

Wildfire Mitigation Plan
Power & Water Resources Pooling Authority (PWRPA)
Version 2.0 (June 28, 2023)

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II. Summary of Changes for Version 2.0

Plan document	Used WSAB template
I. Table of Contents	Added new section
II. Summary of Changes	Added new section
III. Utility Overview and Context	
A. Statutory Cross-Reference Table	Updated for proper references
B. Utility Description and Context Setting Table	Added Zone 7 and new Context Setting Table
C. Process for Utility Adoption and Submittal of Annual WMP and Opportunities for Public Comment	Updated for recent PWRPA Board actions and added Zone 7
D. Description of Where WMP Information Can be Found on Utility Website	Updated website location

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E.	Purpose of the Wildfire Mitigation Plan	No change
F.	Organization of the Wildfire Mitigation Plan	Added new section
IV.	Objectives of the Wildfire Mitigation Plan	
A.	Minimizing sources of ignition	Reorganized
B.	Resiliency of the water-related infrastructure	Reorganized
C.	Minimizing the spread of wildfire	Reorganized
V.	Roles and Responsibilities	
A.	PWRPA Roles and Responsibilities	Expanded list of duties
B.	Project Participant Roles and Responsibilities	Updated contact persons
C.	Coordination with communication infrastructure providers	Added new section
D.	Standardized emergency management system	Added new section
VI.	Wildfire Risks and Drivers associated with design, construction, operation, and maintenance	
A.	Particular risks and risk drivers associated with topographic and climatological risk factors	No change
B.	Enterprise-wide Safety Risks	Updated to include Zone 7 and Local Hazard Mitigation Plan references.
VII.	Wildfire Preventative Strategies	
A.	No Covered PODs in any High fire threat district	No change
B.	Operational awareness	No change
C.	Design and Construction Standards	No change
D.	Vegetation Management	Added Zone 7.
	1. Additional vegetation management: Santa Clara Valley Water District Local Hazard Mitigation Plan	Added new section
	2. Additional vegetation management: RD 108 acting as the Levee District	Added new section
E.	Inspections	Added Zone 7.
F.	Workforce Training	Added new section
G.	Recloser Policy	No change
H.	Deenergization	Added Zone 7
	1. Impacts to Public Safety	Added Zone 7
	2. Customer Notification Policy	Added Zone 7

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VIII.	Community Outreach and Public Awareness	Updated to reflect recent PWRPA Board actions
IX.	Restoration of Service	Updated references
X.	Evaluating of the Plan	
	A. Metrics and Assumptions for Measuring Plan Performance	Updated in accordance with WSAB
	1. Metric 1: Fire Ignitions	Updated in accordance with WSAB
	2. Metric 2: Wires-Down	Updated in accordance with WSAB
	B. Impact of Metrics on Plan	No change
	C. Monitoring and Auditing the Plan	Updated to reflect recent PWRPA Board actions
	D. Identifying and correcting Deficiencies in the Plan	No change
	E. Monitoring the effectiveness of inspections	Updated references
	F. WSAB Guidance and responses	Added this section
XI.	Independent Auditor	Added this section

III. Utility Overview and Context

A. Utility Description and Context Setting Table

The Power & Water Resources Pooling Authority (“PWRPA”) is the retail service provider at approximately 650 points of delivery (“PODs”) located within the PG&E service territory. All of PWRPA’s PODs comprise the water-related loads of its 15 public agency customers (pumping, delivery, transfer, etc.) called Project Participants. There are no residential, commercial or privately-owned industrial loads. Approximately 97% of the PODs are agricultural water pumping loads located in the Central Valley and the remainder are for municipal water loads (pumping, water treatment).

PWRPA has no owned transmission facilities. Wholesale electric distribution service to all PODs is provided by PG&E via its Wholesale Distribution Tariff (“WDT”). At most PODs, the electrical distribution is provided under WDT Service Agreement 17 between PG&E and the Western Area Power Administration (“WAPA”). At 9 PODs, the electrical distribution is provided under WDT Service Agreement 56 between PG&E and PWRPA.

This WMP pertains only to the facilities at those 9 PODs that comprise electrical infrastructure owned by PWRPA (“Covered PODs”). PWRPA has ownership interests in the systems comprised of electric poles, overhead lines and transformers through a separate Distribution Facility Agreement with 4 Project Participants: Reclamation District 108, Glenn-Colusa Irrigation District, Santa Clara Valley Water District and Alameda County Water Agency Zone 7.

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Context-Setting Information Table

Utility Name	Power & Water Resources Pooling Authority	
Service Territory Size	This WMP covers 9 specific points of delivery using PWRPA-owned electrical infrastructure (“Covered PODs”).	
Owned Assets	9 Distribution assets / 1 Generation asset	
Number of Customers Served	15 total customers, with 4 of these being served at the Covered PODs.	
Population Within Service Territory	N/A. All customers at the Covered PODs are publicly-owned water purveyors comprised of 1 irrigation district, 1 water district, 1 water agency and 1 reclamation district.	
Customer Class Makeup	<i>Number of Accounts</i>	<i>Share of Total Load (MWh)</i>
	All Covered POD accounts are Government comprised of 44% (4) Agricultural and 56% (5) Industrial.	All Covered POD loads are Government comprised of 10% Agricultural MWh and 90% Industrial MWh.
Service Territory Location/Topography¹	4 Covered PODs are Agriculture 2 Covered PODs are Herbaceous 3 Covered PODs are Urban	
Service Territory Wildland Urban Interface² (based on total area)	No Covered POD is located within an area defined as Wildland Urban Interface or Wildland Urban Intermix. 4 Covered PODs: Agriculture – Low and very low housing density 2 Covered PODs: Non-vegetated – Low and very low housing density 3 Covered PODs: Non-vegetated – Medium and high housing density	
Percent of Service Territory in CPUC High Fire Threat Districts (based on total area)	No Covered POD is located within a CPUC High Fire Threat District (Tier 2 or Tier3).	

¹ This data is based on the California Department of Forestry and Fire Protection, California Multi-Source Vegetation Layer Map, depicting WHR13 Types (Wildlife Habitat Relationship classes grouped into 13 major land cover types) available at: <https://www.arcgis.com/home/item.html?id=b7ec5d68d8114b1fb2bfbf4665989eb3>.

² This data is based on the definitions and maps maintained by the United States Department of Agriculture, as most recently assembled in *The 2010 Wildland-Urban Interface of the Conterminous United States*, available at https://www.fs.fed.us/nrs/pubs/rmap/rmap_nrs8.pdf.

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Prevailing Wind Directions & Speeds by Season	No data or maps included.
Miles of Owned Lines Underground and/or Overhead	Overhead Dist.: Approximate total of 200 feet at the 9 PODs Overhead Trans.: None Underground Dist.: None Underground Trans.: None
	Explanatory Note 1 - Methodology for measuring is linear feet of the actual line.
	Explanatory Note 2 – Description of Unique Ownership Circumstances: Primary responsibility for monitoring and shut-off is provided by customer.
	Explanatory Note 3 – Additional Relevant Context: [e.g., percentage of lines located outside service territory] None
Percent of Owned Lines in CPUC High Fire Threat Districts	<i>Overhead Distribution Lines as % of Total Distribution System (Inside and Outside Service Territory)</i>
	Tier 2: <u>0</u> % Tier 3: <u>0</u> %
	Tier 2: <u>0</u> % Tier 3: <u>0</u> %
Customers have ever lost service due to an IOU PSPS event?	<input type="checkbox"/> Yes XX No
Customers have ever been notified of a potential loss of service due to a forecasted IOU PSPS event?	XX Yes <input type="checkbox"/> No
Has developed protocols to pre-emptively shut off electricity in response to elevated wildfire risks?	<input type="checkbox"/> Yes XX No
Has previously pre-emptively shut off electricity in response to elevated wildfire risk?	<input type="checkbox"/> Yes XX No If yes, then provide the following data for calendar year 2020: <i>Number of shut-off events:</i> [____] <i>Customer Accounts that lost service for >10 minutes:</i> [____] <i>For prior response, average duration before service restored:</i> [____]

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B. Statutory Cross-Reference Table

Sections V(A), (B)	Persons Responsible	PUC § 8387(b)(2)(A): An accounting of the responsibilities of persons responsible for executing the plan.
Section IV	Objectives of the Plan	PUC § 8387(b)(2)(B): The objectives of the wildfire mitigation plan.
Section VII	Preventive Strategies	PUC § 8387(b)(2)(C): A description of the preventive strategies and programs to be adopted by the local publicly owned electric utility to minimize the risk of its electrical lines and equipment causing catastrophic wildfires, including consideration of dynamic climate change risks.
Section X(A)	Evaluation Metrics	PUC § 8387(b)(2)(D): A description of the metrics the local publicly owned electric utility plans to use to evaluate the wildfire mitigation plan's performance and the assumptions that underlie the use of those metrics.
Section X(B)	Impact of Metrics	PUC § 8387(b)(2)(E): A discussion of how the application of previously identified metrics to previous wildfire mitigation plan performances has informed the wildfire mitigation plan.
Section VII(H)	Deenergization Protocols	PUC § 8387(b)(2)(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.
Section VII(H)(2)	Customer Notification Procedures	PUC § 8387(b)(2)(G): 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.
Section VII(D)	Vegetation Management	PUC § 8387(b)(2)(H): Plans for vegetation management.
Section VII(E)	Inspections	PUC § 8387(b)(2)(I): Plans for inspections of the local publicly owned electric utility's or electrical cooperative's electrical infrastructure.
Section VI(A)	Prioritization of Wildfire Risks	<p>PUC § 8387(b)(2)(J): A list that identifies, describes, and prioritizes all wildfire risks, and drivers for those risks, throughout the local publicly owned electric utility's service territory. The list shall include, but not be limited to, both of the following:</p> <p>(i) Risks and risk drivers associated with design, construction, operation, and maintenance of the local publicly owned electric utility's equipment and facilities.</p> <p>(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 service territory.</p>

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Section VII(A)	CPUC Fire Threat Map Adjustments	PUC § 8387(b)(2)(K): Identification of any geographic area in the local publicly owned electric utility’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.
Section VI(B)	Enterprise-wide Risks	PUC § 8387(b)(2)(L): A methodology for identifying and presenting enterprise-wide safety risk and wildfire-related risk.
Section IX	Restoration of Service	PUC § 8387(b)(2)(M): A statement of how the local publicly owned electric utility or electrical cooperative will restore service after a wildfire.
Sections X(C), (D), (E), (F)	Monitor and Audit	PUC § 8387(b)(2)(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. (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.
Section XI	Qualified Independent Evaluator	PUC § 8387(c): The local publicly owned electric utility or electrical cooperative shall contract with a qualified independent evaluator with experience in assessing the safe operation of electrical infrastructure to review and assess the comprehensiveness of its wildfire mitigation plan. The independent evaluator shall issue a report that shall be made available on the Internet Web site of the local publicly owned electric utility or electrical cooperative, and shall present the report at a public meeting of the local publicly owned electric utility’s or electrical cooperative’s governing board.

C. Process for Utility Adoption and Submittal of Annual WMP and Opportunities for Public Comment

Pursuant to Resolution 23-06-08, adopted on June 7, 2023, PWRPA established a Wildfire Mitigation Committee (“WMC”) which is composed of five persons including the General Manager and one representative from each of the four Project Participants utilizing PWRPA-owned distribution facilities. These are Reclamation District 108 (“RD 108”), Glenn Colusa Irrigation District (“GCID”), Santa Clara Valley Water District (“SCVWD”) and Alameda County Water Agency Zone 7 (“Zone 7”). The PWRPA Governing Board delegated full authority to the WMC for preparing, evaluating, approving and submitting the 2023 Triennial Revision to the California Wildfire Safety Advisory Board.

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D. Description of Where WMP Information Can be Found on Utility Website

This Wildfire Mitigation Plan and Independent Evaluator Report, as well as the prior WMPs, are available on the PWRPA website via a link located on the top right of the website home page.

<https://www.pwrpa.org/wildfire-mitigation/>

E. Purpose of the Wildfire Mitigation Plan

This Wildfire Mitigation Plan describes in detail the range of activities that PWRPA is taking to mitigate the threat of power-line ignited wildfires, including its various programs, policies, and procedures. This plan is subject to direct supervision by the PWRPA Wildfire Mitigation Committee and is implemented by the General Manager. This plan complies with the requirements of Public Utilities Code section 8387 for publicly owned electric utilities to prepare a wildfire mitigation plan by January 1, 2020, and annually thereafter.

F. Organization of the Wildfire Mitigation Plan

This Wildfire Mitigation Plan includes the following elements:

- Utility overview and Context-Setting Table
- Objectives of the WMP
- Roles and responsibilities for carrying out the WMP
- Wildfire risks and risk drivers
- Wildfire preventative strategies
- Community outreach and public awareness
- Restoration of service
- Metrics for measuring the performance of the plan and identifying areas for improvement

IV. Objectives of the Wildfire Mitigation Plan

A. Minimizing sources of ignition

The first and primary goal of this Wildfire Mitigation Plan is to minimize the probability that PWRPA's electrical infrastructure may be an original or contributing source for the ignition of a fire. PWRPA has evaluated the prudent and cost-effective improvements to its physical assets, operations, and training that can help to meet this objective. PWRPA has implemented those changes consistent with this evaluation.

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B. Resiliency of the water-related infrastructure

The second goal of this Wildfire Mitigation Plan is to protect PWRPA’s electrical infrastructure from wildfire damage and improve the resiliency of the water-related systems powered by PWRPA’s electrical infrastructure. This includes mitigating fire fuels located in the areas likely to be a threat to PWRPA’s electrical infrastructure.

C. Minimizing the spread of wildfire

The third goal of this Wildfire Mitigation Plan is to minimize the spread of wildfire by mitigating fire fuels located in the areas likely to be a threat to PWRPA’s electrical infrastructure.

V. Roles and Responsibilities

A. Water District Roles and Responsibilities

This plan is subject to the direct supervision by the PWRPA Board of Directors (“Board”) working through the WMC and will be implemented by the PWRPA General Manager. The PWRPA General Manager has the following responsibilities regarding fire prevention, response and investigation:

- Coordinate to ensure work is performed in a manner that will minimize potential fire dangers.
- Take all reasonable and practicable actions to prevent and suppress fires resulting from PWRPA’s electric infrastructure.
- Coordinate with federal, state, and local fire management personnel to ensure that appropriate preventative measures are in place.
- Immediately report fires, pursuant to specified procedures.
- Take corrective action when observing or having been notified that fire protection measures have not been properly installed or maintained.
- Ensure compliance with relevant federal, state, and industry standard requirements.
- Ensure that wildfire data is appropriately collected.
- Monitor adequate training programs for all relevant stakeholders.

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B. Project Participant Roles and Responsibilities

The specific roles and responsibilities of the Project Participants are shown in the table below.

Strategy or Program	Lead Person
Vegetation Management, Section 4.1	GCID – Chris Cesa RD 108 – Jordon Navarrot SCVWD – John Brosnan Zone 7 – James Carney
Facility Inspections, Section 4.2	GCID – Jeremy Richardson RD 108 – Jordon Navarrot SCVWD – John Brosnan Zone 7 – James Carney
Operational Awareness, Section 4.4	GCID – Jeremy Richardson RD 108 – Jordon Navarrot SCVWD – John Brosnan Zone 7 – James Carney
Wildfire Response & Recovery, Section 5	GCID – Chris Cesa RD 108 – Jordon Navarrot SCVWD – John Brosnan Zone 7 – James Carney
Reclosing & De-energization, Section 5.2	GCID – Chris Cesa RD 108 – Jordon Navarrot SCVWD – John Brosnan Zone 7 – James Carney
Notification, Section 6	GCID – Chris Cesa RD 108 – Jordon Navarrot SCVWD – John Brosnan Zone 7 – James Carney
WMP Evaluation, Section 7	PWRPA – General Manager

C. Coordination with communication infrastructure providers

There are no Covered PODs that supply power for any communication infrastructure providers.

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D. Standardized emergency management system

The SCVWD has planning, communication, and coordination obligations pursuant to the California Office of Emergency Services' Standardized Emergency Management System ("SEMS") Regulations, adopted in accordance with Government Code section 8607. SCVWD maintains and updates as necessary the SEMS Plan and the National Incident Management System ("NIMS") Plan, and submits an appropriate NIMS Compliance Assistance Support Tool ("NIMSCAST") report. SCVWD's most recent Emergency Operations Center responder training included a SEMS/NIMS refresher.

Zone 7, RD 108 and GCID come under the responsibility, direction and authority of the SEMS of the respective County in which they are located.

VI. Wildfire Risks and Drivers associated with design, construction, operation, and maintenance

A. Particular risks and risk drivers associated with topographic and climatological risk factors

At the Covered PODs and the surrounding areas, the primary risk drivers for wildfire are the following:

- Extended drought;
- Vegetation type and density;
- Extreme weather events;
- Lightning;
- Low humidity; and
- High winds.

B. Enterprise-wide Safety Risks

PWRPA is authorized to provide retail electricity anywhere in California. However, PWRPA does not have a designated service territory and its electrical infrastructure comprises nine specific geographic locations. PWRPA evaluated the level of wildfire risk to the PWRPA 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 Version 2.0, there have been no forced outages, wildfires or other emergencies at any delivery point served by PWRPA electrical infrastructure.

The SCVWD has a Local Hazard Mitigation Plan ("LHMP") which is a blueprint for how SCVWD may reduce the threats posed by natural hazards that might impact its property or facilities, including wildfires. To achieve those goals, the LHMP identifies critical facilities; discusses the SCVWD's capabilities and resources; provides an overview of potential hazards that may affect the SCVWD; lists strategies to reduce risks; and discusses guidance and coordination of

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mitigation actions between the SCVWD and other government agencies. The LHMP³ and the annual updates,⁴ are incorporated by reference in PWRPA's WMP for the SCVWD's single Covered POD.

Zone 7 has a Hazard Mitigation Plan ("HMP") that reflects ongoing hazard mitigation activities. The Agency's hazard mitigation involves strategies to reduce short and long-term vulnerability to identified hazards, including wildfires. This document serves as the framework for the ongoing identification and implementation of hazard mitigation strategies developed for the Zone 7 Service Area. The current HMP⁵ is incorporated by reference in PWRPA's WMP for the Agency's four Covered PODs.

VII. Wildfire Preventative Strategies

A. No Covered PODs in any High fire threat district

In 2018, the California Public Utilities Commission (CPUC) completed the development of the statewide Fire Threat Map that designates areas of the state at an elevated risk of electric line-ignited wildfires. This updated map incorporated historical fire data, fire-behavior modeling, assessments of fuel, weather modeling, and host of other factors. 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. No portions of PWRPA's electrical infrastructure are located in designated Tier 2 or 3 wildfire threat 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: (a) extended drought; (b) vegetation type and density; (c) extreme weather events; (d) lightning; (e) low humidity; and (f) high winds.⁶ By the definitions stated in *The 2010 Wildland-Urban Interface of the Conterminous United States*, all of the Covered PODs are located in non-vegetated or agricultural areas.

PWRPA has not identified any geographic area of the Covered PODs that is a higher wildfire threat than is identified in a commission fire threat map, nor identified any area where the commission should expand a high fire threat district based on new information or changes to the environment.

³ [https://s3.us-west-1.amazonaws.com/valleywater.org.us-west-1/s3fs-public/2021-05/R14163%20%202017%20FINAL%20LOCAL%20HAZARD%20MITIGATION%20PLAN%20v.%2004-09-21%20\(04-12-21\).pdf](https://s3.us-west-1.amazonaws.com/valleywater.org.us-west-1/s3fs-public/2021-05/R14163%20%202017%20FINAL%20LOCAL%20HAZARD%20MITIGATION%20PLAN%20v.%2004-09-21%20(04-12-21).pdf)

⁴ <https://www.valleywater.org/flooding-safety/local-hazard-mitigation-plan#:~:text=Hazard%20Mitigation%20planning%20is%20the,determined%2C%20prioritized%2C%20and%20implemented.>

⁵ https://www.zone7water.com/sites/main/files/file-attachments/draft_hazard_mitigation_plan_sept-2017.pdf?1618861028

⁶ See Section VI(A), above.

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B. Operational awareness

These strategies consist of proactive, day-to-day actions taken to mitigate wildfire risks. The practices in this category aim to ensure PWRPA is prepared in high-risk situations, such as dry, windy environmental conditions. PWRPA will operate the system in a manner that will minimize potential wildfire risks including taking all reasonable and practicable actions to minimize the risk of a catastrophic wildfire caused by PWRPA electric facilities. PWRPA will take corrective action for deficiencies when the staff witnesses or is notified of improperly installed or maintained fire protection measures.

C. Design and Construction Standards

PWRPA’s designs and constructs its electric facilities to meet or exceed CPUC General Orders (“GO”) 95 and 128, PG&E Standards, and any applicable local codes, ordinances and authority having jurisdiction. The overhead design criteria is GO 95 Section IV, 43.2 Light Loading. All construction meets criteria for PG&E raptor-safe construction and Wildlife Protection STD. DWG. ES 061149. Unless noted to the contrary, all equipment, materials, and labor shall be furnished in accordance with the applicable sections of the latest revisions of the following:

- Institute of Electrical and Electronics Engineers (IEEE)
- Underwriter’s Laboratories (UL)
- National Electrical Manufacturers Association (NEMA)
- National Electrical Code (NEC)
- National Electrical Safety Code (NESC)

The above listed codes and standards are referenced to establish minimum requirements and wherever these Technical Specifications require higher standards of materials or workmanship than required by the codes and standards, these Technical Specifications shall apply.

D. Vegetation Management

This management strategy reduces vegetation near to PWRPA electrical infrastructures. This also includes fire fuels mitigation and other work in order to prevent the system from causing a fire and to protect the system from fire. 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 growing conditions to determine the appropriate time-of-trim clearance in each circumstance.

GO 95, RULE 35, TABLE 1					
Case	Type of Clearance	N/A	Supply Conductors, 750 - 22,500 Volts	N/A	N/A

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13	Radial clearance of bare line conductors from tree branches or foliage		18 inches		
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**GO 95 APPENDIX E GUIDELINES
TO RULE 35**

The radial clearances shown below are recommended minimum clearances that should be established, at time of trimming, between the vegetation and the energized conductors and associated live parts where practicable. Reasonable vegetation management practices may make it advantageous for the purposes of public safety or service reliability to obtain greater clearances than those listed below to ensure compliance until the next scheduled maintenance. Each utility may determine and apply additional appropriate clearances beyond clearances listed below, which take into consideration various factors, including: line operating voltage, length of span, line sag, planned maintenance cycles, location of vegetation within the span, species type, experience with particular species, vegetation growth rate and characteristics, vegetation management standards and best practices, local climate, elevation, fire risk, and vegetation trimming requirements that are applicable to State Responsibility Area lands pursuant to Public Resource Code Sections 4102 and 4293.

Voltage of Lines	Case 13	
Radial clearances for any conductor of a line operating at 2,400 or more volts, but less than 72,000 volts	4 feet	N/A

CCR § 1254. Minimum Clearance Provisions for Poles - PRC 4292.

The firebreak clearances required are applicable within an imaginary cylindroidal space surrounding each pole or tower on which a switch, fuse, transformer or lightning arrester is attached and surrounding each dead end or corner pole. The radius of the cylindroid is 10 feet measured horizontally from the outer circumference of the specified pole or tower. Flammable vegetation and materials located wholly or partially within the firebreak space shall be treated as follows: (a) At ground level - remove flammable materials, including but not limited to, ground litter, duff and dead or desiccated vegetation that will allow fire to spread, and; (b) From 0-8 feet above ground level -remove flammable trash, debris or other materials, grass, herbacious and brush vegetation. All limbs and foliage of living trees shall be removed up to a height of 8 feet.

1. Additional vegetation management: Santa Clara Valley Water District Local Hazard Mitigation Plan

The SCVWD complies with Government Code Section 51182 which requires the maintenance of a firebreak within 30 feet of occupied structures on its property by removing flammable vegetation

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or combustible growth. Weed abatement activities are performed March through December. Herbicide application to prevent weed growth is performed October through June. An enhanced fuel assessment / reduction program policy is being considered for natural areas managed by the SCVWD.

2. Additional vegetation management: RD 108 acting as the Levee District

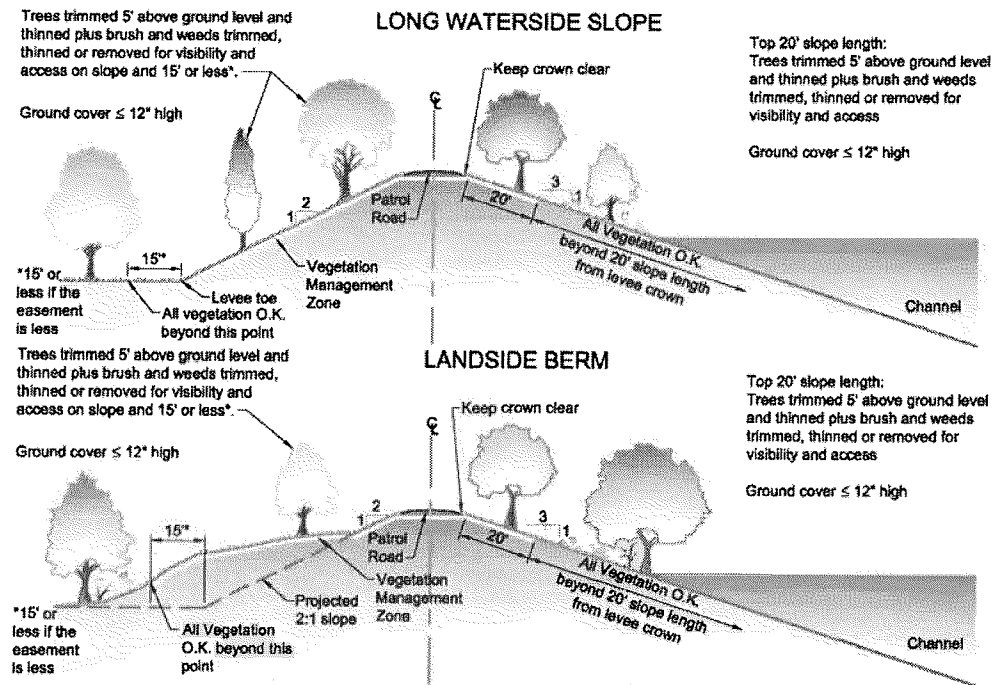


Figure 5-1. DWR Vegetation Inspection Criteria for Standard Levees –Long Waterside Slope and Landside Berm

E. Inspections

These strategies consist 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. Inspection plays an important role in wildfire prevention.

GCID: 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).

RD 108: When operating, Lateral 8 Pump Station is inspected daily, and a maintenance log is completed. Vegetation management is performed as needed. RD108 also has a SCADA system that detects irregularities at Lateral 8 Pump Station. In the event of irregularities, including power

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failure, the system will send an automated message to the System A operator (employee(s) on call 24/7 to respond to these alarms). Shut-off procedures are described in section VII(H).

SCVWD: The distribution facility is located immediately adjacent to the Advanced Recycling Water Treatment Facility and is observed on a daily basis.

Zone 7: Zone 7 follows its HMP.2016.08 and continues and expands thinning/ clearing of non-fire resistive vegetation near evacuation roads and routes to critical facilities.

Joint poles and adjacent infrastructure owned by PG&E: PWRPA's infrastructure are intervening facilities as defined in Federal law. Accordingly, they are interconnected with PG&E electrical infrastructure. The first pole in PWRPA's infrastructure is immediately adjacent to the last pole in PG&E's. 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.

F. Workforce training

Work rules and complementary workforce training programs to help reduce the likelihood of the ignition of wildfires is the responsibility of each respective Project Participant.⁷

The Santa Clara Valley Water District conducts and/or promotes attendance at local or regional hazard conferences and workshops for elected officials and staff to educate them on the critical need for programs in mitigating earthquake, wildfire, flood, and landslide hazards.

G. Recloser Policy

PWRPA does not have the authority to preemptively shut off the 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.

H. Deenergization

The Covered PODs at four sites located at GCID and RD 108 provide electrical service to onsite agricultural water pumps only. The Covered POD at SCVWD provides electrical service for onsite water pumping at the Advanced Recycled Water Treatment Facility. The Covered PODs at four sites at Zone 7 provide electrical service for two water treatment plants and two well stations, one of which is connected to a demineralization plant. 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.

- GCID: If incoming power needs to be shut off, GCID staff will call PG&E's Ag Hotline at

⁷ See Section V(B), Project Participant Roles and Responsibilities.

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(877) 311-3276 and request a shutdown at the nearby PG&E meter. In the event of fire, the operator will call 911 and the Hamilton City Fire Department at (530) 826-0222. The Hamilton City Fire Department has standard operating procedures that address fire fighter safety when working near downed power lines. If they are the first responders to a scene with downed power lines, they assume that all lines are energized and wait for PG&E to respond and control the scene.

- RD 108: The System A operator that monitors Lateral 8 Pump Station will shut off power in the event of an emergency. If incoming power needs to be shut off, RD108 staff will call PG&E's Ag Hotline at (877) 311-3276 and request a shutdown at the nearby PG&E meter 1010126474. In the event of fire, the operator will call 911 and the Sacramento River Fire District at (530) 458-0200. The Sacramento River Fire District has standard operating procedures that address fire fighter safety when working near downed power lines. If they are the first responders to a scene with downed power lines, they assume that all lines are energized and wait for PG&E to respond and control the scene.
- SCVWD: If incoming power needs to be shut off, SCVWD staff will call PG&E's Hotline at (800) 743-5000 and request a shutdown at the nearby PG&E meter. In the event of fire, the operator will call 911 or the San Jose Fire Department Station 29 at (408) 794-7000. The San Jose Fire Department Station 29 has standard operating procedures that address fire fighter safety when working near downed power lines. If they are the first responders to a scene with downed power lines, they assume that all lines are energized and wait for PG&E to respond and control the scene.
- Zone 7: In accordance with protocols set forth in its HMP, Zone 7 staff will call PG&E's Hotline at (800) 743-5000 if incoming power needs to be shut off. In the event of fire, the operator will call the City of Livermore Fire Emergency at (925) 373-5402, or the City of Pleasanton Fire Emergency at (925) 373-5400.

1. Impacts to public safety

NOTIFICATION (PUB UTIL CODE §§ 8387(b)(2)(G))

As described above in Section VII(D), 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.

2. Customer Notification Protocols

No water customer notifications are required for GCID, SCVWD or Zone 7. If the power shutoff is forecast to extend longer than 24 hours, RD 108 will contact its agricultural water customers individually by telephone.

VIII. Community Outreach and Public Awareness

PWRPA will maintain a proactive outreach and education strategy to create public awareness of fire threats, fire prevention, and available support during a wildfire or large power outages. PWRPA's Board of Directors serves as the local regulatory authority with respect to matters related to PWRPA's operation as a publicly-owned electric utility. All deliberations and

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considerations of PWRPA's WMP are conducted in noticed meetings as required by the Ralph M. Brown Act ("Brown Act"). Accordingly, all WMP updates and comprehensive revisions are made available to the public before their approval.

In 2023, the PWRPA Board of Directors established the PWRPA Wildfire Mitigation Committee (WMC) which has been delegated full authority to develop, consider, adopt, implement and audit the WMP. The WMC is a standing committee, therefore, it is subject to all notice and deliberation requirements of the Brown Act.

In accordance with its HMP.2016.07, Zone 7 participates in local and regional wildfire prevention groups (i.e., Diablo Firesafe Council, ABAG Resilience Program) and local jurisdictions in order to support local wildfire safety efforts.

IX. Restoration of Service

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 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.

X. Evaluating the Plan

A. Metrics and Assumptions for Measuring Plan Performance

PWRPA will track the performance of this Wildfire Mitigation Plan by recording the: (1) number of fire ignitions; and (2) conductors down at a site served by PWRPA electrical infrastructure.

Metric 1: Fire Ignitions

For purposes of this metric, a fire ignition is defined as follows:

- PWRPA electric infrastructure was associated with the origin of the fire;
- The fire was self-propagating and of a material other than electrical and/or communication facilities; and
- The resulting fire traveled greater than one linear meter from the ignition point.

As of the date of this WMP, PWRPA has had zero fire ignition events since it began operations on January 1, 2005. In future Wildfire Mitigation Plans, PWRPA will provide the number of fires that occurred that were less than 10 acres in size. Any fires greater than 10 acres will be individually described.

Metric 2: Wires-Down

For purposes of this metric, a wires-down event includes any instance where an electric conductor falls to the ground or on to a foreign object.

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As of the date of this WMP, PWRPA has had zero wires-down events since it began operations on January 1, 2005. PWRPA will not normalize this metric by excluding unusual events, such as severe storms. Instead, PWRPA will supplement this metric with a qualitative description of any such unusual events.

B. Impact of Metrics on Plan

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 the plan.

C. Monitoring and Auditing the Plan

This Wildfire Mitigation Plan is subject to review by PWRPA Wildfire Mitigation Plan Committee (WMC) which has been delegated full authority by the PWRPA Governing Board.⁸ 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.

D. Identifying and correcting Deficiencies in the Plan

PWRPA Participants' staff and qualified external stakeholders are encouraged to report Wildfire Mitigation Plan 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.

E. Monitoring the effectiveness of inspections

The primary mitigation measure against wildfires at PWRPA's electrical infrastructure is vegetation management.⁹ 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), Metrics and Assumptions for Measuring Plan Performance.

⁸ See Section III(C), Process for Utility Adoption and Submittal of Annual WMP and Opportunities for Public Comment and Section VIII, Community Outreach and Public Awareness.

⁹ See Section VII(D), Vegetation Management.

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F. WSAB Guidance and responses

PWRPA received suggested guidance in the *California Wildfire Safety Advisory Board Guidance Advisory Opinion for the 2023 Wildfire Mitigation Plans of Electric Publicly Owned Utilities and Rural Electrical Cooperatives* (November 16, 2022).

<p>WSAB comment: 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>WSAB comment: 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>WSAB comment: The WSAB appreciates reference in the informational response showing the website location of the 2022 PWRPA 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. This link is provided in Section III(D) and Section XI of the WMP.</p>
<p>WSAB comment: 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>

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XI. Independent Auditor

PWRPA shall contract with a qualified independent evaluator experienced in assessing the safe operation of electrical infrastructure to review and assess the comprehensiveness of the triennial update to the Wildfire Mitigation Plan. The independent evaluator must issue a report that is posted to PWRPA's website. This report shall be presented to either the PWRPA WMC or the PWRPA Governing Board at a public meeting.

This Wildfire Mitigation Plan and Independent Evaluator Report, as well as the prior WMPs, are available on the PWRPA website via a link located on the top right of the website home page.

<https://www.pwrpa.org/wildfire-mitigation/>