

SB901 Wildfire Mitigation Plan  
Joint IOU Proposed Outline

SB901 Reference Number	Outline Topic
2	I. Objectives of the plan
3	II. Description of the preventive strategy or programs to minimize risk of electric lines and equipment causing wildfires (including consideration of the dynamic climate change risk)
10, 11, 14, 15	III. Risk Analysis and Risk Drivers <ul style="list-style-type: none"> <li>A. List that identifies, describes, and prioritizes all wildfire risks and drivers, including all relevant wildfire risk and mitigation that is identified in the Risk Assessment Mitigation Phase (RAMP)               <ul style="list-style-type: none"> <li>1. Including risk and drivers associated with design, construction, operations and maintenance of equipment and facilities, including topographical and climatological risk factors throughout service territory</li> </ul> </li> <li>B. Description of how the plan accounts for the wildfire risk identified in the RAMP</li> <li>C. Evaluation of higher fire threat areas beyond existing Tier 2 and Tier 3 or elevating within those areas to the extent applicable</li> </ul>
6, 7, 8, 9, 12	IV. Wildfire Prevention Strategy and Programs <ul style="list-style-type: none"> <li>A. Operational Practices               <ul style="list-style-type: none"> <li>1. Operational considerations such as blocking reclosers and fast-curve/sensitive relay settings</li> <li>2. Other special work procedures during Red Flag Warning period or other conditions that presents elevated wildfire risk</li> <li>3. Wildfire Infrastructure Protection Teams</li> </ul> </li> <li>B. Plans for inspections of electrical infrastructure</li> <li>C. System hardening (asset management) to achieve highest level of safety, reliability, and resiliency               <ul style="list-style-type: none"> <li>1. System Design – summary of the programs, investments, strategies, technologies, policies, and procedures that we have deployed in the past or that we propose to deploy in the future as part of our effort to prudently manage our mitigation of wildfire risks</li> <li>2. Equipment Design/Application Focus Areas</li> <li>3. Structure Design</li> <li>4. Pole Loading</li> <li>5. Conductor</li> <li>6. Protection</li> </ul> </li> </ul>

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	<ul style="list-style-type: none"> <li>7. Equipment</li> <li>8. Alternative technologies – the exploration of new technologies that will reduce the probability of an ignition event and/or reduce public exposure to a hazardous condition during periods of high fire risk by providing better situational awareness, faster isolation, or minimized energy transfer</li> <li>D. Vegetation Management Plan <ul style="list-style-type: none"> <li>1. Remove at-risk overhanging tree limbs, as feasible (specific criteria may vary by utility)</li> <li>2. Any additional (more than annual) inspections within the high fire-threat district (HFTD) as deemed necessary</li> <li>3. Trim vegetation back to 12 feet (or more), where prudent based on species and environmental conditions, in alignment with California Public Utilities Commission (CPUC) General Order (GO) 95, Rule 35, Appendix E guidelines</li> <li>4. Mitigate identified hazard trees</li> <li>5. Identify reliability/at-risk tree species to trim or remove, where feasible, per location-specific criteria</li> <li>6. Assess trees that are tall enough, and have a feasible path, to strike powerlines (rather than inspecting to a pre-determined distance from the powerline)</li> </ul> </li> <li>E. Protocols on Situational Awareness <ul style="list-style-type: none"> <li>1. Meteorological services and advanced situational awareness that meet the utility’s organizational, operational, and public safety program needs</li> <li>2. The deployment and support of situational awareness cameras where possible and practical</li> </ul> </li> <li>F. Protocols on Public Safety Power Shut-off (PSPS) <ul style="list-style-type: none"> <li>1. Strategy to minimize public safety risk during high wildfire conditions and details of the considerations</li> <li>2. Strategy to provide for safe and effective re-energization of any area that was de-energized due to PSPS protocol</li> <li>3. Company standards relative to customer communications, including consideration for the need to notify priority essential services – critical first responders, health care facilities, and operators of telecommunications infrastructure</li> <li>4. Protocols for mitigating the public safety impacts of these protocols, including impacts on first responders and on health and communication infrastructure</li> </ul> </li> </ul>
13, 16, 17, 18	<ul style="list-style-type: none"> <li>V. Emergency Preparedness and Response <ul style="list-style-type: none"> <li>A. Provide a general of description of the overall emergency preparedness and response plan</li> <li>B. Description of how plan is consistent with disaster and emergency preparedness plan prepared pursuant to Public Utilities Code Section 768.6, including</li> </ul> </li> </ul>

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	<ol style="list-style-type: none"> <li>1. Plans to prepare for and restore service, including workforce mobilization and repositioning equipment and employees</li> <li>2. Emergency communications               <ol style="list-style-type: none"> <li>a. Public outreach/communications before, during, and after a wildfire in English, Spanish, and top three languages in California as determined by United States Census data</li> </ol> </li> <li>3. Showing that the utility has an adequate and trained workforce to promptly restore service after a major event taking into account mutual aid and contractors</li> </ol> <p>C. Customer support in emergencies</p> <ol style="list-style-type: none"> <li>1. Protocols for compliance with requirements adopted by the CPUC regarding activities to support customers during and after a wildfire, including:               <ol style="list-style-type: none"> <li>a. Outage reporting</li> <li>b. Support for low income customers</li> <li>c. Billing adjustments</li> <li>d. Deposit waivers</li> <li>e. Extended payment plans</li> <li>f. Suspension of disconnection and nonpayment fees</li> <li>g. Repair processing and timing</li> <li>h. Access to utility representatives</li> </ol> </li> </ol>
1, 4, 5, 19	<p>VI. Performance Metrics and Monitoring</p> <ol style="list-style-type: none"> <li>A. Accounting of the responsibilities of the responsible person(s) executing the plan           <ol style="list-style-type: none"> <li>1. Executive level with overall responsibility</li> <li>2. Program owners specific to each component of the plan</li> </ol> </li> <li>B. Description of the metrics to evaluate the performance of the plan and the assumptions that underlie the use of those metrics</li> <li>C. Discussion of how the application of previously identified metrics to previous plan performance has informed the plan, as applicable</li> <li>D. Description of processes and procedures of the following:           <ol style="list-style-type: none"> <li>1. Monitoring and auditing of the plan</li> <li>2. Identifying and correcting any deficiencies in the plan</li> <li>3. Monitoring and auditing the effectiveness of equipment and line inspections</li> </ol> </li> </ol>
20	<p>VII. Any other information that the CPUC may require</p>