



# City Council Memorandum

City of Arts & Innovation

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**TO: HONORABLE MAYOR AND CITY COUNCIL**                      **DATE: JULY 18, 2023**

**FROM: PUBLIC UTILITIES DEPARTMENT**                      **WARDS: ALL**

**SUBJECT: RIVERSIDE PUBLIC UTILITIES 2023 WILDFIRE MITIGATION PLAN PREPARED  
IN ACCORDANCE WITH CALIFORNIA PUBLIC UTILITIES CODE SECTION  
8387 FOR SUBMITTAL TO THE WILDFIRE SAFETY ADVISORY BOARD**

**ISSUE:**

Consider approving the Riverside Public Utilities 2023 Wildfire Mitigation Plan for submittal to the Wildfire Safety Advisory Board in accordance with California Public Utilities Code Section 8387.

**RECOMMENDATION:**

That the City Council approve the Riverside Public Utilities 2023 Wildfire Mitigation Plan for submittal to the Wildfire Safety Advisory Board in accordance with California Public Utilities Code Section 8387.

**BOARD RECOMMENDATION:**

On June 26, 2023, the Board of Public Utilities, with eight members present, voted seven “yes” and one “no” to recommend that City Council approve the Riverside Public Utilities 2023 Wildfire Mitigation Plan for submittal to the Wildfire Safety Advisory Board in accordance with California Public Utilities Code Section 8387.

**BACKGROUND:**

The Riverside Public Utilities (RPU) Wildfire Mitigation Plan (WMP or Plan) is prepared to meet the standards set forth in Section 8387 of the Public Utilities Code. Senate Bill (SB) 901 amended Section 8387 of the Public Utilities Code when it passed in September 2018. The new code section tasked all private and publicly owned utilities and corporations, among other actions, to construct, maintain, and operate their electrical system in a manner that minimizes the risk of wildfire. To ensure that each utility addressed the risk of their electric systems causing a wildfire, several requirements were put in place and are summarized here:

1. All utilities, public and private, are required to prepare a WMP and update the plan annually.
2. A prescriptive list of required elements for the WMP is identified and must be addressed by each utility.

3. The utility must have their WMP reviewed and assessed for comprehensiveness by an independent evaluator with experience in assessing the safe operation of electrical infrastructure.
4. Both the WMP and the report issued by the independent evaluator must be presented at a public meeting of the utility's governing board.
5. The WMP and the independent evaluator report must be posted on the utility's website.

On July 12, 2019, Assembly Bill (AB) 1054 and AB 111 were passed. Neither bill changed the required content of the WMP established by SB 901, but they did change procedure. AB 111 required state agencies to form a new Wildfire Safety Division and establish a Wildfire Safety Advisory Board (Wildfire Board) in 2020. Per the legislation, the new Division and the Wildfire Board were initially housed within the California Public Utilities Commission and then, on July 1, 2021, were transferred to the California Natural Resources Agency under a newly created Office of Energy Infrastructure Safety.

AB 1054 added, among other actions, the requirement that publicly owned utilities' WMPs be submitted to the Wildfire Board by July 1st of each year for review. The Wildfire Board, after receiving submitted WMPs from all utilities, must review the documents and provide comments to the utilities regarding the WMPs conformance with legislative requirements. Each year, the Wildfire Board will then provide comments back to the public utilities.

Finally, in October 2019, SB 560 was signed into law and became effective on January 1, 2020. The bill changed Public Utilities Code Section 8387(b)(2)(G) modifying requirements for customer notification protocols for emergency de-energization. In the event of a utility de-energizing a portion of their grid infrastructure for the purpose of preventing the equipment from potentially causing wildfire, the utility is required to notify all public safety offices, critical first responders, health care facilities, and operators of telecommunications infrastructure that have facilities within the footprint of the potential de-energization event.

On June 27, 2022, the Board of Public Utilities approved the Riverside Public Utilities 2022 Plan for submittal to the Wildfire Board in accordance with California Public Utilities Code Section 8387. On June 30, 2022, RPU submitted the 2022 Plan to the Wildfire Board. On October 17, 2022, the Advisory Board issued a Guidance Advisory Opinion for the 2023 Wildfire Mitigation Plans for Electric Publicly Owned Utilities and Rural Electric Cooperatives (Wildfire Board Guidance). The Wildfire Board Guidance included general guidance that applied to all Publicly Owned Utilities (POUs), specific guidance for each POU, and a template with instructions for preparing 2023 plans. All Wildfire Board Guidance was incorporated into RPU's 2023 WMP.

## **DISCUSSION:**

The purpose and content of RPU's WMP is identified in California Public Utilities Code Section 8287, as noted above. As such, the WMP is a compliance document. Each utility responds and addresses the required contents, but the focus of the plan is very specific and directs electric utilities to describe the actions they are taking to reduce the risk of their electric equipment causing a wildfire. The WMP needs to be specific and only address the required contents to assist the Wildfire Board and members of the public that are reviewing the report for compliance with State code and intent.

While there are many detailed sections that must be included in the WMP, there are essentially six key components:

1. Identify the High Fire Threat Districts (HFTD) in RPU Service Territory
2. Identify RPU electric infrastructure located within the HFTD
3. Assess the fire risk posed by electric infrastructure in HFTD, including environmental conditions such as high wind events or high heat events that may exacerbate fire risk
4. Establish preventative strategies that RPU is taking to reduce fire risk by electric infrastructure in HFTD
5. Implement customer support and communications if de-energization is utilized as a wildfire risk preventative strategy
6. Identify the metrics and processes that RPU will take to evaluate the effectiveness of the preventative strategies

### 2023 Wildfire Mitigation Plan

RPU's 2023 WMP was developed by RPU's Wildfire Working Group, with concurrence from the Riverside Fire Department, for the purpose of establishing structured protocols to reduce and mitigate the risk of RPU's electric utility infrastructure causing a wildfire. Included in the WMP are the six key components listed above, and the steps, programs, policies, and procedures implemented by RPU to reduce wildfire risks and minimize impacts to customers.

RPU's 2023 WMP complies with the requirements of Public Utilities Code Section 8387 for publicly owned electric utilities to prepare a wildfire mitigation plan by January 1st, 2020, and update/review the plan annually thereafter.

Metrics – The Wildfire Board recommends two primary metrics to measure the performance of the WMP: number of fire ignitions and wires down within the service territory, recorded separately for those that occur within the HFTD and outside of the HFTD. RPU includes unplanned electric outages inside and outside the HFTD as its third metric. Counts are provided in the Plan for the number of fires that occurred that were less than 10 acres in size and all fires greater than 10 acres are individually described. If any unusual events occur, they are reported individually as well. RPU had no wildfires larger than 10 acres or unusual events to report for calendar year 2022.

Preventative Strategies – The metrics provide guidance as to how time, budget, and resources will be allocated for future years. RPU will make data-driven decisions to implement preventative strategies to improve equipment, operations, and processes to continue to reduce the risk of utility caused wildfire incidents. Preventative strategies are implemented through updates and improvements to design and construction standards, inspection and maintenance programs, operational policies, and situational awareness.

Projects – RPU's 2023 WMP describes specific projects completed in 2022 that improved system safety in the HFTD and RPU service territory. The WMP also includes planned projects for 2023. These projects have primarily focused on improvements in situational awareness and operational practices to continue to improve safety and performance to mitigate the occurrence of utility caused wildfire events.

Independent Evaluator – Public Utilities Code Section 8387 requires POUs to contract with a qualified independent evaluator with experience in assessing the safe operation of electrical infrastructure to review and assess the comprehensiveness of its wildfire mitigation plan. The independent evaluator shall issue a report that shall be made available on RPU's website and shall present the report at a public meeting of the POUs governing board.

Through a competitive request for proposal process, RPU contracted with Chloeta Fire, LLC (Chloeta) in March 2023, for an independent evaluation of the 2023 Plan. Chloeta conducted the evaluation of the draft WMP in April 2023. Through a collaborative process with the consultant's

input, RPU added additional details to the Plan to further clarify its wildfire mitigation measures. Following the independent evaluation, Chloeta concluded that the RPU WMP is sufficient in meeting the requirements for comprehensiveness as set forth by California Public Utilities Code Section 8387.

Per the Wildfire Board Guidance, “with respect to Independent Evaluations of WMPs, the statute is not specific about how often these should be procured by POUs and included in POU filings. For the low-wildfire-likelihood POUs, the [Wildfire Board] suggests that performing an independent evaluation essentially a pro-forma exercise, with little to no chance of providing useful insights into reducing wildfire risks from already low to nonexistent levels. Hence, the [Wildfire Board] proposes that these low-wildfire-likelihood POUs need not engage in additional independent evaluations unless their wildfire circumstances change, particularly for the annual updates between the comprehensive revisions.” Per this direction, RPU will procure the services of an Independent Evaluator for comprehensive revisions, which are required every three years, or when major updates are made to the Plan.

#### Submission Deadline

If approved by City Council, the 2023 RPU WMP will be submitted to the Wildfire Board immediately following approval.

### **STRATEGIC PLAN ALIGNMENT:**

This item contributes to **Strategic Priority 4 - Environmental Stewardship** and **Strategic Priority 6 - Infrastructure, Mobility and Connectivity** and the following goals:

**Goal 4.3** – Implement local and support regional proactive policies and inclusive decision-making processes to deliver environmental justice and ensure that all residents breath healthy and clean air with the goal of having zero days of unhealthy air quality per the South Coast Air Quality District’s Air Quality Index (AQI).

**Goal 4.6** – Implement the requisite measures to achieve citywide carbon neutrality no later than 2040.

**Goal 6.2** – Maintain, protect, and improve assets and infrastructure within the City’s built environment to ensure and enhance reliability, resiliency, sustainability, and facilitate connectivity.

This item aligns with each of the five Cross-Cutting Threads as follows:

1. **Community Trust** – This item addresses strategies to prevent wildfire caused by RPU electrical equipment and articulates a clear communications strategy for our customers in a de-energization event ensuring public safety for the greater public good.
2. **Equity** – This item is utility-wide and identifies measures and strategies to protect the safety and wellbeing of all customers of RPU and many areas of the region.
3. **Fiscal Responsibility** – This item represents fiscal responsibility by establishing strategies to minimize potential wildfires and the associated financial impacts that RPU and the City could incur.
4. **Innovation** – This item identifies new technology and deployment of a new infrastructure

that helps RPU mitigate the risks of its electrical equipment causing a wildfire.

5. **Sustainability & Resiliency** – Wildfires are a major source of greenhouse gas emissions that contribute to climate change as well as source of emissions that negatively impact local air quality. This item reduces the potential that a wildfire will occur due to RPU’s electrical equipment and thus reduces the potential release of greenhouse gas emissions and pollutants that negatively affect air quality.

**FISCAL IMPACT:**

There is no fiscal impact associated with this item.

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- Attachments:
1. 2023 RPU Wildfire Mitigation Plan
  2. Independent Evaluator (Chloeta) Report
  3. Presentation