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UKIAH ELECTRIC UTILITY

Ukiah Wildfire Mitigation Plan Review *Ukiah Wildfire Mitigation Plan*

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REVISION HISTORY		
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1 BACKGROUND

Ukiah Electric Utility (UEU) contracted with POWER Engineers, Inc. (POWER) to review UEU's Wildfire Mitigation Plan (WMP) for compliance with California Public Utilities Code Section 8387 (Code) and make recommendations for revisions that might be necessary. The Code requires that each local publicly owned electric utility and/or electrical cooperative shall prepare and submit a WMP to the California Wildfire Safety Advisory Board and lists specific topics that the WMP shall consider.

2 GENERAL FINDINGS

The analysis conducted for UEU's Wildfire Mitigation Plan compared the requirements of each section of the Code with the WMP and did not find any significant issues. The analysis did identify several sections of the WMP that should be strengthened.

The analysis established the following high-level findings:

- CPUC Code Section 8387 (b)(2) contains 14 lettered topics that each WMP shall consider, some of which contain subheadings
- The lettered topics in the Code were separated into 22 topics for this review
- UEU's WMP addresses all of the 22 topics identified for review
- Overall, UEU's WMP compares favorably to plans submitted by other utilities
- Discussions in three sections of the WMP should be revised to assure compliance with the Code
- Discussion for one topic provides limited information and could be expanded to better address the intent of the Code
- Recommendations for some other sections are provided for UEU's consideration

3 RECOMMENDATIONS FOR SECTIONS THAT SHOULD BE REVISED

It is recommended that each of the following WMP sections be revised to assure complete compliance with the Code requirements. For each section the topic from the Code is shown along with the relevant section number from the UEU WMP. The comments explain the weakness of the WMP section and recommendations for revisions. The revisions recommended should be relatively easy to implement.

Note that the code text here may vary slightly from the actual text in the code and that the term *utility* has been substituted for *local publicly owned electric utility and/or electrical cooperatives*. The reader should refer to the code as published by the CPUC for the exact text.

Code (2) (C) *A description of the preventive strategies and programs to be adopted to minimize the risk of its electrical lines and equipment causing catastrophic wildfires, including consideration of dynamic climate change risks.*

UEU §2C – Comment: Strategies and programs are well described. Climate change risks are not addressed here. Climate Risk is mentioned in §4D but there is no discussion of how any strategies or programs consider it. The WMP should be expanded to include a brief discussion of dynamic climate change risks if any such risks are applicable to UEU. Some other plans have noted that they were unable to identify any direct risks with dynamic climate change.

Code (2) (D) *A description of the metrics the utility plans to use to evaluate the wildfire mitigation plan's performance and the assumptions that underlie the use of those metrics.*

UEU §8A – Comment: The two metrics presented are reasonable and are the same as ones presented in other plans. The rationale and assumptions for use of these metrics should be included.

Code (2) (G) *Appropriate and feasible procedures for notifying a customer who may be impacted by the deenergizing of electrical lines. The procedures shall direct notification to all public safety offices, critical first responders, health care facilities, and operators of telecommunications infrastructure with premises within the footprint of potential deenergization for a given event.*

UEU §5F, §6 – Comment: Section 5F references coordination with other departments, communications protocols, and social media, but does not explain how the groups identified in the code will be notified. The coordination will probably provide information to public safety officials and first responders. The section should be expanded to more clearly describe how health care facilities and telecommunications operator will receive notification. Section 6 refers to a proactive outreach and education strategy that is apparently a joint effort among multiple departments. It should be made clear either that such a strategy is either already in place or is under development.

Code (2) (J) *A list that identifies, describes, and prioritizes all wildfire risks, and drivers for those risks, throughout the 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 utility's equipment and facilities.*
- ii. Particular risks and risk drivers associated with topographic and climatological risk factors throughout the different parts of utility's service territory*

UEU §4C – Comment: The section does not discuss any risk except for reference to the small section of the UEU system that is in Tier 2 fire threat area. The responses for this part of the code vary widely in WMP's from others and many do not include any specific risks. UEU may elect to take the same approach and not expand this section. However, some possible risks for design, construction, operation and maintenance that UEU might want to consider could be items such as old poles, bare conductor, large bird nests, etc.

4 ADDITIONAL RECOMMENDATIONS FOR SPECIFIC SECTIONS

The following comments and recommendations are offered as ways to strengthen the WMP.

UEU §4B – Comment: The section identifies historical sources of outages that were examined by staff. It does not provide any rationale for selecting these sources as potential wildfire risks or what was found during staff's examination of them. A brief explanation would be beneficial.

UEU §4D – Comment: The section lists geographical and climate risks. Since only a small portion of UEU's facilities are in the fire threat zone, it would be helpful to include a statement and map to describe the facilities that are inside the threat zone compared to those outside the threat zone. Any

issues related to working in the threat zone should also be discussed. This could include such items as creeks, ditches, or general terrain that would make it difficult to get trucks or equipment where it would be needed.

UEU §4E – Comment: The section discusses the CPUC Fire Threat Map and adjustments to it. The code asks for *... any geographic area in the service territory that is a higher wildfire threat than is identified in a commission fire threat map...* A statement that there are currently no such areas would be beneficial.

UEU §5A – Comment: The section refers to and includes excerpts from GO95 for vegetation management. It would be helpful to add a statement about UEU’s existing line clearance program or how inspection and maintenance cycles will be established in a new program.

UEU §5G – Comment: The section states that system protection will be set for non-reclose. A statement should be added about how many devices are involved and how they will be set for non-reclose, i.e. though SCADA or manually at each device.

UEU §5I, §5J, §5K – Comment: Sections were not included in the version of the plan reviewed. These sections will provide additional support for the WMP.

5 GENERAL RECOMMENDATION

Ukiah is generally located in an area that is outside the Tier 2 Fire Threat Zone yet is subject to events in the zone. Maps are very useful to make clear how UEU’s service territory relates to the fire zone and how events in the zone but outside UEU’s territory could impact UEU’s service.