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Dear Mr. Raufdeen:

As an introduction, I am the owner and president of Fuentes Consulting LLC, a utility consulting business that focuses on providing technical, subject matter expertise and litigation opinions to the electric transmission and distribution utility industry.

I have 36 years of experience in the utility industry, including the Sacramento Municipal Utility District as a Grid Assets Line Supervisor of Business Operations. My professional focus has been utility operations, safety initiatives and developing related training programs.

I am presently engaged in assisting utilities in the development of and review of their CPUC mandated "Wildfire Mitigation Plan" (WMP) in accordance with SB 901, AB1054 and the related Public Utilities Codes §8386(c) and §8387. My most recent clients are the Imperial Irrigation District (IID) and Island Energy (A subsidiary of Pittsburg Power), with Wildfire Mitigation Plan consulting services that include, but are not limited to:

- Reviewing drafts of Utility's WMP
- Identify Plan improvements
- Submitting an independent review to the utility's Board of Directors
- Identify areas of ecological system change / risk areas
- Ensuring that all applicable areas of the utility's WFMP is in accordance with the CPUC's regulations and California law.



Fuentes Consulting LLC has been retained by the City of Cerritos to provide an independent professional consultant review of the Cerritos Electric Utility's (CEU) Wildfire Mitigation Plan as it relates to their electric utility operations. The following plan review takes into consideration the unique relationship with Southern California Edison as the owner and operator of the City of Cerritos's electrical infrastructure; Fuentes Consulting LLC comments and recommendations are provided in the executive summary at the end of the review.

The Cerritos Electric Utility serves approximately 368 customer accounts and provides approximately 73 million kilowatt-hours of energy every year. The CEU's Wildfire Mitigation Plan contains the required elements listed in the provision of SB 901 and AB 1054 related to our review, and Public Utilities Code Section 8386(c) and 8387. CEU uses Southern California Edison (SCE) to deliver the power that is generated by CEU resources.

The entire wildfire mitigation plan was reviewed along with similar elements of the SCE plan as it relates to the CEU. The following topics provided the essential information needed by the consultant to develop the basis of his opinion in deciding that the plan meets the necessary regulations as stipulated by the State of California and the CPUC.

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.

Organization of the Wildfire Mitigation Plan

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 the 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 Shutoffs (PSPS);
- CEU has shared City of Cerritos emergency contact information with SCE as part of SCE PSPS.



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 in an effort to help reduce the risk of SCE equipment-related fires.

Wildfire Prevention

- 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.
- 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.

Wildfire Preventative Strategies

No part of CEU service territory is located in or near the High Fire Threat District identified in the California Public Utilities Commission's (CPUC) Fire-Threat Map and all of CEU 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.⁷ 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.

De-energization

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.



Executive Summary

The City of Cerritos Wildfire Mitigation Plan has met the necessary requirements as stated in SB 901 and AB 1054, and Code Sections §8386(c) and §8387.

CEU should consider adding more language in the plan to provide a more thorough description of the agreement with SCE as it pertains to public outreach and areas that deal with public communication.

Fuentes Consulting LLC makes the following recommendations

- **De-energization** – Although SCE is responsible for PSPS's (Public Safety Power Shutoffs), CEU should include in their plan the following:
 - How CEU works and coordinates with SCE on the expected impact of de-energizing circuits on essential services?
 - How CEU will notify its customers, local agencies and public officials about de-energization operations by SCE?
 - What are the potential impacts to the community?
- **Impacts to public safety** – The plan should include special considerations of the public safety impact of shutting off power.
- **Customer Notification Protocols** – a description of how the CEU communicates to their customers.
- **Community Outreach and Public Awareness** - describe how CEU works with SCE to provide outreach to the community including any public meetings or public service announcements.
- **SCE** – Continue collaborating and coordinating with SCE as they revise and update their WFMP in order to stay current presently and in the future.

Sincerely,

Maximo M. Fuentes

Maximo M. Fuentes - Owner