



CERRITOS ELECTRIC UTILITY WILDFIRE MITIGATION PLAN

VERSION 3.0

June 23, 2022

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I. OVERVIEW

A. CERRITOS ELECTRIC UTILITY (CEU)

The following **Table 1** provides context setting information on the Cerritos Electric Utility (CEU).

Table 1: Context-Setting Information

Utility Name	Cerritos Electric Utility	
Service Territory Size	8.9 square miles	
Owned Assets	<input type="checkbox"/> Transmission <input type="checkbox"/> Distribution <input checked="" type="checkbox"/> Generation	
Number of Customers Served	300 customer accounts	
Population Within Service Territory	50,143 people	
Customer Class Makeup	Number of Accounts	Share of Total Load (MWh)
	0% Residential; 50% Government; 0% Agricultural; 20% Small/Medium Business; 30% Commercial/Industrial	0% Residential; 35% Government; 0% Agricultural; 20% Small/Medium Business; 45% Commercial/Industrial
Service Territory Location/Topography ¹	0% Agriculture 0% Barren/Other 0% Conifer Forest 0% Conifer Woodland 0% Desert 0% Hardwood Forest 0% Hardwood Woodland 0% Herbaceous 0% Shrub 100% Urban 0% Water	
Service Territory Wildland Urban Interface ² (based on total area)	0% Wildland Urban Interface; 0% Wildland Urban Intermix;	

¹ This data shall be 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://www.arcgis.com/home/item.html?id=b7ec5d68d8114b1fb2bfbf4665989eb3>.

² This data shall be 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://www.fs.fed.us/nrs/pubs/rmap/rmap_nrs8.pdf.

Percent of Service Territory in CPUC High Fire Threat Districts (based on total area)	<input type="checkbox"/> Includes maps Tier 2: 0% Tier 3: 0%
Prevailing Wind Directions & Speeds by Season	<input type="checkbox"/> Includes maps <p>“During the autumn and winter months, high-pressure weather systems develop over the Great Basin and upper Mojave Deserts, heating up the air. These systems often produce strong offshore winds, known as the Santa Ana winds by the National Weather Service, and are described as having strong down slope winds blowing through Southern California mountain passes. Relative air humidity is further decreased as it travels from the high desert to the coast. These hot dry winds blow through valleys and canyons, pre-heating and dropping fuel moisture and relative humidities in all areas of Los Angeles County. This condition produces a high frequency of wildland fires where temperatures are high, while fuel moistures are extremely low, and winds blow at 30-70 miles per hour.”³</p>
Miles of Owned Lines Underground and/or Overhead	Overhead Dist.: 0 miles Overhead Trans.: 0 miles Underground Dist.: 0 miles Underground Trans.: 0 miles
Percent of Owned Lines in CPUC High Fire Threat Districts	<i>Overhead Distribution Lines as % of Total Distribution System (Inside and Outside Service Territory)</i>
	Tier 2: 0% Tier 3: 0%
	<i>Overhead Transmission Lines as % of Total Transmission System (Inside and Outside Service Territory)</i>
	Tier 2: 0% Tier 3: 0%
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 type="checkbox"/> Yes <input checked="" type="checkbox"/> No

³ Los Angeles County Fire Department 2020 Strategic Fire Plan, at t 11, available at: <https://osfm.fire.ca.gov/media/uf5joh2s/2020-lac-fire-plan.pdf>.

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 2020:
	<i>Number of shut-off events: none</i>
	<i>Customer Accounts that lost service for >10 minutes: none</i>
<i>For prior response, average duration before service restored: N/A</i>	

B. POLICY STATEMENT

Cerritos Electric Utility (CEU) overarching goal is to provide safe, reliable, and economic electric service to its local community. In order to meet this goal, CEU uses Southern California Edison (SCE) to deliver the power that is generated by CEU resources. Electric utilities that own electrical infrastructure are required by California Public Utilities Code 8386 (a) to construct, maintain, and operate its electrical lines and equipment in a manner that minimizes the risk of catastrophic wildfire posed by its electrical lines and equipment.⁴

C. PURPOSE OF THE WILDFIRE MITIGATION PLAN

CEU does not own any electrical lines or equipment in the City of Cerritos or in any other area of the state. CEU is located in a region of the state with a very low wildfire risk. No part of CEU's service territory is located in or near the High Fire Threat District designated in the California Public Utilities Commission's (CPUC) Fire Threat Map and all of CEU's service territory is designated as "non-fuel" or "moderate" in the California Department of Forestry and Fire Protection's (CALFIRE) Fire and Resource Assessment Program (FRAP) Fire Threat Map.

Despite this low risk, CEU takes appropriate actions to help its region prevent and respond to the increasing risk of wildfires. In its role as a public agency, CEU closely coordinates with other local safety and emergency officials to help protect against fires and respond to emergencies. This Wildfire Mitigation Plan describes the safety-related measures that CEU follows to reduce its risk of causing wildfires.

D. ORGANIZATION OF THE WILDFIRE MITIGATION PLAN

CEU does not own any electrical lines, supply system or equipment and CEU is located in a region of the state with a very low wildfire risk. SCE owns and operates the electrical delivery system within the City of Cerritos. Therefore, CEU's Wildfire Mitigation Plan included the following elements:

- CEU does not own any electrical system infrastructure in City of Cerritos. SCE owns and maintains the electrical system infrastructure within City of Cerritos territory and delivers power to CEU customers. Therefore, CEU will depend on SCE's Wildfire Mitigation Plan to Cover Public safety power shutoff (PSPS);

⁴ Cal. Pub. Util. Code § 8386(a).

- CEU has shared City of Cerritos emergency contact information with SCE as part of SCE PSPS.

E. CROSS-REFERENCE TO STATUTORY REQUIREMENTS

The following **Table 2** provides a roadmap as to where each statutory requirement is addressed within the CEU's Wildfire Mitigation Plan (WMP).

Table 2: Cross-References to Statutory Requirements

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 III (A) Page 6
Objectives of the Plan	PUC § 8387(b)(2)(B): The objectives of the wildfire mitigation plan.	Section II Page: 6
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 III (B) Page 7
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 N/A Page N/A
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 VII Page 11
De-Energization Protocols	PUC § 8387(b)(2)(F): Protocols for disabling reclosers and de-energizing 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 (B) Page 10
Customer Notification Procedures	PUC § 8387(b)(2)(G): Appropriate and feasible procedures for notifying a customer who may be impacted by the de-energizing 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 (B) Page 10
Vegetation Management	PUC § 8387(b)(2)(H): Plans for vegetation management.	Section N/A Page N/A
Inspections	PUC § 8387(b)(2)(I): Plans for inspections of the local publicly owned electric utility's or electrical cooperative's electrical infrastructure.	Section N/A Page N/A

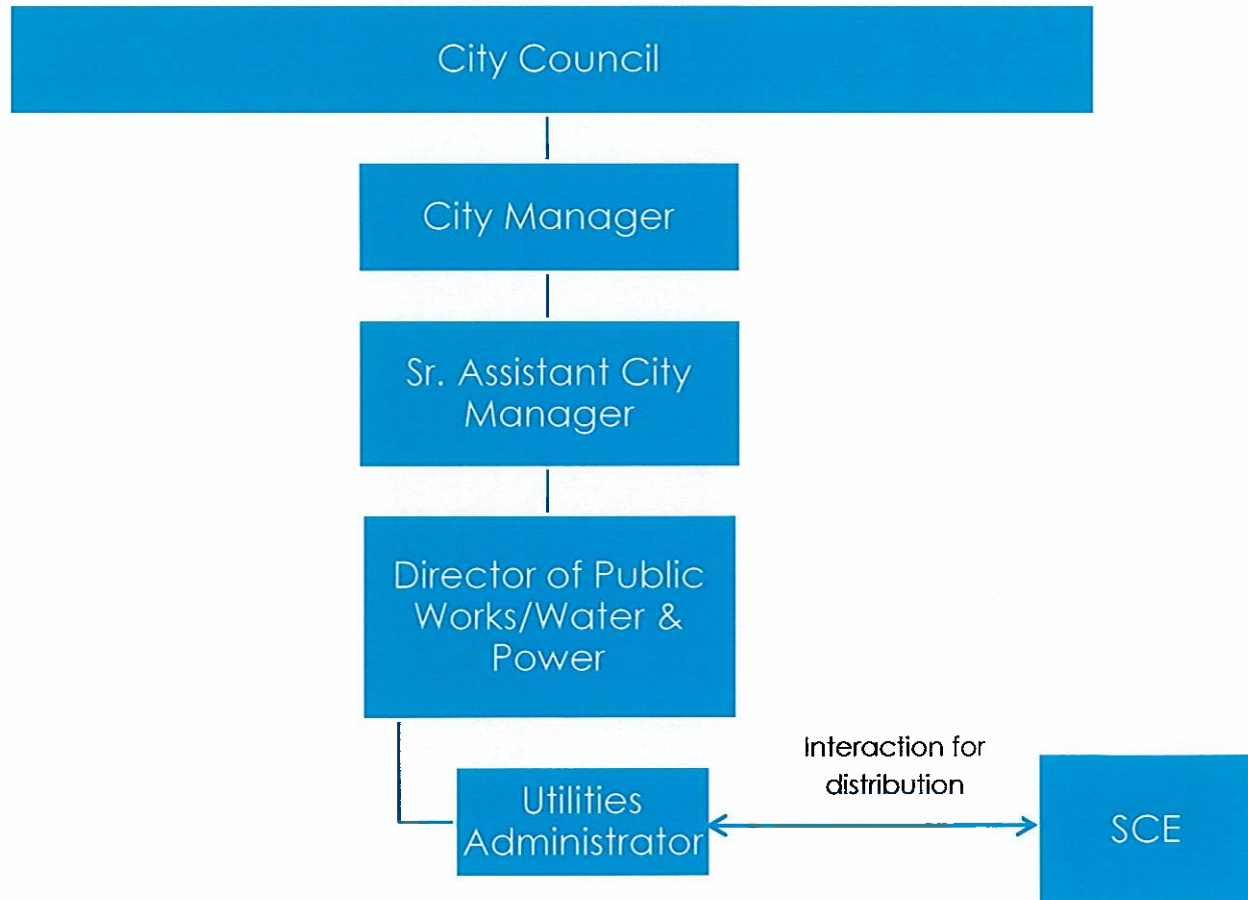
Prioritization of Wildfire Risks	<p>PUC § 8387(b)(2)(J): A list that identifies, describes, and prioritizes all wildfire risks, and drivers for those risks, throughout the local publicly owned electric utility's or electrical cooperative's service territory. The list shall include, but not be limited to, both of the following:</p> <p>(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.</p> <p>(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.</p>	Section IV Page 8
CPUC Fire Threat Map Adjustments	<p>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.</p>	Section V Page 10
Enterprise-Wide Risks	<p>PUC § 8387(b)(2)(L): A methodology for identifying and presenting enterprise-wide safety risk and wildfire-related risk.</p>	Section IV (B) Page 9
Restoration of Service	<p>PUC § 8387(b)(2)(M): A statement of how the local publicly owned electric utility or electrical cooperative will restore service after a wildfire.</p>	Section VI Page 11
Monitor and Audit	<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>	Section VII (B) Page 11
Qualified Independent Evaluator	<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>	Section VIII Page 12

II. OBJECTIVES OF THE WILDFIRE MITIGATION PLAN

The primary goal of this Wildfire Mitigation Plan is to describe CEU's unique status of not possessing any electrical system infrastructure and to bring attention to SCE's existing programs, practices, and measures that effectively reduce the probability that SCE electric supply system could be the origin or contributing source for the ignition of a wildfire. To support this goal, CEU will regularly contact SCE to evaluate its physical assets, operations, and training that can help reduce the risk of SCE's equipment-related fires.

III. ROLES AND RESPONSIBILITIES

A. UTILITY GOVERNANCE STRUCTURE



The Cerritos City Council is the governing board for Cerritos Electric Utility.

B. WILDFIRE PREVENTION

CEU does not own any electrical system infrastructure in the City of Cerritos. Because SCE owns and maintains the electrical system infrastructure that delivers electricity to CEU's customers, SCE is responsible for complying with applicable standards and regulations, including General Orders (GO) 95, 128, 165, and 174. SCE in the past several years has done clearance trims on trees to maintain a safe distance from the power lines on its own.

The City of Cerritos General Plan 2004 contains guidelines and policies that serve as the City's vision for future planning and development. Mitigation projects defined in the Hazard Mitigation Plan will be required to align with the objectives outlined in the Safety Element of the General Plan.⁵

The City of Cerritos adopted its original Natural Hazards Mitigation Plan in 2004 and updated the plan in October 2016 where it includes City of Cerritos Fire Hazards.

C. WILDFIRE RESPONSE AND RECOVERY

Large wildfire response and recovery will be managed according to City of Cerritos Emergency Operation Plan (EOP). During a Wildfire emergency, the City Manager leads the City's response as the Director of Emergency Services. The City of Cerritos is a part of the Los Angeles County Operational Area (OA), which includes the County and its political subdivisions (e.g., cities and special districts). In accordance with Standard Emergency Management System (SEMS) and the National Incident Management System (NIMS), the City of Cerritos sends requests for additional support through the OA and its designated emergency management organization, which is under the Los Angeles County's Office of Emergency Management. In the event that the OA cannot meet the needs of the City, requests are then sent to the Region, State and Federal levels in accordance with SEMS/NIMS.

D. STANDARDIZED EMERGENCY MANAGEMENT SYSTEM

As a local governmental agency,⁶ City of Cerritos has planning, communication, and coordination obligations pursuant to the California Office of Emergency Services' Standardized Emergency Management System ("SEMS") Regulations,⁷ 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.⁸ Pursuant to this structure, City of Cerritos annually

⁵ City of Cerritos, Hazard Mitigation Plan

⁶ As defined in Cal. Gov. Code § 8680.2.

⁷ 19 CCR § 2407.

⁸ Cal. Gov. Code § 2403(b):

(1) "Field response level" commands emergency response personnel and resources to carry out tactical decisions and activities in direct response to an incident or threat.

coordinates and communicates with the relevant safety agencies as well as other relevant local and state agencies. CEU's role is to coordinate with SCE on PSPS program during fire-treat conditions.

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. Los Angeles County serves as the Operational Area and is guided by the Los Angeles County Office of Emergency Management that is made up of County and its political subdivisions. The Operational Area includes local and regional organizations that bring relevant expertise to the wildfire prevention and recovery planning process.

Pursuant to the SEMS structure, CEU participates in annual training exercises. To simulate actual emergencies. They typically involve complete emergency management staffs and are designed not only to exercise procedures, but to also test the readiness of personnel, communications, and facilities. EOC Functional Exercises are typically conducted at least once per year in the City of Cerritos.

Planning alone will not achieve preparedness or build and maintain resilience. Training and exercising are essential to make emergency operations personnel, and their support systems operationally ready.

As a member of the Operational Area (OA), all agency and department staff who have designated roles in an emergency (e.g., field and EOC responders) in the OA EOC must receive appropriate SEMS, NIMS, and other specialized training as required by SEMS regulations, NIMS policy, or their job function, respectively. CEU Staff participate in City of Cerritos Emergency Services Coordinator coordinated training.⁹

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

(2) "Local government level" manages and coordinates the overall emergency response and recovery activities within their jurisdiction.

(3) "Operational area level" manages and/or coordinates information, resources, and priorities among local governments within the operational area and serves as the coordination and communication link between the local government level and the regional level.

(4) "Regional level" manages and coordinates information and resources among operational areas within the mutual aid region designated pursuant to Government Code §8600 and between the operational areas and the state level. This level along with the state level coordinates overall state agency support for emergency response activities.

(5) "State level" manages state resources in response to the emergency needs of the other levels, manages and coordinates mutual aid among the mutual aid regions and between the regional level and state level, and serves as the coordination and communication link with the federal disaster response system.

⁹ City of Cerritos, Emergency Operation Plan.

A. PARTICULAR RISKS AND RISK DRIVERS ASSOCIATED WITH TOPOGRAPHIC AND CLIMATOLOGICAL RISK FACTORS

While the City of Cerritos and its surrounding cities are urbanized, it is possible for brush fires to spread and pose a threat to the area. Since the City of Cerritos consists of urban terrain, the expected type of fire is an urban fire. Urban fires often consume buildings with the potential to spread to adjoining buildings. According to City of Cerritos Hazard Mitigation Plan major urban fires are highly unlikely.

B. ENTERPRISEWIDE SAFETY RISKS

According to the City of Cerritos Hazard Mitigation Plan, wildfire risk assessment consists of four steps: Hazard Identification, Hazard Profiling, Asset Inventory, and Loss Estimates. The Risk Assessment provides a foundation for the evaluation of wildfire mitigation measures that can help reduce the impacts of a potential wildfire hazard event.

The first step was to identify all the natural and man-made hazards that might affect the City and then narrow the list to the hazards that are most likely to occur. These hazards included natural, technical, and human-caused events with an emphasis on the effect of natural disasters on critical facilities, services, and roadways (e.g., government buildings, schools, and public services including police and fire). The Steering Committee participated in a Hazard Identification Workshop during the first Steering Committee Meeting to identify and rank the potential hazards within the City of Cerritos.

The second step was to Profile Hazard Events the hazard event profiles consist of either a map indicating the area impacted by each hazard or key information regarding the characteristics of hazard events within the planning area. To develop detailed hazard profiles, relevant open-source hazard studies and mapping projects were reviewed and documented within this report. In addition, the City of Cerritos supplied historical accounts of man-made hazard events (e.g. transportation incidents, etc.) that included specific hazard and emergency information. This planning step also determined the magnitude, frequency, and location characteristics of relevant natural hazards (urban fire, fault locations, flood plains, etc.) that were utilized as the design-basis for the loss estimates.

The third step is to Inventory Assets. The purpose of this step is to determine the quantity of buildings, people, and assets in the City of Cerritos that lie in the different hazard areas and what proportion of the City this represents. The asset inventory was completed utilizing spatial Geographic Information Systems (GIS) asset locations and specifications for the following assets: General Buildings (City well sites, Civic Buildings, Parks, etc.) and Critical Facilities (Hazmat Facilities, Schools, etc.). The development of the comprehensive inventory facilitated the development of loss estimates for all hazard scenarios.

The final step was Loss Estimates. The loss estimate step relied on detailed information regarding the hazard probability and maps that were completed as part of the hazard profiles. This

information was utilized to apply the hazard probabilities and recurrence intervals to the City's assets and inventory (buildings and infrastructure). This step was critical in determining which assets were subject to the greatest potential damages and which hazard event was likely to produce the greatest potential losses. The HAZUS-MH software package, which implements the FEMA-developed methodology and runs on a GIS platform, was utilized to map and display earthquake hazard data, as well as the results of damage and economic loss estimates for buildings and infrastructure within the City. To estimate potential losses for the remaining hazards, detailed spreadsheets, including the asset inventory and potential hazards, were used to find the monetary impact of each hazard to the City of Cerritos. In estimating losses, HAZUS-MH and the spreadsheets take into account various impacts of a hazard event such as Physical damage (damage to public buildings, schools, critical facilities, and infrastructure); Economic loss (lost jobs, business interruptions, repair and reconstruction costs); and Social impacts (impacts to people, including requirements for shelters and medical aid).

The conclusion of this step precipitated a comprehensive loss estimate (vulnerability assessment) for each identified hazard for each specific asset in terms of damages, economic loss, and the associated consequences for the City of Cerritos.

V. WILDFIRE PREVENTATIVE STRATEGIES

A. HIGH FIRE THREAT DISTRICT

No part of CEU service territory is located in or near the High Fire Threat District designated in the California Public Utilities Commission's (CPUC) Fire Threat Map, and all of CEU's service territory is designated as "non-fuel" or "moderate" in the California Department of Forestry and Fire Protection's (CALFIRE) Fire and Resource Assessment Program (FRAP) Fire Threat Map.

CEU directly participated in the development of the CPUC's Fire-Threat Map.¹⁰ In the map development process, CEU coordinated with Southern California Edison Company (SCE) and determined that, because CEU does not own any electrical system infrastructure, SCE would serve as the territory lead for the region served by CEU.¹¹

B. DEENERGIZATION

De energization will be covered under SCE's Public Safety Power Shutoff (PSPS) program, which is described in more detail in SCE's Wildfire Mitigation Plan. SCE has the authority to preemptively shut off power due to fire-threat conditions. This option will only be used in extraordinary circumstances.

¹⁰ Adopted by CPUC Decision 17-12-024.

¹¹ SCE Wildfire Mitigation Plans, February 6, 2019

While a PSPS event is in effect, City of Cerritos will be alerted by SCE via email and phone. SCE will contact the City Manager, Sr. Assistant City Manager, Director of Public Works/Water & Power, General Maintenance Manager, and Utilities Administrator.

CEU will then notify customers using the City's emergency notification system as well as regular communication methods. These other notification methods include Alert LA County system, media alerts sent to news wire services for distribution to broadcast and print news media, announcements on Cerritos TV3, the City's government access cable television channel, email and text message to emergency news subscribers, the City's Facebook group and posting the emergency alert on the City's website.

Impact to public safety is minimal. The City's 911 center is equipped with backup generation. CEU will continue to collaborate with SCE to revise the Wildfire Mitigation Plan and keep it current.

VI. RESTORATION OF SERVICE

Because CEU does not own any electrical system infrastructure in the City of Cerritos, SCE is responsible for any restoration of service after a PSPS event or other outage.

VII. EVALUATING OF THE PLAN

A. METRICS AND ASSUMPTIONS FOR MEASURING PLAN PERFORMANCE

Because CEU does not own any electrical system infrastructure, CEU cannot use a wires down or ignition based metric. CEU will evaluate alternative options for measuring the effectiveness of this Wildfire Mitigation Plan in future years.

B. MONITORING, AUDITING AND ACCESSING THE PLAN

This Wildfire Mitigation Plan along with any updates will be presented to the CEU's governing board, the Cerritos City Council, on an annual basis at a publicly held Cerritos City Council meeting. Additionally, a qualified independent evaluator's report recommending approval of the CEU's WMP was presented to the Cerritos City Council on June 8, 2020. The current version of the WMP is available on the CEU's page of the City's website: www.cerritos.us/ceu.

C. IDENTIFYING AND CORRECTING DEFICIENCIES IN THE PLAN

Based on the recommendations of the Cerritos City Council, CEU will correct any identified deficiencies.

D. MONITORING THE EFFECTIVENESS OF INSPECTIONS

Because CEU does not own any electrical system infrastructure, there are no relevant inspections of CEU facilities to describe in this section.

VIII. INDEPENDENT AUDITOR

Public Utilities Code section 8387(c) requires CEU to contract with a qualified independent evaluator with experience in assessing the safe operation of electrical infrastructure to review and assess the comprehensiveness of this Wildfire Mitigation Plan.

CEU engaged Fuentes Consulting LLC as the independent evaluator to complete an evaluation of the CEU Wildfire Mitigation Plan. Fuentes Consulting LLC issued a report of their evaluation.