

CITY OF CERRITOS

RESOLUTION NO. 2020-12

A RESOLUTION OF CITY OF CERRITOS ADOPTING INDEPENDENT EVALUATOR'S REPORT OF THE CERRITOS ELECTRIC UTILITY ANNUAL WILDFIRE MITIGATION PLAN

WHEREAS, Cerritos Electric Utility is authorized under Public Utilities Code Section 366.1 to serve as a community aggregator on behalf of retail end-use customers in its jurisdiction; and

WHEREAS, the City of Cerritos operates a community aggregator; and

WHEREAS, Cerritos Electric Utility is generally subject to the legislative and regulatory requirements applicable to local publicly owned electric utilities (POUs); and

WHEREAS, Senate Bill (SB) 1028 (stats. 2016), adding California Public Utilities Code, Section 8387, requires each POU to 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; and

WHEREAS, SB 901 (stats. 2018), amended California Public Utilities Code Section 8387, requires all POUs to prepare a Utility Wildfire Mitigation Plan before January 1, 2020, and annually thereafter; and

WHEREAS, the City of Cerritos City Council approved and adopted the Cerritos Electric Utility Annual Wildfire Mitigation Plan (exhibit 1) at the November 25, 2019 City Council Meeting;

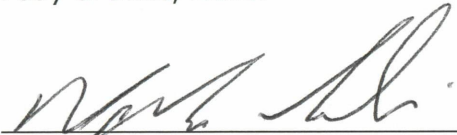
WHEREAS, California Public Utilities Code Section 8387(c) requires each POU to have a qualified independent evaluator review its Wildfire Mitigation Plan to assess the comprehensiveness of its plan and to issue a report that is made available on the POU's website and presented at a public meeting; and

WHEREAS, an independent evaluator, Fuentes Consulting LLC, has performed a comprehensive review of the Cerritos Electric Utility Annual Wildfire Mitigation Plan ("Independent Evaluator's Report") (exhibit 2) and determined that the plan meets the requirements of California Public Utilities Code Section 8387; and

NOW, THEREFORE, THE CITY OF CERRITOS CITY COUNCIL DOES FIND, DETERMINE AND DECLARE AS FOLLOWS:

Section 1. The Cerritos City Council, pursuant to California Public Utilities Code Section 8387, adopts the Independent Evaluator's Report, dated April 27, 2020.

PASSED, APPROVED and ADOPTED this 8th day of June, 2020.



Naresh Solanki, Mayor

ATTEST:



Vida Barone, City Clerk/Treasurer



CERRITOS ELECTRIC UTILITY WILDFIRE MITIGATION PLAN

VERSION 1.7

November 25, 2019

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I. OVERVIEW

A. POLICY STATEMENT

Cerritos Electric Utility's (CEU) overarching goal is to provide safe, reliable, and economic electric service to its local community. In order to meet this goal, CEU uses Southern California Edison (SCE) to deliver the power that is generated by CEU resources. Electric utilities that own electrical infrastructure are required by California Public Utilities Code 8386 (a) to construct, maintain, and operate their electrical lines and equipment in a manner that minimizes the risk of catastrophic wildfire posed by its electrical lines and equipment.¹

B. PURPOSE OF THE WILDFIRE MITIGATION PLAN

CEU does not own any electrical lines or equipment in the City of Cerritos or in any other area of the state. CEU is located in a region of the state with a very low wildfire risk. No part of CEU's service territory is located in or near the High Fire-Threat District designated in the California Public Utilities Commission's (CPUC) Fire-Threat Map and all of CEU's service territory is designated as "non-fuel" or "moderate" in the California Department of Forestry and Fire Protection's (CALFIRE) Fire and Resource Assessment Program (FRAP) Fire-Threat Map.

Despite this low risk, CEU takes appropriate actions to help its region prevent and respond to the increasing risk of wildfires. In its role as a public agency, CEU closely coordinates with other local safety and emergency officials to help protect against fires and respond to emergencies. This Wildfire Mitigation Plan describes the safety-related measures that CEU follows to reduce its risk of causing wildfires.

C. ORGANIZATION OF THE WILDFIRE MITIGATION PLAN

CEU does not own any electrical lines, supply system, or equipment and CEU is located in a region of the state with a very low wildfire risk. SCE owns and operates the electrical delivery system within the City of Cerritos. Therefore, CEU's Wildfire Mitigation Plan included the following elements:

- CEU does not own any electrical system infrastructure in the City of Cerritos. SCE owns and maintains the electrical system infrastructure within City of Cerritos territory and delivers power to CEU customers. Therefore, CEU will depend on SCE's Wildfire Mitigation Plan to cover Public Safety Power Shutoffs (PSPS);
- CEU has shared City of Cerritos emergency contact information with SCE as part of SCE PSPS.

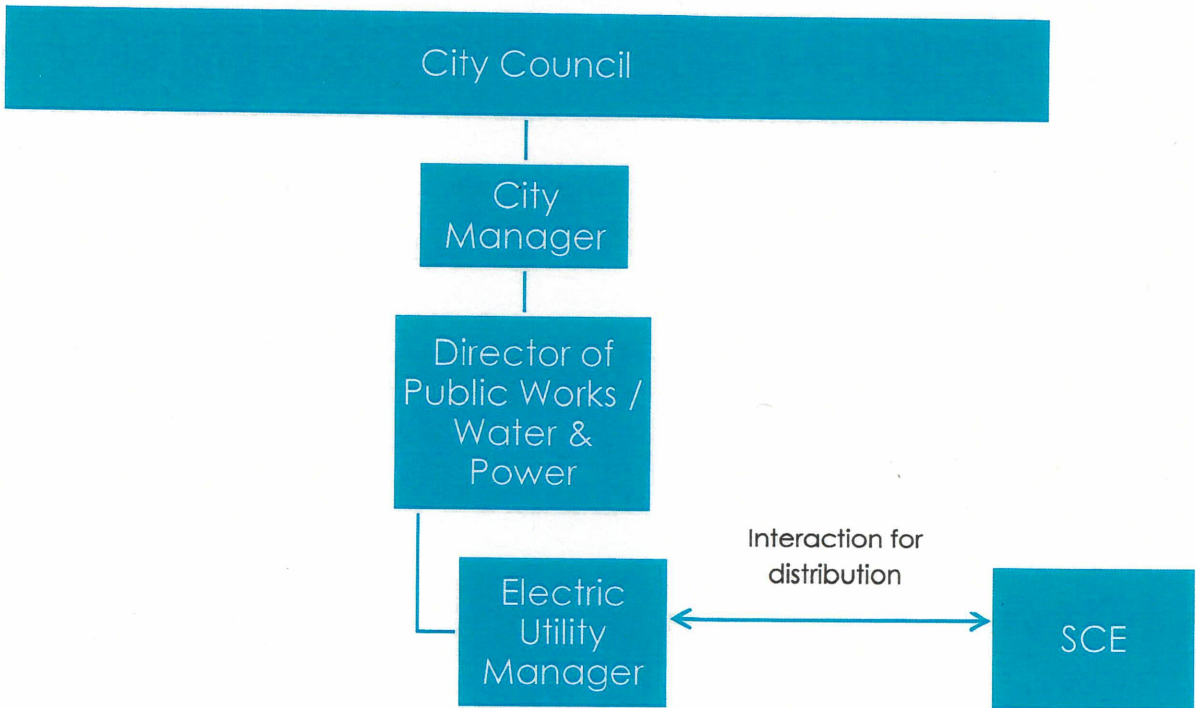
¹ Cal. Pub. Util. Code § 8386(a).

II. OBJECTIVES OF THE WILDFIRE MITIGATION PLAN

The primary goal of this Wildfire Mitigation Plan is to describe CEU's unique status of not possessing any electrical system infrastructure and to bring attention to SCE's existing programs, practices, and measures that effectively reduce the probability that SCE electric supply system could be the origin or contributing source for the ignition of a wildfire. To support this goal, CEU will regularly contact SCE to evaluate its physical assets, operations, and training in an effort to help reduce the risk of SCE equipment-related fires.

III. ROLES AND RESPONSIBILITIES

A. UTILITY GOVERNANCE STRUCTURE



The Cerritos City Council is the governing board for Cerritos Electric Utility.

B. WILDFIRE PREVENTION

CEU does not own any electrical system infrastructure in the City of Cerritos. Because SCE owns and maintains the electrical system infrastructure that delivers electricity to CEU's customers, SCE is responsible for complying with applicable standards and regulations, including General Orders (GO) 95, 128, 165, and 174. In the past several years, SCE has completed clearance trims on trees to maintain a safe distance from the power lines on its own.

The City of Cerritos General Plan 2004 contains guidelines and policies that serve as the City's vision for future planning and development. Mitigation projects defined in the Hazard Mitigation Plan will be required to align with the objectives outlined in the Safety Element of the General Plan.²

The City of Cerritos adopted its original Natural Hazards Mitigation Plan in 2004 and updated the plan in October 2016 where it includes City of Cerritos Fire Hazards.

C. WILDFIRE RESPONSE AND RECOVERY

Large wildfire response and recovery will be managed according to the City of Cerritos Emergency Operation Plan (EOP). During a wildfire emergency, the City Manager leads the City's response as the Director of Emergency Services. The City of Cerritos is a part of the Los Angeles County Operational Area (OA), which includes the County and its political subdivisions (e.g., cities and special districts). In accordance with Standard Emergency Management System (SEMS) and the National Incident Management System (NIMS), the City of Cerritos sends requests for additional support through the OA and its designated emergency management organization, which is under the Los Angeles County's Office of Emergency Management. In the event that the OA cannot meet the needs of the City, requests are then sent to the Region, State, and Federal levels in accordance with SEMS/NIMS.

² City of Cerritos, Hazard Mitigation Plan

D. STANDARDIZED EMERGENCY MANAGEMENT SYSTEM

As a local governmental agency,³ the City of Cerritos has planning, communication, and coordination obligations pursuant to the California Office of Emergency Services' Standardized Emergency Management System ("SEMS") regulations,⁴ 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.⁵ Pursuant to this structure, the City of Cerritos annually coordinates and communicates with the relevant safety agencies as well as other relevant local and state agencies. CEU's role is to coordinate with SCE on the PSPS program during fire-threat conditions.

Under the SEMS structure, a significant amount of preparation is done through advanced planning at the county level, including the coordination effort of public, private, and nonprofit organizations. Los Angeles County serves as the Operational Area and is guided by the Los Angeles County Office of Emergency Management, which is made up of the County and its political subdivisions. The Operational Area includes local and regional organizations that bring relevant expertise to the wildfire prevention and recovery planning process.

Pursuant to the SEMS structure, CEU participates in annual training exercises to simulate actual emergencies. These exercises typically involve complete staffing of emergency management personnel and are designed not only to exercise procedures, but also to test the readiness of personnel, communications, and facilities. EOC Functional Exercises are typically conducted at least once per year in the City of Cerritos.

³ As defined in Cal. Gov. Code § 8680.2.

⁴ 19 CCR § 2407.

⁵ 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.

Planning alone will not achieve preparedness or build and maintain resilience. Training and exercising are essential to make emergency operations personnel and their support systems operationally ready.

As a member of the Operational Area (OA), all agency and department staff who have designated roles in an emergency (e.g., field and EOC responders) must receive appropriate SEMS, NIMS, and other specialized training as required by SEMS regulations, NIMS policy, or their job function, respectively. CEU staff participate in City of Cerritos Emergency Services coordinated training.⁶

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

While the City of Cerritos and its surrounding cities are urbanized, it is possible for brush fires to spread and pose a threat to the area. Since the City of Cerritos consists of urban terrain, the expected type of fire is an urban fire. Urban fires often consume buildings with the potential to spread to adjoining buildings. According to the City of Cerritos Hazard Mitigation Plan, major urban fires are highly unlikely.

B. ENTERPRISE-WIDE SAFETY RISKS

The City of Cerritos Hazard Mitigation Plan wildfire risk assessment consists of four steps: Hazard Identification, Hazard Profiling, Asset Inventory, and Loss Estimates. The Risk Assessment provides a foundation for the evaluation of wildfire mitigation measures that can help reduce the impacts of a potential wildfire event.

The first step was to identify all the natural and man-made hazards that might affect the City and subsequently narrow the list to the hazards that are most likely to occur. These hazards include natural, technical, and human-caused events with an emphasis on the effect of natural disasters on critical facilities, services, and roadways (e.g., government buildings, schools, and public services including police and fire). The Steering Committee participated in a Hazard Identification Workshop during the first Steering Committee Meeting to identify and rank the potential hazards within the City of Cerritos.

The second step was to profile hazard events. The hazard event profiles consist of either a map indicating the area impacted by each hazard or key information regarding the characteristics of hazard events within the planning area. To develop detailed hazard profiles, relevant open-source hazard studies and mapping projects were reviewed and documented within this report. In addition, the City of Cerritos supplied historical accounts of man-made hazard events (e.g.

⁶ City of Cerritos, Emergency Operation Plan

transportation incidents, etc.) that included specific hazard and emergency information. This planning step also determined the magnitude, frequency, and location characteristics of relevant natural hazards (urban fire, fault locations, flood plains, etc.) that were utilized as the design-basis for the loss estimates.

The third step was to inventory assets. The purpose of this step was to determine the quantity of buildings, people, and assets in the City of Cerritos that lie in the different hazard areas and what proportion of the City this represents. The asset inventory was completed utilizing spatial Geographic Information Systems (GIS) asset locations and specifications for the following two asset categories: General Buildings (City well sites, civic buildings, parks, etc.) and Critical Facilities (hazmat facilities, schools, etc.). The development of the comprehensive inventory facilitated the development of loss estimates for all hazard scenarios.

The final step was estimating losses. The loss estimate step relied on detailed information regarding the hazard probability and maps that were completed as part of the hazard profiles. This information was utilized to apply the hazard probabilities and recurrence intervals to the City's assets and inventory (buildings and infrastructure). This step was critical in determining which assets were subject to the greatest potential damages and which hazard event was likely to produce the greatest potential losses. The HAZUS-MH software package, which implements the FEMA-developed methodology and runs on a GIS platform, was utilized to map and display earthquake hazard data, as well as the results of damage and economic loss estimates for buildings and infrastructure within the City. To estimate potential losses for the remaining hazards, detailed spreadsheets, including the asset inventory and potential hazards, were used to find the monetary impact of each hazard to the City of Cerritos. In estimating losses, HAZUS-MH and the spreadsheets take into account various impacts of a hazard event such as, Physical damage (damage to public buildings, schools, critical facilities, and infrastructure); Economic loss (lost jobs, business interruptions, repair and reconstruction costs); and Social impacts (impacts to people, including requirements for shelters and medical aid).

The conclusion of this step precipitated a comprehensive loss estimate (vulnerability assessment) for each identified hazard for each specific asset in terms of damages, economic loss, and the associated consequences for the City of Cerritos.

V. WILDFIRE PREVENTATIVE STRATEGIES

A. HIGH FIRE THREAT DISTRICT

No part of CEU service territory is located in or near the High Fire Threat District identified in the California Public Utilities Commission's (CPUC) Fire-Threat Map and all of CEU service territory is designated as "non-fuel" or "moderate" in the California Department of Forestry and Fire Protection's (CALFIRE) Fire and Resource Assessment Program (FRAP) Fire-Threat Map.

CEU directly participated in the development of the CPUC's Fire-Threat Map.⁷ In the map development process, CEU coordinated with Southern California Edison Company (SCE) and determined that because CEU does not own any electrical system infrastructure, SCE would serve as the territory lead for the region served by CEU.⁸

B. DE-ENERGIZATION

De-energization will be covered under SCE's Public Safety Power Shutoff (PSPS) program, which is described in more detail in SCE's Wildfire Mitigation Plan. SCE has the authority to preemptively shut off power due to fire-threat conditions. This option will only be used in extraordinary circumstances.

VI. RESTORATION OF SERVICE

Because CEU does not own any electrical system infrastructure in the City of Cerritos, SCE is responsible for any restoration of service after a PSPS event or other outage.

VII. EVALUATION OF THE PLAN

A. METRICS AND ASSUMPTIONS FOR MEASURING PLAN PERFORMANCE

Because CEU does not own any electrical system infrastructure, CEU cannot use a wires down or ignition based metric. CEU will evaluate alternative options for measuring the effectiveness of this Wildfire Mitigation Plan in future years.

B. MONITORING AND AUDITING THE PLAN

This Wildfire Mitigation Plan will be presented to the Cerritos City Council and CEU will present updates to the plan on an annual basis. Additionally, a qualified independent evaluator will present a report on this plan to the Cerritos City Council at a future date.

C. IDENTIFYING AND CORRECTING DEFICIENCIES IN THE PLAN

Based on the recommendations of the Cerritos City Council, CEU will correct any identified deficiencies.

D. MONITORING THE EFFECTIVENESS OF INSPECTIONS

Because CEU does not own any electrical system infrastructure, there are no relevant inspections on CEU facilities to describe in this section.

⁷ Adopted by CPUC Decision 17-12-024.

⁸ SCE Wildfire Mitigation Plans, February 6, 2019



April 27, 2020

Ramzi Raufdeen
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Dear Mr. Raufdeen:

As an introduction, I am the owner and president of Fuentes Consulting LLC, a utility consulting business that focuses on providing technical, subject matter expertise and litigation opinions to the electric transmission and distribution utility industry.

I have 36 years of experience in the utility industry, including the Sacramento Municipal Utility District as a Grid Assets Line Supervisor of Business Operations. My professional focus has been utility operations, safety initiatives and developing related training programs.

I am presently engaged in assisting utilities in the development of and review of their CPUC mandated "Wildfire Mitigation Plan" (WMP) in accordance with SB 901, AB1054 and the related Public Utilities Codes §8386(c) and §8387. My most recent clients are the Imperial Irrigation District (IID) and Island Energy (A subsidiary of Pittsburg Power), with Wildfire Mitigation Plan consulting services that include, but are not limited to:

- Reviewing drafts of Utility's WMP
- Identify Plan improvements
- Submitting an independent review to the utility's Board of Directors
- Identify areas of ecological system change / risk areas
- Ensuring that all applicable areas of the utility's WFMP is in accordance with the CPUC's regulations and California law.



Fuentes Consulting LLC has been retained by the City of Cerritos to provide an independent professional consultant review of the Cerritos Electric Utility's (CEU) Wildfire Mitigation Plan as it relates to their electric utility operations. The following plan review takes into consideration the unique relationship with Southern California Edison as the owner and operator of the City of Cerritos's electrical infrastructure; Fuentes Consulting LLC comments and recommendations are provided in the executive summary at the end of the review.

The Cerritos Electric Utility serves approximately 368 customer accounts and provides approximately 73 million kilowatt-hours of energy every year. The CEU's Wildfire Mitigation Plan contains the required elements listed in the provision of SB 901 and AB 1054 related to our review, and Public Utilities Code Section 8386(c) and 8387. CEU uses Southern California Edison (SCE) to deliver the power that is generated by CEU resources.

The entire wildfire mitigation plan was reviewed along with similar elements of the SCE plan as it relates to the CEU. The following topics provided the essential information needed by the consultant to develop the basis of his opinion in deciding that the plan meets the necessary regulations as stipulated by the State of California and the CPUC.

Purpose of the Wildfire Mitigation Plan

CEU does not own any electrical lines or equipment in the City of Cerritos or in any other area of the state. CEU is located in a region of the state with a very low wildfire risk.

Organization of the Wildfire Mitigation Plan

SCE owns and operates the electrical delivery system within the City of Cerritos.

Therefore, CEU's Wildfire Mitigation Plan included the following elements:

- CEU does not own any electrical system infrastructure in the City of Cerritos. SCE owns and maintains the electrical system infrastructure within City of Cerritos territory and delivers power to CEU customers. Therefore, CEU will depend on SCE's Wildfire Mitigation Plan to cover Public Safety Power Shutoffs (PSPS);
- CEU has shared City of Cerritos emergency contact information with SCE as part of SCE PSPS.



Objectives of the Wildfire Mitigation Plan

The primary goal of this Wildfire Mitigation Plan is to describe CEU's unique status of not possessing any electrical system infrastructure and to bring attention to SCE's existing programs, practices, and measures that effectively reduce the probability that SCE electric supply system could be the origin or contributing source for the ignition of a wildfire. To support this goal, CEU will regularly contact SCE to evaluate its physical assets, operations, and training in an effort to help reduce the risk of SCE equipment-related fires.

Wildfire Prevention

- SCE owns and maintains the electrical system infrastructure that delivers electricity to CEU's customers, SCE is responsible for complying with applicable standards and regulations, including General Orders (GO) 95, 128, 165, and 174.
- The City of Cerritos adopted its original Natural Hazards Mitigation Plan in 2004 and updated the plan in October 2016 where it includes City of Cerritos Fire Hazards.

Wildfire Preventative Strategies

No part of CEU service territory is located in or near the High Fire Threat District identified in the California Public Utilities Commission's (CPUC) Fire-Threat Map and all of CEU service territory is designated as "non-fuel" or "moderate" in the California Department of Forestry and Fire Protection's (CALFIRE) Fire and Resource Assessment Program (FRAP) Fire-Threat Map.

CEU directly participated in the development of the CPUC's Fire-Threat Map.⁷ In the map development process, CEU coordinated with Southern California Edison Company (SCE) and determined that because CEU does not own any electrical system infrastructure, SCE would serve as the territory lead for the region served by CEU.

De-energization

De-energization will be covered under SCE's Public Safety Power Shutoff (PSPS) program, which is described in more detail in SCE's Wildfire Mitigation Plan. SCE has the authority to preemptively shut off power due to fire-threat conditions. This option will only be used in extraordinary circumstances.



Executive Summary

The City of Cerritos Wildfire Mitigation Plan has met the necessary requirements as stated in SB 901 and AB 1054, and Code Sections §8386(c) and §8387.

CEU should consider adding more language in the plan to provide a more thorough description of the agreement with SCE as it pertains to public outreach and areas that deal with public communication.

Fuentes Consulting LLC makes the following recommendations

- **De-energization** – Although SCE is responsible for PSPS's (Public Safety Power Shutoffs), CEU should include in their plan the following:
 - How CEU works and coordinates with SCE on the expected impact of de-energizing circuits on essential services?
 - How CEU will notify its customers, local agencies and public officials about de-energization operations by SCE?
 - What are the potential impacts to the community?
- **Impacts to public safety** – The plan should include special considerations of the public safety impact of shutting off power.
- **Customer Notification Protocols** – a description of how the CEU communicates to their customers.
- **Community Outreach and Public Awareness** - describe how CEU works with SCE to provide outreach to the community including any public meetings or public service announcements.
- **SCE** – Continue collaborating and coordinating with SCE as they revise and update their WFMP in order to stay current presently and in the future.

Sincerely,

Maximo M. Fuentes

Maximo M. Fuentes - Owner

STATE OF CALIFORNIA)
COUNTY OF LOS ANGELES) ss.
CITY OF CERRITOS)

I, Vida Barone, City Clerk of the City of Cerritos, California, DO HEREBY CERTIFY that the foregoing **Resolution No. 2020-12** was duly approved and adopted by the City Council of the City of Cerritos at a Special Meeting held on the 8th day of June, 2020, and that it was so adopted as follows:

AYES: Councilmembers – Barrows, Hu, Yokoyama, Vo, Solanki
NOES: Councilmembers – None
ABSENT: Councilmembers – None
ABSTAIN: Councilmembers – None

DATED: June 8, 2020



Vida Barone, City Clerk/Treasurer