

**Wildfire Mitigation Plan
Independent Evaluation
Anza Electric Cooperative (AEC)**

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Executive Summary

The Anza Electric Cooperative, Inc (AEC) Wildfire Mitigation Plan (WMP) was prepared by Chloeta Fire, LLC for publication in 2023. In accordance with California Public Utilities Code Section 8387(c), this plan was reviewed and assessed by an independent evaluator to establish its comprehensiveness as legally defined. Chloeta Fire, LLC is providing the independent evaluation of this WMP prior to publication. The employee conducting this review is separate from the team that created the WMP and was not involved with any part of developing the WMP. Chloeta Fire, LLC is completely independent of AEC.

Analysis

This WMP was reviewed for compliance with California Public Utilities Code Section 8387, which establishes the guidelines for the comprehensiveness of a utility's wildfire mitigation plan. Section 8387 delineates multiple criteria for establishing comprehensiveness. This independent evaluation will review each criteria established in Section 8387 and determine if they are met by the WMP provided by AEC.

A. Responsibilities of Persons Responsible for Executing Plan

Section 8387 Requirement: *An accounting of the responsibilities of persons responsible for executing the plan.*

Plan Section Number: 5. A.

The WMP identifies AEC's management responsibilities regarding the implementation of the activities discussed in the WMP. Section 5. A. identifies the general manager as having direct supervision of the WMP and clearly provides the delegated responsibilities to each senior management staff. An organization chart is provided in Figure 1.

B. Objectives of FMP

Section 8387 Requirement: *The objectives of the wildfire mitigation plan.*

Plan Section Number: 3. B, 4.

The WMP establishes an overarching purpose in section 4 and clearly states the plan's objectives. A statutory cross-reference table is included in section 3. B., table 2.

C. Preventative Strategies and Programs

Section 8387 Requirement: *A description of the preventive strategies and programs to be adopted by the local 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.

Plan Section Number: 6. A., 7.

Section 7 of the WMP lists mitigation programs and activities that AEC will undertake to minimize wildfire risk. A high fire threat district map is included in Figure 2. Impacts of climate change are discussed in Section 6. A.

D. Metrics

Section 8387 Requirement: *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 that underlie the use of those metrics.*

Plan Section Number: 10.

Section 10. A. identifies the two primary metrics used to measure the performance of the WMP. Impacts of the metrics are discussed in 10. B.

E. Application of Previously Identified Metrics

Section 8387 Requirement: *A discussion of how the application of previously identified metrics to previous wildfire mitigation plan performances has informed the wildfire mitigation plan.*

Plan Section Number: 10. A., 10. D.

Section 10. A. states that management reviews and discusses any wildfire event and how to improve best practices moving forward as well as the metrics from last year's fire. Section 10. D. discusses the wildfires of 2017 and improvements made to power line safety. Section 10. C. states that AEC's Governing Board reviews the plan annually.

F. Public Safety Protocols

Section 8387 Requirement: *Protocols for disabling reclosers and deenergizing 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.*

Plan Section Number: 7. G., 7. H.

Section 7. G. discusses AEC’s reclosing policy and states improvements continue to be made to older circuit reclosers. De-energization is discussed in section 7. H. and gives specific situations where power is shut off. Communication to affected customers is discussed in section 7. H.

G. Notification of Customers

Section 8387 Requirement: *Appropriate and feasible procedures for notifying a customer who may be impacted by the deenergizing of electrical lines. The procedures shall direct notification to all public safety offices, critical first responders, health care facilities, and operators of telecommunications infrastructure with premises within the footprint of potential de-energization for a given event.*

Plan Section Number: 7. H., 8.

Section 7. H. discusses how customers are notified during deenergization and provides several links on their company website. Section 8 further discusses the comprehensive public awareness communication plan in further detail.

H. Vegetation Management

Section 8387 Requirement: *Plans for vegetation management.*

Plan Section Number: 7. D.

The WMP establishes vegetation management goals and procedures to reduce wildfire risk. The WMP discusses clearing and trimming trees and gives specific perimeters in section 7. D.

I. Inspection Plan

Section 8387 Requirement: *Plans for inspections of the local publicly owned electric utility’s or electrical cooperative’s electrical infrastructure.*

Plan Section Number: 7. E.

The WMP includes a dedicated section on infrastructure inspections and repair in section 7. E.

J. Identification of Risks

Section 8387 Requirement: *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:*

(i) Risks and risk drivers associated with design, construction, operation, and maintenance of the local publicly owned electric utility's or electrical cooperative's equipment and facilities.

(ii) Particular risks and risk drivers associated with topographic and climatological risk factors throughout the different parts of the local publicly owned electric utility's or electrical cooperative's service territory.

Plan Section Number: 6.

Section 6. A. discusses the primary risks drivers for wildfire. AEC's preventative strategies and programs are shown in Table 3.

K. Identification of Higher Threat Areas

Section 8387 Requirement: *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 identified in a commission fire threat map, and identification of where the commission should expand a high fire-threat district based on new information or changes to the environment.*

Plan Section Number: 7.

Figure 2 in section 7 is a map that clearly shows areas that are at a higher risk of wildfire threat. Section 7. A. discusses AEC's management in these higher risk areas.

L. Wildfire Risk Methodology

Section 8387 Requirement: *A methodology for identifying and presenting enterprise wide safety risk and wildfire-related risk.*

Plan Section Number: 6.

The WMP does discuss situational awareness and having the ability to alter practices dependent on fire conditions. Table 3 in section 6. B. is a shows AEC's Preventative Strategies and Programs.

M. Restoration of Service

Section 8387 Requirement: *A statement of how the local publicly owned electric utility or electrical cooperative will restore service after a wildfire.*

Plan Section Number: 9.

Section 9. discusses steps taken by AEC work crews before power can be restored. Customer and media notification will be done throughout the restoration process. Section 9 further states what critical infrastructure facilities are prioritized during this process of re-energization.

N. Processes and Procedures

Section 8387 Requirement: *A description of the processes and procedures the local publicly owned electric utility or electrical cooperative shall use to do all of the following:*

(i) Monitor and audit the implementation of the wildfire mitigation plan.

(ii) Identify any deficiencies in the wildfire mitigation plan or its implementation, and correct those deficiencies.

(iii) Monitor and audit the effectiveness of electrical line and equipment inspections, including inspections performed by contractors, that are carried out under the plan, other applicable statutes, or commission rules.

Plan Section Number: 5. A., 10. C., 10 D., 10. F.

Section 10. C. states the WMP will be subject to review by AEC's Governing annually. Section 5. A. assigns overall responsibility to the general manager to ensure the plan is executed properly and submitted for monitoring and auditing.

Section 10. D. states that AEC is committed to identifying and correcting deficiencies

Section 10. E. states that AEC coordinates and monitors the effectiveness of inspections with staff and contractors and addresses any deficiencies prior to the start of the next fire season.

Conclusion

Following the independent evaluation, it is our conclusion that the AEC WMP is sufficient in meeting the requirements for comprehensiveness as set forth by California Public Utilities Code Section 8387.