

January 9, 2020

12255.02

Angela Kimmey, MPA
Compliance Administrator & Government Affairs
Vernon Public Utilities
4305 S. Santa Fe Ave.
Vernon, CA 90058

Subject: *Vernon Public Utilities Wildfire Mitigation Plan – Comprehensive and Appropriate for Low Wildfire Risk Service Area*

Dear Ms. Kimmey:

Dudek conducted an evaluation of the Vernon Public Utilities (VPU) Wildfire Mitigation Plan (WMP), as required under California Public Utilities Code (CPUC) Section 8387(b). CPUC 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, which shall be submitted to the California Wildfire Safety Advisory Board by July 1, 2020 (Assembly Bill 1054, July 2019). CPUC 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, as the WMP independent evaluator, conducted an initial review of VPU's Draft WMP on December 19, 2019 and provided a summary letter for suggested Draft WMP modifications. The focus of the evaluation was to determine whether the Draft WMP addressed all required elements under CPUC Section 8387(b) (2) (included in Attachment A) that were applicable to VPU.

Subsequently, VPU elected to modify its Draft WMP and incorporated Dudek's recommended modifications to the Plan. The revised WMP was provided to Dudek on December 30, 2019. **Dudek reviewed the revised WMP and determined that VPU's WMP is deemed comprehensive and appropriate for the very low risk fire environment within their service territory. Additionally, VPU's WMP approach appropriately addresses all applicable elements required under CPUC Section 8387(b) (2).**

Should you have any questions or require additional information, please do not hesitate to contact me at (619) 992-9161.

Sincerely,



Michael Huff
Principal/Senior Fire Protection Planner

Att.: 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.