



2023

WILDFIRE MITIGATION PLAN

*Adopted by City Council
June 20, 2023
Plan Version No. 4.0*

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II. EXECUTIVE SUMMARY

The City of Lompoc Electric Utility Division's (Lompoc Electric) overarching goal is to provide safe, reliable, and economic electric service to the City of Lompoc (City). In order to meet this goal, Lompoc Electric constructs, maintains, and operates its electrical lines and equipment in a manner that minimizes the risk of catastrophic wildfire posed by its electrical lines and equipment. Distribution system protection for both public and asset safety has been paramount. Lompoc Electric has been successful in preventing the start of wildfires from its infrastructure.

To help reduce the risk of a wildfire starting from an electric utility's equipment, Senate Bill (SB) 901 was enacted in 2018. A section of the bill, amending Public Utilities Code (PUC) section 8387, directed local publicly owned electric utilities and electric cooperatives to annually prepare a wildfire mitigation plan related to its power lines and equipment and to incorporate in their plans specified information and procedures.

Assembly Bill (AB) 1054 was further enacted in 2019 establishing the Wildfire Safety Advisory Board (WSAB) who was to review each utility's wildfire mitigation plan beginning in 2020 and provide guidance opinions for improvements and future considerations in subsequent wildfire mitigation plans. The bill further requires each electric utility to submit by July 1 of each year, its plan to the WSAB for review with a comprehensive revision not less than every three (3) years.

To comply with SB 901 and to meet the requirements outlined in PUC section 8387(b), Lompoc Electric developed the 2019 Wildfire Mitigation Plan (Plan). The Plan was adopted in 2019 and implemented in 2020. In 2021 and 2022, the Plan was updated, approved by the City of Lompoc City Council and has been submitted annually to the WSAB as required by AB 1054. Lompoc Electric has incorporated the WSAB guidance opinions each year in the Plan updates.

In the WSAB "Guidance Advisory Opinion for the 2023 Wildfire Mitigation Plans of Electric Publicly Owned Utilities and Rural Electric Cooperatives", adopted November 16, 2022, the WSAB recommended consistency in the 2023 Publicly Owned Utilities (POU) comprehensive revision of Wildfire Mitigation Plans. The WSAB recommended that the POU's consider following the WSAB's model comprehensive revision template found in their Guidance Advisory Opinion as well as incorporate Guidance opinions specific to each utility.

In this Plan revision, Lompoc Electric used the recommended WSAB's model comprehensive revision template. In addition, Lompoc Electric considered the specific recommendations and has implemented changes where applicable. Due to the number of changes to the format, as recommended by the WSAB, a detailed list of changes was not included in this revision but will be included in the future.

III. Utility Overview and Context

A. Utility Description and Context Setting Table

Lompoc Electric has been operating its electric system since 1923. Lompoc Electric is a division within the Utility Department of the City. Lompoc Electric owns and operates a system that includes power generation and distribution facilities and uses Pacific Gas and Electric (PG&E) for transmission.

A small portion of Lompoc Electric's Utility's overhead electrical lines and equipment is located in, and adjacent to, California Public Utilities Commission (CPUC) designated Tier 2 High Fire Threat District (HFTD). The area is considered an "Elevated" level of risk for wildfire threat. No service area is located in a Tier 3 area of "Extreme" level of risk. (HFTD designations are described in more detail in Section VII, page 20.)

Lompoc Electric has a much lower wildfire risk profile than other areas in the State that have suffered destructive wildfires in recent years. This is largely due to a small service area with a dense urban footprint, (approximately 12 square miles of land), flat terrain and only 1.15% of overhead distribution lines are in a Tier 2 HFTD. Of Lompoc Electric's 15,181 customers, less than 1% are located in the HFTD. More specific information about Lompoc Electric's service territory is found in Table 1, page 5 in this section.

A small service area offers tremendous visibility on Lompoc Electric's infrastructure. Problems within the service area are generally discovered quickly. The compact territory allows Lompoc Electric to reach nearly every asset within a 10-minute drive from its headquarters. The infrastructure in the HFTD is easily accessible by Lompoc Electric staff and City of Lompoc Fire Department (LFD).

Despite the lower risk, Lompoc Electric takes appropriate actions to help the City prevent and respond to the increasing risk of wildfires from its electric utility infrastructure. In its role as a division of a public agency, Lompoc Electric closely coordinates with other City departments including fire and safety.

The City includes a Safety Element in its General Plan. Wildland Fire is considered a low risk in the City per figure S-2 of the Safety Element and due to the limited areas in HFTD. To help reduce the damage caused to development from wildfires, the City implements various code sections (i.e., Building Code, Fire Code, Zoning Code) in determining the suitability and design of developments.

Table 1: Context-Setting Information

Utility Name	City of Lompoc	
Service Territory Size	[12] square miles	
Owned Assets	<input type="checkbox"/> Transmission <input checked="" type="checkbox"/> Distribution <input type="checkbox"/> Generation	
Number of Customers Served	[15,181] customer accounts	
Population Within Service Territory	[43,736] people (U.S. Census Bureau Data as of 7/1/22)	
Customer Class Makeup	<i>Number of Accounts</i>	<i>Share of Total Load (MWh)</i>
	[90]% Residential; [1]% Government; [0]% Agricultural; [N/A]% Small/Medium Business; We do not collect this data. [9]% Commercial/Industrial	[42]% Residential; [11]% Government; [0]% Agricultural; [N/A]% Small/Medium Business; We do not collect this data. [47]% Commercial/Industrial
Service Territory Location/Topography¹	[2]% Agriculture [3]% Barren/Other [0]% Conifer Forest [0]% Conifer Woodland [0]% Desert [0]% Hardwood Forest [12]% Hardwood Woodland [25]% Herbaceous [7]% Shrub [51]% Urban [.070]% Water	
Service Territory Wildland Urban Interface² (based on total area)	[57.01]% Wildland Urban Interface; [.2]% Wildland Urban Intermix;	
Percent of Service Territory in CPUC High Fire Threat Districts (HFTD) (based on total area)	<input type="checkbox"/> Includes maps Tier 2: [28.8]% Tier 3: [0]%	

¹ This data is based on the California Department of Forestry and Fire Protection, California Multi-Source Vegetation Layer Map, depicting WHR13 Types (Wildlife Habitat Relationship classes grouped into 13 major land cover types) available at: <https://lab.data.ca.gov/dataset/california-vegetation-whr13-types>

² This data is based on the definitions and maps maintained by the United States Department of Agriculture, as most recently assembled in The 2010 Wildland-Urban Interface of the Conterminous United States, available at <https://doi.org/10.2737/RDS-2015-0012-3>.

Prevailing Wind Directions & Speeds by Season	<input type="checkbox"/> Includes maps Lompoc's prevailing wind directions are as follows: WNW wind - November through July and September NW wind – August W wind - October Wind speeds by month are as follows: Jan - 6 mph May - 9 mph Sept - 6 mph Feb - 7 mph June - 8 mph Oct - 6 mph March - 8 mph July - 7 mph Nov - 6 mph April - 9 mph August – 6 mph Dec - 6 mph This data is based on information provided by NOAA, Oxnard office. (Official 30-year averages from 1981-2020.)
Miles of Owned Lines Underground and/or Overhead	Overhead Dist.: [59.5] miles Overhead Trans.: [0] miles Underground Dist.: [64.9] miles Underground Trans.: [0] miles Explanatory Note 1 - Methodology for Measuring "Miles": [e.g., circuit miles, line miles.] Line miles. Explanatory Note 2 – Description of Unique Ownership Circumstances: [N/A] Explanatory Note 3 – Additional Relevant Context: [e.g., percentage of lines located outside service territory] [0]
Percent of Owned Lines in CPUC High Fire Threat Districts	Overhead Distribution Lines as % of Total Distribution System (Inside and Outside Service Territory) Tier 2: [1.15]% Tier 3: [0]% Overhead Transmission Lines as % of Total Transmission System (Inside and Outside Service Territory) Tier 2: [0]% Tier 3: [0]% Explanatory Note 4 – Additional Relevant Context: [e.g., explain any difference from data reported in WMP due to different numerator used for this form] [N/A]
Customers have ever lost service due to an IOU PSPS event?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Customers have ever been notified of a potential loss of service to due to a forecasted IOU PSPS event?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Has developed protocols to pre-emptively shut off electricity in response to elevated wildfire risks?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

Has previously pre-emptively shut off electricity in response to elevated wildfire risk?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If yes, then provide the following data for calendar year 2022: <i>Number of shut-off events:</i> [____] <i>Customer Accounts that lost service for >10 minutes:</i> [____] <i>For prior response, average duration before service restored:</i> [____]
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B. Statutory Cross-Reference Table

Table 2 below indicates applicable Statutory Requirements of PUC 8387(b) requirements and the corresponding section of this Plan that addresses each requirement as requested by the WSAB.

Table 2: Cross References to Statutory Requirements of PUC 8387(b)

Requirement	Statutory Language	Location in WMP
Persons Responsible	PUC § 8387(b)(2)(A): An accounting of the responsibilities of persons responsible for executing the plan.	Section [V], page 10
Objectives of the Plan	PUC § 8387(b)(2)(B): The objectives of the wildfire mitigation plan.	Section [IV], page 9
Preventive Strategies	PUC § 8387(b)(2)(C): 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 [VII(A-H)], page 21
Evaluation Metrics	PUC § 8387(b)(2)(D): 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 [X(A)], page 31
Impact of Metrics	PUC § 8387(b)(2)(E): A discussion of how the application of previously identified metrics to previous wildfire mitigation plan performances has informed the wildfire mitigation plan.	Section [X(B)], page 32
De-energization Protocols	PUC § 8387(b)(2)(F): 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	Section [VII(H)], page 26

	impacts of those protocols, including impacts on critical first responders and on health and communication infrastructure.	
Customer Notification Procedures	PUC § 8387(b)(2)(G): 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 [VIII], page 27
Vegetation Management	PUC § 8387(b)(2)(H): Plans for vegetation management.	Section [VII(D)], page 22
Inspections	PUC § 8387(b)(2)(I): Plans for inspections of the local publicly owned electric utility's or electrical cooperative's electrical infrastructure.	Section [VII(E)], page 25
Prioritization of Wildfire Risks	PUC § 8387(b)(2)(J): 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 utilities 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.	Section [VI], page 16
CPUC Fire Threat Map Adjustments	PUC § 8387(b)(2)(K): 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 [VI(C)], page 18
Enterprise Wide Risks	PUC § 8387(b)(2)(L): A methodology for identifying and presenting enterprise wide safety risk and wildfire-related risk.	Section [VI(B)], page 17
Restoration of Service	PUC § 8387(b)(2)(M): A statement of how the local publicly owned electric utility or electrical cooperative will restore service after a wildfire.	Section [IX], page 29

<p style="text-align: center;">Monitor and Audit</p>	<p>PUC § 8387(b)(2)(N): 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>	<p style="text-align: center;">Section [X(C)], page 33</p>
<p style="text-align: center;">Qualified Independent Evaluator</p>	<p>PUC § 8387(c): The local publicly owned electric utility or electrical cooperative shall 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 the Internet Web site of the local publicly owned electric utility or electrical cooperative, and shall present the report at a public meeting of the local publicly owned electric utility's or electrical cooperative's governing board.</p>	<p style="text-align: center;">Section [XI], page 35</p>

C. Process for Utility Adoption and Submittal of Annual WMP and Opportunities for Public Comment

The City of Lompoc City Council (City Council) is provided the Plan annually for consideration and adoption in an appropriately noticed public meeting and accept comments on the Plan from the public. A draft copy of the Plan is made available for review by the public on the City's website prior to the City Council meetings. City Council meetings are open and accessible to the Public. Meeting notices and agendas are posted in advance on the City's website. Those who are unable to attend can view a livestream of the meeting and can call in with comments.

The adopted plan is filed with the WSAB by July 1st of each year.

D. Description of where Wildfire Mitigation Plan Information can be Found on Utility Website

Lompoc Electric has posted all of its Plans and its most recent Independent Evaluator Report on its website. The report can be found at the link below.

<https://www.cityoflompoc.com/electric>

E. Purpose of the Wildfire Mitigation Plan

This Plan describes the range of activities that Lompoc Electric is taking, has taken, or is considering, in order to mitigate the threat of power-line ignited wildfires, including its various programs, policies, and procedures. This plan is adopted annually by the City Council and is implemented by the Electric Utility Manager. The Plan complies with the requirements of PUC Section 8387 and AB 1054. The Plan will promote continuous improvement year to year and represent best efforts to implement industry best practices in a prudent and reasonable manner.

Lompoc Electric is a division within the Utility Department of the City. In its role as a division of a public agency, Lompoc Electric closely coordinates with other fire and safety agencies. For wildfire prevention and response, Lompoc Electric is subordinate to the City's Fire Department and Police Department. Lompoc Electric's Wildfire mitigation efforts will operate in coordination with the City's Hazard Mitigation Plan and Comprehensive Emergency Management Plan.

F. Organization of the Wildfire Mitigation Plan

The Wildfire Mitigation Plan includes the following elements:

- Executive Summary;
- Utility Overview and Context;
- Objectives of the Plan;
- Roles and responsibilities for carrying out the Plan;
- Identification of key wildfire risks and risk drivers;
- Description of wildfire mitigation strategies;
- Metrics for measuring the performance of the plan and identifying areas for improvement;
- Annual and historical results for metrics;
- Description of Community outreach and education;
- Restoration of service;
- WSAB Guidance Advisory Opinion; and
- Revision history.

IV. OBJECTIVES OF THE WILDFIRE MITIGATION PLAN

A. Minimizing Sources of Ignition

The primary goal of this Wildfire Mitigation Plan is to minimize the probability that Lompoc Electric's distribution system may be an original or contributing source for the ignition of a fire. Lompoc Electric has evaluated prudent and cost-effective improvements to its physical assets, operations, and training that can help to meet this objective. Lompoc Electric has implemented those changes consistent with this Plan.

B. Resiliency of the Grid

The secondary goal of this Plan is to improve the resiliency of the electric grid. As part of the development of this Plan, Lompoc Electric assesses new industry practices and technologies that will reduce the likelihood of a disruption in service and improve the restoration (duration) of service.

Other resiliency efforts include working with the LFD to help mitigate fire fuels located in the wildland urban interface (WUI) and greenbelts likely to be a threat to facilities and equipment.

C. Minimizing Unnecessary or Ineffective Actions

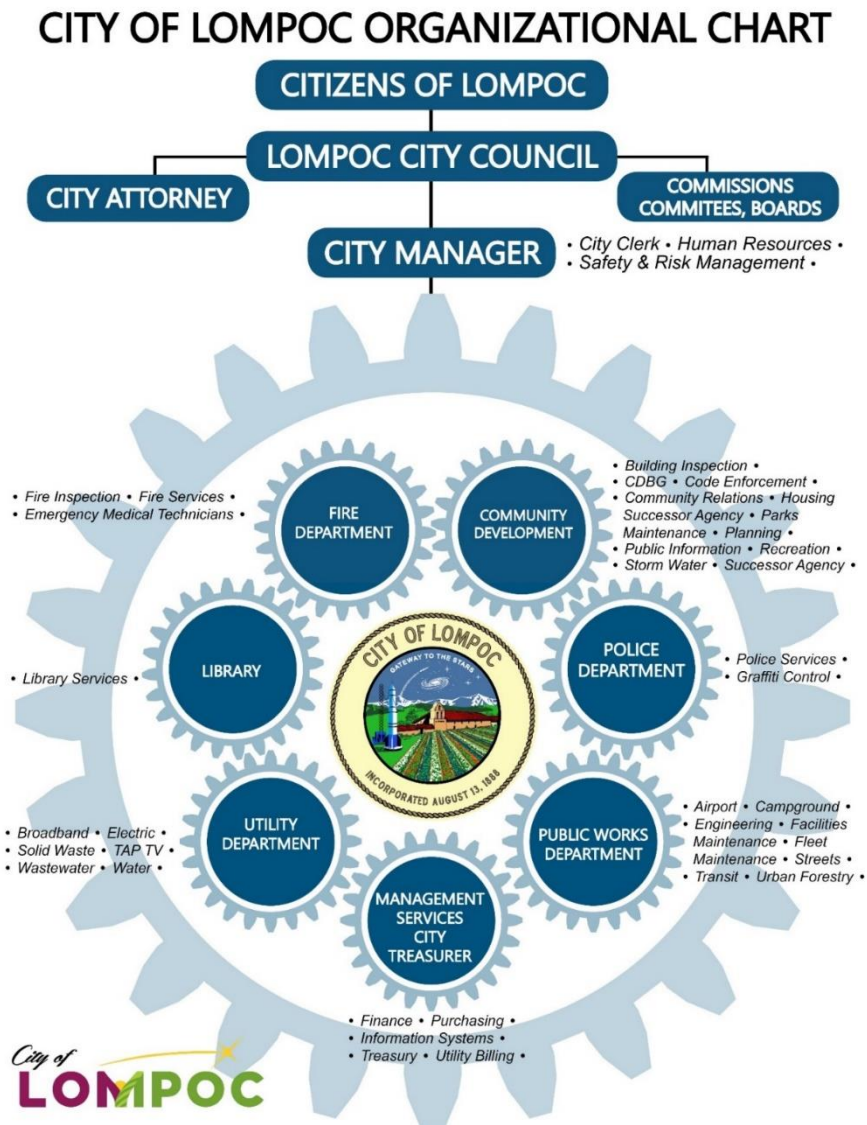
The final goal for this Plan is to measure the effectiveness of specific wildfire mitigation strategies. Where a particular action, program, or protocol is determined to be unnecessary or ineffective, Lompoc Electric assesses whether a modification or replacement is merited. This plan will also help determine if more cost-effective measures would produce the same or better results.

V. ROLES AND RESPONSIBILITIES

A. Lompop Electric's Roles and Responsibilities

The City utilizes the Council-Manager form of local governance, which includes an elected Mayor and four Council Members, and an appointed City Manager. The Mayor is elected every two years and the four Council Members are elected every four years.

The City's organizational chart is provided below:



The City Council is Lompoc’s legislative body, setting policy, approving budgets, and setting tax rates. Council Members also appoint the City Manager (Manager), who is responsible for the day-to-day administration of the City and serves as the City Council's chief advisor. The Manager prepares a recommended budget, recruits and hires most of the City's staff, and carries out the City Council's policies. While the Manager may recommend policy decisions, the Manger is ultimately bound by the actions of the City Council. The City Council also appoints the City Attorney.

Lompoc Electric staff have the following responsibilities regarding fire prevention, response, and investigation:

- Conduct work in a manner that will minimize potential fire dangers;
- Take all reasonable and practical actions to prevent and suppress fires resulting from Lompoc Electric facilities;
- Utilize LFD to coordinate with federal, state and county fire management personnel to ensure that appropriate preventative measures are in place;
- Immediately report fires, pursuant to specified procedures;
- Take corrective action when observing or having been notified that fire protection measures have not been properly installed or maintained;
- Ensure compliance with relevant federal, state, and industry standard requirements; and
- Ensure that wildfire data is appropriately collected.

Executive Level Responsibility for Plan Execution:

The Electric Utility Division Manager oversees the implementation of the Plan and ensures that staff follow procedures and protocols. The Electric Regulatory Compliance Coordinator manages the execution of performance monitoring, including providing guidance to staff and leading the development of reports. The staff responsible for each metric area will aggregate relevant metrics at the direction of the Electric Utility Division Manager.

Plan Owners: The table below outlines the current assignments and are subject to change.

Plan	Owner
Wildfire Mitigation Plan	Electric Utility Division Manager
City Comprehensive Emergency Management Plan	City Fire Chief and City Manager
City Hazard Mitigation Plan	City Fire Chief

Strategy Leads: The table below outlines the proposed assignments and are subject to change.

Strategy	Lead Personnel	Key Technical Personnel
Vegetation Management	Electrical Supervisor	Urban Forestry Supervisor
Enhanced Inspections	Electric Utility Division Manager	Electrical Supervisor
Operational Practices	Electric Utility Division Manager	Electrical Supervisor and Electric Substation Staff
System Hardening	Electric Utility Division Manager	Electrical Supervisor and Electrical Estimator
Public Safety & Notification	Electric Utility Division Manager	City Fire and Police Department Chiefs and Public Information Officer
Reclosing & De-energization	Electric Utility Division Manager	Electrical Supervisor and Electric Substation Staff

B. Coordination with City Water Utility and Other Departments

The City's Fire Department, Police Department, Public Works Department and Utility Department (includes Electric, Water, Wastewater and Solidwaste Divisions) are all departments within the same organization. This unified structure results in frequent contact and communication between the departments on many fronts and topics, and creates a beneficial familiarity in working together.

City Water Utility and City Utility Department

During wildfires and other public safety events, Lompoc Electric works with the Utility Department to ensure power is provided to City Water Division's water-pumping stations, wastewater plant, and other critical infrastructures. In the event power is not available, the City Water Division and Wastewater Division will utilize backup generators located at their facilities to continue to provide water and sewer service. These facilities are not only critical for defending the City from wildfire but are essential for safe repopulation following any disaster.

The City of Lompoc Water Division has a robust water treatment plant, maintaining 11-12 million gallons of drinking water between four elevated reservoirs at all times. This elevated storage allows for needed flow and pressure in the scenario of a City-wide power outage. The Lompoc Water Treatment Plant is outfitted with a 1.5 megawatt diesel generator on site that can power the entire treatment plant during extended City-wide power disruptions. This generator also powers the onsite groundwater Well #4, with a trailer mounted 150 kW generator assigned to Well #11. Between the production sites

with generator power the City is able to produce approximately 4.75 million gallons per day in an emergency scenario.

City Fire Department

The Lompoc Fire Department (LFD) is the City's lead for wildfire and emergency operations and directs Lompoc Electric regarding public safety priorities.

City Police Department

Lompoc Electric coordinates with the Lompoc Police Department (LPD) and is subordinate for emergency and public safety issues. Lompoc Electric will work closely with the LPD for situational awareness and other public safety issues related to the Plan.

Other City Departments and Divisions

Lompoc Electric works to ensure information regarding warnings, alerts, and widespread outages are shared with other City Departments and Divisions. The Administration Department is an integral part of getting information out to the media and public and will coordinate with the City's Emergency Operations Center (EOC) if activated.

C. Coordination with Communication Infrastructure Providers

Lompoc Electric coordinates with communication and electric infrastructure providers throughout the year when work on the system affects their equipment. Lompoc Electric staff also identifies safety issues. If Lompoc Electric staff discovers a facility in need of repair owned by another entity, Lompoc Electric may issue a notice to repair to the facility owner and work to ensure that necessary repairs are promptly completed.

For joint pole fire prevention, Lompoc Electric takes the lead role and informs the subordinate providers when it identifies any compromised poles due to third-party attachments. During emergencies, Lompoc Electric assumes the primary role and informs providers when there is damage or risk to their equipment. Lompoc Electric has not experienced any issues working with third parties.

D. Wildfire Response – Standardized Emergency Management System

Lompoc Electric is a division within the Utility Department of the City. For wildfire response and recovery, Lompoc Electric is subordinate to the LFD and LPD. Lompoc Electric's Wildfire mitigation efforts will operate in coordination with the City Hazard Mitigation Plan and the City Comprehensive Emergency Management Plan.

When the City has a wildfire, Lompoc Electric, or the incident commander, will request needed resources through Lompoc Dispatch. Because Lompoc Electric's service area falls within the City boundaries, LFD can respond to the HFTD areas within six minutes, limiting the potential damage from a wildfire.

Annually, the LFD meets with surrounding agencies and discusses Automatic/Mutual Aid resources that are needed. The LFD has an agreement with Santa Barbara County and Vandenberg Space Force Base Fire Departments which allows LFD to access the needed resources. If the incident is beyond the limits of LFD resources, then LFD will reach out to Cal OES for additional resources.

Wildfire recovery and re-energization will be coordinated with LFD and City EOC if activated. LFD will coordinate with federal, state, and local fire management personnel as necessary or appropriate. During the activation of the City EOC during a wildfire, Lompoc Electric standby staff will be on call for necessary shift changes during fire events.

As a local governmental agency³, the City has planning, communication, and coordination obligations pursuant to the California Office of Emergency Services' Standardized Emergency Management System (SEMS) Regulations,⁴ adopted in accordance with Government Code section 8607. The SEMS Regulations specify roles, responsibilities, and structures of communications at five different levels: field response, local government, operational area, regional, and state.⁵ The LFD maintains a Comprehensive Emergency Management Plan that includes participation from Lompoc Electric when needed. The City works closely with Santa Barbara County to coordinate emergency operations, including the Santa Barbara County Sheriff's Office of Emergency Services (OES).

Under the SEMS structure, a significant amount of preparation is done through advanced planning at the county level, including the coordination of effort of public, private, and nonprofit organizations. Santa Barbara County serves as the Operational Area and is guided by the Santa Barbara County Disaster Council. The Operational Area includes local and regional organizations that bring relevant expertise to the wildfire prevention and recovery planning process. Those participants include local fire agencies, Red Cross, Santa Barbara County Office of Emergency Management and Community Emergency Response Team (CERT).

Pursuant to the SEMS structure, the LFD participates in Santa Barbara County Emergency Operations Center (EOC) annual training exercises.

The OES coordinates with Federal, State, and local agencies to prepare, respond, and recover from emergencies and natural disasters.

³ As defined in Cal. Gov. Code § 8680.2.

⁴ 19 CCR § 2407.

⁵ Cal. Gov. Code § 2403(b).

- OES is responsible for maintaining and updating the County Emergency Operation Plan (EOP), which is an all hazards plan for Santa Barbara County.
- OES also coordinates and maintains the Santa Barbara County Emergency Operation Center (EOC). The EOC can be used during a major incident to carry out the principles of emergency preparedness and emergency management between multiple agencies.
- The OES provides technical advice to the Sheriff on local emergency declarations and has a direct link to the California Governor's Office of Emergency Services (Cal OES) during disasters or any other critical incident. In the event of a major incident OES can work with Cal OES to obtain a Presidential proclamation.
- OES works closely with other local agencies assisting them in preparing emergency plans and in disaster training. OES works as a point of contact for local agencies to the Cal OES.

Pursuant to that structure, LFD coordinates and communicates with the relevant local, State and Federal agencies. Pursuant to the City's Comprehensive Emergency Management Plan, a Lompoc Electric liaison will participate in annual City EOC training, which encompasses disaster preparedness, including wildfire safety.

The LFD completes RT-130 annually, which is a wildland refresher on weather, topography, fuels, suppression, and communications.

The City is a member of the California Utility Emergency Association, which plays a key role in ensuring communications between utilities during emergencies.

VI. WILDFIRE RISKS AND DRIVERS ASSOCIATED WITH DESIGN, CONSTRUCTION, OPERATION, AND MAINTENANCE

A. Particular Risk and Risk Drivers Associated with Topographic and Climatological Risk Factors

Within Lompoc Electric's service territory and surrounding areas, the primary risk drivers for wildfire are the following:

- Terrain of surrounding areas;
- Vegetation type and density in the wildland-urban interface area;
- Changing weather patterns including high wind, high heat, and low humidity; and
- Extended drought.

The City ranked the wildfire hazard as being a limited planning concern for the City. The City's terrain is mostly flat and comprised largely of urbanized areas. City officials continually ensure that future development is sited, designed, and constructed in a manner that will reduce future damage associated with wildfire hazards.

Lompoc is located on California's Central Coast. Rolling hills surround Lompoc Valley to the north, south and east. The Valley is open at its western end to the Pacific Ocean on the undeveloped Gaviota Coast. The Pacific Ocean is 8 miles from downtown Lompoc. The Santa Ynez River runs east to west through the Valley while Burton Mesa, a chaparral forest with sandy soil, lies to the north. The hills to the south are mined for diatomaceous (fossil) earth. The City is surrounded to the North and South by wildland-urban interface areas (WUI) in the CPUC Tier 2 HFTD Agricultural areas surround Lompoc to the East and West.

Vegetation and topography were significant elements in the identification of the fire threat zones in surrounding areas of Lompoc. A substantial amount of the vegetation in Lompoc WUI is commonly called chaparral; it is a dense and scrubby bush that has evolved to persist in a fire-prone habitat. Chaparral plants will eventually age and die; however, they will not be replaced by new growth until a fire rejuvenates the area. Chamise, Manzanita and Ceanothus are all examples of chaparral which are quite common in Lompoc's surrounding areas.

Generally, many of the areas at risk within Lompoc's surrounding area outside of its service territory fall into the classic WUI category. The mixed WUI is characterized by isolated homes, subdivisions, and small communities situated predominantly in wildland settings. The occluded wildland-urban interface exists where islands of wildland vegetation occur inside a largely urbanized area.

Lompoc does not typically experience Red Flag Warning events. Since 2004, only two (2) Red Flag Warnings have been issued for the Santa Barbara Central Coast area. They were in 2007 and 2011 respectively. A northwest breeze is common with an average hourly wind speed of 6 mph. Lompoc is 98 feet above mean sea level and has a mild climate. Daily fog is common and no snow occurs. There is moderate rainfall beginning in October and ending in March with an average of 15.99 inches per year. Due to the above average rainfall of 33.62 inches received during the water year 2023, Lompoc is no longer considered in a drought.⁶

30 Year Average Temperatures & Rainfall (1981-2020)⁷

	<u>Jan</u>	<u>Feb</u>	<u>Mar</u>	<u>Apr</u>	<u>May</u>	<u>Jun</u>	<u>Jul</u>	<u>Aug</u>	<u>Sep</u>	<u>Oct</u>	<u>Nov</u>	<u>Dec</u>	<u>Annual</u>
Avg Max Temperature	63	64	66	67	68	70	72	73	74	73	68	63	68
Avg Min Temperature	42	44	46	47	50	53	55	56	55	51	46	42	49
Avg Temperature	53	54	56	57	59	62	64	64	64	62	57	52	59
Avg Precipitation (in.)	3.33	3.59	2.88	1.01	0.29	0.04	0.01	0.03	0.01	0.74	1.41	2.56	15.99

B. Enterprise Wide Safety Risks

Lompoc Electric has determined that the level of risk for wildfires from its overhead lines and equipment is limited. In order to ascertain the level of risk to its system from risk drivers, the following were reviewed:

1. CPUC Fire-Threat Map to determine areas of high fire risk;

A statewide fire threat map was adopted by the CPUC to delineate the boundaries to identify, evaluate and potentially adopt stricter fire-safety regulations that apply to overhead power lines located within those boundaries. (See Map 1 on Page 19.) An overlay of the CPUC Fire-Threat Map of Lompoc Electric’s service territory was created by Lompoc Electric to identify wildfire safety risks. (See Map 2 on page 20.) Only 1.15% of Lompoc Electric’s overhead distribution lines are in the CPUC Tier 2 HFTD. Of Lompoc Electric’s 15,181 customers, less than 1% are in the HFTD. No critical facilities are located in this area.

2. Size and footprint of the City;

The City is a well-developed area with a dense urban footprint. Additionally, a small service area (12 square miles) offers tremendous visibility on Lompoc Electric’s infrastructure. Problems within the service area are generally discovered quickly. The compact territory allows Lompoc Electric to reach nearly every asset within a 10-minute drive from its headquarters. LFD can respond to a fire in the HFTD within 6 minutes. HFTD areas are easily accessed.

⁶ Data taken from Santa Barbara County Flood Control District Rainfall and Reservoir Summary.

⁷ Information was provided by the National Weather Service Forecast Los Angeles office for the period 1981-2020.

3. Wildfires caused from electric equipment; and

Lompoc Electric has no known history of causing any wildfires from its electrical lines and equipment.

4. A review of outages caused by animals, birds, vegetation, and overhead equipment failures as a way to assess wildfire risk.

Outages in the HFTD areas have been limited. Since 2016, Lompoc Electric has only had two outages. One outage occurred from a tree branch falling on a service line and the other was due to balloons in a service line. System hardening has helped to minimize outages from these exposures.

The description of CPUC fire threat zones is shown in Table 3.

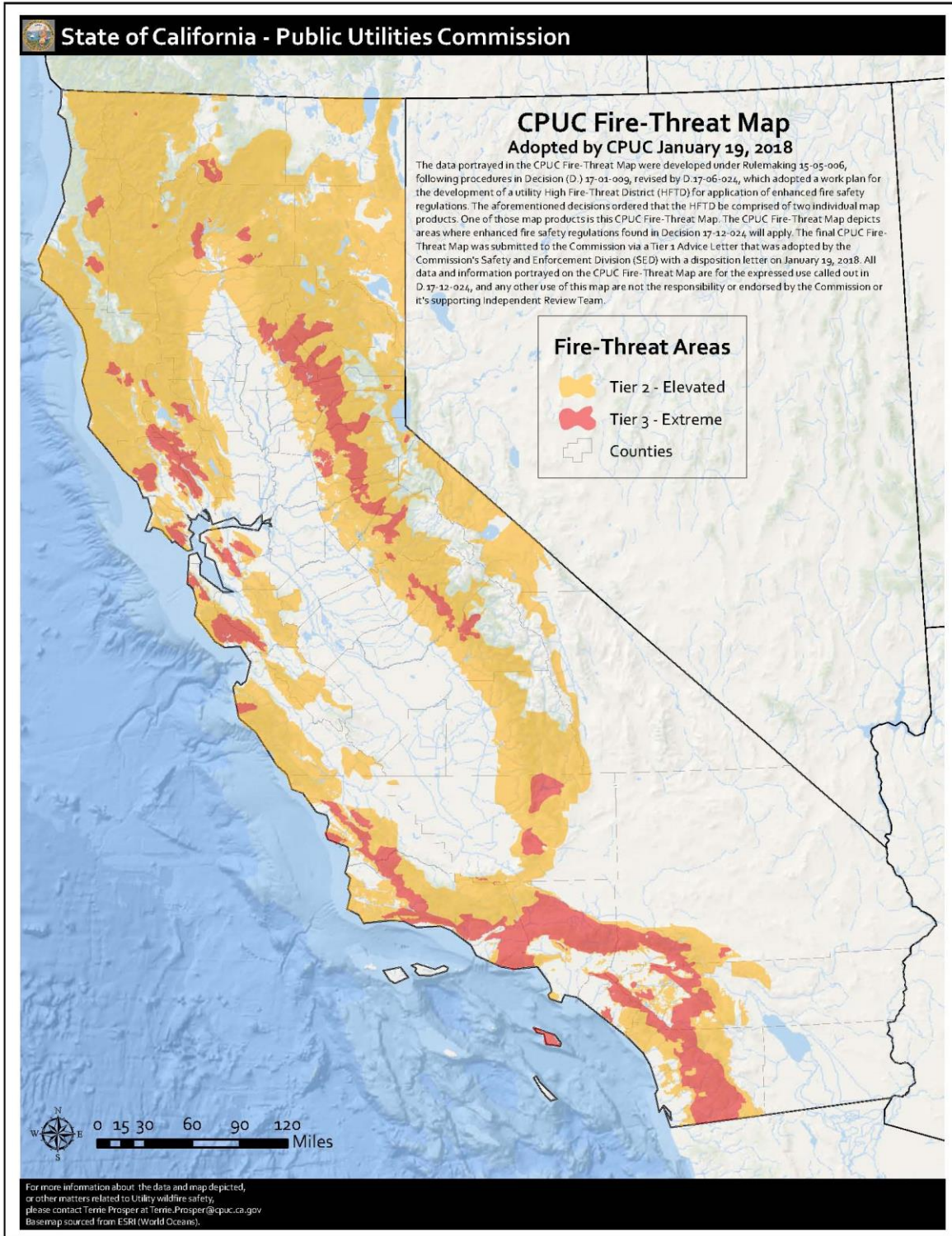
Table 3: Description of Tiered Fire Threat Zones

Zone	Category	Description
Tier 3	Extreme	Wildland areas where exposure to overhead power lines, the availability of water resources, and emergency responder circulation routes affect response times to combat wildland fires.
Tier 2	Elevated	Elevated risk due to vegetation, high voltage regional transmission lines crossing the area, and adjacent to Tier 3 fire threat zones.
Tier 1	Low	Well developed areas, typically with underground high voltage circuitry.

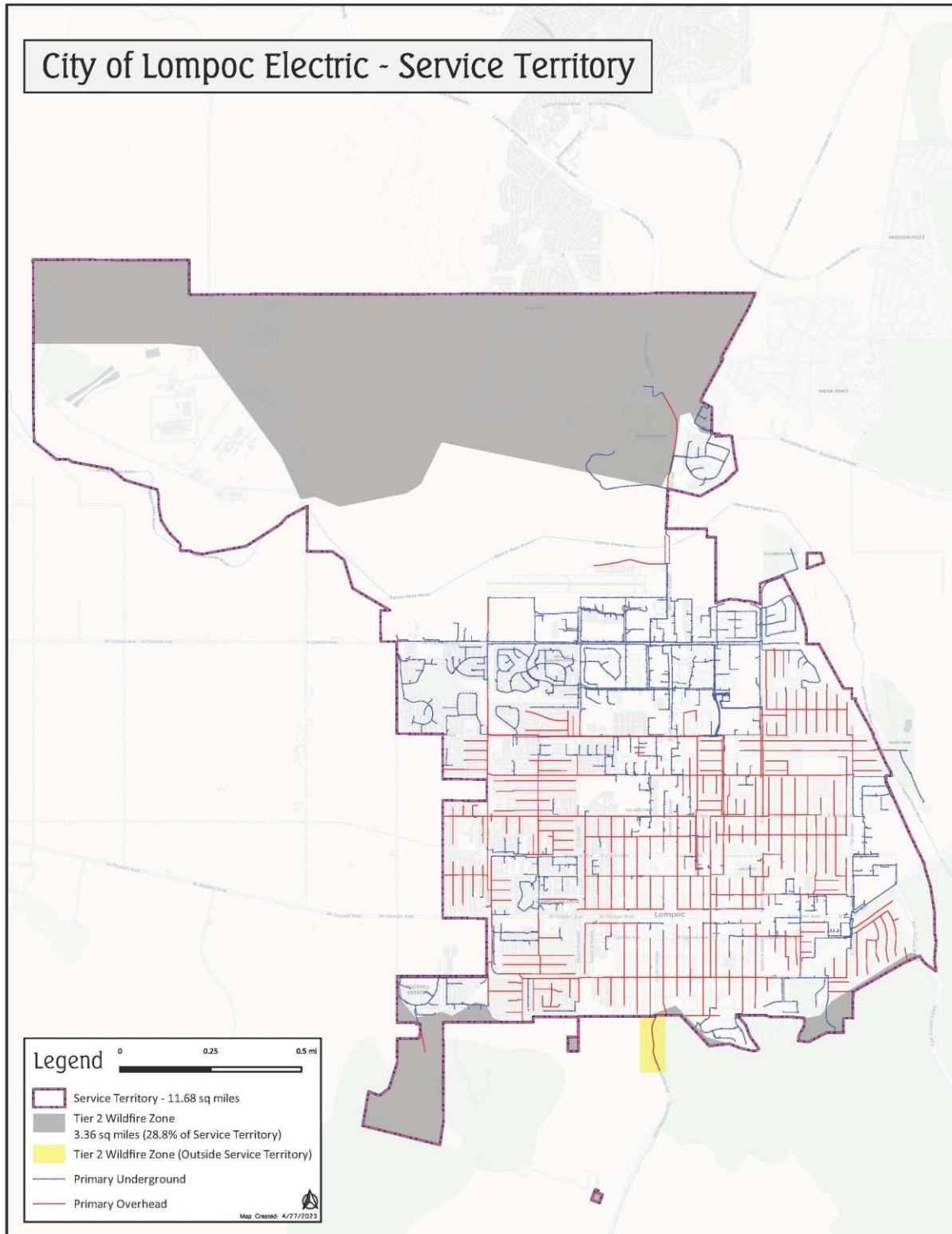
C. Changes to CPUC Fire Threat Map

Currently, the City does not propose any changes to the borders of the HFTD boundaries as indicated in CPUC’s Fire-Threat map (adopted by the CPUC January 19, 2018).

MAP 1 – CPUC Fire-Threat Map



MAP 2 – Overlay of Lompoc Electric Service Territory and CPUC Fire-Threat Map



VII. WILDFIRE PREVENTION STRATEGIES

A. High Fire Threat District

Lompoc Electric did not directly participate in the development of the CPUC Fire-Threat Map, which designates a High Fire Threat District (HFTD), but has incorporated the HFTD into its construction, inspection, maintenance, repair, and clearance practices, where applicable.

Lompoc Electric, in coordination with LFD, will review the CPUC Fire-Threat Map annually to identify needed adjustments to hazard threat levels due to changes in urban development and/or vegetation conditions. When adjustments are identified, Lompoc Electric will collaborate with the LFD to update the CPUC Fire-Threat Map data and Fire-Threat Map accordingly.

B. Weather Monitoring

Lompoc Electric monitors current and forecasted weather data from a variety of sources during high fire threat conditions including:

- United States National Weather Service (NOAA);
- “PG&E Weather Awareness” website (provides PG&E regional PSPS, wind, temperature and Red-Flag information);
- “PG&E PSPS Maps” website;
- National Fire Danger Rating System; and
- Lompoc Fire Department.

Lompoc Electric coordinates with LFD and Urban Forestry Division to monitor climate change impacts where limited amount of infrastructure is located in the HFTD. Lompoc Electric will use California’s Fourth Climate Change Assessment⁸ and subsequent updates including the wildfire risk-related forecast maps that were developed for the Assessment in future plan updates.

C. Design and Construction Standards

Lompoc Electric facilities are designed, constructed, and maintained to meet or exceed the relevant Federal, State, or industry standard. Lompoc Electric treats CPUC General Order (GO) 95 as a key industry standard for design and construction standards for overhead electrical facilities. Additionally, Lompoc Electric monitors and follows, as appropriate, the National Electric Safety Code.

⁸ California’s Fourth Climate Change Assessment can be found at <https://climateassessment.ca.gov/>.

System hardening strategies consist of system, equipment, and structure design and technical upgrades. The practices in this category aim to improve system hardening to prevent contact between infrastructure and fuel sources, such as vegetation and animals. It also includes making the system more resilient to wildfire and other disasters.

In addition to meeting design and construction standards, Lompoc Electric has completed the following system hardening projects and procedures in the HFTD as described below:

- Removed secondary lines to an area in the HFTD that were no longer needed;
- Replaced all high voltage mechanical electrical connections with compression connections to minimize the possibility of high resistance/arcing due to loosening of connection over lifespan;
- Installed non-expulsion type current limiting fuses to minimize the risk of wildfire due to hot fuse material expelled onto vegetation;
- Upgraded existing primary insulators to material with higher dielectric rating (over insulating);
- Tightened all hardware and replace existing hardware bonding components where needed;
- Installed insulated wildlife protective guards on all exposed high voltage wires and apparatus on utility poles; and
- Developed protocol to increase inspection cycle for infrastructure located within the HFTD during increased fire threat conditions or when a Red Flag Warning is called.

Lompoc Electric will continue to explore the following in the HFTD:

- Application of an intumescent paint directly to the bottom six to ten feet of utility poles. The use of properly applied intumescent paint should allow for wood utility pole protection in the event of a wildfire;
- Provide additional access roads along power line easements and maintain to appropriate standards;
- Engineering – Revise construction standards to implement arc suppression components, raptor framing, squirrel guards, tree wire, lightning arresters, and arc suppression fusing;
- Convert overhead lines to underground as feasible and economic; and
- Alternative Technologies – Lompoc Electric will consider the feasibility of implementing alternative technologies, such as wire-break sensing and arc detection technology, as they become available and cost-effective.

D. Vegetation Management

Lompoc Electric's Vegetation Management strategy helps to control vegetation near to Lompoc Electric's overhead distribution lines and equipment in the Tier 2 HFTD so they

better adhere to clearance specifications. The strategy also includes fire fuels mitigation and other work in order to prevent the system from causing a fire and to protect the system from fire.

Lompoc Electric incorporates the industry standard vegetation management practices such as Public Resources Code section 4292 and GO 95 Rule 35 (See Table 3). The recommended time-of-trim guidelines do not establish a mandatory standard, but instead provide useful guidance to utilities. Lompoc Electric performs this work with the assistance of the City's Urban Forestry Division (Forestry Division).

In coordination with the LFD and the Forestry Division, Lompoc Electric monitors current weather conditions, climate change and other relevant factors throughout the year to determine if inspections should be completed on a shorter timeframe and more often. After consulting with the LFD and Forestry Division for this Plan revision, Lompoc Electric has changed its inspection schedule to ensure that all inspections and work within the HFTD are completed by May 1st of each year before the risk of wildfires increase.

The Forestry Division Supervisor is a certified arborist and uses specific knowledge of growing conditions and tree species to determine the appropriate time of trim clearance in each circumstance. During the 2023 fire season, the Urban Forestry Division will conduct multiple inspections due to the elevated moisture content in vegetation causing the potential for increased growth.

Within the HFTD, Lompoc Electric performs an evaluation of every tree that has the potential to strike overhead facilities if it were to fail. Lompoc Electric with coordination of the Forestry Division performs more frequent and detailed inspections of any such trees, and in severe cases will work with the property owner to remove the tree.

Table 4
GO 95, RULE 35, Section III (Minimum Clearances)

Case	Type of Clearance	Trolley Contact, Feeder and Span Wires, 0-5kv	Supply Conductors and Supply Cables, 750 - 22,500 Volts	Supply Conductors and Supply Cables, 22.5 - 300 kV
13	Radial clearance of bare line conductors from tree branches or foliage.	18 inches	18 inches	¼ Pin Spacing
14	Radial clearance of bare line conductors from vegetation in the HFTD.	18 inches	48 inches	48 inches

Described below are enhancements to traditional vegetation management strategy.

- No vertical coverage allowed above Lompoc Electric distribution lines;
- Provide vegetation control in a 30-foot perimeter around substations;
- For public land and greenbelts, provide easement clear from ground to sky adjacent to Lompoc Electric facilities;
- Work with adjacent customers to get approval for wider clearance on their land. This could include removing tall, diseased, leaning trees that appear to be at risk of falling into power lines;
- Perform additional vegetation removal for fuels reduction in easements on an annual rotation to ensure CPUC recommended clearances are maintained based on the fire hazard zone where each distribution line is located; and
- Coordinate with the LFD for other resiliency efforts include working with the LFD to help mitigate fire fuels located in the wildland urban interface and greenbelts likely to be a threat to facilities and equipment. The LFD Weed abatement programs monitor the abatement of weeds on vacant and undeveloped lots to reduce the potential of grass fires.

E. Inspections

Inspection plays an important role in wildfire prevention. Inspection strategies consist of assessment and diagnostic activities as well as associated corrective actions. Lompoc Electric incorporates California specific standard inspection guidelines such as CPUC GO 165 and CPUC GO 95, and Rule 18 inspection guidelines. Pursuant to those standards, Lompoc Electric inspects electric facilities in the HFTD more frequently than the other areas of its service territory. The frequency of inspections will be increased in the HFTD during increased high fire threat conditions such as when a Red Flag Warning is called and when storms or other disasters have significantly impacted the system.

Lompoc Electric's current inspection activities include annual visual inspections of equipment, intrusive inspection of wood poles and GIS data collection. Lompoc Electric plans to purchase a resistograph pole testing drill to inspect poles in the HFTD by the next plan update.

If Lompoc Electric staff discovers a facility in need of repair that is owned by an entity other than the City, Lompoc Electric will issue a notice to repair to the facility owner and work to ensure that necessary repairs are completed promptly.

Lompoc Electric has modified its inspection schedule in this Plan revision to ensure that all inspections within the HFTD are completed by May 1st of each year before the risk of wildfires increases. In coordination with the LFD and the Urban Forestry Division, Lompoc Electric monitors drought conditions and other relevant factors throughout the year to determine if inspections should be completed on a shorter timeframe.

F. Workforce Training

Lompoc Electric staff are trained to work in a manner that will minimize potential wildfire risks including taking all reasonable and practicable actions to minimize the risk of a catastrophic wildfire caused by Lompoc Electric facilities. The Lompoc Electric Utility Division Manager will take corrective action for deficiencies when staff witnesses, or is notified of, improperly installed or maintained fire protection measures. In addition to those general principles, several new operational practices have been implemented to help reduce the risk of wildfire and improve the response time in the event of a fire including:

- All Lompoc Electric staff are required to contact LFD and LPD reporting anything hazardous;
- Staff collects and maintains wildfire data necessary for the implementation and evaluation of the Plan;
- During high wildfire, threat conditions (Red Flag Warnings) staff will perform only essential work;

- A protocol has been developed that includes having Lompoc Electric staff at the substation during high wildfire threat conditions and for patrol of areas where the fire danger is higher;
- Lompoc Electric staff will participate in City EOC system drills and training; and
- During the activation of the City EOC during a wildfire, Lompoc Electric standby staff will be on call.

G. Recloser Policy

Lompoc Electric's protection system in the HFTD during high fire threat conditions have been modified so that circuits that are faulted do not attempt to reclose.

H. De-energization

Lompoc Electric has the authority to preemptively shut off power due to fire threat conditions; however, this option will only be used in extraordinary circumstances. Due to minimal risk of Lompoc Electric's infrastructure causing a power-line ignited wildfire, Lompoc Electric is not adopting specific protocols for de-energizing any portions of its electric distribution system. Lompoc Electric has the capability to open cut-outs or use switches to isolate areas that are in the HFTD to limit power outage to specific areas if necessary. Lompoc Electric is subordinate to LFD in the case of wildfire and emergency response and will turn off power when directed to by LFD.

Turning off power to the areas in the HFTD will have limited impact to the community or public safety. Less than 1% of customers will be impacted. Depending on the location of the wildfire, sections of the HFTD area can be isolated. A power outage in the HFTD area will not impact electric service to other customers. Water, wastewater, and trash collection services will continue to be provided. As weather conditions improve, and with the direction of LFD, inspection of infrastructure and repair to damage, re-energization will be initiated and considered a priority.

In the event power will need to be turned off, Lompoc Electric will coordinate with LFD, the City Administration Department, and the City EOC, if activated, to provide notification to customers impacted prior to a power shut off.

Weather and other extenuating circumstances may not always allow advance notification. Notification will be made through updates to the City's available media outlets such as its website, social media, radio, and television stations.

VIII. COMMUNITY OUTREACH AND PUBLIC AWARENESS

The City will maintain a proactive outreach and education strategy to create public awareness of fire threats, fire prevention, and available support during a wildfire or large power outages. Prior to an emergency, communication will include regular messages related to wildfire prevention, such as right-of-way management, tree trimming, line inspection, or other relevant topics. Methods of communication will include website updates, social media posts, and public service announcements on City television and radio stations.

The following provides how Lompoc Electric communicates with the community during high fire threat periods and disasters.

- Will coordinate with LFD and LPD;
- Will coordinate with the City EOC if activated; and
- Will coordinate with the City Administration Department to formulate and release information about emergencies to the news media and the general public through the City's available media outlets such as website, social media, radio and television stations to push messages out about outages and emergencies.

The following entities will be notified by telephone because they are located in the HFTD or provide support to those customers:

- Santa Barbara County OES to ensure text alerts are sent to customers signed up with Ready SBC Alerts;
- Critical infrastructure: City jail, City Police and Fire Department facilities, other key City Utility facilities (e.g., water, wastewater, solid waste, city-wide communications, City EOC, etc.);
- Hospital and Medical Discount Program customers; and
- City college campus.

Ongoing Public Outreach

The City utilizes several platforms to educate the public about hazards in the community, relevant programs to safeguard and protect themselves from disaster, and actions they can take to prepare themselves for events. Below is a list of the different platforms used and a brief summary of some of the programs:

- Santa Barbara County Alert System – Ready SBC Alerts;
- Social media messaging;
- Wild-fire Readiness information on Lompoc Electric website;
- Public service announcements on City television and radio stations;
- LFD Public demonstrations;
- LFD open house;

- City of Lompoc Public Safety Night during City Old Town Market; and
- LFD Weed Abatement Program.

During an emergency, the City EOC will be utilized to manage both internal and external communication throughout the incident from that initial notification to termination of the incident. Use of established notification and communication plans will allow Lompoc Electric to coordinate with applicable emergency service personnel (LPD, LFD, Santa Barbara County OES, etc.) along with maintaining open lines of communication with customers, media and City staff.

IX. RESTORATION OF SERVICE

In the event of a wildfire or other emergency event, Lompoc Electric will staff up to coordinate activities to restore service. Lompoc Electric will restore power, following an event, in cooperation with LFD, LPD, and City Public Works Department and in coordination with Santa Barbara County, or another named Incident Commander.

Lompoc Electric management will oversee restoration and response activities. In the event that additional staff are needed, Lompoc Electric may leverage mutual aid agencies, other City staff, and local aid organizations.

The following describes the steps typically taken to begin the restoration process:

- **Assessment.** Lompoc Electric crews must patrol each line segment to determine the extent of damage that has occurred. The patrol involves assessing equipment access issues, any cleanup/debris removal issues and determining personal protective equipment requirements for the crews. Lompoc Electric will work with LFD and LPD to access impacted areas as soon as the area is deemed safe.
- **Planning.** After initial assessment, Lompoc Electric staff will meet to plan the needed work. The team will work to prioritize the restoration efforts, targeting the circuits that serve the most critical infrastructure needs.
- **Mobilize.** Based on the size and complexity of the rebuild/restoration efforts, Lompoc Electric will coordinate the crews and material needs internally if possible. Mutual aid may be used on an “as needed” basis to provide additional support.
- **Rebuild.** The rebuild effort lead by Lompoc Electric will commence as soon as areas become safe and accessible. The initial efforts will be to get the lines up and restore the damaged circuits.
- **Restore.** Lompoc Electric and or mutual aid will restore electric services to homes and businesses as soon as possible after the wildfire. Depending on the extent of damage, residential and business customers may have to perform repairs on their facilities and pass inspections by the City Building Division prior to having full electric service restored.

In most cases, the following restoration priorities will be followed depending on the specific incident and available resources:

- Public safety in the affected areas;
- Worker safety in performing the restoration work;
- Medical Discount customers;
- Critical infrastructure: City jail, LPD and LFD facilities, other key City Utility facilities (e.g., water, wastewater, solid waste, City-wide communications, City EOC, etc.);

- Major commercial accounts critical to continuity of community services – Hospitals, medical facilities, large grocery stores, home supply stores, and lodging facilities;
- To reduce the total number of customers affected; and
- To reduce the length of time customers have been without power.
- In directing restoration efforts to best achieve the above priorities, Lompoc Electric personnel will generally find it most efficient to dedicate restoration resources to the following types of facilities in the following order of priority to optimally restore electric services:
 - City facilities;
 - Substations;
 - Distribution circuits (12 kV);
 - Distribution feeders;
 - Distribution transformers; and
 - Service lines.

X. EVALUATION OF THE PLAN

A. Metrics and Assumptions for Measuring Plan Performance

Lompoc Electric will track five outcome and performance metrics in the Tier 2 HFTD to measure the performance of the Plan:

- Number of fire ignitions;
- Wires down;
- Number of outages;
- Inspection cycle completion; and
- Vegetation management completion.

Metric 1: Fire Ignitions

For purposes of this metric, a fire ignition is defined as follows:

- Lompoc Electric facility was associated with the fire. (Origin of fire distinguishes from fires of external origin such as arson);
- The fire was self-propagating and of a material other than electrical and/or communication facilities; and
- The resulting fire traveled greater than one linear meter from the ignition point.

Lompoc Electric provides in the Plan, the number of fires that occurred that were less than 1 acre in size. Any fires greater than 1 acre will be individually described.

Metric 2: Wires Down

The second metric is the number of distribution wires downed in Tier 2 HFTD. For purposes of this metric, a wire down event includes any instance where an electric primary distribution conductor falls to the ground or onto a foreign object. Lompoc Electric does not normalize this metric by excluding unusual events, such as severe storms. Instead, Lompoc Electric will supplement this metric with a qualitative description of any such unusual event.

Metric 3: Number of Outages

The third metric relates to the number of power outages that occur from equipment in the Tier 2 HFTD.

Metric 4: Inspection Completion

The fourth metric relates to the completion percentage of system inspection of infrastructure in Tier 2 HFTD.

Metric 5: Vegetation Management Completion

The fifth metric relates to the completion percentage of vegetation management in Tier 2 HFTD.

B. Impact of Metrics on Plan

Tracking metrics provide insight into the effectiveness of Lompoc Electric's wildfire mitigation measures and assist in formulating enhanced measures in future plans if warranted. The following provides a summary of incident and performance metrics associated with the Plan since its adoption in 2019.

Metric 1: Fire Ignitions

Date Range	Incidents
12/18/19 -- 6/15/21	0
6/16/21 - 6/21/22	0
6/22/22 - 6/20/23	0

Metric 2: Wires Down

Date Range	Incidents
12/18/19 - 6/15/21	0
6/16/21 - 6/21/22	0
6/22/22 - 6/20/23	0

Metric 3: Outages

Date Range	Incidents
12/18/19 - 6/15/21	0
6/16/21 - 6/21/22	0
6/22/22 - 6/20/23	0

Metric 4: Inspection Completion

Date Range	Percent Completed
12/18/19 - 6/15/21	100%
6/16/21 - 6/21/22	100%
6/22/22 - 6/20/23	100%

Metric 5: Vegetation Management Completion

Date Range	Percent Completed
12/18/19 - 6/15/21	100%
6/16/21 - 6/21/22	100%
6/22/22 - 6/20/23	100%

C. Monitoring and Auditing of the Plan

Lompoc Electric staff will perform an internal audit of the Plan annually. The internal audit will align with Lompoc Electric's planning and budgeting process. The review will include an assessment of the previous plan metrics as well as the effectiveness of the Plan mitigation activities. After completion of the internal audit, the Plan will be updated accordingly.

Lompoc Electric has not had a fire ignition, wire down or outage in the Tier 2 HFTD since the adoption of this Plan in 2019. Lompoc Electric's accomplishments indicate that it's been effective in carrying out mitigation activities that reduce the risk of its electrical equipment igniting a wildfire. The system hardening projects completed in Section VII(C), page 21 and full completion of all annual equipment inspections and vegetation management are contributing factors.

Lompoc Electric will submit its Plan to the WSAB after Plan adoption by the City Council. The WSAB will review and provide advisory opinions regarding the content and sufficiency of the Plan. Lompoc Electric will consider comments and opinions received by the WSAB in future plans. Every three (3) years, a comprehensive review of the plan will be conducted.

D. Identifying and Correcting Deficiencies in the Plan

At any point in time when deficiencies are identified, they will be reviewed and corrected. Findings from the internal audits will be recorded by Lompoc Electric's Utility Division Manager and appropriate corrections to the Plan and supporting procedures and processes will be made. No deficiencies in the Plan or implementation were identified.

E. Monitoring the Effectiveness of Inspections

Problems that are identified during inspections are prioritized for correction. Lompoc Electric will utilize the metrics identified in Section X(A) to monitor and audit the effectiveness of electrical lines, equipment inspections and vegetation management inspections. Inspection findings are examined to identify trends and recurring problems. Lompoc Electric will replace or repair the equipment as necessary. All inspections and work were completed by June 20, 2022.

XI. INDEPENDENT AUDITOR

PUC Section 8387(c) requires utilities to contract with a qualified independent evaluator with experience in assessing the safe operation of electrical infrastructure to review and assess the comprehensiveness of the Plan. The independent evaluator must issue a report and present it to the utility's governing board.

Lompoc Electric contracted with Guidehouse in 2020 to conduct an independent evaluation of its Plan. Guidehouse performed the evaluation and presented their report to the City Council on July 21, 2020, in a public meeting and concluded that:

1. Lompoc Electric's Plan aligns appropriately with PUC Section 8387 and includes all required elements.
2. Lompoc Electric's Plan is determined to be comprehensive.

Lompoc Electric has posted its most recent Independent Evaluator Report on its website. The report can be found at the link below.

<https://www.cityoflompoc.com/electric>

Performance metrics have shown the Plan to be effective, indicating no substantial changes are needed at this time. Staff determined that an independent evaluation of the Plan was not necessary for this revision; however, the Plan was reviewed by the LFD Battalion Chief for efficacy. If in the future, the Plan is modified substantially or if the wildfire circumstances substantively change, Lompoc Electric will consider having the Plan reviewed by an independent evaluator.

XII. WSAB GUIDANCE ADVISORY OPINION

On November 16, 2022, the WSAB approved its final “Guidance Advisory Opinion for the 2023 Wildfire Mitigation Plans of Electric Publicly Owned Utilities and Rural Electric Cooperatives” providing comments and advisory opinions to each local publicly owned electric utility and electrical cooperative regarding the content and sufficiency of its wildfire mitigation plan and recommendation on how to mitigate wildfire risk. The WSAB is the only statewide entity authorized in statute to review and provide guidance on the POUs WMPs.

The “Guidance Advisory Opinion for the 2023 Wildfire Mitigation Plans of Electric Publicly Owned Utilities and Rural Electric Cooperatives” can be found at:

<https://energysafety.ca.gov/what-we-do/wildfire-safety-advisory-board/>

The WSAB provided the following guidance advisory opinion for Lompoc Electric:

1. “The WSAB appreciates Lompoc’s inclusion of the context-setting table and statutory cross-reference table in their 2022 WMP. The WSAB also commends Lompoc for referencing the recommendations in the 2021 Guidance Advisory Opinion and pointing to where responses to those recommendations were added in the plan. The WSAB looks forward to Lompoc’s comprehensive revision 2023 WMP and encourages Lompoc to continue to incorporate WSAB recommendations.”
 - WSAB recommendations were incorporated into this plan where applicable.
2. “The WSAB observes the same commitment to improvement in wildfire mitigation planning in Lompoc’s 2022 WMP as in their past submittals.”
3. “Lompoc has added some information about the WMP adoption and public comment processes in their 2022 WMP. The WSAB appreciates the added information but encourages Lompoc to provide some additional specifics per the proposed new 2023 WMP comprehensive revision template in Appendix 2.”
 - Additional information requested in the WSAB Context-Setting Information Template was incorporated in Table 1 on page 2.
4. “The WSAB appreciates Lompoc’s updated, clear and prominent website location for their WMPs including adding historical context and also appreciates the inclusion of the website location links in the WMP itself.”
5. “The WSAB appreciates Lompoc’s revision history information in the 2022 WMP. With the 2023 comprehensive revision WMPs, describing changes from this year’s version may prove too complex to be useful, but the WSAB encourages Lompoc to continue revision history information in subsequent WMPs.”

- Revision history will be provided in future updates.
6. “Lompoc is to be commended for incorporating more than expected levels of industry standards concerning its design and construction within the HFTD, given the relatively low likelihood of causing or encountering a wildfire. Currently they have completed mitigation projects such as replacing all mechanical connections with compression, upgrading primary insulators with higher dielectric rated ones (over insulating for intended voltage.) The WSAB notes, however, that it is difficult to see what was completed in the last year, as the WMP states as in the past that Lompoc is “still considering” some strategies.”
 - Text was changed to show projects that were completed and technologies that are still under consideration in Section VII(C), page 21.
 7. “The WSAB appreciates Lompoc’s continued exploration of how to better understand the structural integrity of their infrastructure and tree inventory, particularly including the procurement of a resistograph drill to enhance its adopted annual poles inspection process within the HFTD areas. The WSAB commends Lompoc for a sound and effective wildfire mitigation strategy and for their stated commitment to upgrade plans depending upon the severity of the effects of climate change. The WSAB encourages Lompoc to provide additional information about when they envision examining or implementing any such changes.”
 - Information regarding climate change is noted in Section VII(B), page 21.
 8. “The WSAB notes that Lompoc has a broad yet effective method of situational awareness of weather conditions, using information from the fire and police departments as well as city employees and information from the county.”
 - Additional weather awareness resources were included in Section VII(B), page 21.
 9. “The WSAB appreciates Lompoc updating their WMP metrics and encourages Lompoc to start providing results tracking information in the WMPs to aid in understanding the usefulness and impact of the metrics.”
 - Metric tracking has been included in Section X(B), page 32.
 10. In addition to the above specific guidance, the WSAB recommended consistency in the 2023 POU comprehensive revision of Wildfire Mitigation Plans. The WSAB provided a model comprehensive revision template to be used. Lompoc Electric used the template for this revision.

Lompoc Electric will continue to evaluate comments from the WSAB for applicability to its service territory.

XIII. REVISION HISTORY

All versions of the Plan are posted to Lompoc Electric’s website. A summary of changes to the Plan is provided below.

Plans can be found at: www.cityoflompoc.com/electric.

Version Number	Version Date	Summary of Changes
1.0	12/17/19	Initial Plan Adoption
2.0	6/15/21	<ol style="list-style-type: none"> 1. Added the following: Guidehouse conducted an evaluation and found the WMP to align appropriately with PUC Section 8387 and included all required elements. 2. Added No ignitions occurred in 2020.
3.0	6/21/22	<p>Changes implemented recommended by the Wildfire Safety Advisory Board:</p> <ol style="list-style-type: none"> 1. Added Cross References to Statutory Requirements Table, page 2. 2. Added a Context-Setting Information Table to provide specific information about the service territory, page 6. 3. Provided information about system hardening projects completed, page 24. 4. Removed references to the “first iteration” of the Plan, page 25. 5. Added information about the Plan adoption process and budget process, page 29. 6. Added a link to view all versions of the Plan on Lompoc Electric’s website, page 31. <p>Additional changes implemented:</p> <ol style="list-style-type: none"> 7. Updated percentage of overhead lines in the HFTD, Tier 2, pages 7 and 16. 8. Updated City of Lompoc’s Organizational Chart, page 11. 9. Updated map of service territory, page 19. 10. Added No fire ignitions or wire down events occurred in 2021, page 29. 11. Added Section 10, Revision History, page 31.
4.0	6/20/23	Comprehensive Revision done to include the WSAB Plan template and WSAB recommendations.