are taking or considering, to mitigate the threat of electrical infrastructure ignited wildfires, including its various strategies and procedures outlined in the Sub-Sections of VII(B)-(H) in their 2023-2025 WMP below:</p> <ul style="list-style-type: none"> B. Operational awareness C. Design and Construction Standards D. Vegetation Management E. Inspections F. Workforce Training G. Recloser Policy H. Deenergization 	
<p>(D) 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.</p>	<p>In Section X(A), PWRPA outlines the two (2) metrics tracked to measure the performance of their WMP, inclusive of any assumption(s) that underlie each metric. The two metrics are tracked by PWRPA’s General Manager and are the following:</p> <ul style="list-style-type: none"> 1. Number of Fire Ignitions 2. Number of Conductors Down at a Site Served by PWRPA Electrical Infrastructure 	<p>Section X(A)</p> <p style="text-align: center;">☑</p> <p>Meets Requirement</p>
<p>(E) A discussion of how the application of previously identified metrics to previous wildfire mitigation plan performances has informed the wildfire mitigation plan.</p>	<p>In Section X(B), PWRPA anticipates that there will be relatively limited data gathered through these metrics. However, as the data collection history becomes more robust, PWRPA will be able to identify areas of its operations and service territory that are disproportionately impacted. PWRPA will then evaluate potential improvements to their WMP.</p>	<p>Section X(B)</p> <p style="text-align: center;">☑</p> <p>Meets Requirement</p>
<p>(F) 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.</p>	<p>In Section VII(H), PWRPA states that it does not have the authority to preemptively shut off the Pacific Gas & Electric (PG&E) power system due to fire-threat conditions unless: (a) the fire is actually threatening the PWRPA electrical infrastructure; and (b) when directed to by the local Fire Department, Police, Cal Fire, or other emergency responding agencies. This must be performed by PG&E at the adjoining pole.</p> <p>In Section VII(H), PWRPA explains that no electrical service is provided to the public, health care facilities or telecommunications infrastructure and, therefore, no public safety impacts would occur if a power shut-off procedure was implemented. Therefore, the only load impacted by deenergization would be that of the respective PWRPA Participant.</p>	<p>Sections VII(G), (H)</p> <p style="text-align: center;">☑</p> <p>Meets Requirement</p>
<p>(G) Appropriate and feasible procedures for notifying a customer who may be impacted by the deenergizing of electrical lines. The</p>	<p>In Section VII(H)(2), PWRPA states that no water customer notifications are required for three (3) of their Project Participants utilizing PWRPA-owned distribution facilities: Glenn Colusa Irrigation District (GCID), Santa Clara Valley Water District (SCVWD), and Alameda County Water Agency Zone 7 (Zone 7). If the power shutoff is forecast to extend longer than 24 hours,</p>	<p>Section VII(H)(2)</p> <p style="text-align: center;">☑</p> <p>Meets Requirement</p>



<p>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.</p>	<p>their remaining Project Participant, Reclamation District 108 (RD 108), will contact its agricultural water customers individually by telephone.</p>	
<p>(H) Plans for vegetation management.</p>	<p>In Section VII(D), PWRPA discusses their strategy in reducing vegetation near to PWRPA electrical infrastructures. PWRPA meets or exceeds the minimum industry standard vegetation management practices. For distribution level facilities, PWRPA meets: (1) Public Resources Code section 4292; (2) Public Resources Code section 4293; (3) GO 95 Rule 35; and (4) the GO 95 Appendix E Guidelines to Rule 35. The recommended time-of-trim guidelines do not establish a mandatory standard, but instead provide useful guidance to utilities. PWRPA will use specific knowledge of vegetation growing conditions to determine the appropriate time-of-trim clearance in each circumstance.</p> <p>In Sections VII(D)(1) and (2), PWRPA discusses additional vegetation management mitigations from:</p> <ol style="list-style-type: none"> 1. SCVWD 2. RD 108 	<p>Section VII(D)</p> <p style="text-align: center;"><input checked="" type="checkbox"/></p> <p>Meets Requirement</p>
<p>(I) Plans for inspections of the local publicly owned electric utility's or electrical cooperative's electrical infrastructure.</p>	<p>In Section VII(E), PWRPA comprehensively describes their infrastructure inspection program which consists of assessment and diagnostic activities as well as associated corrective actions. The practices in this category aim to ensure all infrastructure is in working condition and vegetation adheres to defined minimum distance specifications. Below are further inspection details by the four (4) Project Participants utilizing PWRPA-owned distribution facilities:</p> <ul style="list-style-type: none"> • <i>GCID</i>: Abatement staff monitors the vegetation conditions on all of its ditch banks and well sites at least weekly, and dispatches personnel to mow and/or spray herbicide on these areas on an as-needed basis in order to maintain minimal vegetation growth and safe conditions. Shut-off procedures are described in section VII(H). • <i>RD 108</i>: When operating, there are inspections daily, and a maintenance log is completed, and vegetation management is performed as needed. RD 108 also has a Supervisory Control and Data Acquisition (SCADA) system that detects irregularities. In the event of irregularities, including power failure, the system will send an automated message to employee(s) on call 24/7 to respond to these alarms. Shut-off procedures are described in section VII(H). 	<p>Section VII(E)</p> <p style="text-align: center;"><input checked="" type="checkbox"/></p> <p>Meets Requirement</p>



	<ul style="list-style-type: none"> • SCVWD: The distribution facility is located immediately adjacent to the Advanced Recycling Water Treatment Facility and is observed daily. • Zone 7: Staff follows its Hazard Mitigation Plan; they continually expand thinning/clearing of non-fire resistant vegetation near evacuation roads and routes to critical facilities. <p>PWRPA discusses how their joint poles and adjacent infrastructure are owned by PG&E: The first pole in PWRPA’s infrastructure is immediately adjacent to the last pole in PG&E’s infrastructure. For joint pole fire prevention, PWRPA shall inform PG&E when PWRPA identifies any compromised poles due to damage or wildfire susceptibility. PWRPA coordinates with PG&E throughout the year when work on its system may affect PG&E’s equipment or if PWRPA identifies safety issues.</p>	
<p>(J) 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:</p> <ul style="list-style-type: none"> (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. 	<p>In Section VI(A), PWRPA shares the primary wildfire risk drivers at their Covered PODs and the surrounding areas:</p> <ul style="list-style-type: none"> • Extended drought • Vegetation type and density • Extreme weather events • Lightning • Low humidity • High winds <p>In Section VI(B), PWRPA outlines how Project Participants SCVWD and Zone 7 have localized hazard mitigation plans. As there is no electrical infrastructure in the HFTD Tier 2 or 3, their risk drivers in the HFTD are limited.</p>	<p>Sections VI(A), (B)</p> <p><input checked="" type="checkbox"/></p> <p>Meets Requirement</p>



<p>(K) 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.</p>	<p>In Section VII(A), PWRPA describes the development of the CPUC’s HFTD map. No portions of PWRPA’s electrical infrastructure are located in designated Tier 2 or 3 wildfire threat areas. PWRPA has not identified any geographic area of the Covered PODs that is a higher wildfire threat than is identified in the CPUC’s HFTD map, and thus does not recommend changes to the HFTD boundaries as currently established.</p>	<p>Section VII(A) <input checked="" type="checkbox"/> Meets Requirement</p>
<p>(L) A methodology for identifying and presenting enterprise wide safety risk and wildfire-related risk.</p>	<p>In Section VI(B), PWRPA describes their enterprise-wide safety risk identification process. PWRPA evaluates the level of wildfire risk to their electrical infrastructure by reviewing the history of events, outages, accidents, and/or equipment failures at each delivery point. As of the effective date of this 2023-2025 WMP, there have been no forced outages, wildfires, or other emergencies at any delivery point served by their electrical infrastructure.</p>	<p>Section VI(B) <input checked="" type="checkbox"/> Meets Requirement</p>
<p>(M) A statement of how the local publicly owned electric utility or electrical cooperative will restore service after a wildfire.</p>	<p>In Section IX, PWRPA describes how PG&E provides wholesale distribution service to PWRPA’s electrical infrastructure covered by this WMP. Accordingly, system power shut offs and restorations are implemented by PG&E. In the event of a wildfire or other emergency event, PWRPA will restore power in cooperation with PG&E and the affected Project Participant. The PWRPA Project Participant will notify the PWRPA General Manager to track the event and response activities as described in Section X(A). PWRPA may also engage contractors on an as-needed basis.</p>	<p>Sections IX, X(A) <input checked="" type="checkbox"/> Meets Requirement</p>
<p>(N) 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.</p>	<p>In Section X, PWRPA describes the processes and procedures for evaluating their WMP. In Section X(C), PWRPA describes how they monitor and audit the implementation of their WMP. Their WMP is subject to review by PWRPA’s WMC which has been delegated full authority by the PWRPA Governing Board.³ The WMC will present this plan to the PWRPA Governing Board on an annual basis. Additionally, on a triennial basis, a qualified independent evaluator will present a report on this plan to the WMC.</p>	<p>Sections X(C), (D), (E) <input checked="" type="checkbox"/> Meets Requirement</p>

³ See Section III(C) of PWRPA’s 2023-2025 WMP, Process for Utility Adoption and Submittal of Annual WMP and Opportunities for Public Comment and Section VIII, Community Outreach and Public Awareness.



<p>(ii) Identify any deficiencies in the wildfire mitigation plan or its implementation, and correct those deficiencies.</p> <p>(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.</p>	<p>In Section X(D), PWRPA explains their process for identifying and correcting deficiencies in their WMP. PWRPA Project Participants’ staff and qualified external stakeholders are encouraged to report WMP deficiencies or potential deficiencies to the PWRPA General Manager as soon as possible when observed. The General Manager shall evaluate each reported deficiency and, if the deficiency is determined to be a valid plan deficiency, it shall be entered into a log with the following information: (a) date discovered; (b) description of the deficiency; (c) priority based on deficiency severity; (d) assigned corrective action including the date when it must be completed by; (e) assigned staff responsible for completing the corrective action; and (f) date corrected.</p> <p>In Section X(E), PWRPA explains that their primary mitigation measure against wildfires at their electrical infrastructure is vegetation management.⁴ All vegetation programs are audited on an annual basis by PWRPA’s General Manager. Any areas found that need improvement or appear hazardous will be documented with a work order, given a priority, and the work order will be tracked. When completed, the work order will have a close date. The effectiveness of inspections will be demonstrated by these vegetation program audits and by the metrics tracked in Section X(A).⁵</p>	
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⁴ See Section VII(D) of PWRPA’s 2023-2025 WMP, Vegetation Management.

⁵ See Section X(A) of PWRPA’s 2023-2025 WMP, Metrics and Assumptions for Measuring Plan Performance.



F. Wildfire Safety Advisory Board Recommendations

The WSAB published their Guidance Advisory Opinion for the 2023 Wildfire Mitigation Plans of Electric Publicly Owned Utilities and Rural Electric Cooperatives in November 2022.⁶ This Opinion document provides general and PWRPA-specific recommendations for improving their 2023-2025 WMP. Anser reviewed the WSAB’s Advisory Opinion document, the section below contains a summary of each recommendation the WSAB had for PWRPA’s 2022 WMP Update and whether their 2023-2025 WMP has addressed the WSAB’s recommendation.⁷

Table 2: WSAB Advisory Guidance Opinion from PWRPA’s 2022 WMP Update⁸

WSAB Advisory Guidance Opinions on PWRPA's 2022 WMP Update	Anser's IE Review
<p>The WSAB appreciates PWRPA providing in response to the WSAB’s 2021 Guidance Advisory Opinion some additional context information in two paragraphs at the beginning of their 2022 WMP, additional sentences about the vegetation and rural (no WUI interface nature of the utility area, and the inclusion of the statutory cross-reference table. However, in the comprehensive revision 2023 WMP (and subsequent WMPs), the WSAB encourages PWRPA to include the full context-setting template and other WSAB requests in our Guidance Advisory Opinions. Such inclusion is part of the proposed new WSAB WMP template, established for the 2023 comprehensive revision WMPs.</p>	<p>PWRPA answer: The 2023 comprehensive revision incorporates: (a) the full context-setting template; and (b) all changes recommended by the WSAB as described below.</p> <p>IE review: PWRPA followed the guidance of the WSAB and incorporated both Appendix 1 – WSAB’s Proposed WMP Template for 2023 Comprehensive Revision WMPs throughout their 2023-2025 WMP and Appendix 2 - Context-Setting Information Template in Section III(A).</p>
<p>The WSAB appreciates the inclusion of redline text showing changes between the 2021 and 2022 WMPs, though there were clearly not very many changes. The 2023 comprehensive revision WMP, following as appropriate the new proposed WSAB WMP template, may have too many changes to make redline text a useful help for WMP review but the WSAB in general encourages information about changes in the WMPs from year to year.</p>	<p>PWRPA answer: PWRPA used the WSAB template for this comprehensive revision. Substantial text from the previous version was incorporated where appropriate but a redline, as noted by the WSAB, would be confusing. A summary of changes was included in Section II.</p> <p>IE review: PWRPA followed the guidance of the WSAB and instead of a redlined version of the WMP updates, they provided Section II – A Summary of Changes for [the WMP] Version 2.0.</p>

⁶ See WSAB’s “Guidance Advisory Opinion for the 2023 Wildfire Mitigation Plans of Electric Publicly Owned Utilities and Rural Electric Cooperatives,” Adopted November 16, 2022.

⁷ Note the materials published by the WSAB and the recommendations provided are for guidance and are not statutory requirements.

⁸ See WSAB’s “Guidance Advisory Opinion for the 2023 Wildfire Mitigation Plans of Electric Publicly Owned Utilities and Rural Electric Cooperatives,” Adopted November 16, 2022, pp. A3-48 – A3-49.



<p>The WSAB appreciates reference in the informational response showing the website location of the 2022 PRWPA WMP. PWRPA should consider creating a more direct link to WMPs on the webpage, since there is no “search” feature and one would have to understand the placement under “legal notices”, which is not logically apparent, to find the WMP information.</p>	<p>PWRPA answer: PWRPA created a direct link as recommended by the WSAB. The WMPs are found here: https://www.pwrpa.org/wildfire-mitigation/</p> <p>IE review: PWRPA followed the recommendation from the WSAB and moved the WMP website location out of “legal notices” and created a new tab on the homepage for “Wildfire Mitigation” where it stores their WMPs and will upload this IE report upon completion.</p>
<p>The WSAB appreciates the information in the WMP regarding review of the plan for acceptable fire risk by local fire district personnel. Given the low likelihood of catastrophic wildfire for PWRPA, this may be sufficient, but in the comprehensive revision 2023 WMP the WSAB encourages PWRPA to also engage with a qualified and certified Independent Evaluator to review the WMP.</p>	<p>PWRPA answer: PWRPA contracted with a qualified and certified Independent Evaluator for this comprehensive revision.</p> <p>IE review: PWRPA retained Anser Advisory, a qualified and certified Independent Evaluator, for their 2023-2025 WMP comprehensive revision.</p>

G. Benchmarking Industry Practices and Standards

Inclusion of Site-Specific Information Cards

Anser, as the Independent Evaluator of PWRPA’s 2023-2025 WMP, would recommend for consideration in future WMPs, the inclusion of site-specific information cards that were previously provided in PWRPA’s 2022 WMP Update – Attachment A.⁹ This could also be of value to other POUs or Cooperatives of a similar scale, with limited wildfire risk exposure. We acknowledge and appreciate Appendix 1 – WSAB’s Proposed WMP Template for 2023 Comprehensive Revision WMPs¹⁰ and that utilities are not required to provide this level of detail. However, as a professional utility services provider and wildfire mitigation strategy practitioner, Anser found great value in this level of detail being collected about equipment and site environmental conditions for wildfire mitigation planning. We also believe that this documentation can be leveraged for overall portfolio and risk management for utilities of a similar size and exposure. As a relatively new and evolving area of electric utility management, we believe it is appropriate to provide this recommendation for consideration based upon the key benefits associated with this approach, which include:

- Visualization of site-specific conditions assisted in understanding any items of concern documented in the WMP and ultimately supported by the IE’s conclusion that the mitigation measures established in PWRPA’s 2023-2025 WMP are appropriate and comprehensive, including equipment structural integrity and condition, and emergency response services.
- In the event of a wildfire, this data supports enhanced collaboration and communication with other utility providers and municipal agencies that may share access/use of the site.
- Support the management and regular maintenance of electrical infrastructure, inclusive of enhanced worker safety.
- Enhanced risk protection for PWRPA by providing time-stamped photo documentation of equipment and site conditions.

H. Conclusion

Anser has independently reviewed PWRPA’s 2023-2025 WMP and deem it to be comprehensive per California PUC §8387(b)(2) requirements for a POU. PWRPA also considered the recommendations from the WSAB and revised their WMP where appropriate. Anser has discussed the IE review results and recommendation with PWRPA’s General Manager.

⁹ See PWRPA’s 2022 WMP Update, Version 1.4, Attachment A, https://www.pwrpa.org/wp-content/uploads/2022/06/2022_PWRPA-WMP-1.4-clean.pdf, pp. 12 – 17.

¹⁰ See WSAB’s “Guidance Advisory Opinion for the 2023 Wildfire Mitigation Plans of Electric Publicly Owned Utilities and Rural Electric Cooperatives,” Adopted November 16, 2022, pp. A1-1 – A1-14.