

Agenda Report

December 5, 2022

TO: Honorable Mayor and City Council
FROM: Water and Power Department
SUBJECT: APPROVAL OF THE WATER AND POWER DEPARTMENT'S 2023 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 2023 for the Water and Power Department ("PWP") to mitigate the utility's risk of responsibility for a catastrophic wildfire which is attached to this agenda report as "Attachment A – 2023 PWP Wildfire Mitigation Plan."

BACKGROUND:

The PWP Wildfire Mitigation 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. The PWP Wildfire Mitigation Plan update is to be approved annually by the City Council and is implemented by the General Manager of PWP. The plan's key objectives are: 1) minimize the sources of ignition of a fire; 2) improve the resiliency of the PWP electric grid; 3) identify unnecessary and ineffective actions of specific wildfire mitigation strategies and assess potential modifications; and 4) assess new industry practices and technologies that will reduce the likelihood of an interruption in service and improve the restoration of service.

PWP's Wildfire Mitigation Plan was first approved by the City Council in November 2019. The plan complied with the requirements of the California Public Utilities Commission ("CPUC") Section 8387 for publicly owned electric utilities to prepare a wildfire mitigation plan before the end of calendar year 2019.

Since the initial adoption of the Wildfire Mitigation Plan, the City Council has approved two annual updates in December 2020 and December 2021. PWP has completed several key projects defined in the original plan and subsequent updates, including:

- Installation of 7,500 ft. of covered conductors in the Voluntary Tier 2 Elevated Fire Area surrounding Sequoia Dr., Anita Dr., Malcom Dr., Glenover Dr., and Glenullen Dr. Additionally, 14 poles were replaced as part of this project.
- De-energization of 2,000 ft. of high voltage overhead electric system in Millard Canyon, located in Tier 3 Extreme Fire Area, by converting the high voltage system to a low voltage system.
- Focused inspection, repair, and replacement of overhead infrastructure in Tier 2 Elevated Fire Areas. Within the Tier 2 areas, 548 poles were inspected, 12 poles and 4 transformers were replaced, as well as 500 ft. of covered conductors were installed, based on the inspections.

Additional projects are ongoing or scheduled for future construction:

- Install covered conductors in the Tier 2 Elevated Fire Area on Glen Oaks Blvd. from Fairlawn Dr. to the El Mirador Radio Tower and Reservoir. Targeting FY 2023 construction.
- Two targeted pole replacement projects in the Tier 2 area, totaling 28 poles including 18 poles comprised of composite material that is fire resistant and provides extra durability. Targeting FY 2023 and FY 2024 construction.
- Install covered conductors in the Tier 2 Elevated Fire Area on Rosemont Ave. from Washington Blvd. to Arroyo Blvd. Targeting FY 2024 construction.
- Conversion of high voltage overhead infrastructure to low voltage within the Tier 3 Extreme Fire Area, along Canyon Close Rd. and Fox Ridge Dr. Targeting FY 2025 construction.
- Consideration of conversion of overhead infrastructure to underground distribution infrastructure, within the Tier 3 Extreme Fire Area, along Florecita Dr. and Crestford Dr. Targeting FY 2026 construction.

PWP Wildfire Mitigation Plan – 2023 Update

The CPUC Section 8387 requires all utilities, including PWP, to submit annual approved revisions of the Wildfire Mitigation Plan to ensure that utilities are compliant with current fire mitigation strategies on a calendar year basis. The 2023 Wildfire Mitigation Plan is considered a comprehensive update to align all utilities to a more universal plan.

The content of the 2023 Wildfire Mitigation Plan is largely consistent with the 2022 Wildfire Mitigation Plan but has been extensively reformatted to comply with the CPUC recommended template. The 2023 Wildfire Mitigation Plan also incorporates recommendations by the Pasadena Fire Department who served as an independent evaluator.

In adherence to the 2023 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 enhancements to its physical assets and operations driven by changes in design and construction standards. In addition to the existing practices of installing covered overhead wires, enhanced fault protection equipment, system hardening, and aggressive tree trimming within the defined fire threat areas, PWP is analyzing the potential impact of undergrounding the high voltage electric distribution system in areas of extreme risks (Tier 3) to further mitigate the risks of wildfire.

Additionally, PWP will continue to perform regular system analysis to help identify internal risks of design, construction standards, and ignition sources to identify threats and improve mitigation measures. Annual assessments of PWP's electric grid are performed as part of the 2023 Wildfire Mitigation Plan to identify new industry practices and technologies that may reduce the likelihood of an interruption in service and improve the restoration of service following a fire-related outage.

In the event a wildfire causes an outage, PWP customers can receive updates by calling the power outage hotline (626) 744-4673 or visiting the outage map available on PWP's website. PWP had no wildfires caused by its electric system in 2022.

Another stated objective of the Wildfire Mitigation Plan is to identify unnecessary and ineffective actions or programs already in place. PWP conducts annual assessments of existing actions and protocols to determine whether modifications or replacements are necessary to improve the existing plan. PWP's most recent assessment did not identify any significant changes to the current and future actions and plans.

Regarding wildfire prevention strategies, PWP's proposed 2023 Wildfire Mitigation Plan does not recommend preemptively de-energizing 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 a manageable area of 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 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 or when power lines are compromised. This option will only be deployed in extraordinary circumstances and PWP will make every effort to provide notification to impacted customers if feasible.

COUNCIL POLICY CONSIDERATION:

The 2023 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 the recommended 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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