

## Attachment B

### Independent Evaluation of the VMUS Wildfire Mitigation Plan By the Victorville Fire Department



# **CITY OF VICTORVILLE FIRE DEPARTMENT**

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## **INDEPENDENT EVALUATION OF THE VICTORVILLE MUNICIPAL UTILITY SERVICES (VMUS) WILDFIRE MITIGATION PLAN**

**June 20, 2023**

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## I. WILDFIRE MITIGATION PLAN REQUIREMENTS

### A. Senate Bill 901

Senate Bill (SB) 901 (2018) requires all publicly owned electric utilities (POUs), including Victorville Municipal Utility Services (VMUS), to prepare and present a wildfire mitigation plan (WMP) to its governing board prior to January 1, 2020, and annually thereafter. SB 901 identifies specific topics that must be addressed in each POU's WMP, including describing the POU's wildfire mitigation preventative strategies and programs. POUs must also have their plan reviewed by a qualified independent evaluator to assess the comprehensiveness of the plan.

This report serves as VMUS' independent evaluation in compliance with SB 901.

### B. AB 1054 & AB 111

Assembly Bill (AB) 1054 (2019) and AB 111 (2019) created a new state agency called the California Wildfire Safety Advisory Board ("Board"), which will be made up of seven members, five appointed by the Governor, one appointed by the Speaker of the Assembly, and one appointed by the Senate Rules Committee. SB 1054 requires that every POU must submit its WMP to the Board by July 1 of each year, starting in 2020. The Board will then review the POU WMP and provide comments and advisory opinions on the content and sufficiency of the WMP.

### C. POU WMP REQUIREMENTS

California Public Utilities Code (PUC) § 8387(b)(2) lists the statutory requirements for POU WMPs. These are the specific elements that the Victorville Fire Department (VFD) must review in order to make its determination for this report. The following list provides the specific elements that must be addressed in a POU WMP:

- **Responsibilities:** An accounting of the responsibilities of persons responsible for executing the plan. (PUC § 8387(b)(2)(A))
- **Objectives:** The objectives of the wildfire mitigation plan. (PUC § 8387(b)(2)(B))
- **Preventive Strategies:** 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. (PUC § 8387(b)(2)(C))
- **Evaluation Metrics:** 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. (PUC § 8387(b)(2)(D))



- **Impact of Metrics:** A discussion of how the application of previously identified metrics to previous wildfire mitigation plan performances has informed the wildfire mitigation plan. (PUC § 8387(b)(2)(E))
- **Recloser and/or De-energization Protocols:** 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. (PUC § 8387(b)(2)(F))
- **Customer Notification Procedures:** Appropriate and feasible procedures for notifying a customer who may be impacted by the deenergizing of electrical lines. The procedures shall consider the need to notify, as a priority, critical first responders, health care facilities, and operators of telecommunications infrastructure.<sup>1</sup> (PUC § 8387(b)(2)(G))
- **Vegetation Management:** Plans for vegetation management. (PUC § 8387(b)(2)(H))
- **Inspections:** Plans for inspections of the local publicly owned electric utility's or electrical cooperative's electrical infrastructure. (PUC § 8387(b)(2)(I))
- **Prioritization of Wildfire Risks:** 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:
  - 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. (PUC § 8387(b)(2)(J)(i))
  - 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. (PUC § 8387(b)(2)(J)(ii))

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<sup>1</sup> On October 2, 2019, the Governor signed into law SB 560 (stats. 2019, ch. 410), which amends the language of this provision. As amended, this language states:

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 deenergization for a given event.

Because the statute was amended after VMUS prepared its WMP and because this new language is not yet effective, VMUS' WMP reflects the prior statutory language. VFD has determined that because [POU] is not adopting deenergization protocols, this statutory change does not impact VFD's review.

- **CPUC Fire Threat Map Adjustments:** 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. (PUC § 8387(b)(2)(K))
- **Enterprisewide Risks:** A methodology for identifying and presenting enterprisewide safety risk and wildfire-related risk. (PUC § 8387(b)(2)(L))
- **Restoration of Service:** A statement of how the local publicly owned electric utility or electrical cooperative will restore service after a wildfire. (PUC § 8387(b)(2)(M))
- **Monitor and Audit:** A description of the processes and procedures the local publicly owned electric utility or electrical cooperative shall use to do all of the following:
  - Monitor and audit the implementation of the wildfire mitigation plan. (PUC § 8387(b)(2)(N)(i))
  - Identify any deficiencies in the wildfire mitigation plan or its implementation, and correct those deficiencies. (PUC § 8387(b)(2)(N)(ii))
  - 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. (PUC § 8387(b)(2)(N)(iii))



## II. DESCRIPTION OF POU

Victorville Municipal Utility Services is only a distributor and does not own or operate any generating plants. The service area for Victorville Municipal Utility Services only includes the Southern California Logistics Airport (SCLA) and the Foxborough Industrial Park, less than 60 customers combined. VMUS only serves commercial and industrial customers. Southern California Edison serves all of the residents of the City of Victorville and any commercial / industrial customer not located within the VMUS territory.

Victorville Municipal Utility Services entire electric supply system is located underground in conduit and vaults. Historically, undergrounded electric lines have not been associated with catastrophic wildfires. The undergrounding of electric lines serves as an effective mitigation measure to reduce the potential of power-line ignited wildfires. Based on a review of local conditions and historical fires, VMUS has determined that its electrical lines and equipment do not pose a significant risk of catastrophic wildfire.

Despite this low risk, VMUS takes appropriate actions to help its region prevent and respond to the increasing risk of devastating wildfires. In its role as a public agency, VMUS closely coordinates with other local safety and emergency officials to help protect against fires and respond to emergencies. In its role as a utility, VMUS follows all applicable design, construction, operation, and maintenance requirements that reduce safety risks associated with its system. This Wildfire Mitigation Plan describes the safety-related measures that VMUS follows to reduce its risk of causing wildfires.

## III. INDEPENDENT EVALUATION

### ***A. INDEPENDENT EVALUATOR REQUIREMENT***

SB 901 requires each POU 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.”<sup>2</sup> Additionally, the independent evaluator’s assessment of the comprehensiveness of the POU WMP must be issued in a report that is both posted to the POU’s website and presented at a public meeting of the POU’s governing board.

### ***B. VICTORVILLE FIRE DEPARTMENT QUALIFICATIONS***

SB 901 requires that the qualified independent evaluator that performs the assessment of VMUS’ WMP must have experience in assessing the safe operation of electrical infrastructure. The Victorville Fire Department (VFD) is the primary response agency for fires and other

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<sup>2</sup> Cal. Pub. Util.Code § 8387(c).

emergency services within the Victorville city limits. VFD is staffed with 70 personnel. The department is led by a Fire Chief, a Division Chief and three Battalion Chiefs. Together, the command staff possesses more than 100 years of experience.

In addition to the VFD, Mission Fire Rescue (Mission) services the Southern California Logistics Airport (SCLA) and coordinates with VFD for all fire emergencies within VMUS' proximities. VMUS and airport staff are able to communicate with Mission Fire Rescue through 400-megahertz radios or by calling their station directly. Additionally, the control tower has a direct line to Mission's fire station, which rings throughout the station and opens the bay doors alerting them of an emergency.

CONFIRE provides dispatch services for the VFD and Mission. CONFIRE is a regional dispatch agency that also provides services for Apple Valley Fire Protection District, and San Bernardino County Fire Protection District. CAL FIRE has a separate dispatch agency. CONFIRE coordinates incident command requests to several other agencies such as Southwest Gas, Southern California Edison, AMR, and other local agencies to assist in an emergency. CONFIRE also functions as the Operational Area (OA) dispatch for the County of San Bernardino, and can coordinate mutual aid on request of VFD as needed.

At the county level, a San Bernardino County Emergency Operations Center (EOC) talk group is programmed into an 800-megahertz frequency band radio and is used to communicate with EOCs within San Bernardino County during a disaster or emergency. The City of Victorville contracts with San Bernardino County Sheriffs. They too utilize 800-megahertz frequency band radios to communicate and have the capability to patch in California Highway Patrol, CAL FIRE, and other county resources to assist during emergencies.

### ***C. EVALUATION METHODOLOGY***

The Victorville Fire Department will evaluate the comprehensiveness of the VMUS' WMP on the following measures:

- **Statutory Compliance:** VFD will ensure that each required element specified in SB 901 (as listed in Section II.C. above) is either addressed in VMUS' WMP or VMUS has sufficiently described why that element is not applicable due to VMUS' size, geography, system, or other relevant factor.
- **Industry Comparison:** VFD is familiar with existing industry practices and has reviewed the Investor Owned Utility (IOU) WMPs previously filed with the California Public



Utilities Commission (CPUC).<sup>3</sup> The VFD has compared VMUS' WMP against existing practices and any comparable actions planned by the IOUs.

- **Physical Inspections:** Because of the VFDs role in the City of Victorville along with great collaboration with Mission Fire Rescue, the VFD has access to and regularly inspects the City of Victorville's facilities, including electrical infrastructure. Therefore, the VFD has access to prior data on the fire mitigation decisions and performance of VMUS. The VFDs evaluation of VMUS' WMP draws upon this data and experience.

#### ***D. METRICS***

VMUS' WMP proposes the following metrics to measure performance of its wildfire mitigation measures: (1) number of fire ignitions,<sup>4</sup> and (2) wires down events.<sup>5</sup> . The VFD will evaluate the metrics selected in Phase 2 of the CPUC's current Wildfire Mitigation Plan rulemaking for the IOUs (R.18-10-007) and determine if any additional metrics should be incorporated into future VMUS' WMPs.

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<sup>3</sup> IOU WMPs are available at: <https://www.cpuc.ca.gov/SB901/>.

<sup>4</sup> For purposes of this metric, a fire ignition is defined as follows: (i) VMUS facility was associated with the fire; (ii) the fire was self-propagating and of a material other than electrical and/or communication facilities; (iii) the resulting fire traveled greater than one linear meter from the ignition point; and (iv) VMUS has knowledge that the fire occurred.

<sup>5</sup> For purposes of this metric, a wires down event includes any instance where an electric transmission or primary distribution conductor falls to the ground or on to a foreign object.

#### IV. EVALUATION OF VMUS' WILDFIRE MITIGATION PLAN

##### A. MINIMIZING WILDFIRE RISKS

California Public Utilities Code section 8387(a) requires the following:

Each local publicly owned electric utility and electrical cooperative shall construct, maintain, and operate its electrical lines and equipment in a manner that will minimize the risk of wildfire posed by those electrical lines and equipment.

The Victorville Fire Department has determined that VMUS complies with this standard due to the construction of VMUS's equipment and resources not being located in an area that is considered an elevated or extreme risk of electric line wildfire. Also, with VMUS's electrical lines being entirely underground, this significantly decreases the opportunity for wildfires to occur above ground during high fire danger conditions.

##### B. EVALUATION OF WMP ELEMENTS

The following table lists each required element for VMUS' WMP and provides the Victorville Fire Department's assessment of the comprehensiveness of that element within VMUS' WMP.

Required Element of WMP	Location in WMP	Summary of VMUS WMP	Independent Evaluator's Assessment
PUC § 8387(b)(2)(A): An accounting of the responsibilities of persons responsible for executing the plan.	Section III	Utilities Commission, VMUS staff, City Council and the Victorville Fire Department	<i>VMUS WMP meets this requirement.</i>
PUC § 8387(b)(2)(B): The objectives of the wildfire mitigation plan.	Section II	Description of current VMUS policy, practices, and procedures that reduce its wildfire risk. Goal to improve electric grid resiliency.	<i>VMUS WMP meets this requirement.</i>

Required Element of WMP	Location in WMP	Summary of VMUS WMP	Independent Evaluator's Assessment
<b>PUC § 8387(b)(2)(C):</b> 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.	Section V	VMUS' distribution system 100% underground. VMUS adheres to all state and federal design, construction, and inspection standards.	<i>VMUS WMP meets this requirement.</i>
<b>PUC § 8387(b)(2)(D):</b> 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.	Section VII.A	VMUS will track fire ignitions attributed to VMUS facilities and equipment.	<i>VMUS WMP meets this requirement.</i>
<b>PUC § 8387(b)(2)(E):</b> A discussion of how the application of previously identified metrics to previous wildfire mitigation plan performances has informed the wildfire mitigation plan.	Section VII.B	As data collection history becomes more robust, VMUS will build and continue to analyze the data set to identify areas of its operations and service territory that are impacted.	<i>VMUS WMP meets this requirement.</i>
<b>PUC § 8387(b)(2)(F):</b> 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.	Section V.E-F	VMUS electrical system is 100% underground and has no automatic re-closures in service.	<i>VMUS WMP meets this requirement.</i>



Required Element of WMP	Location in WMP	Summary of VMUS WMP	Independent Evaluator's Assessment
<b>PUC § 8387(b)(2)(G):</b> Appropriate and feasible procedures for notifying a customer who may be impacted by the deenergizing of electrical lines. The procedures shall consider the need to notify, as a priority, critical first responders, health care facilities, and operators of telecommunications infrastructure.	Section V.E-F	Due to minimal risk of underground system, VMUS is not adopting specific protocols for deenergizing any portions of its electrical distribution system.	<i>VMUS WMP meets this requirement.</i>
<b>PUC § 8387(b)(2)(H):</b> Plans for vegetation management.	Section V.C	VMUS meets or exceeds industry standards; CPUC GO95, GO128, GO165, GO174, Public resources Code 4292-4293.	<i>VMUS WMP meets this requirement.</i>
<b>PUC § 8387(b)(2)(I):</b> Plans for inspections of the local publicly owned electric utility's or electrical cooperative's electrical infrastructure.	Section V.D	VMUS meets or exceeds the inspection requirements set forth in CPUC GO 165 and 174.	<i>VMUS WMP meets this requirement.</i>
<b>PUC § 8387(b)(2)(J):</b> 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	Section IV.A	Primary risk drivers for Wildfire within VMUS service territory are Earthquakes and Flooding.	<i>VMUS WMP meets this requirement.</i>

Required Element of WMP	Location in WMP	Summary of VMUS WMP	Independent Evaluator's Assessment
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.			
<b>PUC § 8387(b)(2)(K):</b> 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.	Section IV	No part of VMUS service territory is a higher wildfire threat than identified on the CPUC Fire Threat Map.	<b><i>VMUS WMP meets this requirement.</i></b>
<b>PUC § 8387(b)(2)(L):</b> A methodology for identifying and presenting enterprisewide safety risk and wildfire-related risk.	Section IV.B	VMUS has compiled and assessed historical data for local and regional earthquake and flooding events.	<b><i>VMUS WMP meets this requirement.</i></b>
<b>PUC § 8387(b)(2)(M):</b> A statement of how the local publicly owned electric utility or electrical cooperative will restore service after a wildfire.	Section VI	VMUS has listed a detailed safety plan of the actions to be taken in order to restore services after a wildfire.	<b><i>VMUS WMP meets this requirement.</i></b>

Required Element of WMP	Location in WMP	Summary of VMUS WMP	Independent Evaluator's Assessment
<p><b>PUC § 8387(b)(2)(N):</b> A description of the processes and procedures the local publicly owned electric utility or electrical cooperative shall use to do all of the following:</p> <p>(i) Monitor and audit the implementation of the wildfire mitigation plan.</p> <p>(ii) Identify any deficiencies in the wildfire mitigation plan or its implementation, and correct those deficiencies.</p> <p>(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.</p>	Section VII.C-E	<p>VMUS will submit their Wildfire Mitigation Plan to the Utility Commission, City Council, and the Victorville Fire Department for review and comment on an annual basis. VMUS will continue to monitor and reported reliability statistics to analyze the effectiveness of the Wildfire Mitigation Plan.</p>	<i><b>VMUS WMP meets this requirement.</b></i>



## V. RESULTS AND CONCLUSION

The Victorville Fire Department concludes that VMUS' WMP comprehensively addresses all of the statutorily required elements for a POU WMP specified in California Public Utilities Code section 8387. The Victorville Fire Department further finds that Victorville Municipal Utility Services has taken reasonable actions to minimize the risk that its lines or equipment will cause a wildfire.



Reviewed by Andrew Roach, Battalion Chief  
(Wildfire Subject Matter Expert)

5.24.23

Date



Approved by David Foster, Fire Chief

5.23.23

Date