

November 11, 2019

12108.01

Mr. Jason Grace
Operations Manager
City of Roseville, Electric Utility Department
2070 Hilltop Circle
Roseville, CA 95747

Subject: *Evaluation of Roseville Electric Utility's Wildfire Mitigation Plan*

Dear Mr. Grace:

Dudek conducted an evaluation of Roseville Electric Utility's (REU) Wildfire Mitigation Plan (WMP), as required under California Public Utilities Code (PUC) Section 8387(b). PUC Section 8387(b), as modified by Senate Bill (SB) 901, and the Administrative Law Judge's Ruling issued on January 17, 2019 in CPUC Docket No. R.18-10-007 (ALJ Ruling), applies to publicly-owned electric utilities and requires preparation of a WMP before January 1, 2020. PUC Section 8387(c) requires that an independent evaluator review and assess the comprehensiveness of a publicly-owned utility's WMP and issue a summary report.

Dudek conducted an initial review of REU's Draft WMP in October 2019 and provided recommendations for clarifications/modifications on October 17, 2019. The focus of the evaluation was to determine whether the Draft WMP included all elements required under PUC Section 8387(b)(2) (included in Attachment A). The following summarizes the recommended clarifications/modifications identified during the initial review, by required element. Required elements not identified below were determined to satisfactorily meet Code requirements in the Draft WMP.

- 8387(b)(A): Provide clarification regarding staff responsibility for WP execution.
- 8387(b)(C): Provide additional detail regarding the effects of climate change.
- 8387(b)(E): Provide clarification regarding WMP metrics.
- 8387(b)(F): Provide clarifications regarding communications to critical facilities.
- 8387(b)(G): Provide clarification regarding customer notification during outages and restoration.
- 8387(b)(H): Provide clarification regarding City's Wildfire Reduction Zone Inspection and Maintenance Program.
- 8387(b)(J)(i): Provide clarification regarding risk drivers associated with operations.
- 8387(b)(J)(ii): Provide clarification regarding risk drivers associated with climate factors.
- 8387(b)(L): Provide clarification regarding risk identification.

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- 8387(b)(M): Provide clarification regarding post wildfire condition assessments.
- 8387(b)(N)(ii): Provide clarification regarding WPM review frequency.
- 8387(b)(N)(ii): Provide clarification regarding monitoring frequency.

A Revised WMP was prepared by REU that incorporated the recommended modifications identified above. The revised WMP was provided to Dudek on October 28, 2019. Dudek reviewed the Revised WMP and determined that it satisfactorily addressed all elements required under PUC Section 8387(b)(2) (included in Attachment A).

Should you have any questions or require additional information, please do not hesitate to contact me at (530) 863-4650.

Sincerely,



Scott Eckardt, RPF
Project Manager

Att.: A. Required WMP Elements under PUC Section 8387(b)
cc: Michael Huff, Dudek



Attachment A

Required WMP Elements under PUC Section 8387(b)

Required WMP Elements under PUC Section 8387(b)

PUC 8387(b)(2) Section	Description
A	An accounting of the responsibilities of the persons responsible for executing the plan.
B	The objectives of the wildfire mitigation plan.
C	Description of the preventative strategies and programs to be adopted by the 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 made 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 de-energizing 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 de-energizing of electric 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 cooperative's 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:
J(i)	Risks and risk drivers associated with design, construction, operations, and maintenance of the local publicly owned electric utility or electrical cooperative's equipment and facilities.
J(ii)	Particular risks and risk drivers associated with topographic and climatological risk factors throughout the different parts of the local publicly owned 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 currently identified in a commission fire threat map, and identification of where the commission should expand the 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 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:
N(i)	Monitor and audit the wildfire mitigation plan.
N(ii)	Identify any deficiencies in the wildfire mitigation plan or its implementation, and correct those deficiencies.
N(iii)	Monitor and audit the effectiveness of electrical line and equipment inspections, including inspections performed by contractors, that are carried out under the plan, and other applicable statutes, or commission rules.