



# City of Palo Alto

## Utilities Advisory Commission Staff Report

(ID # 14175)

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Meeting Date: 6/8/2022

Report Type:

**Title: Discussion and Update to the 2022 Wildfire Safety Mitigation Plan**

**From: Director of Utilities**

**Lead Department: Utilities**

### Recommendation

Staff recommends that the UAC receive the Wildfire Mitigation Plan Update.

### Executive Summary

Each year, electric utilities are required to update their Wildfire Mitigation plans, present those plans in a noticed public meeting, then submit the plan by July 1 to the State's Wildfire Safety Advisory Board.<sup>1</sup> Staff updated the plan earlier this year, will present the plan at today's meeting, and intends to submit the plan in late June, pending any UAC discussion.

### Background

Utilities Department Staff prepared our [first Wildfire Mitigation Plan](#) in 2019, after the passage of a new law requiring such plans of all electric utilities. The law requires specific plan elements, including a description of the preventive strategies used to minimize the risk of electric lines and equipment causing catastrophic wildfires, protocols for disabling reclosers and deenergizing when necessary, and twelve other elements. The first plan was [presented to and accepted by the City Council](#) on January 21, 2020 ([Staff Report ID 10670](#)). The law requires an annual update to the original plan, with a comprehensive revision at least once every three years.<sup>2</sup> As such, staff presented the [updated plan in 2021](#) to the UAC ([Staff Report ID 12190](#)) and the 2022 update is [Linked Here](#). The redlines appearing in the update are at the request of the Wildfire Safety Advisory Board and the plan will be submitted as such to easily show changes.

### Discussion

After submitting the 2021 updates, the Wildfire Safety Advisory Board reviewed the plans from each utility and [offered comments and suggestions](#) for future iterations. Some comments and suggests were intended broadly for all entities reporting and some for each specific agency;

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<sup>1</sup> See [Public Utility Code 8387](#).

<sup>2</sup> "Update" and "comprehensive revision" are undefined in statute. Palo Alto staff and other POUs take "update" to mean simply bringing the original plan up to date, with few meaningful changes and "comprehensive revision" to mean an in-depth review of each plan element, with significant changes made as needed to the original plan.

many of the comments directed to Palo Alto specifically were favorable.<sup>3</sup> Below is a summary of the key changes between the 2021 and 2022 updates:

- At the request of the Wildfire Safety Advisory Board, we moved the website placement of the original plan and 2021 update to make it easier to find and we included the Board’s Context Table (page 3)
- Dates of past years’ public presentations on the plan were added (page 24)
- Added more context to community outreach efforts during a fire (page 25)
- Added the Response and Communications Procedure for Public Safety Power Shutoff (Appendix G)
- Updates made to the status of reported projects, including: the installation of a weather station, progress on undergrounding lines, assessments for emergency back-up generators, and more (pages 18 – 20 and Appendix E)
- General wordsmithing for clarity

### **Timeline and Resource Impact**

This update does not have any immediate resource impact besides staff time. Ongoing and proposed activities noted in the plan are and will be approved through the Capital and Operating Budget process. The plan update will be submitted to the Wildfire Safety Advisory Board by July 1, 2022, as is legally required.

### **Stakeholder Engagement**

The annual presentation of plan iterations in a publicly noticed meeting affords an opportunity for stakeholders to provide comments to the UAC and staff. Additionally, all versions of the plan are [posted on the Utilities Department website](#) for public review.

### **Environmental Review**

The UAC’s receipt of this report and presentation is not a project requiring California Environmental Quality Act review, because it is an administrative governmental activity which will not cause a direct or indirect change in the physical environment.

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<sup>3</sup> See “[Guidance Advisory Opinion for the 2022 Wildfire Mitigation Plans of Electric Publicly Owned Utilities and Rural Electric Cooperatives](#),” page 15 for one example: “Palo Alto’s proactive attention to consideration of pumping water uphill in preparation for a potential wildfire and/or PSPS event is commendable.”