PITTSBURG POWER COMPANY
(ISLAND ENERGY)

UTILITY PHYSICAL SECURITY PLAN

A Public Report on Island Energy's physical security program for distribution-level electrical facilities

March 24, 2021

TABLE OF CONTENTS

I. OVERVIEW

A. GOAL OF UTILITY PHYSICAL SECURITY PLAN

Ensuring the safety of its facilities is a top priority for Island Energy, and Island Energy prioritizes safety in all aspects of its design, operation, and maintenance practices. The overarching goal of this Utility Security Plan is to describe Island Energy's risk management approach toward distribution system physical security, with appropriate consideration of resiliency, impact, and cost.

Island Energy recognizes the importance of securing the safety and reliability of its electric system and, therefore, Island Energy voluntarily participated in the California Public Utilities Commission's (CPUC) Physical Security proceeding and has undertaken this assessment. In the spirit of continued voluntary cooperation, Island Energy offers the following in response to CPUC Decision D.9-01-018.

B. DESCRIPTION OF ISLAND ENERGY

Pittsburg Power Company, a joint powers authority ("PPC"), is a Publicly Owned Municipal Utility ("Utility") providing electric and gas utility services on Mare Island Vallejo, CA, operating under the common name of "Island Energy".

The electric utility component of the PPC Utility serves approximately 500 electric meters, with a combination of residential, commercial, and industrial customers. Approximately 90% of the load served on Mare Island is to commercial and industrial customers. The electric distribution system operates at 12kV, while taking power at 115kV from PG&E at Island Energy's Station H substation. Island Energy does not own, operate, or manage any transmission or generation facilities.

The Island Energy service territory covers an area of approximately 2.6 square miles. The electric distribution system has approximately 25 miles of 12kV conductor and is an almost exclusively underground system.

However, Island Energy does have approximately 10,500 ft of energized, overhead 12kV distribution lines serving street lighting, storm water pumping and a US Coast Guard telecommunications installation and other minor uses.

C. RESULTS OF UTILITY PHYSICAL SECURITY PLAN ASSESSMENT

In performing the Physical Security Plan Assessment (the "Plan"), Island Energy conducted a field review of 16 medium-voltage (12kV) substations and related facilities. Island Energy also reviewed system electrical single-line drawings and performed a customer type and substation interconnect review. Please refer to Exhibit B.

The distribution system review and assessment did not identify any "Covered Distribution Facilities" as described by and defined within the CPUC approved Decision (D.) 19-01-018, which adopted the Joint IOU/POU Straw Proposal as modified by the CPUC's Risk Assessment and Safety Advisory (RASA) section.

The review did identify two (2) customers that could be considered sensitive to power interruptions:

1. Veterans Affair (VA) Outpatient Clinic
2. US Coast Guard Telecommunications Facility

Island Energy did not classify these facilities as "Covered Distribution Facilities" as both facilities have mitigation measures in place with on-site back-up generation.

Island Energy also notes the US Army Reserve operations on South Mare Island. This is primarily a vehicle storage and maintenance facility and is lightly staffed. Hence, Island Energy did not classify the US Army Reserve operation as a "Covered Distribution Facility".

All other customers within the Island Energy service territory are either residential, general commercial and light to heavy industrial.

[**PLACEHOLDER:** Once completed, this section should describe the general conclusions of the Independent Evaluation and POU's response]

II. BACKGROUND

On April 16, 2013, one or more individuals attacked equipment located within Pacific Gas and Electric Company's (PG&E) Metcalf Transmission Substation, ultimately damaging 17 transformers. These individuals also cut nearby fiber-optic telecommunication cables owned by AT&T. In response to the attack, the Federal Energy Regulatory Commission (FERC) directed the North American Electric Reliability Corporation (NERC) to develop new physical security requirements, resulting in the creation of CIP-014.

In 2014 California State Senator Jerry Hill authored SB 699, directing the CPUC to "consider adopting rules to address the physical security risks to the distribution systems of electrical corporations." In response to SB 699, the CPUC's Safety and Enforcement Division, Risk Assessment and Safety Advisory Section (RASA) prepared a white paper proposing a new requirement for investor-owned utilities (IOUs) and publicly owned utilities (POUs) to develop security plans that would identify security risks to their distribution and transmission systems, and propose methods to mitigate those risks. The CPUC hosted a series of workshops to better understand the state of utility physical security protections and to seek input on refining their proposal.

In order to support a statewide improvement of how utilities address distribution level physical security risks, the California Municipal Utilities Association (CMUA), which is the statewide trade association for POUs, coordinated with the state's IOUs to develop a comprehensive Straw Proposal[1] (Joint IOU/POU Straw Proposal) for a process to identify at-risk facilities and, if necessary, develop physical security mitigation plans. As a member of CMUA, Island Energy staff participated in the development of the Joint IOU/POU Straw Proposal through a CMUA working group as well as through direct meetings with the IOUs. The Joint POU/IOU Straw Proposal set out a process for the following:

1) Identifying if the utility has any high priority distribution facilities.

2) Evaluating the potential risks to those high priority distribution facilities.

[1] Straw Proposal available at: https://www.cpuc.ca.gov/uploadedFiles/CPUCWebsite/Content/Safety/Risk_Assessment/physicalsecurity/R1506009-Updated%20Joint%20Straw%20Proposal%20and%20Cover%20083117%20Filing.pdf.

3) For the distribution facilities where the identified risks are not effectively mitigated through existing resilience/security measures, developing a mitigation plan.

4) Obtaining third party reviews of the mitigation plans.

5) Adopting a document retention policy.

6) Ensuring a review process established by the POU governing board; and

7) Implementing information sharing protocols.

RASA filed a response[2] to the Joint IOU/POU Straw Proposal that recommended various modifications and clarifications, including a six-step process. Additionally, RASA recommended that the utility mitigation plans include:

1) An assessment of supply chain vulnerabilities.

2) Training programs for law enforcement and utility staff to improve communication during physical security events; and

3) An assessment of any nearby communication utility infrastructure that supports priority distribution substations.

In 2019, the CPUC approved Decision (D.) 19-01-018, which adopted the Joint IOU/POU Straw Proposal as modified by the RASA proposal, with additional clarifications and guidance. D.19-01-018 clarified that where there is a conflict between the Straw Proposal and the RASA proposal, then it is the rule in the RASA proposal that controls.[3]

D.19-01-018 asserted that the POUs should utilize the Utility Security Plan process described therein. Island Energy is following the process and issuing this report at this time to reflect its existing commitment to safety and to protecting its ratepayers' investment by taking reasonable and cost-effective measures in an effort to safeguard key assets of its distribution system.

[2] RASA Response available at: https://www.cpuc.ca.gov/uploadedFiles/CPUCWebsite/Content/Safety/Risk_Assessment/physicalsecurity/Final%20Staff%20Recommendation%20for%20Commission%20Consideration%20010318.pdf.

[3] D.19-01-018 at 43, footnote 58 ("Should there be any question of which shall predominate should there be any incongruity or conflict between a utility or SED RASA recommended rule, the SED RASA rule shall apply.").

III. PLAN DEVELOPMENT PROCESS

A. PHYSICAL SECURITY PRINCIPLES

The Joint IOU/POU Straw Proposal seeks to support the creation of a risk management approach toward distribution system physical security, with appropriate considerations of resiliency, impact, and cost. In order to accomplish this risk-based approach, the Joint IOU/POU Straw Proposal identifies several principles to guide the development of each individual utility's program. These principles are the following:

1. Distribution systems are not subject to the same physical security risks and associated consequences, including threats of physical attack by terrorists, as the transmission system.

2. Distribution utilities will not be able to eliminate the risk of a physical attack occurring, but certain actions can be taken to reduce the risk or consequences, or both, of a significant attack.

3. A one-size-fits-all standard or rule will not work. Distribution utilities should have the flexibility to address physical security risks in a manner that works best for their systems and unique situations, consistent with a risk management approach.

4. Protecting the distribution system should consider both physical security protection and operational resiliency or redundancy.

5. The focus should not be on all Distribution Facilities, but only those that risk dictates would require additional measures.

6. Planning and coordination with the appropriate federal and state regulatory and law enforcement authorities will help prepare for attacks on the electrical distribution system and thereby help reduce or mitigate the potential consequences of such attacks.

B. UTILITY PHYSICAL SECURITY PLAN DEVELOPMENT PROCESS

Island Energy applied the multi-step process to develop this Utility Security Plan that is consistent with the Joint IOU/POU Straw Proposal and D.19-01-018. The relevant six steps of that process are the following:

STEP 1: ASSESSMENT / PLAN DEVELOPMENT

Island Energy staff and/or consultants prepare a Draft Utility Security Plan through the process set forth in Steps 1A, 1B, and 1C.

STEP 1A: IDENTIFY COVERED DISTRIBUTION FACILITIES

Island Energy will evaluate all distribution-level facilities in its service territory that are subject to its control to determine if any facility meets D.19-01-018's definition of a "Covered Distribution Facility" using the seven factors identified in the Joint IOU/POU Straw Proposal.

STEP 1B: PERFORM RISK ASSESSMENT

For every individual Covered Distribution Facility identified pursuant to Step 1A, Island Energy will perform an evaluation of the potential risks associated with a successful physical attack on that Covered Distribution Facility, and whether existing grid resiliency, back-up generation, and/or physical security measures appropriately mitigate identified risks.

STEP 1C: DEVELOP MITIGATION PLAN

If there are any individual Covered Distribution Facilities where the Risk Assessment performed pursuant to Step 1B finds that the existing mitigation and/or resiliency measures do not effectively mitigate the identified risks, then Island Energy will develop a Mitigation Plan for that Covered Distribution Facility. The Mitigation Plan will use a risk-based approach to select reasonable and cost-effective measures that can either be security focused (e.g., walls or alarms) or resiliency focused (e.g., adequate spare parts).

STEP 2: INDEPENDENT REVIEW

For every Utility Security Plan cycle, Island Energy will document the results of the identification process, risk assessment, and Mitigation Plan development performed pursuant to Steps 1A, 1B, and 1C. This documentation in combination with narrative description in Section IX below, constitutes Island

Energy's Draft Utility Security Plan. Each Draft Utility Security Plan is submitted to a Qualified Third Party for Independent Review. The Qualified Third Party Reviewer will then issue an evaluation that identifies any potential deficiencies in the Draft Utility Security Plan as well as recommendations for improvements. Island Energy will then modify its plan to address any identified deficiencies or recommendations or will document the reasons why any recommendations were not adopted. The combination of the Draft Utility Security Plan, the non-confidential conclusions of the Qualified Third-Party Reviewer, and Island Energy's responses to the Qualified Third-Party Review will constitute Island Energy's Utility Security Plan.

STEP 3: VALIDATION

Island Energy will submit its Utility Security Plan to a qualified authority for review. Such entity will provide additional feedback and evaluation of Island Energy's Utility Security Plan and, to the extent that this entity is authorized, such entity deems the Utility Security Plan as adequate.

STEP 4: ADOPTION

Island Energy's Utility Security Plan will be presented to and adopted by Island Energy's [governing board] at a public meeting.

STEP 5: MAINTENANCE

Island Energy will refine and update the Utility Security as appropriate and as necessary to preserve plan integrity.

STEP 6: REPEAT PROCESS

Island Energy will repeat this six-step process at least once every five years.

IV. IDENTIFICATION OF COVERED DISTRIBUTION FACILIITES (STEP 1A)

As described in Section III, Step 1A of the Utility Security Plan process involves assessing all distribution-level facilities that are subject to the control of Island Energy to determine which facilities are "Covered Distribution Facilities" subject to the need for a risk assessment. This Section describes the factors that Island Energy used to evaluate its distribution facilities and the results of its evaluation.

A. IDENTIFICATION FACTORS

The Joint IOU/POU Straw Proposal defines seven screening factors to determine if a facility is a "Covered Distribution Facility." Some factors require additional definitions and/or clarifications in order to be applied to Island Energy's facilities.

The following Table provides the Joint IOU/POU Straw Proposal's Factors as modified/clarified by Island Energy.

Factor	Joint IOU/POU Straw Proposal Description	Additional Clarification
1	Distribution Facility necessary for crank path, black start or capability essential to the restoration of regional electricity service that are not subject to the California Independent System Operator's (CAISO) operational control and/or subject to North American Electric Reliability Corporation (NERC) Reliability Standard CIP-014-2 or its successors	No additional clarification.
2	Distribution Facility that is the primary source of electrical service to a military installation essential to national security and/or emergency response services (may include certain airfields, command centers, weapons stations, emergency supply depots)	No additional clarification.
3	Distribution Facility that serves installations necessary for the provision of regional drinking water supplies and wastewater services (may include certain aqueducts, well fields, groundwater pumps, and treatment plants)	An installation provides "regional drinking water supplies and wastewater services" if it is the primary source of drinking water supply or wastewater services for over 40,000 customer accounts for an area with a population of over 100,000.

4	Distribution Facility that serves a regional public safety establishment (may include County Emergency Operations Centers; county sheriff's department and major city police department headquarters; major state and county fire service headquarters; county jails and state and federal prisons; and 911 dispatch centers)	Island Energy defines "regional public safety establishment" as any of the following: (1) Headquarters of a major police or fire department serving 1.5 million population with at least 1,000 sworn officers; (2) County Sheriff's Department Headquarters; (3) County Emergency Operations Center; (4) County/State Fire headquarters; (5) a California State Prison; (5) a United States Penitentiary; or (6) a Federal Correctional Institute.
5	Distribution Facility that serves a major transportation facility (may include International Airport, Mega Seaport, other air traffic control center, and international border crossing)	In addition to the facilities listed in the Joint IOU/POU Straw Proposal, Island Energy defines a "major transportation facility" as any transportation facility that has (1) an average of 600 or more flights per day; or (2) over 50,000 passengers arriving or departing per day.
6	Distribution Facility that serves as a Level 1 Trauma Center as designated by the Office of Statewide Health Planning and Development	No additional clarification.
7	Distribution Facility that serves over 60,000 meters	No additional clarification.

B. IDENTIFICATION ANALYSIS

In performing this identification analysis, Island Energy is assessing all distribution level facilities that are subject to its exclusive control, or if the facility is jointly owned, the joint ownership agreement identifies Island Energy as the entity responsible for operation and maintenance. The specific types of facilities include substations, ductbanks and overhead distribution lines.

Based on this scope, Island Energy has identified 16 facilities that are subject to this identification analysis. Of these 16 facilities, none fall within one of the categories listed above.

The following table summarizes the results of Island Energy's identification analysis (next page).

Facility ID	1. Crank Path, Black Start	2. Military Installation	3. Regional Drinking Water/ Wastewater Services	4. Regional Public Safety	5. Major Transportation Facility	6. Level 1 Trauma Center	7. Over 60,000 Meters
Substation A	No	No	No	No	No	No	No
Substation D	No	No	No	No	No	No	No
Substation E	No	No	No	No	No	No	No
Substation F	No	No	No	No	No	No	No
Substation G	No	No	No	No	No	No	No
Substation H	No	No	No	No	No	No	No
Substation I	No	No	No	No	No	No	No
Substation J	No	No	No	No	No	No	No
Substation K	No	No	No	No	No	No	No
Substation L	No	No	No	No	No	No	No
Substation M	No	No	No	No	No	No	No
Substation N	No	No	No	No	No	No	No
Substation P	No	No	No	No	No	No	No
Substation 738	No	No	No	No	No	No	No
Ductbanks	No	No	No	No	No	No	No

V. RISK ASSESSMENT (STEP 1B)

A. METHODOLOGY

Pursuant to the process identified in the Joint IOU/POU Straw Proposal and D.19-01-018, Island Energy will assess the potential risks associated with a successful physical attack on each of the Covered Distribution Facilities identified in Section IV above. For purpose of this analysis, a physical attack is limited to the following: (1) theft; (2) vandalism; and (3) discharge of a firearm. A "successful physical attack" is limited to circumstances where a theft, vandalism, and/or the discharge of a firearm has directly led to the failure of any elements of the Covered Distribution Facility that are necessary to provide uninterrupted service to the specific load identified in Section IV.

In order to perform this risk analysis, Island Energy evaluates the relative risk that (1) a physical attack on a Covered Distribution Facility will be successful considering the protective measures in place; or (2) that the impacts of a successful attack will be mitigated due to resiliency and other measures in place.

A. MITIGATION MEASURES

D.19-01-018 identifies the specific mitigation measures that a utility should consider when performing this risk analysis. The following table lists these mitigation measures and provides Island Energy's additional clarifications that are necessary to apply these measures to the Island Energy's territory.

Measure	D.19-01-018 Description	Additional Clarification
1	The existing system resiliency and/or redundancy solutions (e.g., switching the load to another substation or circuit capable of serving the load, temporary circuit ties, mobile generation and/or storage solutions).	No additional clarification.
2	The availability of spare assets to restore a particular load.	No additional clarification.
3	The existing physical security protections to reasonably address the risk.	No additional clarification.
4	The potential for emergency responders to identify and respond to an attack in a timely manner.	Each facility is evaluated based on the likelihood that a law enforcement officer would generally be able to arrive at the Covered Distribution Facility within 15 minutes of a report from the public of a break-in or attack, or of Island Energy notifying the law enforcement agency of triggering of an alarm at the facility.
5	Location and physical surroundings, including proximity to gas pipelines and geographical challenges, and impacts of weather.	Island Energy evaluated this element based on the proximity of the Covered Distribution Facility to populated areas and the extent to which the interior of the facility is shielded from view and access due to walls, vegetation, or other physical obstructions.
6	History of criminal activity at the Distribution Facility and in the area.	Island Energy assesses the property crime rates in the immediate vicinity of the Covered Distribution Facility and compares those crimes rates to property crime rates for the county and the state to determine if the area is subject to a higher than average

		incidence of property related crimes.
7	The availability of other sources of energy to serve the load (e.g., customer owned back-up generation or storage solutions).	No additional clarification.
8	The availability of alternative ways to meet the health, safety, or security.	No additional clarification.
9	Requirements served by the load (e.g., back up command center or water storage facility).	No additional clarification.

B. RISK ASSESSMENT

Based on the process described in the Joint IOU / POU Straw Proposal and the direction provided in D.19-01-018, Island Energy has determined that there are no Covered Distribution Facilities identified in Section IV.

Island Energy's overall approach and standard practice is to secure each substation to prevent and discourage to the extent possible entry into the substation, vandalism or theft.

Depending on physical location, the substations may be all or partly enclosed with cinderblock walls, screened 6' to 8' chain link or open fencing, and locked gates. Two substations, H and N additionally have photocell-controlled area security lighting to discourage vandalism. Our service territory also has the benefit of 24/7 security patrols provided by the Mare Island Master Developer (Nimitz Group / Southern Land Co.) who also monitor activity around Island Energy's facilities.

The following table provides a summary of Island Energy's assessment of each mitigation measure for each Covered Distribution Facility (next page).

Facility ID	1. Existing Resiliency	2. Spare Assets	3. Existing Physical Security	4. Emergency Responders	5. Location	6. Criminal History	7. Back up Generation
Substation A	n/a	n/a	Exhibit B	n/a	n/a	n/a	Exhibit B
Substation D	n/a	n/a	Exhibit B	n/a	n/a	n/a	Exhibit B
Substation E	n/a	n/a	Exhibit B	n/a	n/a	n/a	Exhibit B
Substation F	n/a	n/a	Exhibit B	n/a	n/a	n/a	Exhibit B
Substation G	n/a	n/a	Exhibit B	n/a	n/a	n/a	Exhibit B
Substation H	n/a	n/a	Exhibit B	n/a	n/a	n/a	Exhibit B
Substation I	n/a	n/a	Exhibit B	n/a	n/a	n/a	Exhibit B
Substation J	n/a	n/a	Exhibit B	n/a	n/a	n/a	Exhibit B
Substation K	n/a	n/a	Exhibit B	n/a	n/a	n/a	Exhibit B
Substation L	n/a	n/a	Exhibit B	n/a	n/a	n/a	Exhibit B
Substation M	n/a	n/a	Exhibit B	n/a	n/a	n/a	Exhibit B
Substation N	n/a	n/a	Exhibit B	n/a	n/a	n/a	Exhibit B
Substation P	n/a	n/a	Exhibit B	n/a	n/a	n/a	Exhibit B
Substation 738	n/a	n/a	Exhibit B	n/a	n/a	n/a	Exhibit B
Ductbanks	n/a	n/a	Exhibit B	n/a	n/a	Yes – cable theft	Exhibit B

VI. COVERED DISTRIBUTION FACILITY MITIGATION PLANS (STEP 1C)

Pursuant to the process identified in the Joint IOU/POU Straw Proposal and D.19-01-018, Island Energy has determined that there are no Covered Distribution Facilities within its service territory that are subject to Island Energy's control.

Island Energy will continue to apply best-practice security mitigation measures to its existing Substations and related facility infrastructure in its normal course of business. Refer to Exhibit B.

New facilities will take into consideration best practices in design and in the application of security measures.

VII. INDEPENDENT EVALUATION AND RESPONSE (STEP 2)

A. REQUIREMENTS FOR QUALIFIED THIRD-PARTY REVIEW

D.19-01-018 specifies the following criteria for a Qualified Third-Party Reviewer:

Independence: A Qualified Third-Party Reviewer cannot be a division of the POU. A governmental entity can select as the third-party reviewer another governmental entity within the same political subdivision, so long as the entity has the appropriate expertise, and is not a division of the POU that operates as a functional unit, i.e., a municipality could use its police department as its third-party reviewer if it has the appropriate expertise.

Adequate Qualifications: A Qualified Third Party Reviewer must be an entity or organization with electric industry physical security experience and whose review staff has appropriate physical security expertise, which means that it meets at least one of the following: (1) an entity or organization with at least one member who holds either an ASIS International Certified Protection Professional (CPP) or Physical Security Professional (PSP) certification; (2) an entity or organization with demonstrated law enforcement, government, or military physical security expertise; or (3) an entity or organization approved to do physical security assessments by the CPUC, Electric Reliability Organization, or similar electrical industry regulatory body.

B. IDENTIFICATION OF THIRD-PARTY REVIEWER

Island Energy has selected as its Third-Party Reviewer the City of Pittsburg Police Department Special Operations Unit.

Island Energy's service territory is located within the City of Vallejo and is under the jurisdiction of the City of Vallejo Police Department. The City of Pittsburg Police Department is a separate and independent organization to Island Energy, with a separate service jurisdiction.

Within the City of Pittsburg Police Department's jurisdiction are three (3) major former utility and current private energy generation, substation, and transmission facilities:

1. Former PG&E Pittsburg Power Plant
2. Delta Energy Center
3. Los Medanos Energy Center

The City of Pittsburg police department is keenly aware and experienced in the service to and protection of these former and current power generation and associated substation and distribution facilities.

C. PUBLIC RESULTS OF THIRD-PARTY EVALUATION

[PLACEHOLDER: This section to be completed when Third Party Reviewer completes its analysis and has prepared a public summary of its conclusions and recommendations.]

D. ISLAND ENERGY RESPONSE

[PLACEHOLDER: This section to be completed when Third Party Reviewer completes its analysis and POU has completed its response.]

VIII. VALIDATION (STEP 3)

A. SELECTION OF QUALIFIED AUTHORITY

The Pittsburg Power Company Board of Directors has selected the California Utility Emergency Association (CUEA) as the “Qualified Authority” to review Island Energy’s Utility Security Plan.

CUEA advises Publicly Owned Utilties on emergency, security and related matters and is in direct association with the California Office of Emergency Services (CalOES). CalOES advises utilities, including POU’s and other state entities on security and related emergency response matters.

B. RESULTS OF QUALIFIED AUTHORITY REVIEW

*[**PLACEHOLDER:** This section to be completed when qualified authority completes its review.]*

C. ISLAND ENERGY RESPONSE TO QUALIFIED AUTHORITY REVIEW

*[**PLACEHOLDER:** This section to be completed when POU has a response to the qualified authority review.]*

IX. NARRATIVE DESCRIPTIONS FOR UTILITY PHYSICAL SECURITY PLAN

A. ASSET MANAGEMENT PROGRAM

Island Energy's asset management program includes three main components:

1. Maintaining a working on-site inventory of key spare parts and materials - including transformers, switchgear, fuses, distribution system cable of varying sizes plus necessary equipment, tools, and hardware to quickly effect repairs.
2. Maintaining direct access to multiple key suppliers through standing purchase orders or other arrangements to allow for the immediate placement of material orders and timely delivery.
3. Maintaining multiple "on-call" utility contractor and construction resources to augment Island Energy resources in the event of a distribution failure, vandalism, or other reliability event.

Other actions include ordering multiple equipment and materials spares when doing system upgrades and maintenance.

B. WORKFORCE TRAINING AND RETENTION PROGRAM

Island Energy retains AVO training services among other providers to train, enhance employee skills and improve retention. And recently, Island Energy crew became part of the International Brotherhood of Electrical Workers (IBEW) which also offers training and skill-enhancing programs.

C. PREVENTATIVE MAINTENANCE PLAN

Island Energy has an ongoing security preventative maintenance program to both maintain existing systems and to improve system security and security equipment. These ongoing steps are underway and include, but are not limited to:

1. Routine Fencing, Gate and lock Maintenance at all Facilities
2. Routine Lighting Checks
3. Adding Screening Fencing
4. Adding Security Wire
5. Adding Security Lighting (1/3 completed)

6. Removing Facility Visual Barriers – Foilage, unnecessary fencing, stored or abandoned equipment and materials.
7. Security Cameras – remote and key facilities
8. Signage

D. PHYSICAL SECURITY EVENT TRAINING

Island Energy provides information session with the Nimitz Group / Southern Land Company Master Developer personnel. Such sessions identify key facilities, areas of historical theft or vandalism and other security concerns.

Additionally, Island Energy meets periodically with Vallejo Police Department representatives on utility operations and issues and as part of larger Mare Island security issues and related police department support and mitigations.

E. COMMUNICATION INFRASTRUCTURE RISK ASSESSMENT

Island Energy does not have in place communication systems specific to the utility distribution system.

F. FACILITY DESIGN FEATURES

Any future new facilities, or refurbishment of existing facilities, will incorporate best practices or better for low observability, sightlines, defensibility, general order, and perimeter security – including screening fencing, lighting and security cameras.

EXHIBIT A: Island Energy Service Territory

EXHIBIT B: Utility Distribution Facilities Description

Island Energy
energy solutions for Mare Island

Subject: Utility Distribution System Assessment Summary
Revision: 8-Feb-21

Island Energy Distribution Facilities		Type	Location	Service Type	Security Characteristics	Other Characteristics / Mitigation
Station	A	12kV Substation	7th & Oak Street	Residential, Business Offices	Concrete Building, locked entry	
Station	B	12kV Substation	Azuar Dr. - North Island	Not in Service	n/a	
Station	D	12kV Substation	Nimitz Ave - Pintado St	General Commercial	Screened fencing, locked entry	
Station	E	12kV Substation	Nimitz Ave - Kansas St	Residential, General Commercial, VA Outpatient Clinic	Partial cinderblock enclosure, screened fencing, locked entry	VA Clinic: Customer standby generator
Station	F	12kV Substation	Railroad Ave. South	Residential, General Commercial	Cinderblock enclosure, fencing, locked entry	
Station	G	12kV Substation	Azuar Dr. - South Island	Army Reserve Satelite Maintenance Facility, Touro University, USCG Telecom	Substation: Cinderblock enclosure, locked entry. Overhead distribution to USCG	Touro University, USCG Telecom: Customer standby generators
Station	H	12kV Substation	Azuar Dr. - South Island	Main 115kV Step-down Substation	Partial cinderblock enclosure, fencing, locked entry, security lighting	
Station	I	12kV Substation	Berth 18	Industrial	Fencing, locked entry	
Station	J	12kV Substation	Bldg 680 - Nimitz Ave	Industrial	Within commercial building, enclosed, locked entry	
Station	K	12kV Substation	1080 Nimitz - MIDD	Industrial	Within commercial facility (24hr manned security), partial cinderblock enclosure, screened fencing, locked entry, security lighting	
Station	L	12kV Substation	Nimitz Ave - Railroad Ave	Industrial	Partial cinderblock enclosure, fencing, locked entry	
Station	M	12kV Substation	Bldg 577 - Railroad Ave	Industrial, Causeway Bridge Lift Span	Within Island Energy building, security system	Causeway Bridge: City portable standby generator
Station	N	12kV Substation	Azuar Dr. - North Island	Industrial	Fencing, locked entry, security lighting	
Station	P	12kV Substation	Nimitz Ave - S&C Plaza	General Commercial	Screened fencing, locked entry	
Station	738	12kV Substation	Nimitz Ave - S&C Plaza	Industrial	Cinderblock enclosure, locked entry	
Electrical Ductbanks		Conduit	Various	Island Energy Distribution	Buried ductbanks	Welded manhole covers in areas at high-risk for general vandalism, theft

EXHIBIT C: 3RD-Party Review Response

February 23, 2021

Mr. Douglas W. Buchanan
Power Company Manager
Pittsburg Power Company – Island Energy
995 Walnut Ave.
Vallejo, CA 94592

Subject: Utility Security Plan
Regarding: Plan 3rd-Pary Review

Dear Mr. Buchanan –

The Pittsburg Police Department Special Response Unit has performed a review of Island Energy's "Utility Security Plan" in the context of the California Public Utilities (CPUC) approved Decision (D.) 19-01-018, which adopted the Joint IOU / POU Straw Proposal as modified by the CPUC's Risk Assessment and Safety Advisory (RASA) section. We have also performed a site inspection of the subject facilities as outlined in the Utility Security Plan Exhibit B.

The City's police department's Special Response Unit believes it is uniquely qualified to perform an assessment of Island Energy's Utility Security Plan given its ongoing security operations supporting the City's commercial, large industrial and utility related facilities. The City of Pittsburg is host to three (3) significant power generation, substation and transmission related facilities:

1. Former PG&E Power Plant
2. Delta Energy Center
3. Los Medanos Energy Center

This has provided the Special Response Unit with both the experience and insight to understand and evaluate security issues and plans related to the Island Energy distribution system and the Utility Security Plan. In the past, the Special Response Unit has conducted numerous trainings at similar locations, such as Dow Chemical and NRG Energy (Antioch and Pittsburg locations). Part of these trainings have included a review of the physical security of these locations. Furthermore, the Special Response Unit has been provided training throughout the Bay Area (through Urban Shield and other trainings) on conducting site surveys, threat assessments, and security reviews.

Plan Review:

We have reviewed Island Energy's Utility Security Plan and concur with the plan conclusion that the Island energy distribution system, including substations, ductbanks, overhead lines and related facilities do not serve any "Covered Distribution Facilities" as described and defined by CPUC Decision (D.) 19-01-018.

Further, we have reviewed existing facility security measures, the maintenance of those measures, and Island Energy's ongoing plans to further enhance security with sightline improvements, screening fencing, additional lighting, additional security cameras and electronic security devices.

We believe Island Energy's security efforts to be consistent with industry practices and that their ongoing programs to enhance facility security measures do not require additional or special mitigation measures.

Sincerely,

#307

Sgt. Kyle Baker #307
925-252-6464
kbaker@ci.pittsburg.ca.us

EXHIBIT D: Qualified Authority Response

The Utility Physical Security Plan was submitted to the California Office of Emergency Services (CalOES) on February 8, 2021. Their response is pending as of this revision.