

**Wildfire Mitigation Plan
Independent Evaluation
ANZA ELECTRIC COOPERATIVE, INC.**

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Table of Contents

Executive Summary	3
Analysis.....	3
A. Responsibilities of Persons Responsible for Executing Plan.....	3
B. Objectives of FMP	3
C. Preventative Strategies and Programs.....	4
D. Metrics	4
E. Application of Previously Identified Metrics	4
F. Public Safety Protocols	5
G. Notification of Customers.....	5
H. Vegetation Management	5
I. Inspection Plan.....	6
J. Identification of Risks.....	6
K. Identification of Higher Threat Areas.....	6
L. Wildfire Risk Methodology	7
M. Restoration of Service.....	7
N. Processes and Procedures	7
Conclusion	8

Executive Summary

The Anza Electric Cooperative, Inc. (AEC) Wildfire Mitigation Plan (WMP) was prepared in house by AEC employees for publication in June 2020. In accordance with California Public Utilities Code Section 8387(c), this plan was reviewed and assessed by an independent evaluator to establish its comprehensiveness as legally defined. Chloeta Fire, LLC is providing the independent evaluation of this WMP prior to publication. Chloeta Fire, LLC is completely independent of AEC.

Analysis

This WMP was reviewed for compliance with California Public Utilities Code Section 8387, which establishes the guidelines for the comprehensiveness of a utility's wildfire mitigation plan. Section 8387 delineates multiple criteria for establishing comprehensiveness. This independent evaluation will review each criteria established in Section 8387 and determine if they are met by the WMP provided by AEC.

A. Responsibilities of Persons Responsible for Executing Plan

Section 8387 Requirement: *An accounting of the responsibilities of persons responsible for executing the plan.*

Plan Section Number: III.

The WMP identifies AEC's management responsibilities regarding the implementation of the activities discussed in the WMP.

We recommend creating a table that identifies action items outlined in the WMP and the responsible department and workgroup in AEC responsible for implementation.

B. Objectives of FMP

Section 8387 Requirement: *The objectives of the wildfire mitigation plan.*

Plan Section Number: II.

The WMP establishes an overarching purpose in Section II. A. and clearly states primary and secondary objectives in Section II. B. and II. C.

To assist with continued compliance with Section 8387, it is recommended that a table be added that indicates where each required compliance is discussed in the WMP.

C. Preventative Strategies and Programs

Section 8387 Requirement: *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.*

Plan Section Number: IV. B, V.

Section V. of the WMP lists mitigation programs and activities that AEC will undertake to minimize wildfire risk. Impacts of climate change are touched on in Section IV. B.

We recommend that a table consisting of mitigation programs with specific activities for each explained be added.

Some preventive strategies are in the discussion and research phase. The plan should be updated as soon as specific information for these strategies are available.

While not a Section 8387 requirement, a table of estimated timelines or costs on implementation of the preventative strategies and programs would be beneficial for planning purposes.

D. Metrics

Section 8387 Requirement: *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.*

Plan Section Number: VIII. A.

Section VIII. A. discusses two initial metrics that will be used to measure performance of the WMP. Other metrics will be integrated in future plans as data becomes available

Target goals for each metric should be added to establish a baseline for the first year.

For plan usability, we recommend that a table be added to show the metric, rationale, indicator, and the measure of effectiveness. An additional table with the target percentage of compliance and goals of each mitigation program should be included as well.

E. Application of Previously Identified Metrics

Section 8387 Requirement: *A discussion of how the application of previously identified metrics to previous wildfire mitigation plan performances has informed the wildfire mitigation plan.*

Plan Section Number: VIII. B.

As noted in the WMP is in its initial implementation and existing data is limited. The WMP establishes in the executive summary that this is a living document and is subject to modifications as information is updated. As these metrics are analyzed in subsequent years the WMP should be updated based on data collected.

F. Public Safety Protocols

Section 8387 Requirement: *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.*

Plan Section Number: V. G, V. H

Protocols for disabling reclosers and deenergizing portions of the electrical distribution system are outlined in Sections G and H of Chapter V. Public safety impacts are discussed in Section H.

G. Notification of Customers

Section 8387 Requirement: *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.*

Plan Section Number: V. H. 2

Key first responder infrastructure, health care facilities, and operators of telecommunications infrastructure are identified in section V. H. 2.

H. Vegetation Management

Section 8387 Requirement: *Plans for vegetation management.*

Plan Section Number: V. D.

The WMP establishes vegetation management goals and procedures to reduce wildfire risk. The WMP discusses clearing and trimming trees and gives specific perimeters.

It is recommended that a table be included with a metrics goal of 95-100% compliance annually.

I. Inspection Plan

Section 8387 Requirement: *Plans for inspections of the local publicly owned electric utility's or electrical cooperative's electrical infrastructure.*

Plan Section Number: V. E.

The WMP includes a dedicated section on infrastructure inspections and repair in accordance with CPUC GO 165 and CPUC GO 95, Rule 18.

J. Identification of Risks

Section 8387 Requirement: *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.

Plan Section Number: IV, V. C

Risk drivers associated with topographic and climatological risk are detailed at length in Chapter IV. Risk drivers associated with design, construction, and maintenance of equipment and facilities are addressed in less detail, though specific equipment risk drivers are addressed in Section V. C. We recommend that potential risk drivers associated with equipment and facilities, such as foreign contact with powerlines, equipment failures that emit sparks, and wire to wire contact be identified as risk drivers in Chapter IV.

K. Identification of Higher Threat Areas

Section 8387 Requirement: *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.*

Plan Section Number: V. A.

AEC is primarily in a geographical area that is prone to wildfires and is labeled as District 2. A large portion of their operational area has a significantly greater risk of wildfire, which is labeled as District 3. These areas are shown in Figure 1.

L. Wildfire Risk Methodology

Section 8387 Requirement: *A methodology for identifying and presenting enterprise wide safety risk and wildfire-related risk.*

Plan Section Number: IV. B.

The WMP does discuss situational awareness and having the ability to alter practices dependent on fire conditions but lacks explaining their methodology for identifying risks.

It is recommended that AEC uses an Enterprise Risk Management process for assessing risk. Such a process involves a formal methodology to identify, assess, report, monitor, and report risk.

M. Restoration of Service

Section 8387 Requirement: *A statement of how the local publicly owned electric utility or electrical cooperative will restore service after a wildfire.*

Plan Section Number: VII.

The service restoration process following a wildfire is briefly discussed in section VII. Section 8387 requires that publicly owned utilities detail how the utility will restore service after a wildfire.

It is recommended that critical infrastructure facilities are prioritized during this process.

N. Processes and Procedures

Section 8387 Requirement: *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.

Plan Section Number: VIII. C., VIII. D., VIII E.

WMP efforts will be monitored by the General Manager and reported to the Board of Directors annually.

The AEC General Manager will ensure that the WMP is reviewed annually and that any deficiencies identified are corrected.

Guidelines for monitoring and auditing the effectiveness of inspections are established in Section VIII. C

Guidelines for identifying deficiencies in the WMP are outlined in Section VIII. D.

The WMP includes a dedicated section on infrastructure inspections and repair (Section V. E). The WMP gives general guidance on monitoring the effectiveness of inspections, including those by contractors, in Section VIII.E.

Conclusion

Following the independent evaluation it is our conclusion that the AEC WMP is compliant in meeting the requirements for comprehensiveness as set forth by California Public Utilities Code Section 8387. Action items we have recommended in this independent evaluation will facilitate ease of use and future updates but are not required to meet the requirement for comprehensiveness.