

BEFORE THE GOVERNING BOARD OF THE PITTSBURG POWER COMPANY

In the Matter of:

Approving the Annual Wildfire)
Mitigation Plan)

RESOLUTION NO. 21-411

WHEREAS, Pittsburg Power Company (PPC), a joint powers authority, provides retail utility electric and natural gas services on Mare Island, Vallejo, operating under the name Island Energy (IE); and

WHEREAS, state law at California Public Utilities Code Section 8387, added by the state legislature in 2016 and amended by Senate Bill 901 in 2018 and Assembly Bill 1054 in 2019, requires a publicly owned utility to develop, review, update and file a Wildfire Mitigation Plan (Plan) comprised of specified elements by July 1st of each year with the California Wildfire Safety Advisory Board; and

WHEREAS, a Fire Threat Map compiled by the California Public Utilities Commission, as well as local historical fire data and local conditions, indicate that PPC's underground and overhead electrical lines, equipment and related facilities are not located in areas designated as either elevated risk or extreme risk areas for wildfire; and

WHEREAS, PPC has reviewed and made minor adjustments to the Plan from its initial development as utility infrastructure and fire mitigation measures have evolved.

NOW, THEREFORE BE IT RESOLVED that the Governing Board of Pittsburg Power Company hereby approves the Wildfire Mitigation Plan, attached as Exhibit A.

PASSED AND ADOPTED by Governing Board of the Pittsburg Power Company at a regular meeting on the 17th day of May 2021, by the following vote:

AYES: Banales, Killings, Scales-Preston, White, Craft

NOES: None


ABSTAINED: None

ABSENT: None

ATTEST:



Merl Craft, Chair

for 

Garrett Evans, Executive Secretary

PITTSBURG POWER COMPANY

WILDFIRE MITIGATION PLAN

Pittsburg Power Company
is a
California Joint Powers Authority
Providing Electric and Gas Utility Services
on Mare Island Vallejo, CA;
Operating Under the Name of
“Island Energy”

15 MARCH 2021

TABLE OF CONTENTS

I.	Overview	5
	A. Policy Statement.....	5
	B. Purpose of the Wildfire Mitigation Plan	5
	C. Organization of the Wildfire Mitigation Plan	6
II.	Objectives of the Wildfire Mitigation Plan	6
	A. Minimizing Sources of Ignition	6
	B. Resiliency of the Electric Grid	6
	C. Identifying Unnecessary or Ineffective Actions	7
III.	Roles and Responsibilities	7
	A. Utility Governance Structure	7
	B. WILDFIRE PREVENTION	7
	C. WILDFIRE RESPONSE AND RECOVERY	9
	D. Coordination with Water Utilities/Department	9
	E. Coordination With Communication Infrastructure Providers	9
	F. Standardized Emergency Management System.....	10
IV.	Wildfire Risks and Drivers associated with design, construction, operation, and maintenance	11
	A. Particular Risks and Risk Drivers Associated With Topographic and Climatological Risk Factors	11
	B. Enterprisewide Safety Risks	11
	C. Changes to CPUC Fire Threat Map.....	12
V.	Wildfire Preventative Strategies.....	12
	A. High fire threat district.....	12

B.	Weather Monitoring	12
C.	design and Construction Standards.....	13
D.	Vegetation Management.....	13
E.	Inspections.....	15
F.	Workforce training.....	16
G.	Reclosing Policy	16
H.	Deenergization.....	16
1.	Impacts to public safety.....	17
2.	Customer Notification Protocols	17
VI.	Community Outreach and Public Awareness	18
VII.	Restoration of Service	18
VIII.	Evaluating of the Plan.....	18
A.	Metrics and Assumptions for Measuring Plan Performance	18
Metric 1:	Fire Ignitions.....	19
Metric 2:	Wires Down.....	19
B.	Impact of Metrics on Plan	19
C.	Monitoring and Auditing the Plan	19
D.	Identifying and correcting Deficiencies in the Plan.....	20
E.	Monitoring the effectiveness of inspections	20
IX.	Independent Auditor	20
EXHIBIT A	CPUC Fire Threat Map	
EXHIBIT B	Mare Island Service Territory Electrical Distribution Circuits	
EXHIBIT C	CPUC Public Utilities Code 8387	

Revision Log

Date:	Revision:
3/15/2021	Updated Exhibit B. Added "Everbridge" notification to Article III.C

I. OVERVIEW

A. POLICY STATEMENT

Pittsburg Power Company's goal is to provide safe, reliable, and economic electric service to its Mare Island customers. In order to meet this goal, PPC constructs, maintains, and operates its electrical lines and equipment in a manner that minimizes the risk of catastrophic wildfire posed by its electrical lines and equipment.

B. PITTSBURG POWER COMPANY UTILITY OVERVIEW

Pittsburg Power Company ("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". PPC is a joint powers authority.

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 PPC's Station H substation. PPC does not own, operate or manage any transmission facilities.

The PPC Mare Island Utility service territory is outside of California Public Utility Commission ("CPUC") Tier 2 (Elevated) and Tier 3 (Extreme) fire threat zones as defined by the "CPUC Fire Threat Map" adopted by the CPUC on January 18, 2019. Please refer to Exhibit A.

The PPC Utility electric distribution system is an almost exclusively underground system. However, PPC does have approximately 10,480 ft of energized, overhead 12kV distribution lines. Please refer to Exhibit B.

C. PURPOSE OF THE WILDFIRE MITIGATION PLAN

This Wildfire Mitigation Plan describes the range of activities that PPC 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 PPC Board of Directors and its Executive Director and is implemented by the PPC Power Company 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. Please refer to Exhibit C.

In general, PPC's fire prevention and safety efforts conform to the intent of Vallejo's ("City") General Plan and other safety planning efforts and programs implemented by the City. PPC participates in and coordinates directly with the City on such programs.

Mare Island is within the City of Vallejo limits and under the jurisdiction of the City's municipal departments. PPC coordinates directly with the City of Vallejo Public Works, Police and Fire departments on matters related to Utility operations, safety and emergency response on Mare Island, including wildfire response.

D. ORGANIZATION OF THE WILDFIRE MITIGATION PLAN

This Wildfire Mitigation Plan includes the following elements:

- Objectives of the plan;
- Roles and responsibilities for carrying out the plan;
- Identification of key wildfire risks and risk drivers;
- Description of wildfire prevention, mitigation, and response strategies and programs;
- Community outreach and education;
- Metrics for evaluating the performance of the plan and identifying areas for improvement;
- Review and validation of the plan; and
- Timelines

II. OBJECTIVES OF THE WILDFIRE MITIGATION PLAN

A. MINIMIZING SOURCES OF IGNITION

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

B. RESILIENCY OF THE ELECTRIC GRID

The secondary goal of this Wildfire Mitigation Plan is to improve the resiliency of the electric grid. As part of the development of this plan, PPC assesses new industry practices and technologies that will reduce the likelihood of an interruption in service and improve the time frames for restoration of service.

C. IDENTIFYING UNNECESSARY OR INEFFECTIVE ACTIONS

The final goal for this Wildfire Mitigation Plan is to measure the effectiveness of specific wildfire mitigation strategies. Where a particular action, program component, or protocol is determined to be unnecessary or ineffective, PPC will assess whether a facility modification or replacement is merited.

This plan will also help determine if more cost-effective measures would produce the same or improved results.

III. ROLES AND RESPONSIBILITIES

A. UTILITY GOVERNANCE STRUCTURE

Board of Directors: PPC is governed by a “Pittsburg Power Company Board of Directors”. The Board of Directors is comprised of five (5) members, who also serve as the City Council for the City of Pittsburg.

Executive Director: The currently sitting City Manager serves as the Pittsburg Power Company Executive Director.

Director of Community Services: The Director of Community Services serves as PPC’s Department Head.

Power Company Manager: The Power Company Manager is a direct-hire City employee managing the day-to-day activities of the Utility.

B. WILDFIRE PREVENTION

The Utility has a staff of four (4) Utility Technicians – three (3) dedicated to electric operations, one (1) to gas operations. In addition to the Utility Technicians, there is a Linework position and a Maintenance Worker II position.

And in addition to the Power Company Manager, there is an Administrative Officer and Administrative Assistant positions.

The Power Company Manager has the responsibility for the operation of the Utility and the effective implementation and management of the Wildfire Mitigation Plan.

Utility staff perform all forms of distribution system operations and maintenance, including phase checking, switching, system repairs, minor upgrades, metering, system safety inspections assessments and related work.

Vegetation management is supervised by a Utility Technician and performed by the Maintenance Worker II position, other available staff, and contractors as may be required.

Typical vegetation management includes tree trimming per CPUC GO 95, manual and mechanical clearing of brush and grass from around wood poles and rights-of-way, and the limited application of herbicides to prevent recurrence of grasses around wood power poles.

System inspection for hazards or wildfire risk occurs in the normal course of staff business activities. System-wide vegetation reduction and management is performed annually.

Further and in addition to the preceding, the Utility will:

- Operate system in a manner that will minimize potential wildfire risks.
- Take all reasonable and practicable actions to minimize the risk of a catastrophic wildfire caused by PPC electric facilities.
- Coordinate with federal, state, and local fire management personnel as necessary or appropriate to implement PPC's Wildfire Mitigation Plan.
- Immediately report fires, pursuant to existing POU standard practices and the requirements of this Wildfire Mitigation Plan.
- Take corrective action when the staff witnesses or is notified that fire protection measures have not been properly implemented or maintained.
- Comply with relevant federal, state, and industry standard requirements, including the industry standards established by the California Public Utilities Commission.
- Collect and maintain service territory and other relevant POU wildfire data necessary for the implementation of this Wildfire Mitigation Plan.
- Provide regular training programs for employees having obligations for implementation of this Wildfire Mitigation Plan.

C. WILDFIRE RESPONSE AND RECOVERY

PPC Utility staff has the following obligations regarding fire prevention, response and investigation:

- Take all reasonable and practicable actions to prevent and suppress fires resulting from PPC electric facilities.
- Communicate potential risks and expected Utility actions during Red Flag or other emergency warnings.
- The Utility will provide an immediate response to any event causing or having the potential to cause a wildfire or other safety situation.
- The Utility will immediately communicate to City of Vallejo Fire and Police of an event requiring a response by public safety.
- The Utility will further communicate with City of Vallejo Public Works or other City staff as may be necessary.

Public Communication:

Presently, public communication occurs primarily through the PPC Utility website and social media outlets such as Facebook and Mare Island Next Door.

PPC is planning to put in place an “Everbridge” email and text notification system in 2020 to facilitate immediate communication with the public during wildfire and other emergencies.

D. COORDINATION WITH WATER UTILITIES / DEPARTMENT

PPC is in regular communication with the City of Vallejo Water Department in its normal course of business.

During an emergency, the PPC Utility staff would work with the water department to de-energize electrical circuits as may be necessary and provide other general assistance as may be required. The City of Vallejo does not have electric pumping facilities within the PPC service territory.

E. COORDINATION WITH COMMUNICATION INFRASTRUCTURE PROVIDERS

Coordination with communication infrastructure providers would be through incident first responders and through the City of Vallejo Communications Center (911 Call Center).

F. STANDARDIZED EMERGENCY MANAGEMENT SYSTEM

PPC participates in planning, communication, and coordination obligations pursuant to the California Office of Emergency Services' Standardized Emergency Management System ("SEMS") Regulations,¹ adopted in accordance with Government Code section 8607.

The SEMS Regulations specify roles, responsibilities, and structures of communications at five different levels: field response, local government, operational area, regional, and state.² Pursuant to this structure, PPC coordinates and communicates with the relevant safety agencies as well as other relevant local and state agencies.

¹ 19 CCR § 2407.

² Cal. Gov. Code § 2403(b):

(1) "Field response level" commands emergency response personnel and resources to carry out tactical decisions and activities in direct response to an incident or threat.

(2) "Local government level" manages and coordinates the overall emergency response and recovery activities within their jurisdiction.

(3) "Operational area level" manages and/or coordinates information, resources, and priorities among local governments within the operational area and serves as the coordination and communication link between the local government level and the regional level.

(4) "Regional level" manages and coordinates information and resources among operational areas within the mutual aid region designated pursuant to Government Code §8600 and between the operational areas and the state level. This level along with the state level coordinates overall state agency support for emergency response activities.

(5) "State level" manages state resources in response to the emergency needs of the other levels, manages and coordinates mutual aid among the mutual aid regions and between the regional level and state level, and serves as the coordination and communication link with the federal disaster response system.

Under the SEMS structure, planning and preparation is done at the county level, including the coordination of efforts of public and private organizations. Solano County serves as the Operational Area and is guided by the Solano County Office of Emergency Services. Pursuant to the SEMS structure, PPC participates in periodic information, planning and training exercises with both Solano County and the City of Vallejo.

PPC is a member of the California Utility Emergency Association (“CEUA”), which plays a key role in ensuring communications between utilities and the Office of Emergency Services (“OES”) during emergencies.

IV. WILDFIRE RISKS AND DRIVERS ASSOCIATED WITH DESIGN, CONSTRUCTION, OPERATION, AND MAINTENANCE

A. PARTICULAR RISKS AND RISK DRIVERS ASSOCIATED WITH TOPOGRAPHIC AND CLIMATOLOGICAL RISK FACTORS

Within PPC’s service territory and the surrounding areas, the primary risk drivers for wildfire are the following:

- Extended drought
- Vegetation type
- Vegetation Density
- Weather
- High winds
- Terrain
- Changing Weather Patterns (Climate Change)
- Communities or Facilities at Risk
- Fire History

B. ENTERPRISEWIDE FIRE SAFETY RISKS

Enterprise-wide safety risks are almost exclusively limited to the energized overhead distribution system (Exhibit B). Within the overhead distribution system, sections of circuits to the South of the service territory are in areas of moderate to heavy brush. Overhead circuits in the center of the service territory are in areas of some trees. Circuits on the north end of the service territory have no-to-light grasses and similar vegetation.

The underground portion of the distribution system poses low risk of wildfire, as the underground system is in commercial, industrial and residential developed areas. Events in these areas tend to be highly localized and absent dense vegetation.

C. CHANGES TO CPUC FIRE THREAT MAP

PPC does not propose nor believe there to be a need to alter or expand the CPUC Fire Threat Map as it relates to the PPC Utility Service Territory on Mare Island, Vallejo. Please refer to Exhibit A.

V. WILDFIRE PREVENTATIVE STRATEGIES

A. HIGH FIRE THREAT DISTRICT

PPC was not a participant in the development of the California Public Utilities Commission's (CPUC) Fire-Threat Map,³ which designates a High-Fire Threat District.

PPC has self-performed in identifying the areas of PPC's service territory that are at an elevated risk of power line ignited wildfire. The PPC Utility has incorporated the elements of this plan and prudent Utility practice into its construction, inspection, maintenance, repair, and clearance practices, where applicable.

B. WEATHER MONITORING

PPC monitors current and forecasted weather data from several sources including:

- United States National Weather Service
- Local Fire District Warnings
- Utility Electric Metering System Temperature Logging and Forecast

³ Adopted by CPUC Decision 17-12-024.

PPC assigns one of four operating conditions based on the relevant weather data and knowledge of local conditions:

- (1) **Normal:** During normal conditions, no changes are made to operations or work policy.
- (2) **Elevated:** During elevated fire-risk conditions, PPC will periodically monitor both electrical system and weather conditions.
- (3) **Extreme:** During extreme fire-risk conditions, PPC will perform mobile patrols and inspections of the distribution system within areas of high vegetation and fire risk.
- (4) **Red Flag:** If the National Weather Service declares a Red Flag Warning for any portion of PPC's service territory, PPC may selectively de-energize portions of its overhead distribution system.

C. DESIGN AND CONSTRUCTION STANDARDS

PPC's electric facilities are designed and constructed to meet or exceed the relevant federal, state, or industry standard. PPC treats CPUC General Order (GO) 95 as a key industry standard for design and construction standards for overhead electrical facilities. PPC meets or exceeds all standards in GO 95. Additionally, PPC monitors and follows as appropriate the National Electric Safety Code.

D. VEGETATION MANAGEMENT

PPC meets or exceeds the minimum industry standard vegetation management practices. The recommended time-of-trim guidelines do not establish a mandatory standard, but instead provide useful guidance to utilities. PPC will use specific knowledge of growing conditions and tree species to determine the appropriate time of trim clearance in each circumstance.

GO 95, Rule 35, Table 1					
Case	Type of Clearance	Trolley Contact, Feeder and Span Wires, 0-5kv	Supply Conductors and Supply Cables, 750 - 22,500 Volts	Supply Conductors and Supply Cables, 22.5 - 300 kV	Supply Conductors and Supply Cables, 300 - 550 kV (mm)
13	Radial clearance of bare line conductors from tree branches or foliage	18 inches	18 inches	¼ Pin Spacing	½ Pin Spacing
14	Radial clearance of bare line conductors from vegetation in the Fire-Threat District	18 inches	48 inches	48 inches	120 inches

Appendix E Guidelines to Rule 35		
<p>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.</p>		
Voltage of Lines	Case 13	Case 14

Radial clearances for any conductor of a line operating at 2,400 or more volts, but less than 72,000 volts	4 feet	12 feet
Radial clearances for any conductor of a line operating at 72,000 or more volts, but less than 110,000 volts	6 feet	20 feet
Radial clearances for any conductor of a line operating at 110,000 or more volts, but less than 300,000 volts	10 feet	30 feet
Radial clearances for any conductor of a line operating at 300,000 or more volts	15 feet	30 feet

Within higher fire threat areas, PPC performs an evaluation of every tree that has the potential to strike overhead facilities if it were to fail on an estimated annual basis. PPC performs more frequent and detailed inspections of any such trees, and in cases where “hazard trees” (Dead, Dying, Diseased or leaning) could strike the facilities, will work with the City of Vallejo (or property owner) to remove the tree or portion of the tree that poses a risk.

E. INSPECTIONS

PPC meets or exceeds the minimum inspection requirements provided in CPUC GO 165 and CPUC GO 95, Rule 18. Pursuant to these rules, PPC inspects electric facilities in areas of high fire threat more frequently than the other areas of its service territory.

Additionally, PPC staff uses their knowledge of the specific environmental and geographical conditions to determine when areas outside of a higher fire threat area require more frequent inspections.

If PPC staff discovers a facility in need of repair that is owned by an entity other than PPC (such as a Utility customer), PPC will issue a notice to repair to the facility owner and work to ensure that necessary repairs are completed promptly.

PPC works to ensure that all inspections to be performed within its service territory are completed generally in late spring, with mitigation performed not later than September 1st.

PPC monitors drought conditions and other relevant factors throughout the year to determine if inspections should be completed on a shorter timeframe.

F. WORKFORCE TRAINING

PPC has implemented work rules and complementary training programs for its workforce to help reduce the likelihood of the ignition of wildfires.

Specific training includes safety monitoring of system distribution facilities, identification of circuit disconnect / isolation points and right-of-way brush management and removal.

G. RECLOSING POLICY

“Reclosers” are electrical fault detection devices that trip open when detecting an electrical fault, but then “reclose” the circuit to test if the fault was temporary. PPC does not currently employ the use of ‘reclosers’ within its service territory and does not have plans to add such devices in the future.

H. DE-ENERGIZATION

PPC has the authority to preemptively shut off power due to fire-threat conditions; however, this option will only be used in extraordinary circumstances. PPC will make a case-by-case decision to shut off power based on the following considerations:

- Red Flag Warnings issued by the National Weather Service for fire weather zones that contain PPC circuits;
- PPC staff assessments of local conditions, including wind speed (sustained and gust), humidity and temperature, fuel moisture, fuel loading and data from weather stations;
- Real-time information from staff located in areas identified as at risk of being subject to extreme weather conditions;
- Input from PPC fire experts and vegetation experts;
- Input from local and state fire authorities regarding the potential consequences of wildfires in select locations;
- Alternative ways to reroute power to affected areas;
- Awareness of mandatory or voluntary evacuation orders in place;
- Expected impact of de-energizing circuits on essential services;

- Other operational considerations to minimize potential wildfire ignitions, including the blocking of reclosers on the identified circuit(s);
- On-going fire activity throughout PPC territory and California;
- Ability to notify customers;
- Notifications to local governments and public officials; and
- Potential impacts to communities and customers

I. IMPACTS TO PUBLIC SAFETY

In the event of the need to shut off power within the service territory, or when PG&E's supply of power to PPC is shutoff, the following may be impacted.

- Customers with special medical devices requiring power and not having backup.
- Streetlights and traffic signals are out
- US Coast Guard ship traffic radar station is out
- G Street Causeway Bridge inoperable

Note that many critical facilities within the Utility service territory have back-up generation, including the VA Medical Clinic, US Coast Guard communications facility and Bay Ferry terminal. There are no primary police or fire facilities within the Utility service territory.

J. CUSTOMER NOTIFICATION PROTOCOLS

The basic protocols for customer notification remain telephone, email, the Utility website and social media.

Customers will be notified in advance of a planned shutdown, whether by the Utility or by PG&E – to the extent PPC is made aware of or can anticipate a grid-wide shutdown event.

Future customer and public notification schemes include 'Everbridge' email and text notifications.

VI. COMMUNITY OUTREACH AND PUBLIC AWARENESS

PPC has performed community outreach regarding wildfire and power outage risk in three ways:

1. PPC drafted and issued a statement regarding the potential for power interruptions on Mare Island due to wildfire risk. The statement was posted on the Utility website and distributed via social media (Mare Island Next Door). PPC will also be using the Everbridge communications platform for public outreach beginning 3Q2020.
2. Responding to individual customer inquiries regarding the potential for power interruptions.
3. Fiscal Year new rate schedule Public Hearing on Mare Island

Going forward, other public meetings and tools such as 'Everbridge' will be employed. PPC will also continue to use social media to communicate important public and customer information.

VII. RESTORATION OF SERVICE

Restoration of electric distribution services will be per PPC Utility operation procedures. Such procedures include, but are not limited to:

1. Inspect involved facilities and any related facilities for damage and/or operability. Perform repairs or replacement as may be necessary.
2. Check relay protections and circuit breaker status for correct setting / position.
3. Confirm circuit phasing.
4. Perform circuit switching per switching protocol.
5. Confirm restoration and normal operation of system.
6. Perform final safety check.

VIII. EVALUATING OF THE PLAN

A. METRICS AND ASSUMPTIONS FOR MEASURING PLAN PERFORMANCE

PPC will track two metrics to measure the performance of this Wildfire Mitigation Plan: (1) number of fire ignitions; and (2) wires down within the service territory.

METRIC 1: FIRE IGNITIONS

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

- A PPC facility was associated with the fire;
- The fire was self-propagating and of a material other than electrical and/or communication facilities;
- The resulting fire traveled greater than one linear meter from the ignition point; and
- PPC has knowledge that the fire occurred.

In future Wildfire Mitigation Plans, PPC 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

The second metric is the number of distribution and transmission wires downed within PPC's service territory. For purposes of this metric, a "wires down" event includes any instance where an electric transmission or primary distribution conductor falls to the ground or on to a foreign object. PPC will divide the wires down metric between wires down inside and outside of the High Fire Threat District.

PPC will not normalize this metric by excluding unusual events, such as severe storms or vandalism – such as attempted copper theft. Instead, PPC will supplement this metric with a qualitative description of any such unusual events.

B. IMPACT OF METRICS ON PLAN

In the initial years, PPC anticipates that there will be relatively limited data gathered through these metrics. However, as the data collection history becomes more robust, PPC will be able to identify areas of its operations and service territory that are disproportionately impacted. PPC will then evaluate potential improvements to the plan.

C. MONITORING AND AUDITING THE PLAN

This Wildfire Mitigation Plan will be presented to the PPC Board of Directors which will conduct a Public Hearing on the plan. PPC will present this plan to Board of Directors on an annual basis.

D. IDENTIFYING AND CORRECTING DEFICIENCIES IN THE PLAN

Deficiencies in the plan will be identified by ongoing distribution system safety reviews, field operations, and identified 'lessons learned' from other POU's.

Responsibility for correcting deficiencies within the plan and implementing corrective actions or plans will be the responsibility of the Power Company Manager.

E. MONITORING THE EFFECTIVENESS OF INSPECTIONS

PPC will monitor the effectiveness of its inspections through written reports and periodic field verification by others, including the Power Company Manager.

IX. INDEPENDENT AUDITOR

Public Utilities Code section 8387(c) requires PPC to engage with a qualified independent evaluator with experience in assessing the safe operation of electrical infrastructure to review and assess the comprehensiveness of this Wildfire Mitigation Plan. The independent evaluator must issue a report that is posted to PPC's website. This report must also be presented to PPC Board of Directors at a public hearing.

PPC has selected a qualified independent evaluator with experience in assessing the safe operation of electrical distribution infrastructure and related facilities.

The evaluator is familiar with the PPC Utility service territory and Utility operations and has performed safety audits and training of Utility Technician personnel for PPC. The auditor has detailed and specific knowledge of the requirements of California Senate Bill 901 and California Public Utilities Code 8387.

EXHIBIT A

**CPUC Fire-Threat Map
Adopted by CPUC January 19, 2018**

The data portrayed in the CPUC Fire-Threat Map were developed under Rulemaking 15-05-006, following procedures in Decision (D.) 17-03-009, revised by D.17-06-024, which adopted a work plan for the development of a utility High Fire-Threat District (HFTD) for application of enhanced fire safety regulations. The aforementioned decisions ordered that the HFTD be comprised of two individual map products. One of those map products is this CPUC Fire-Threat Map. The CPUC Fire-Threat Map depicts areas where enhanced fire safety regulations found in Decision 17-12-024, will apply. The final CPUC Fire-Threat Map was submitted to the Commission via a Tier 1 Advice Letter that was adopted by the Commission's Safety and Enforcement Division (SED) with a disposition letter on January 19, 2018. All data and information portrayed on the CPUC Fire-Threat Map are for the expressed use called out in D.17-12-024, and any other use of this map are not the responsibility or endorsed by the Commission or its supporting Independent Review Team.

Fire-Threat Areas

- Tier 2 - Elevated
- Tier 3 - Extreme
- Counties

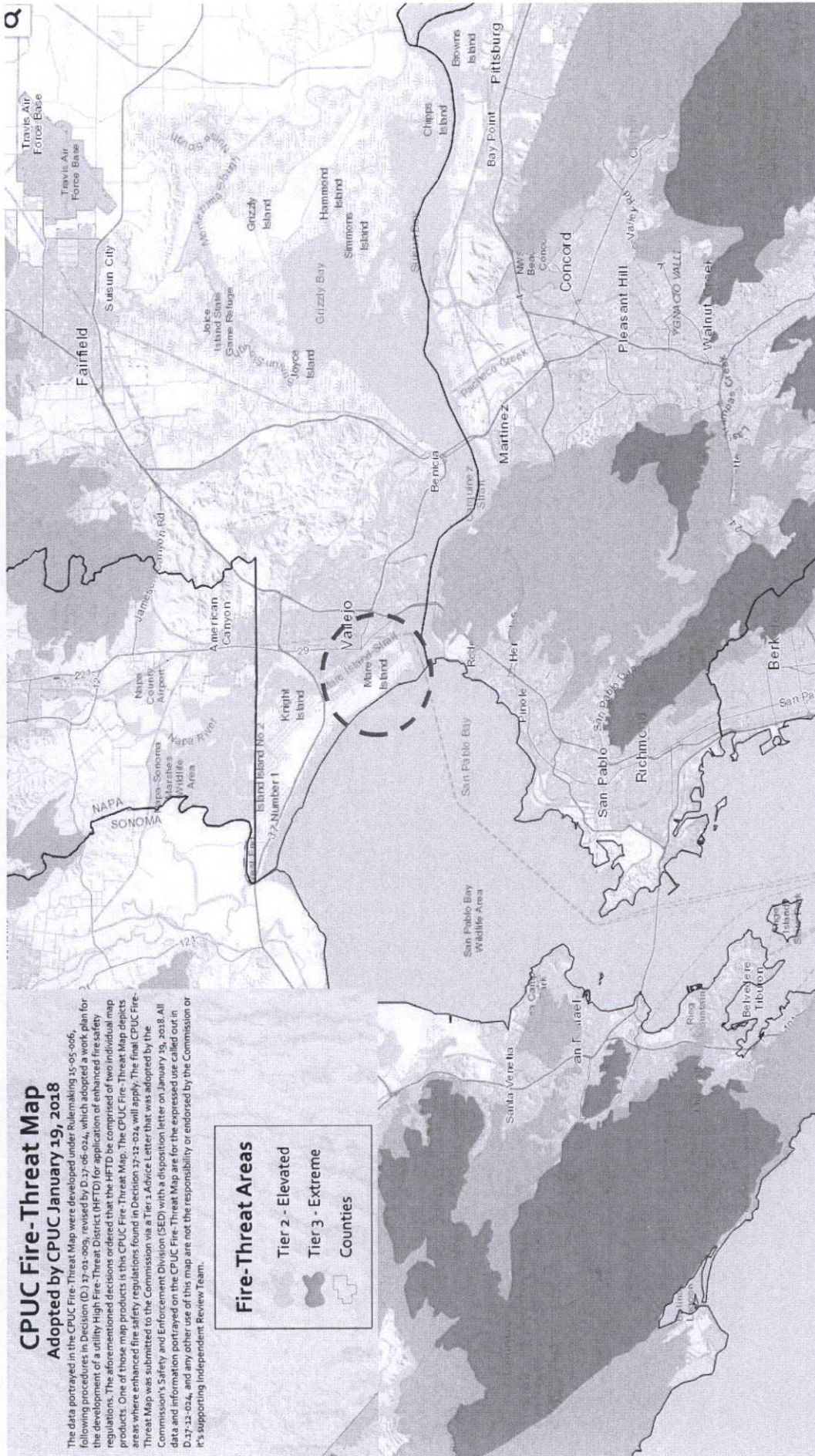


EXHIBIT B



EXHIBIT C

PUBLIC UTILITIES CODE - CPUC

DIVISION 4.1. PROVISIONS APPLICABLE TO PRIVATELY OWNED AND PUBLICLY OWNED PUBLIC UTILITIES [8301 - 8390] (Heading of Division 4.1 amended by Stats. 1988, Ch. 1560, Sec. 2.)

CHAPTER 6. Wildfire Mitigation [8385 - 8389] (Chapter 6 added by Stats. 2016, Ch. 598, Sec. 1.)

8387.

(a) Each local publicly owned electric Utility and electrical cooperative shall construct, maintain, and operate its electrical lines and equipment in a manner that will minimize the risk of wildfire posed by those electrical lines and equipment.

(b) (1) The local publicly owned electric Utility or electrical cooperative shall, before January 1, 2020, prepare a wildfire mitigation plan. After January 1, 2020, a local publicly owned electric Utility or electrical cooperative shall prepare a wildfire mitigation plan annually and shall submit the plan to the California Wildfire Safety Advisory Board on or before July 1 of that calendar year. Each local publicly owned electric Utility and electrical cooperative shall update its plan annually and submit the update to the California Wildfire Safety Advisory Board by July 1 of each year. At least once every three years, the submission shall be a comprehensive revision of the plan.

(2) The wildfire mitigation plan shall consider as necessary, at minimum, all of the following:

(A) An accounting of the responsibilities of persons responsible for executing the plan.

(B) The objectives of the wildfire mitigation plan.

(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 consideration of dynamic climate change risks.

(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.

(E) A discussion of how the application of previously identified metrics to previous wildfire mitigation plan performances has informed the wildfire mitigation plan.

(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.

(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.

(H) Plans for vegetation management.

(I) Plans for inspections of the local publicly owned electric Utility's or electrical cooperatives electrical infrastructure.

(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:

(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.

(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.

(L) A methodology for identifying and presenting enterprise-wide safety risk and wildfire-related risk.

(M) A statement of how the local publicly owned electric Utility or electrical cooperative will restore service after a wildfire.

(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.

(3) The local publicly owned electric Utility or electrical cooperative shall, on or before January 1, 2020, and not less than annually thereafter, present its wildfire mitigation plan in an appropriately noticed public meeting. The local publicly owned electric Utility or electrical cooperative shall accept comments on its wildfire mitigation plan from the public, other local and state agencies, and interested parties, and shall verify that the wildfire mitigation plan complies with all applicable rules, regulations, and standards, as appropriate.

(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 website 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.

(Amended by Stats. 2019, Ch. 79, Sec. 20. (AB 1054) Effective July 12, 2019.)



**OFFICE OF THE CITY MANAGER/EXECUTIVE DIRECTOR
65 Civic Avenue
Pittsburg, CA 94565**

TO: Chair and Governing Board Members
FROM: Garrett Evans, Executive Director
SUBJECT: Adoption of a Pittsburg Power Company Resolution Approving the Annual Wildfire Mitigation Plan
MEETING DATE: May 17, 2021

EXECUTIVE SUMMARY

Pittsburg Power Company (PPC), a joint powers authority, provides retail utility electric and natural gas services on Mare Island, Vallejo in the name of Island Energy (IE).

State law, California Public Utilities Code Section 8387, requires all publicly owned electric utilities to develop, review, update and file a Wildfire Mitigation Plan (Plan). The Plan is to be filed with the California Wildfire Safety Advisory Board (WSAB) by July 1st of each year.

FISCAL IMPACT

Approval of the Plan has no direct fiscal impact to the City and the General Fund. Funds for managing the Plan, including inspections, brush removal and other mitigation will be from IE's annual electric rate case proceedings and operating budget as approved by the Governing Board of the PPC each fiscal year.

RECOMMENDATION

The Governing Board of the PPC approve the annual Wildfire Mitigation Plan.

BACKGROUND

California Public Utilities Code Section 8387 was added in 2016 and amended by Senate Bill 901 in 2018 and by Assembly Bill 1054 2019, expanding the requirements of the existing wildfire mitigation efforts of electric utilities. Local publicly owned electric utilities are now required to prepare a Plan with specified elements and receive comments from the public and stakeholders, obtain an independent evaluation of the report, and submit it to the newly created California Wildfire Safety Advisory Board.

PPC's initial plan was developed in late 2019 and received comments from key stakeholders and was also independently evaluated. The WSAB is not requiring stakeholder review, public comment or independent evaluation for the 2021 Plan update.

SUBCOMMITTEE FINDINGS

The update to the 2021 Wildfire Mitigation Plan was not presented to the PPC Subcommittee.

STAFF ANALYSIS

The "Fire Threat Map" compiled by the California Public Utilities Commission, as well as local historical fire data and local conditions, indicate that PPC's underground and overhead electrical lines, equipment and related facilities are not located in areas designated as either elevated risk or extreme risk areas for wildfire.

However, for those portions of the utility's underground and overhead distribution system that are in areas of potential local fire risk, PPC's Plan employs vegetation management and infrastructure inspections in its routine preventive maintenance activities for these electrical lines and related facilities.

The Plan addresses all the elements required by California Public Utilities Code Section 8387. The initial Plan was reviewed by a qualified independent evaluator, who issued a summary report. PPC also received comments from the Solano County Office of Emergency Services, CalFire and the City of Vallejo Fire Department on the initial Plan draft, and their comments were incorporated.

The Wildfire Mitigation Plan is implemented as part of PPC's routine safety inspection and electrical system preventive maintenance activities to minimize the risk of its overhead electrical lines and equipment potentially causing a fire.

ATTACHMENTS: Resolution
2021 Wildfire Mitigation Plan

Report Prepared By: Douglas Buchanan, Power Company Manager