

Agenda Report

December 13, 2021

TO: Honorable Mayor and City Council
FROM: Water and Power Department
SUBJECT: APPROVAL OF THE WATER AND POWER DEPARTMENT'S 2022 ANNUAL UPDATE TO THE WILDFIRE MITIGATION PLAN

RECOMMENDATION:

It is recommended that the City Council:

1. Find that the proposed action is statutorily exempt from the California Environmental Quality Act ("CEQA") pursuant to Section 21080(b)(4) of CEQA and Section 15269 (Emergency Projects) of the State CEQA Guidelines and, as such, no environmental document pursuant to CEQA is required for the project; and
2. Accept and approve the annual update of the Wildfire Mitigation Plan for 2022 for the Water and Power Department ("PWP") as an approved operating manual to mitigate the utility's risk of causing a catastrophic wildfire and for submittal to the California Public Utilities Commission ("CPUC").

BACKGROUND:

The recommended PWP Wildfire Mitigation Plan is an update to the plan that was approved by City Council on December 20, 2020. The plan comprises various programs, objectives, policies, and a range of activities to mitigate the threat and minimize the risk of catastrophic wildfire posed by electrical lines and equipment. Similar to the initial Wildfire Mitigation Plan, this update was also developed in coordination with and reviewed by the Pasadena Fire Department. The PWP Wildfire Mitigation Plan update is required to be approved annually by the City Council and is implemented by the General Manager of PWP in accordance with California Senate Bill 901. The plan's three objectives are as follows: 1) minimize the sources of ignition of a fire; 2) improve the resiliency of the PWP electric grid; and 3) identify unnecessary and ineffective actions of specific wildfire mitigation strategies.

The primary goal of the Wildfire Mitigation Plan is to minimize the probability that PWP's electric system may be the origin or contributing source for the ignition of a wildfire. The secondary goal of the Wildfire Mitigation Plan is to improve the resiliency of the electric grid as PWP assesses new industry practices and technologies that will reduce the likelihood of an interruption in service and improve the restoration of service. The final goal

for the Wildfire Mitigation Plan is to measure the effectiveness of specific wildfire mitigation strategies. Where a particular action, program component, or protocol is determined to be unnecessary or ineffective, PWP will assess whether a modification or replacement is needed.

PWP Wildfire Mitigation Plan

The PWP Wildfire Mitigation Plan was first approved by the City Council in November 2019. The plan complied with the requirements of the CPUC section 8387 for publicly owned electric utilities to prepare a wildfire mitigation plan before the end of calendar year 2019.

The Wildfire Mitigation Plan was subsequently updated and approved by the City Council in December 2020.

Since the adoption of the PWP Wildfire Mitigation Plan, PWP has worked on several projects and implemented various programs, policies, and the objectives outlined herein that have since been completed, such as;

- Installation of covered overhead wires in the Tier 2 Elevated Fire Area surrounding Sequoia Drive, Anita Drive, Malcom Drive, Glenover Drive and Glenullen Drive.
- De-energize primary voltage overhead electric system in Millard Canyon, located in Tier 3 Extreme Fire Area, by converting high voltage system to low voltage system
- Focused inspection, repair, and replacement of overhead infrastructure in Tier 2 Elevated Fire Areas

PWP Wildfire Mitigation Plan - 2022

The CPUC Section 8387 requires all utilities, including PWP, to submit annual approved revisions of the Wildfire Mitigation Plan to the CPUC for review to ensure utilities are in compliance with current fire mitigation strategies on a calendar year basis.

The 2022 PWP Wildfire Mitigation Plan is largely consistent with the 2021 Wildfire Mitigation Plan and includes some clarifications and additional information as follows:

- Updated and enhanced Utility Background Information
- Updated Risks and Mitigation strategies
- Updated Cause Metrics (effectiveness evaluation criteria for the plan) for Calendar Year 2021

In adherence to the 2022 Wildfire Mitigation Plan, PWP will continue to implement programs that reduce the probability of wildfires caused by the City's electric system. This will be achieved by implementing cost-effective improvements to the physical assets and operations driven by changes in design and construction standards. In addition to the current practices of installing covered overhead wires and enhanced fault current

protection equipment, system hardening, and aggressive tree trimming within the fire threat areas defined by the CPUC fire threat map, PWP is currently evaluating the feasibility of undergrounding the remaining primary voltage electric distribution system in areas of extreme risks (Tier 3) to further mitigate the chances of causing a wildfire.

Additionally, PWP will continue to perform regular system analysis to help identify internal risks of design, construction standards, and ignitions to identify threats and improve mitigation measures.

To improve the resiliency of PWP's electric grid, annual assessments of new industry practices and technologies that may have the potential to reduce the likelihood of an interruption in service and improve the restoration of service, have been and will continue to be conducted in the 2022 Wildfire Mitigation Plan.

In the event that a wildfire causes an outage, PWP customers will receive updates by calling the power outage hotline or visiting the outage map available on PWP's website. PWP has had no outages caused by wildfire in 2021.

To identify unnecessary and ineffective actions, PWP will continue to conduct annual assessments to determine whether a particular action, program component, or protocol is determined to be ineffective or unnecessary. PWP will then determine whether modifications or replacements of overhead infrastructure would produce improved or cost-effective results. PWP conducted an annual assessment of the 2021 Wildfire Mitigation Plan and did not identify any significant changes to the proposed actions and plans.

In consideration of wildfire preventative strategies, it is not the intent of PWP in the 2022 Wildfire Mitigation Plan to preemptively de-energize portions of the City during periods of elevated fire risk. The primary reasons behind this strategy are 1) PWP's service territory is mainly urban and covers only 23 square miles; 2) PWP has been using covered conductors for decades which provide more protection against incidental contacts; and 3) PWP prevents automatic re-energization from field devices of circuits during red flag warnings. However, PWP reserves the right and authority to preemptively de-energize portions of the City and shut off power due to fire threat conditions if or when power lines are compromised. This option will only be exercised in extraordinary circumstances and PWP will make every effort to provide notification to impacted customers if feasible.

COUNCIL POLICY CONSIDERATION:

The 2022 PWP wildfire mitigation plan is consistent with the City Council's strategic goals to maintain fiscal responsibility and stability, and to ensure public safety.

ENVIRONMENTAL ANALYSIS:

The action proposed herein is statutorily exempt from CEQA pursuant to Section 21080(b)(4) of CEQA and Section 15269 (Emergency Projects) of the State CEQA

Guidelines. Public Resources Code Section 21080(b)(4) states that CEQA does not apply to "Specific actions necessary to prevent or mitigate an emergency." Accordingly, Section 15269 of the State CEQA Guidelines provides a statutory exemption for "Emergency Projects" including part (c), which includes "Specific actions necessary to prevent or mitigate an emergency." The adoption of the proposed Wildfire Mitigation Plan is an action to prevent and/or mitigate wildfire emergencies and is, therefore, exempt from CEQA.

FISCAL IMPACT:

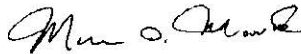
There are no direct or indirect fiscal impacts from this action. There will be no anticipated impact to other operational programs or capital projects as a result of this action.

Respectfully submitted,



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