CITY OF
PALO ALTO
UTILITIES

# WILDFIRE MITIGATION PLAN
# 2025 UPDATE

**June 4, 2025**

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## A. Context table

| City of Palo Alto Utilities | |
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| Size in Square Miles | 26 square miles |
| Assets | Distribution |
| Number of Customers Served | 29,757 |
| Customer Classes | Residential and Small/Medium Commercial Businesses |
| Location/Topography | Urban |
| Percent Territory in California Public Utilities Commission (CPUC) High Fire Threat District (HFTD) | Tier 3 - 0%<br>Tier 2 - 40%<br><br>40% is based on visual interpretation of CPUC ArcGIS Map[1] |
| Existing Grid Hardening Measures | Undergrounding |
| Impacted by another utility's PSPS? | Yes, as a transmission dependent utility, Palo Alto could be impacted by a PG&E PSPS. |
| Mitigates impact of another utility's PSPS? | Yes |
| Expects to initiate its own PSPS? | Factors used to identify possible need for PSPS are based on weather forecast and field conditions. Refer to the PSPS Policy and Process, see **Appendix B**. |
| Prevailing wind directions & speeds by | Refer to CAL FIRE's Santa Clara Unit 2024 Strategic Fire Plan for information about wind regional wind conditions.[2] |

[1] CPUC ArcGIS map https://www.arcgis.com/home/webmap/viewer.html

[2] CAL FIRE's Santa Clara Unit 2024 Strategic Fire Plan https://osfm.fire.ca.gov/what-we-do/community-wildfire-preparedness-and-mitigation/pre-fire-planning

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| 8387(b)(2)(N) | Process to monitor Plan, identify any execution deficiencies, and audit inspection effectiveness | 10 |
| 8387(b)(3) | Present Plan in an appropriately noticed public meeting | 2 |

## C. Process for Wildfire Mitigation Plan adoption

Palo Alto is unique among Public Owned Utilities (POUs) because it has a Utilities Advisory Commission (UAC), an advisory Commission to the City Council. This commission is comprised of Council-appointed residents who meet monthly to provide advice to City Council and staff on utilities-related matters, including the City's Wildfire Mitigation Plan (Plan). A Brown Act body, the UAC publishes agendas in advance of each public meeting and provides opportunities for public comment at each meeting. Each year, Palo Alto staff presents the Plan at a UAC meeting where staff accept any public comments and receive feedback from Commissioners.[3] Minutes and videos of past meetings are available on the City's website.

## D. Plan location on the website

Palo Alto's Plan is the first substantive item found on the Utilities Department safety webpage. Navigating to this page from the Department's main page takes only two clicks and is intuitive. Users click on "Utilities Services and Safety," then "Wildfire Mitigation." [4] Because the City also has a Fire Department and an Office of Emergency Services that respond to fires and other emergencies, this report briefly notes how this wildfire Plan differs from other City emergency response plans.

[3] PUC 8783(b)(3) requires a POU to "present its wildfire mitigation plan in an appropriately noticed public meeting…[and] accept comments on its wildfire mitigation plan from the public…." While not the governing board of the utility, the UAC review satisfies the legal requirement of presenting the Plan at a noticed public meeting where comments from the public are accepted.
http://leginfo.legislature.ca.gov/faces/codes_displaySection.xhtml?sectionNum=8387&lawCode=PUC

[4] Utilities Department safety webpage, www.paloalto.gov/safeutility

# II. PLAN PURPOSE AND OBJECTIVES

## A. Purpose

This Plan is written in compliance with Public Utilities Code section 8387[5] and describes how the City of Palo Alto Utilities Department (CPAU) maintains and operates its electrical lines and equipment in a manner that minimizes the risk of wildfire posed by those lines and equipment.

## B. Scope

The scope of this Plan is limited to providing information about mitigating the risk of wildfires from electric lines and equipment. It distinguishes between mitigating risks of possible electric line-ignited wildfires versus wildfires or wildfire suppression generally. The latter topics are in the scope and under the purview of trained fire experts, such as the City's Fire Department, and not within the expertise of utility engineers and technicians. The former is within the scope of CPAU responsibilities and is the subject of the state code section mandating this Plan; therefore, it is the sole focus of this Plan.

Additionally, this Plan applies to the only area in the City of Palo Alto identified as a high fire threat area per the California Public Utilities Commission (CPUC) High Fire Threat District (HFTD) map. Currently, the high fire threat area in Palo Alto includes all areas with the City limits west of Highway 280, referred to as the Foothills Area, see below **Figure 1**. This area is about eight square miles, is sparsely populated, and consists primarily of open space.

Lastly and per the California Wildfire Safety Advisory Board (WSAB) request of all POUs, this updated Plan deliberately omits general information the Board already understands in favor of specific information about the City's territory, infrastructure, and mitigation projects. For example, the Board already knows that CPAU, and other POUs, meet all applicable CPUC General Order 95 (GO95) standards so it is not reiterated here.

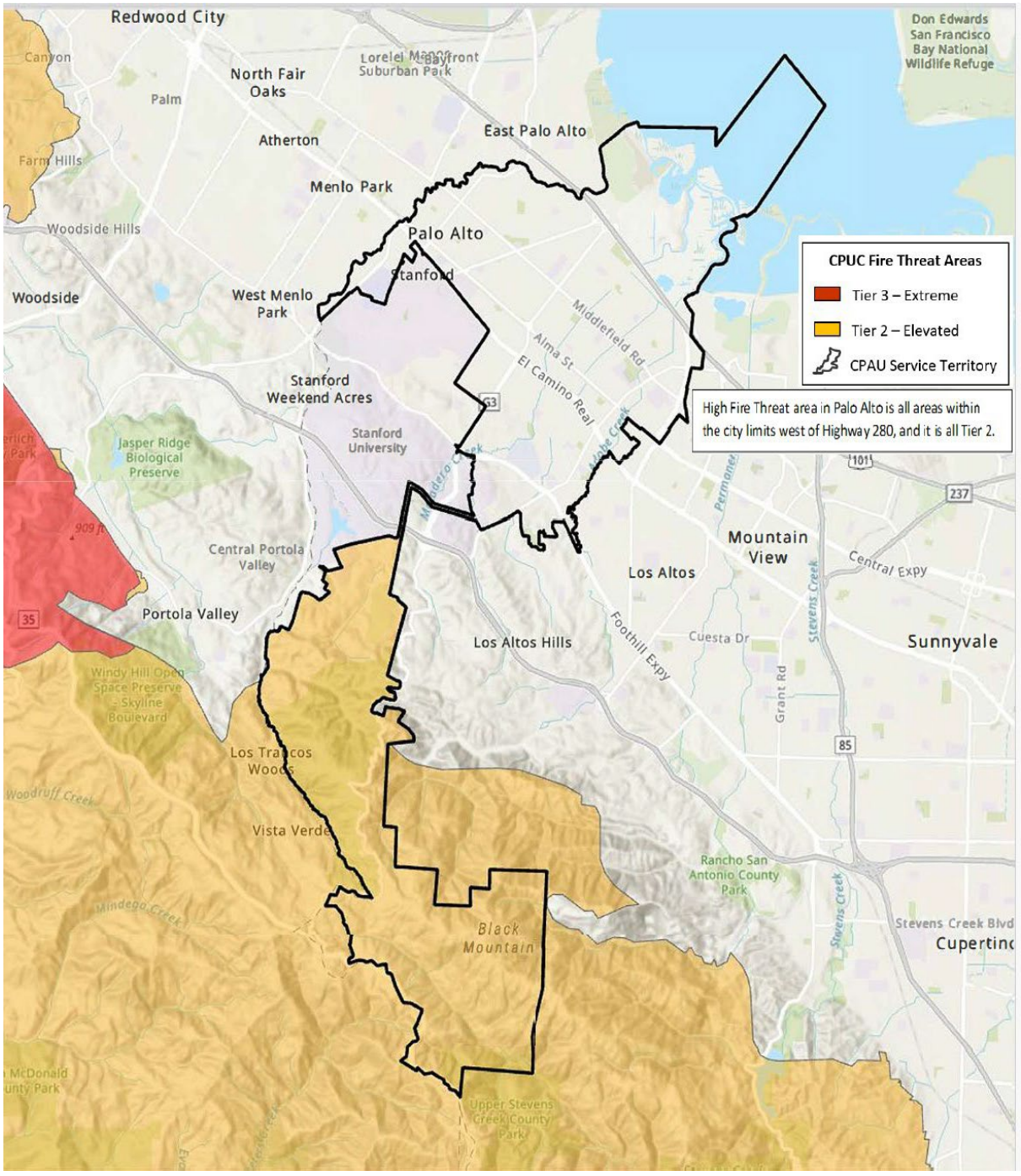
## C. Plan objectives

The Plan's primary objective is to guide CPAU staff in minimizing the probability that the City's electric distribution system may be an original or contributing source for wildfire ignition. The City strives to ensure that its infrastructure is safe and resilient by taking proactive actions to maintain its equipment, refine the existing Public Safety Power Shutoff (PSPS) protocols as needed, and underground the electric lines in the high fire threat area.

A secondary objective is to improve the resiliency of the City's electric distribution system and to measure the efficacy of the wildfire mitigation strategies.

[5] Public Utilities Code section 8387
http://leginfo.legislature.ca.gov/faces/codes_displaySection.xhtml?sectionNum=8387&lawCode=PUC

***Figure 1: Map of CPAU Electric Service Area - CPUC HFTD Tier 2-Elevated Fire Risk "Foothills Area"***

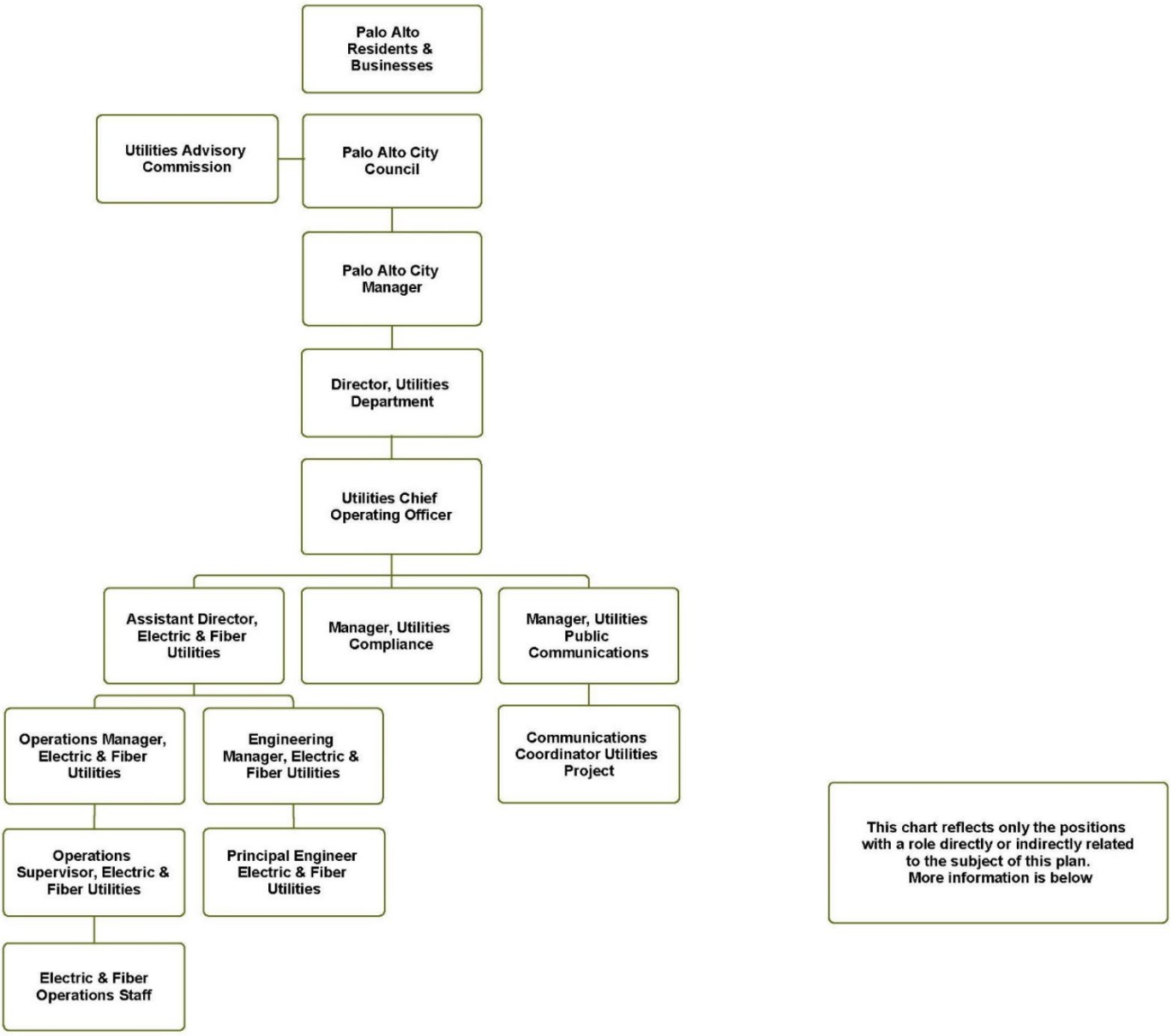


# III. ROLES AND RESPONSIBILITIES

## A. City of Palo Alto organizational structure

**Figure 2** highlights staff and governing bodies with direct or indirect roles and responsibilities related to the Plan.

***Figure 2: Organizational Structure of Roles & Responsibilities Supporting the Plan***



In Palo Alto, the City Council is the governing body of all City functions including the City's utilities. As noted above, the UAC is a Brown Act body that provides advice on utilities-related matters. CPAU operates and maintains all the utilities in the City, including electric, water, gas, fiber, and wastewater. CPAU also employs communications staff to engage with the community and a Compliance Manager who, among other duties, ensures reports such as this Plan are completed timely and appropriately.

CPAU's electric and fiber staff noted above all play a key role in mitigating wildfire risk from electric lines and equipment. Specifically, CPAU engineering staff produce safe and resilient designs, and oversee wildfire mitigation projects such as undergrounding electric and fiber lines.[6]

**B. Coordination with other departments**

CPAU's Electric Engineering and Operations Divisions work closely with other divisions within the Utilities Department. Utilities collaborates with the Public Works Department (PWD) and its Urban Forestry and Environmental Compliance Division, the Fire Department, and the Office of Emergency Services (OES). Together, these departments and divisions proactively prepare for wildfires, act to mitigate climate and fire-related risks, maintain utilities infrastructure, develop plans for deenergization events, provide vegetation management, and lead Palo Alto's robust climate action efforts. As these divisions, departments, and teams are under the umbrella of one City, there is a strong history of working together closely.

**C. Deenergization-related communication**

CPAU's Communications staff is responsible for engaging the community about deenergization events. CPAU staff maintain and update as necessary a "Utilities Wildfire Mitigation Response and Communications Procedure for Public Safety Power Shutoff" (PSPS), see **Appendix C**. This procedure details the City's outreach to customers about Public Safety Power Shutoffs (PSPS). CPAU proactively communicates with potentially impacted customers when first alerted to weather conditions that may require a PSPS, provides updates while monitoring conditions, and if a PSPS is activated, communicates with customers during and after an event.

The City uses a variety of communication channels for public information outreach. Customers can be reached directly through the Outage Management System (OMS) using text notification, email, and phone calls. Information on PSPS in general and specific events as they occur is provided on the City's website (www.paloalto.gov/PSPS) and recordings on City hotlines such as the Electric Operations Dispatch phone line at the Utilities Control Center and Utilities Customer Service Call Center.

[6] To keep the public informed of CPAU's capital improvement projects (CIPs), CPAU places CIP-related information on its website, paloalto.gov/UtilityProjects. This information includes primary staff contact information for the projects.

# IV. ELECTRIC-LINE IGNITED WILDFIRE RISK DRIVERS WITH PREVENTION AND MITIGATION EFFORTS

**A. Primary risk drivers and specific mitigation efforts**

Palo Alto recognizes that the WSAB is most interested in specific risks unique to each POU and its service territory, rather than general risks carried by all electric utilities. As such, and because Palo Alto is in the process of undergrounding the lines in its single high fire threat area, this Plan notes only the risk associated with electric equipment in the Foothills area. The more general risks (outside the Foothills area) Palo Alto regularly mitigates, but does not specifically address in this Plan, include:

- Electric distribution system operating, management, and construction practices
- Weather including high winds
- Extended drought

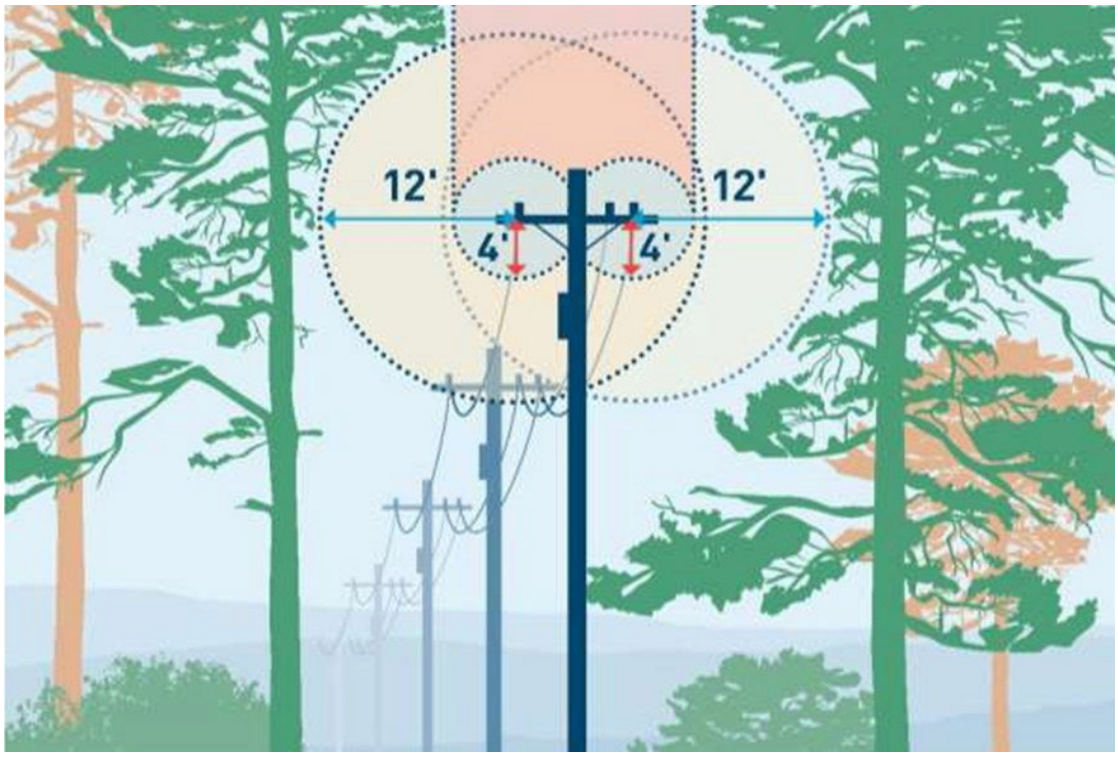
With regard to weather monitoring, Palo Alto installed a weather station in the Foothills area and a second weather station at the Utility Control Center to view localized weather data. CPAU staff also monitor regional conditions, such as red flag warnings (RFW), and communicate with first-responder departments on any actions needed due to weather conditions.

**B. Primary risk drivers and specific mitigation efforts:** Vegetation type, density, and management practices.

Wildfire risks from electric lines and equipment include vegetation intruding into power lines, falling onto lines, or roots damaging undergrounded equipment. Mitigation efforts include ongoing physical inspections, ensuring the proper type of vegetation is placed at the correct distance from equipment, and adherence to the City's Line Clearing Program and Tree Technical Manual for proper care of trees. Palo Alto's dedicated Urban Forestry Division, part of the Public Works Department and staffed by trained, experienced urban foresters, also oversees and coordinates the work of external contractors. Twice a year, these individuals evaluate vegetation in proximity to the spans in the high fire threat area to identify potential conflicts with CPAU electric lines.

Palo Alto utilizes a variety of vegetation treatment methods to reduce the risk of wildfire, including tree or branch removal, trimming, mowing, and brush cutting. The Urban Forestry Division is planning a program to help remove potential fall-ins from trees outside of Palo Alto's maintenance envelope of line-adjacent trees. In the future, to help staff track and manage flammable new growth, Palo Alto may utilize geographic information system (GIS) and growth modeling. Currently, this work is performed manually with physical inspections. In addition, for the Foothills area, Urban Forestry uses an enhanced vegetation management buffer as shown in **Figure 3**.

***Figure 3: Vegetation Buffer Diagram***




**C. Other electric equipment-specific mitigation strategies**

*Disabling certain reclosures*. In the Foothills area, CPAU has two reclosers on the distribution line that automatically open when they sense a large amount of current flowing due to a fault. After a preset delay, they both can automatically reclose; however, as a method to minimize fire risk, the reclosing function is permanently disabled on both reclosures and at the circuit breaker of the substation serving this area. Restoring service requires manual reclosing, which occurs only after staff have physically inspected the lines, performed any needed repairs, and ensured that the outage cause has been addressed. While this practice means potentially longer outage times, it is an important risk mitigation activity.

- *Utilizing specific fuses*. CPAU utilizes non-expulsion fuses in the high fire threat area. Specifically, CPAU utilizes Eaton's Cooper PowerE series ELFE fuse, a full range, current-limiting dropout fuse with a self-contained design that eliminates noise and expulsive showers. If these fuses explode, any hot metal is contained within the fuse holder, preventing contact with vegetation.

- *Deenergizing, then reenergizing when prudent*. CPAU considers deenergizing electric lines as a last resort, realizing that while the lack of power could be an inconvenience for some customers, it could cause significant health and safety concerns for others. However, CPAU will utilize this option when necessary to minimize the risk of an electric-line ignited wildfire in the high fire threat area. Factors CPAU considers when determining whether to deenergize include:

- The possible safety impacts to CPAU customers
- Any fire activity in the vicinity
- Any evacuation orders and other information from emergency personnel
- Information from local fire agencies, vegetation staff, and CPAU electric system operators
- Local and regional weather conditions including wind, humidity, precipitation and any red flag warnings
- The state of vegetation in the area (i.e. very dry)

- *Restoring power after a wildfire or deenergization event.* Lines will only be reenergized when (1) the risk has passed, (2) the lines are inspected, and (3) any needed repairs are complete. CPAU utilizes its Public Safety Power Shutoff (PSPS) policy and procedure, see **Appendix B**. when determining whether to deenergize lines because of a wildfire risk. The written protocol also includes customer notification procedures and reenergization information. In addition to customer notification from the Utilities Department, PSPS communication is also coordinated with Palo Alto's OES. The decision to institute a PSPS also includes working with CPAU's water utility staff to determine if the City should pump water up to the reservoirs located in the Foothills area in advance of shutting off power, to ensure there is sufficient water and water pressure for any firefighting activities.

- *Coordination with PG&E.* As a transmission-dependent utility, CPAU communicates with PG&E regarding their potential deenergization events that may impact the City's service territory.

- *Studying device coordination strategies*. Staff has engaged in protective device coordination studies to ensure that any fault is isolated quickly and any impact limited. Based on these studies, CPAU changed the fuse type and size, as noted above, on Foothills area distribution lines and changed relay settings for reclosers and a station circuit breaker.

## D. Enterprise-wide Safety Risks

Palo Alto's protocol for identifying and addressing enterprise-wide safety risks is a collaborative effort with various City departments. Together the goal is to prevent, protect from, mitigate, respond to, and recover from a broad range of potential hazards and threats. The City's OES leads that coordination with the goal of developing, maintaining, and sustaining a citywide, comprehensive, all hazard, risk-based emergency management program that engages the whole community. This community driven hazard and risk process leads to a range of plans, programs, projects, and other preparations to reduce risks from the hazards of highest concern. The City maintains and updates the following assessment and plans that provide information regarding the risks in Palo Alto and the necessary actions to take.

- *Threat and Hazard Identification and Risk Assessment*[7] - The result of the THIRA process is an organized evaluation of vulnerability and implementation measures based on the necessary capabilities to deal with the natural and non- natural hazards and threats of most concern.

- *Santa Clara County Multi-jurisdictional Hazard Mitigation Plan*[8] - Identifies and prioritizes potential and existing hazards across jurisdictional borders, including hazards that may be further amplified by climate change, and provides mitigation objectives with prioritized actions.

- *Foothills Fire Management Plan*[9] - Addresses a broad range of integrated activities and planning documents to address and mitigate the impacts of fire hazards in the Palo Alto Foothills Area.

### E. Current and prior activities

CPAU's earlier Plans note mitigation tasks the City has already completed, such as preparing a Foothills Fire Mitigation Plan and acting as "territory lead" for the CPUC's fire threat map. Additionally, prior Plans note ongoing efforts, which continue. These include regular vegetation management, inspection and maintenance of the electric distribution system, and electric infrastructure designs that consider fire safety. **Appendix A** shows the status of CPAU's mitigation-related activities.

# V. MONITORING THE PLAN

### A. Measuring Plan and inspection performance

In preparing annual Plans, CPAU takes the opportunity to evaluate the current Plan for any deficiencies, or if any best practices have changed. In doing so, CPAU considers what, if anything, related to wildfires occurred in the high fire threat area. Any events related to wildfires or City electric infrastructure in the Foothills area could inform future Plans and help understand the effectiveness of the current Plan.

With regard to inspections, CPAU examines its electric infrastructure in the high fire threat area more frequently than in other areas of the service territory. Staff strive to ensure that all inspections are completed by June, before the historic start of fire season, or earlier, depending on drought conditions. Inspections are completed manually. Staff analyze the results of the inspections for trends of any failures or maintenance needs, which can inform

[7] The current 2017 Threat and Hazard Identification and Risk Assessment can be found at https://www.cityofpaloalto.org/files/assets/public/v/1/oes/plans/unrestricted_palo_alto_thira_report_final_april-2017.pdf

[8] The current 2023 Santa Clara County Multi-jurisdictional Hazard Mitigation Plan, along with the local Palo Alto Annex, can be found at https://www.paloalto.gov/Departments/Emergency-Services/Plans-and-Information/Local-Hazard-Mitigation-Plan

[9] The current 2016 Foothills Fire Management Plan can be found at https://www.cityofpaloalto.org/files/assets/public/oes/plans/foothills-fire-management-plan-update-2016-final.pdf. A 2025 update is scheduled for Council consideration in June, 2025.

future design changes. Staff also monitors the performance of equipment during windy and severe weather conditions as described in the metrics below.

## B. Performance and outcome metrics

CPAU audits the effectiveness of the Plan's mitigation and prevention efforts by using two broad metrics: performance and outcomes. Information specific to each are below:

*i. Performance metrics*

a. Vegetation management. This metric includes the amount of vegetation cleared or number of trees trimmed in the high fire threat area.

b. Infrastructure maintenance in high fire threat area. This metric includes the amount of equipment and number of lines inspected and repaired (if needed) in the high fire threat area.

c. Project status. This metric involves monitoring the progress of any projects related to mitigating wildfires from electric equipment or lines in the high fire threat area and ensuring that projects progress on the proper timeline.

*ii. Outcome metrics*

a. Electric-line ignited wildfire. This metric includes any fire started by CPAU's electric equipment in the high fire threat area that traveled greater than one linear meter from the ignition point. In at least the past 20 years, there have been zero such fires.

b. Downed lines in the high fire threat area. For purposes of this Plan, a wires-down event includes any instance where an electric line in the high fire threat area of the service territory falls to the ground or onto a foreign object. CPAU will not normalize this metric by excluding unusual events, such as severe storms. Instead, staff will supplement this metric with a qualitative description of any such unusual events.

## C. Applying previous Plan metrics to this Plan

CPAU's initial Plan specified two metrics for evaluating performance, each discussed below, and noting how they have informed this revised Plan:

*i. Outages to the overhead lines in the high fire threat area*

In the initial 2020 Plan, staff described how CPAU would evaluate an outage in the high fire threat area. The 2020 Plan also noted a related project in rebuilding the overhead lines, the status of which is presented in **Appendix A.** CPAU's evaluation of any outages in the high fire threat area described in 2020 remains: Determine if CPAU's activities (a) should have prevented any outages, (b) were adequate to prevent an outage, (c) could be improved, and (d) could not have prevented an outage. Both the evaluation and metric remain for this Plan because they properly inform CPAU efforts in preventing outages. Since January 1, 2020, CPAU has had twelve (12) outages in the

Foothills area. None were a result of a PSPS event or weather-related. Most were caused by animal activity in this heavily wooded area or a car hitting a pole.

*ii. Fire ignitions*

An important metric, CPAU stated in the 2020 Plan that staff would provide the number of fires occurring in the high fire threat area that were less than ten (10) acres in size, specifically describing any fires larger than ten (10) acres. Since January 1, 2020, CPAU has had zero wildfires in the high fire threat area over ten (10) acres with no calls to 911 to report of a wildfire of any size.

If CPAU experiences any wildfires in this area, whether ignited by electric infrastructure or not, CPAU will work with the Fire Department, Office of Emergency Services, and any related local government agency to review the cause, how or if CPAU equipment related to the cause or was impacted and collaborate on any after-action activities.

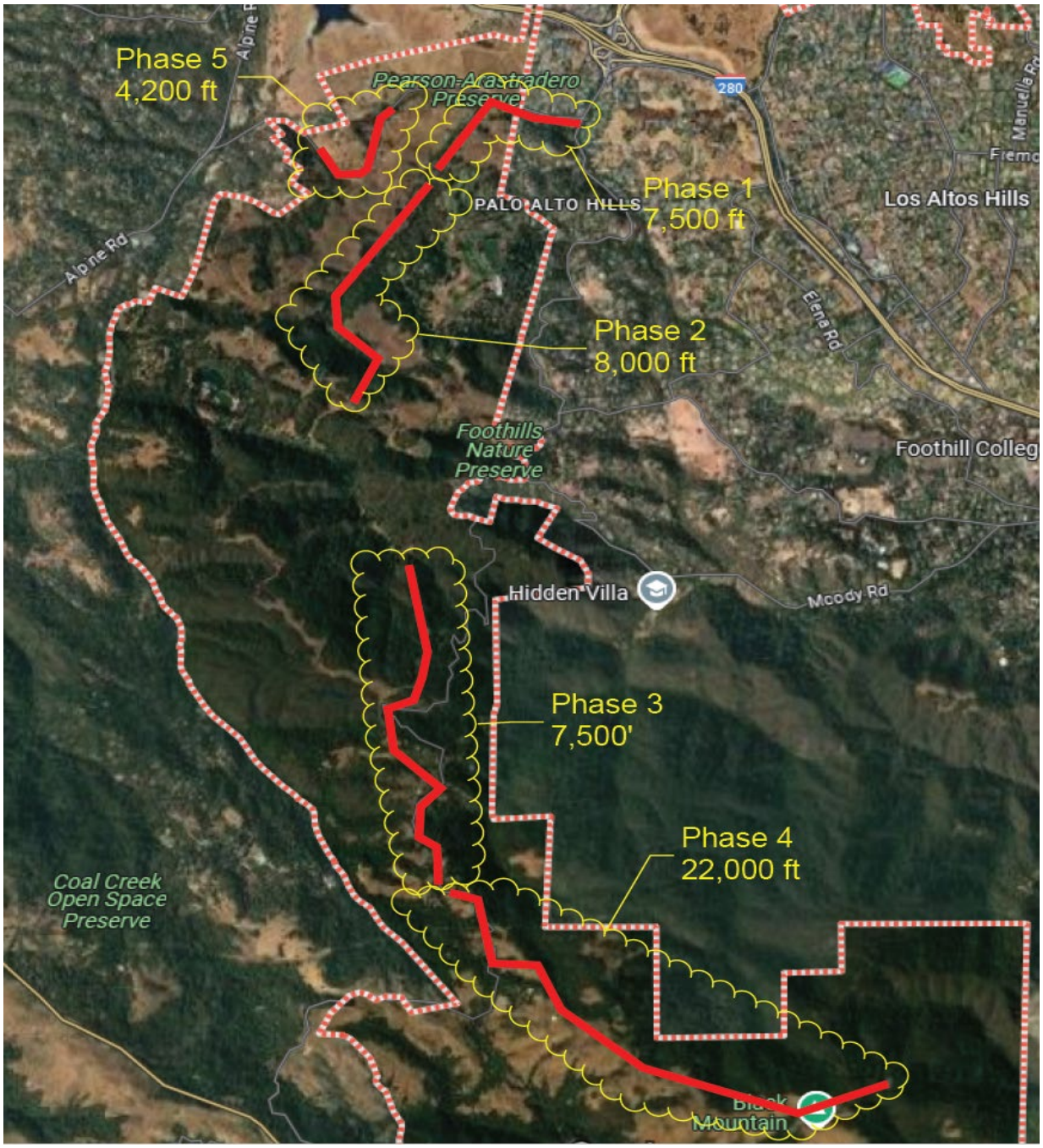
*iii. Wires down*

This metric includes instances of any electric lines or conductors that fall to the ground or come into contact with a foreign object in the high fire threat area. For each wires-down event, CPAU will utilize an evaluation system similar to CPAU's outage evaluation: reviewing the cause, what actions may have prevented the event, and if there are areas for improvement.

## *Appendix A: Summary of Key Wildfire Mitigation Activities*

The City's key mitigation activity is undergrounding overhead electric lines in the Foothills area. This multi-phase Foothill Fire Mitigation Project includes substructure construction, including the installation of boxes and pad-mounted equipment, cable pulling and line energization, and decommissioning of overhead city-owned poles and equipment. This project is expected to be complete in 2025.

**Figure 4: High Level Map of the Foothill Fire Mitigation Project**



| Summary of Key Wildfire Mitigation Activities | |
|---|---|
| Grid Design, Operations and Maintenance | 2024 Accomplishments (Prior Year Overview):<br>• Foothill Fire Mitigation Project - Construction Phase 3 (of 5 phases): Completed 5,700 feet of undergrounding work out of 7,500 feet, including substructure and cable installation. 1,800 feet remain for both substructure and cable installation.<br>• Foothill Fire Mitigation Project - Construction Phase 4 (of 5 phases): Completed 12,000 feet of undergrounding work out of 22,000 feet, including substructure and cable installation. 10,000 feet remain for both substructure and cable installation.<br>• Foothill Fire Mitigation Project - Construction Phase 5 (of 5 phases): Completed 4,200 feet of undergrounding work, with all substructure installation finished. 4,200 feet remain for cable installation.<br>• Fiber Optic Extension - To strengthen communication capabilities in the high fire threat area, the installation of underground conduit is progressing in phases, in coordination with ongoing electric substructure work, phase by phase. The City has installed 28,000 feet out of 45,000 feet new fiber optic cables for Phases 1, 2, 3, and 4.<br><br>2025 Goals (Current Year Objectives):<br>• Complete the Foothill Fire Mitigation Project - undergrounding of approximately 49,200 feet of electric overhead distribution lines and fiber optic cable.<br>• Energize the remaining Foothills Fire Mitigation Project Phases 3-5<br>• Decommission city-owned overhead poles, along with electric and fiber lines and equipment across Phases 1-5.<br>Overall Foothill Fire Mitigation Project Summary:<br>• Substructure Work: 37,400 feet Completed out of 49,200'<br>• Cable Installation: 33,200' Wire pulled out of 49,200'<br>• Energized: 15,500' out of 49,200' (Phases 1-2)<br>• Fiber Installation: 28,000’ out of 45,000’<br><br>2026 Planned Initiatives (Future Strategies):<br>• When electric infrastructure replacements are necessary, incorporate fiberglass materials for poles and crossarms remaining in the high fire threat area to enhance resiliency.<br>• The City’s multi-year Grid Modernization initiative is focused on strengthening the electric distribution system to support 100% electrification. This effort will improve grid resiliency and reliability through the replacement of poles, transformers, aerial wires, select cabinets, and underground infrastructure. It also |

| | |
|---|---|
| | includes upgrades to two substations, with completion targeted by 2032, aligning with both near- and long-term energy goals.<br>• Strengthen the City's wildfire resilience by proactively integrating the updated 2025 CAL FIRE- Fire Hazard Severity Zone (FHSZ) designations into infrastructure planning, emergency outreach protocols, and long-term mitigation efforts within the Local Responsibility Area (LRA), with a focus on newly designated Moderate risk zones. |
| Vegetation Management and Inspections | 2024 Accomplishments (Prior Year Overview):<br>• Electric General Order 165 Inspections in the high fire threat area:<br>o Completed 100% of annual inspections<br>o Up to date with all intrusive pole inspections<br>• Vegetation Management in the high fire threat area:<br>o Completed 100% of vegetation inspections<br>o 8,193 number of trees trimmed<br><br>2025 Goals (Current Year Objectives):<br>• Continue to complete all required annual electric infrastructure inspections.<br>• Complete annual vegetation maintenance, inspection and clearances from electrical lines to avoid vegetation contact with electrical infrastructure.<br>• PWD staff is actively working to update the Draft Tree Landscape Technical Manual (TLTM) and also plan to establish a tree and landscape line clearing policy, similar to the current utility line clearing policy.<br><br>2026 Planned Initiatives (Future Strategies):<br>• The City has previously evaluated the use of drones for vegetation management and electric infrastructure inspections. While privacy concerns, public feedback, and local regulations have posed challenges to implementation, the City remains interested in exploring this technology for potential future use.<br>• PWD staff will continue to work on The Public Tree Management Plan by establishing a timeline for this work and will resume upon completion of the TLTM update. |
| Situational Awareness and Forecasting | 2024 Accomplishments (Prior Year Overview):<br>• Monitored weather conditions daily during Red Flag Warning (RFW) periods to assess wildfire risks and maintain situational awareness. Prepared staff for potential PSPS events by briefing them on response protocols and collaborating with the communications team for effective coordination.<br>• The City partnered with Stanford and Town of Woodside to install fifty (50) N5 Sensors, advanced gas monitors for early wildfire detection. Of these, Stanford installed twenty-five (25), Palo Alto installed twelve |

| | |
|---|---|
| | (12), and Woodside installed thirteen (13). While coverage in the Foothills is not complete, these sensors have been strategically placed in the high fire threat area to enhance early warning capabilities.<br>2025 Goals (Current Year Objectives):<br>• Continue to enhance our OMS and update our GIS data to help with locating outages and decrease response time.<br><br>2026 Planned Initiatives (Future Strategies):<br>• As part of the Electric Grid Modernization effort, CPAU is in the early planning stages to implement an Advanced Distribution Management System (ADMS). The ADMS will integrate various functionalities such as the OMS, Distributed Energy Resource Management (DERM), and real-time monitoring to enhance grid reliability, efficiency, and resilience. The new system will help manage issues like severe weather, the growing use of renewable energy, and increasing electricity demand. |
| Emergency Preparedness | 2024 Accomplishments (Prior Year Overview):<br>• As part of the City's ongoing commitment to wildfire preparedness, the City engaged independent auditor BakerTilly to conduct the Emergency Preparedness Wildfire Audit in 2024. The audit evaluated current efforts and provided recommendations to strengthen evacuation planning and wildfire mitigation to enhance local wildfire resilience.<br><br>2025 Goals (Current Year Objectives):<br>• A tabletop exercise for wildfire mitigation: Conduct a comprehensive tabletop exercise to assess and improve the City's response plans for wildfire events. This exercise will simulate wildfire scenarios, engage key stakeholders, and identify potential gaps in communication, coordination, and resource management to strengthen preparedness and response strategies.<br>• City staff is in the process of updating two existing plans, the OES Emergency Operations Plan (EOP) and the Foothills Fire Management Plan (FFMP), part of Annex 3 of the Santa Clara County Community Wildfire Protection Plan, to improve coordination of emergency response and wildfire prevention efforts.<br><br>2026 Planned Initiatives (Future Strategy):<br>• An annual tabletop exercise for wildfire mitigation. This exercise aims to improve internal awareness, validate updated plans mentioned above, build collaboration with our public safety staff, and practice response procedures in a simulated setting. It will assess capabilities in three areas:<br>1. Wildfire emergency preparedness<br>2. Notification and response<br>3. Recovery operations |

| | |
|---|---|
| Community Outreach and Engagement | 2024 Accomplishments (Prior Year Overview):<br>• Updated the "Utilities Wildfire Mitigation Response and Communications Procedure for Public Safety Power Shutoff (PSPS)," enhancing coordination with city departments and improving communication with the community, impacted customers, and media outlets. Enhanced customer communication functions through modifications to the OMS for recorded messages, outbound SMS text notifications, and phone calls.<br><br>2025 Goals (Current Year Objectives):<br>• Continue to refine best practices to disseminate information across the City's website and other communication channels so customers can easily find information and updates on PSPS, specifically during and post event(s).<br><br>2026 Planned Initiatives (Future Strategy):<br>• Continue to educate customers about PSPS, including increased risks of wildfire due to climate change. Inform customers about CPAU's efforts to mitigate risks such as through utilities undergrounding, system monitoring, and other improvements. Ensure all customers in high fire threat areas are well-informed about how to take steps to prevent wildfire (in coordination with the Fire Department), how to prepare for emergencies and what to do during PSPS, and what to expect from CPAU in terms of communication and response. |

# *Appendix B: PSPS Policy and Process for Public Safety Power Shutoff*



CITY OF PALO ALTO UTILITIES

## Policy and Process for Public Safety Power Shutoff

## PURPOSE

Devastating wildfires throughout the State of California have prompted electric utilities throughout the state to identify areas within their jurisdiction that are susceptible to power-line ignited wildfires and to take steps to prevent their occurrence. One of these steps is a proactive de-energization of electric lines, often called Public Safety Power Shutdown (PSPS), by the State and other California utilities.

The City of Palo Alto's Utilities Department (CPAU) has the authority to preemptively shut off power due to fire-threat conditions; however, this option will only be used as a last resort in extraordinary circumstances. This document outlines the policy and process to identify the fire threat conditions that will dictate PSPS of CPAU facilities by CPAU. CPAU, in conjunction with City Staff, will make a case-by-case decision to shut off power based on criteria listed in this document. The electric lines most likely to be considered for PSPS are lines in Palo Alto west of Highway 280 which are in a Tier 2 (elevated risk for wildfire) area on the CPUC Fire Threat Map. Palo Alto could also be impacted by PSPS activities initiated by PG&E on the transmission system.

CPAU typically deals with two types of outages, 1) Planned outages for construction maintenance, or 2) Unplanned outages due to circumstances beyond our control, e.g. car pole accidents, birds/tree contact with overhead lines, equipment failure, etc., (commonly referred to as a fault or short-circuit). The PSPS is a preemptive shutdown of power to prevent the occurrence of the faults that cause the unplanned outages from occurring when high fire threat conditions exist, as sparks from a fault or energized wires on the ground could result in wildfires.

## POLICY

CPAU considers the safety of the community our top priority and will take the necessary steps to mitigate the threat of wildfires associated with overhead electric lines and associated equipment owned and operated by CPAU. In extreme conditions, this will require CPAU to deenergize power lines for the safety of life and property.

## PROCESS

Below is a summary of tasks for proactive de-energization and restoration of the electric distribution system as part of the City's wildfire mitigation plan.

### Factors used to identify possible need for PSPS based on weather forecast and field conditions

The following factors could result in CPAU, in conjunction with other City Staff, identifying that it may be necessary to shut off power:

- Red Flag Warnings issued by the National Weather Service (NWS) for the fire weather zone that includes the Foothills Area (Santa Cruz Mountains);
- City staff assessments of local conditions, including wind speed (sustained and gust), humidity and temperature, fuel moisture, fuel loading and data from weather stations;
- Real-time information from staff located in areas identified as at risk of being subject to extreme weather conditions;
- Input from City Fire and Urban Forestry staff;
- Input from local and state fire authorities regarding the potential consequences of wildfires in select locations;
- Awareness of mandatory or voluntary evacuation orders in place.

CPAU will consider the following when making a decision to shut off power:

- Expected impact of de-energizing circuits on essential services;
- Notifications to local governments and public officials; and
- Safety and potential impacts to communities and customers

Ideally, the decision will be made as soon as the information is available to facilitate an informed decision and allow for timely notification of customers. There may be instances where weather conditions rapidly change and advance notice to customers is not possible. It is anticipated that this will be infrequent, if at all.

### Preapproval and Authorization to notify customers of possible PSPS based on weather forecasts

Once it is determined that a PSPS may be required, staff will present an assessment to the Utilities Director or his/her designee to review, assess, and approve the request.

### Notification of affected customers of possible PSPS

If a PSPS is approved, staff will notify the City Manager's Office (CIO), OES, Police, Fire, 911 Dispatch, WGW Operations, Utilities Customer Service and Utilities Communications. They in turn will communicate with the community, customers impacted, and the media.

### Monitoring of real time weather and field conditions

Staff will monitor real time and updated forecast information to determine if forecasts are accurate and the PSPS should occur as planned; if changes need to be made to the PSPS scheduling; or if the PSPS can be cancelled.

### Notification of customers of impending outage

If a PSPS is to occur, staff will follow the "*Utilities Wildfire Mitigation Response and Communications Procedure for Public Safety Power Shutoff*" to notify city departments and communicate with the community, customers impacted, and the media.

### Deenergization of power line

At the determined time, Utilities Electric Operations staff will deenergize all lines in areas identified for PSPS

### Inspection and patrol of line

After the weather has passed and it is safe to do so, Electric Operations staff will perform a full visual inspection of the distribution system to ensure that there is no damage before reenergizing the line. Any damage will be assessed and repairs will need to be made before power can be restored to those sections or anything downstream.

### Notification of customers of impending restoration

Staff will follow the "*Utilities Wildfire Mitigation Response and Communications Procedure for Public Safety Power Shutoff*" to notify city departments and communicate with the community, customers impacted, and the media.

### Reenergize power line

The lines will be systematically reenergized as the lines are patrolled and inspected, and any damage is repaired.

**Reviewed and Approved by:**

| | | |
|---|---|---|
| DocuSigned by: Dean Batchelor 7C0097F94DAF492... | DocuSigned by: Tomm Marshall C6FCC656B7CA47E... | DocuSigned by: Debbie Lloyd 7F6C50A6A96F4F5... |
| **Utilities Director** | **AD of Utilities Operations** | **AD of Utilities Engineering** |

*Appendix C: Utilities Wildfire Mitigation Utilities Response and Communications Procedure for Public Safety Power Shutoff (PSPS)*

| | | |
|---|---|---|
| CITY OF PALO ALTO UTILITIES | **Title:** | Utilities Wildfire Mitigation<br>Response and Communications Procedure for Public Safety Power Shutoff (PSPS) |
| | **Document Date:** | April 2025 |

**Policy**
The City has established a Public Safety Power Shutoff (PSPS) Policy which defines the conditions for a Public Safety Power Shutoff (PSPS) and establishes general procedures.

**Public Safety Power Shutoff (PSPS)**
High winds can cause trees and debris to contact energized electric power lines, damage equipment, and potentially lead to wildfire ignition. Utilities may temporarily turn off power to specific areas to reduce the risk of fires caused by electric infrastructure. This temporary outage is called a Public Safety Power Shutoff (PSPS). The City of Palo Alto Utilities (CPAU) prepares for a PSPS when severe weather may create the risk for wildfire.

**Criteria for PSPS**
CPAU aligns PSPS criteria with Pacific Gas and Electric (PG&E), the primary electricity provider for the region where Palo Alto is located. Conditions for a PSPS are:

- Red Flag Warning issued by the National Weather Service;
- Low humidity levels less than 30%;
- Forecasted high winds above 19 miles per hour and gusts above 25-40 miles per hour.

**High Fire Threat Areas**
The California Public Utilities Commission (CPUC) has sorted regions according to their wildfire risk. Homes and businesses in Tiers 2 and 3 wildfire risk areas are more likely to experience a PSPS.

- Tier 2: An area where there is an elevated risk of wildfire.
- Tier 3: An area where there is an extreme risk of wildfire.

View the CPUC map and information on fire-threat areas[10].

The electric lines most likely to be considered for PSPS are lines in Palo Alto west of Highway 280 which are in a Tier 2 (elevated risk for wildfire) area on the CPUC Fire Threat Map. Palo Alto could also be impacted by PSPS activities initiated by PG&E on the transmission system.

**Purpose and Scope of the Utilities Wildfire Response and Communications Procedure**
This document provides details on responsibilities and instructions for the implementation of a PSPS.

[10] CPUC map and information on fire-threat areas https://www.cpuc.ca.gov/industries-and-topics/wildfires/fire-threat-maps-and-fire-safety-rulemaking

The purpose of this procedure is to establish a process, assign responsibilities, and define a communication plan for the discontinuation of electrical service to high fire threat areas in Palo Alto to prevent potential wildfires ignited by electrical power lines and equipment.
Pertinent documents including contact information for staff in critical responder roles and backup support, messaging templates, customer list, and more, are maintained by the CPAU.

**Procedure**

***A. Monitoring for a PSPS***

Utilities System Operators are responsible for monitoring the weather forecast for Red Flag Warnings issued by the National Weather Service (NWS) for the Santa Cruz Mountains. NWS will often forecast Red Flag Warnings up to five day forecast. The operator will note the date of the Red Flag Warning in the daily log and will inform their Supervisor (or designee) of the conditions.

The Supervisor of the Utilities System Operators (or designee) will become the Incident Commander for PSPS. The Incident Commander is responsible for managing the dissemination of information and executing the PSPS procedure upon approval from the Utilities Director.

In coordination with the Utilities Director, the Incident Commander will specify the anticipated timeframe for a potential PSPS and notify City staff listed in the Notification Section of PSPS conditions.

***B. Declaring a PSPS***

The Utilities Director (or designee) is responsible for declaring a PSPS event and directing the Incident Commander to initiate a PSPS event. The Incident Commander will notify City staff listed in the Notification Section of this PSPS protocol that a PSPS event has been initiated and provide the following information:

- State that a PSPS event has been declared.
- The approximate timeframe of the event.
- The affected areas.

CPAU has aligned the PSPS criteria with PG&E. The latest 2024 PSPS guide is as follows:

- Red Flag Warning issued by the National Weather Service;
- Low humidity levels, generally 30% and below;
- Forecasted high winds above 19 miles per hour and gusts above 25-40 miles per hour.

***C. Preparation for a PSPS***

**The Incident Commander (or designee) will be responsible for the following:**

- Instruct the Electric Operations Manager to prepare personnel for the power shutoff and restoration process.
- Instruct the Water-Gas-Wastewater (WGW) Manager to prepare personnel and Water and Wastewater facilities in the high-fire threat area for an electrical shutdown.
- Inform City staff enrolled in the outage communications chain (“top 20 list”) via text message thread.
- Instruct the Utilities Communications Manager and the Utilities Customer Service Manager to initiate notifications to affected customers, the Customer Service Call Center, Utility Program Services, as well as other City staff in public-facing customer roles.
- Provide updates about PSPS conditions at mutually agreeable regular intervals to the Utilities Communications Manager and the Utilities Customer Service Manager so staff in public-facing customer roles will be able to edit scripted messages and address customer inquiries across

communication platforms (website, email, text, call center recordings, social media).

**The Utilities Customer Service Manager (or designee) is responsible for the following:**

- Maintain and provide contact information for customers in the high-fire threat area. This list will be used to contact customers before, during, and after PSPS events. This list will be updated as follows:
  - In May or leading into fire weather season, and/or;
  - When the Utilities Customer Service Manager indicates changes to the customer list maintained on the PSPS/Outage internal SharePoint site.
- Prepare Customer Service Representatives for calls and customer inquiries related to PSPS.
- Activate recorded messages for the Customer Service Call Center Automatic Call Distribution (ACD) for customers to hear information about a PSPS when calling (650) 329-2161.
- Relay updates from Electrical Operations on PSPS conditions to the Customer Service call center staff and direct appropriate updates to Customer Service communication platforms to address customer inquiries.

**The Utilities Communications Manager (or designee) is responsible for the following:**

- Prepare and get approval from the Utilities Director (or designee) for scripts to be used for customer notifications.
- Maintain template messaging that will be used in notifications to customers about PSPS.
- Inform the Utility Program Services Manager about PSPS to inform key account and business customers in affected areas.
- Ensure that the appropriate staff, including Utilities Customer Service Representatives, Utilities Key Account Representatives, and Utilities System Operators have access to these protocols for PSPS communication and customer notifications.
- Initiate customer notifications before, during, and after a PSPS.
- Update status of PSPS conditions via website, social media, and other communication platforms.

### D. *Monitoring Weather Condition Forecasts*

The Utilities Incident Commander is responsible for monitoring the weather forecasts and informing the Utilities Director of conditions, including establishing a recommended start time and duration for a PSPS event. Once the Utilities Director has declared a PSPS and established a timeframe in coordination with the Incident Commander, the Incident Commander will notify all City staff listed in the Notification Section of this PSPS protocol.

The Incident Commander will contact the Utilities Communications Manager and Utilities Customer Service Manager to initiate the approved *Second Tier Message*. That message will be sent to customers who will be impacted by the PSPS and provide an estimate of the time of the PSPS. (See example in the Messaging Section).

### *E. Power Shutoff*

The Utilities System Operators will monitor wind conditions and the status of the Red Flag Warning after the PSPS event has been declared and provide updates to the Utilities Director and Incident Commander. Operators will record wind conditions in the Dispatch Log every 30 minutes.

The Utilities Director (or designee) is responsible for declaring a PSPS. Upon approval from the Utilities Director, the Utilities System Operators will initiate a power shutoff if the following conditions are met:

- Red Flag Warning issued by the National Weather Service;
- Low humidity levels less than 30%;
- Forecasted high winds above 19 miles per hour and gusts above 25-40 miles per hour.

The Utilities System Operators will inform the Incident Commander that the power shutoff is being initiated. The Incident Commander will notify City staff in the Notification Section of this PSPS protocol that the power is being shutoff.

**The Utilities System Operators are responsible for the following:**

- Notify the Incident Commander when conditions meet PSPS criteria.
- Initiate PSPS following direction from the Incident Commander and inform the Incident Commander when power is shutoff.
- Document the time the PSPS occurs and confirm the area of impact and number of customers affected.
- Open the switch that terminates power to the affected areas.
- Update the Outage Management System (OMS) outage map, customer SMS text notification, voicemail recording for the Utilities Control Center, and email and/or phone call notifications – if the latter is determined by the Incident Commander to be required - with PSPS information.

### *F. Ending PSPS Event*

The Utilities System Operators will continue to monitor weather conditions and will inform the Incident Commander when the wind speeds have decreased, or the Red Flag Warning has been called off. The Incident Commander will inform the Utilities Director of the conditions. The Utilities Director will make the determination that the PSPS event has ended and inform the Incident Commander. The Incident Commander will inform City staff in the Notification Section that the PSPS declaration is over and when restoration is complete.

### G. *Restoration of Power*

The Incident Commander will direct the Utilities System Operators to begin the process of restoration. The Utilities System Operators will call out line personnel for line patrol inspections. All line patrol inspections will be conducted during daylight hours to ensure the lines are in working order. Any damage will be assessed, and any necessary repairs must be complete before power can be restored to those sections or anything downstream. Overhead lines will be restored after line patrol inspections are complete.

Power restoration will occur in phases starting at the open switch near Junipero Serra Boulevard. Line configuration at the time of reclosing will determine the sequence of restoration. Utilities System Operators will coordinate the sequence of power restoration under guidance of the Incident Commander.

The Incident Commander will inform the Utilities Communications Manager and Customer Service Manager that power has been restored.

The Utilities Communications Manager and Customer Service Manager (or designees) will notify affected customers that their power has been restored.

### *H. Coordination with Departments Outside of Utilities*

The Utilities Director (or designee) will be responsible for communicating activities outside of the Utilities Department and is the main channel of communication for the Incident Commander.

**The Office of Emergency Services will be responsible for the following:**

- Assist the inter-departmental coordination efforts resulting from a PSPS incident.
- Assist with external communications as needed.
- Assist with the coordination of external entities and agencies required by the incident.

***City Staff Notification List***

Those on the CPA Top 20 Internal Emergency Alerts Text Group include:
City Manager
Assistant City Manager
Utilities Director
Utilities Chief Operating Officer
Utilities Communications Manager
Utilities Customer Service Manager
Assistant Director of Electric & Fiber Utilities
Utilities Electric Operations Manager
Utilities Electric Operations Supervisors
Chief Communications Officer
Office of Emergency Services Director
Office of Emergency Services Coordinator
Fire Chief
Police Captain
Information Technology Director
Utilities Strategic Business Manager
Utilities Communication Projects Coordinator

Also inform:
Public Works Director
Assistant Director of Customer Services
Assistant Director of Water-Gas-Wastewater Utilities
Manager of Water-Gas-Wastewater Operations
Urban Forester

**I. Utilities Communication Plan**

The Utilities Communications Manager (or designee) will send out First Tier messages warning customers that a PSPS is possible, Second Tier messages informing customers that power will be shut off for PSPS, and eventually messaging about power restoration following the end to a PSPS event:

- **First Tier Message** - CPAU is monitoring conditions for a potential PSPS.
- **Second Tier Message –** CPAU expects a PSPS.
- **Third Tier Message** – PSPS initiated.

**Customer Notification Steps:**

1) The Utilities Communications Manager will coordinate with the Utilities Director (or designee) on status of potential PSPS and customer notifications.
2) The Utilities Communications Manager will coordinate with staff in Electric Operations to update and activate OMS voicemail recording on the Utilities Control Center phone line and OMS SMS text messaging for customers in the affected areas.

3) The Utilities Communications Manager will coordinate with the Customer Service Manager to call customers without mobile phones in the affected areas and update outgoing messages in the Utilities Customer Service Call Center to alert customers about a PSPS event.

The following communication platforms will have coordinated messages:

- OMS - Outage Management System voicemail recording and SMS text
- Website
- Emails to affected customers
- ACD – Automatic Call Distribution recording on Utilities Customer Service Call Center line at (650) 329-2161
- Social media – X (formerly Twitter) and Facebook – if deemed appropriate by the Utilities Director and Utilities Communications Manager.

**Template Messaging**

**First Tier** (*Monitoring for a potential PSPS)*

1) OMS Text (SMS)

Red Flag Warning in effect from Date and Time through Date and Time. CPAU is monitoring conditions in the Foothills for possible power shutoffs. More info at paloalto.gov/utilities

*2)* Outlook Email
   *a. (Use either Utilities Customer Service or Utilities Communications email address)*

Subject Line: Potential Public Safety Power Shutoff (PSPS) for the Palo Alto Foothills

The National Weather Service issued a Red Flag Warning for parts of the Bay Area due to dry and windy conditions from Date and Time through Date and Time. The City of Palo Alto Utilities is monitoring conditions to determine if a Public Safety Power Shutoff (PSPS) will be required to reduce the potential for wildfire in the Foothills area of Palo Alto. We do not expect that the remainder of the City's businesses and residences will be impacted by a power shutoff. Do not call 9-1-1 if your power is out unless there is a threat to life safety. View the power outage map at www.paloalto.gov/outagemap

3) Website

Potential Public Safety Power Shutoff (PSPS)

Red Flag Warning: Date

The National Weather Service (NWS) issued a Red Flag Warning for parts of the Bay Area due to dry and windy conditions that pose a risk of wildfires spreading quickly. The Red Flag Warning is in effect Date(s) and time.

Status: Monitoring Conditions
Due to current weather conditions, the City is monitoring winds to determine if a Public Safety Power Shutoff (PSPS) will be required to reduce wildfire potential. Electric lines most likely to be considered for a PSPS event are those in the Palo Alto Foothills west of Highway 280. We do not expect that the

remainder of the City's businesses and residences will be impacted by a power shutoff.
Do not call 9-1-1 if your power is out unless there is a threat to life safety. View the power outage map at www.paloalto.gov/outagemap
This page will be updated as conditions evolve and new information becomes available.

Learn more about preparing for power outages at www.paloalto.gov/PSPS

Information for Palo Alto PG&E Customers
There are a few Palo Alto residents in the Palo Alto Foothill served by PG&E who may be impacted by a shutoff from PG&E. If you are a Palo Alto resident served by PG&E, visit their website for information on their Public Safety Power Shutoff plans.

**Second Tier** *(CPAU expects a PSPS)*

1) OMS SMS Text

Red Flag Warning in effect from Date and Time through Date and Time. CPAU is monitoring conditions in the Foothills for possible power shutoffs. View power outage map at www.paloalto.gov/outagemap

*2)* Outlook Email
   *a. (Use either Utilities Customer Service or Utilities Communications email address)*

Subject Line: Public Safety Power Shutoff (PSPS) May Occur

The National Weather Service (NWS) issued a Red Flag Warning for parts of the Bay Area due to dry and windy conditions that pose a risk of wildfires spreading quickly. The Red Flag Warning is in effect from Date and Time through Date and Time.

Due to current weather conditions, the City of Palo Alto Utilities is monitoring conditions to determine if a Public Safety Power Shutoff (PSPS) will be required to reduce the potential for wildfire in the Foothills. Our records show that you are in an area that may require a power shut off for safety precautions. We will do our best to inform you as conditions evolve and new information becomes available.

View Palo Alto PSPS updates at www.paloalto.gov/utilities *(insert link to specific news item if available).*

View the power outage map at www.paloalto.gov/outagemap

Read more about PSPS at www.paloalto.gov/psps

Additional Resources

Ensure we have your current mobile number to be notified of outages and updates through the City's Outage Management System. Log in to MyCPAU at www.paloalto.gov/mycpau or contact Utilities Customer Service at (650) 329-2161 to update your contact information.

Do not call 9-1-1 unless you are experiencing a life-threatening emergency. For non-emergency public safety issues, call (650) 329-2413.
Information for PG&E Customers

In response to the current forecast, PG&E is also monitoring conditions for their electric utility customers. There are a few Palo Alto residents in the Palo Alto area west of highway 280 served by PG&E who may be impacted by a shutoff from PG&E. These customers should contact PG&E for information on their Public Safety Power Shutoff plans. Visit https://pgealerts.alerts.pge.com/psps-updates/

Outage Preparations

You may want to consider the following steps to be prepared for a power outage:

- Utilize an emergency supply kit with enough water, food, medicine, batteries and flashlights to last several days.
- Consult with your medical professional regarding medical treatment, backup generators, or other power supplies for medical or other needs.
- Have your vehicle gas tank filled or electric battery charged and cash on hand (as electronic transaction devices and ATM machines may be without power).

3) ACD Recording on Customer Service Call Center Phone Line

The National Weather Service issued a Red Flag Warning for parts of the Bay Area due to dry and windy conditions from Date and Time through Date and Time. The City of Palo Alto Utilities is monitoring wind conditions to determine if a Public Safety Power Shutoff (PSPS) will be required to reduce the potential for wildfire in the Foothills area of Palo Alto. We do not expect that the remainder of the City's businesses and residences will be impacted by a power shutoff. Please do not call 9-1-1 if your power is out unless there is also a threat to life safety. View the power outage map at www.paloalto.gov/outagemap

**4) Website**

Potential Public Safety Power Shutoff (PSPS)

Red Flag Warning: Date

The National Weather Service (NWS) issued a Red Flag Warning for parts of the Bay Area due to dry and windy conditions that pose a risk of wildfires spreading quickly. The Red Flag Warning is in effect Date(s) and time.

Status: Monitoring Conditions
Due to current weather conditions, the City is monitoring winds to determine if a Public Safety Power Shutoff (PSPS) will be required to reduce wildfire potential. Electric lines most likely to be considered for a PSPS event are those in the Palo Alto Foothills west of Highway 280. We do not expect that the remainder of the City's businesses and residences will be impacted by a power shutoff.

Do not call 9-1-1 if your power is out unless there is a threat to life safety. View the power outage map at www.paloalto.gov/outagemap

This page will be updated as conditions evolve and new information becomes available.

Learn more about preparing for power outages at www.paloalto.gov/PSPS

Information for Palo Alto PG&E Customers
There are a few Palo Alto residents in the Palo Alto Foothill served by PG&E who may be impacted by a shutoff from PG&E. If you are a Palo Alto resident served by PG&E, visit their website for information on their Public Safety Power Shutoff plans.

**Messaging – Third Tier** *(PSPS initiated)*

1) OMS Text (SMS)

Public Safety Power Shutoff necessary. View power outage map at www.paloalto.gov/outagemap

2) OMS Voice Recording for incoming calls to UCC

Public Safety Power Shutoff for customers in the Foothills. Due to anticipated fire weather conditions, the City of Palo Alto Utilities shut off power to reduce the potential for a wildfire. We do not expect that the remainder of the City's businesses and residences will be impacted by a power shutoff. View the power outage map at www.paloalto.gov/outagemap

3) ACD Recording on Customer Service Call Center Phone Line

Due to Red Flag Warning conditions from the National Weather Service, the City of Palo Alto Utilities shut off electricity to customers in the Foothills to prevent the risk for a potential wildfire. We do not expect that the remainder of the City's businesses and residences will be impacted by a power shutoff. Do not call 9-1-1 if your power is out unless there is a threat to life safety. View the power outage map at www.paloalto.gov/outagemap

4) Outlook Email
    a. *(Use either Utilities Customer Service or Utilities Communications email address)*

Subject Line: Public Safety Power Shutoff (PSPS) for Palo Alto Utilities Customers in the Foothills

Due to anticipated fire weather conditions, the City of Palo Alto Utilities shut off power in the Foothills to reduce the potential for wildfire. Our records show that you are in this area and may be impacted by a power shutoff for safety precautions. We do not expect that the remainder of the City's businesses and residences will be impacted by a power shutoff.

The City will continue to monitor conditions and do our best to keep you informed as conditions evolve and new information becomes available.

View Palo Alto PSPS updates at www.paloalto.gov/utilities *(insert link to specific news item if available).*

View the power outage map at www.paloalto.gov/outagemap

Read more about PSPS at www.paloalto.gov/psps

The State's Office of Health & Human Services has set up a non-emergency hotline at 1 (833) 284-3473 to help those who are medically vulnerable.

Dial 9-1-1 in the event of a life-threatening emergency. For non-emergency public safety issues, call (650) 329-2413. For Public Safety Power Shutoff updates, call Utilities Customer Service at (650) 329-2161.

The City of Palo Alto also uses AlertSCC to communicate during emergency events such as natural disasters, crime bulletins, power outages, and more. You can sign up to receive Alert SCC notifications at https://emergencymanagement.sccgov.org/AlertSCC and follow our Emergency Preparedness page at www.paloalto.gov/preparedness

5) Website

Due to a Red Flag Warning from the National Weather Service, electricity has been shut off for customers in high fire threat areas in the Foothills to avoid potential risk of wildfire. We do not expect that the remainder of the City's businesses and residences will be impacted by a power shutoff.

View Palo Alto PSPS updates at www.paloalto.gov/utilities *(insert link to specific news item if available).*

View the power outage map at www.paloalto.gov/outagemap

Read more about PSPS at www.paloalto.gov/psps

At this time, we do not know when power will be restored. Restoration will begin as soon as possible after conditions clear. Prior to energizing power again, Utilities must patrol the lines during daylight hours for safety precautions. This may take multiple hours or days depending upon the conditions.

The State's Office of Health & Human Services has set up a non-emergency hotline at 1 (833) 284-3473 to help those who are medically vulnerable.

Dial 9-1-1 in the event of a life-threatening emergency. For non-emergency public safety issues, call (650) 329-2413. For Public Safety Power Shutoff updates, call Utilities Customer Service at (650) 329-2161.

6) Social media *(Upload image if possible and tag @cityofpaloalto and @paloaltopolice in social media posts)*

Power has been shut off for customers in the Foothills to prevent risk of wildfire. CPAU must patrol lines during daylight hours for safety before reenergizing. This could take hours to days, depending upon the conditions. View the power outage map at www.paloalto.gov/outagemap
or call 650-496-6914 for other electrical emergencies.

**Messaging - Restoration**

1) ACD Message, Email, and Website

The City of Palo Alto Utilities has restored power to customers in the Foothills following a Public Safety

Power Shutoff to prevent the risk of wildfire. If your power was shut off during this period and you still do not have power, please contact us at (650) 496-6914 to report a continuing outage.

2) Social Media (only if deemed necessary by the Utilities Director and Utilities Communications Manager)

POWER OUTAGE UPDATE: CPAU restored power to the Foothills as the Red Flag Warning has been lifted. Call 650-496-6914 to report a continuing outage and/or power issue. Thank you for your patience as we work to ensure the safety of all in our community. www.paloalto.gov/utilities

*Appendix D: Plan Revision Log of Key Changes*

| Plan Revision Log of Key Changes | | |
|---|---|---|
| **Date** | **Plan Section/Location** | **Description** |
| 6/4/25 | Section III Roles and Responsibilities - Sections<br>A. City of Palo Alto Utilities Department<br>C. Deenergization-related communication (including revised Appendix C)<br><br>Section IV Monitoring the Plan<br>C. Applying previous Plan metrics to this Plan<br>Appendix A – Wildfire Mitigation Activities<br><br>Added Appendix D – Plan Revision Log of Key Changes | Annual Update, Plan will be dated June 4, 2024 upon UAC adoption.<br>• Updated organizational chart to reflect current structure.<br>• Updated outage metric since 2020 from ten (10) to twelve (12).<br>• Revised Appendix A using a hybrid format based on the recommended WSAB template to summarize mitigation activities such as project progress.<br>• Added Appendix D: Plan Revision Log of Key Changes to formally track Plan changes, included high level of past updates/changes.<br>• Updated sections related to deenergization to align with the latest PSPS communication protocols.<br>• General editorial improvements for clarity and consistency and including listing out Appendices and Table of Figures. |
| 6/3/24 | Figure 1 – CPUC High Fire-Threat District (HFTD) Map<br><br>Appendix A – Wildfire Mitigation Activities | Annual Update, Plan is dated June 2024, (Staff Report ID 2404-2905[11]).<br>• Updated Appendix A, minor changes were made to reflect current status of wildfire mitigation activities and project status.<br>• Initiated a review and update of the Utilities Wildfire Mitigation Response and Communications Procedure for Public Safety Power Shutoff (PSPS) to enhance community readiness. This included incorporating Outage Management System (OMS) features to support outbound communications during potential PSPS events.<br>• General editorial improvements for clarity and consistency. |
| 6/7/23 | Entire Plan – Comprehensive Review | • Annual Update, Plan dated 6/7/2023 (Staff Report ID 2301-0900[12]).<br>• Comprehensive revision of the Plan was completed to determine its efficacy, legal compliance, and provide suggestions for improvement. The comprehensive review was completed by an Independent Evaluator (IE) Dudek.<br>• The Plan was revised to incorporate recommended improvements. |

[11] Staff Report ID 2404-2905 https://cityofpaloalto.primegov.com/Portal/Meeting?meetingTemplateId=15094
[12] Staff Report ID 2301-0900 https://cityofpaloalto.primegov.com/Portal/Meeting?meetingTemplateId=11331

| Date | Plan Section/Location | Description |
|---|---|---|
| 6/8/22 | Overall Plan<br><br>Context Table<br><br>Cross Reference Table<br><br>Appendix G - Utilities Wildfire Mitigation Response and Communications Procedure for Public Safety Power Shutoff (PSPS)<br><br>Appendix E- Status of Proposed Activities to Reduce Risk of Wildfire | Annual update, Plan is dated 6/8/22 (Staff Report ID 14175[13] ).<br>• Submitted redlined Plan document as part of the WSAB's request and;<br>  ○ Updated Plan placement on the Utilities website for easier navigation.<br>  ○ Included the WSAB's Context Table.<br>  ○ Included Dates of past years' public presentations.<br>  ○ Added more context to community outreach efforts during a fire<br>  ○ Added Appendix G Utilities Wildfire Mitigation Response and Communications Procedure for Public Safety Power Shutoff (PSPS).<br>  ○ Updates made to the status of reported projects, including: the installation of a weather station, progress on undergrounding lines, assessments for emergency back-up generators, etc. (Appendix E).<br>  ○ General wordsmithing for clarity. |
| 4/27/21 | Appendix F – Status of Proposed Activities to Reduce Risk of Wildfire or Improve Response | Annual update, Plan is dated 4/27/2021 (Staff Report ID 12190[14]).<br>• The primary revision focused on updating the status of proposed wildfire mitigation activities detailed in Appendix F. |
| 12/16/19 | New Plan | Original WMP was adopted by Council on January 21, 2020, the Plan is dated December 16, 2019 (Staff Report ID 10670[15]). |

[13] Staff Report ID 14175 https://www.cityofpaloalto.org/files/assets/public/v/2/agendas-minutes-reports/agendas-minutes/utilities-advisory-commission/archived-agenda-and-minutes/agendas-and-minutes-2022/06-08-2022/06-08-2022-id-14175-item-3-wildfire.pdf

[14] Staff Report ID 12190 https://www.cityofpaloalto.org/files/assets/public/v/2/utilities/id-12190-item-2.pdf

[15] Staff Report ID 10670 https://www.cityofpaloalto.org/files/assets/public/v/1/agendas-minutes-reports/reports/city-manager-reports-cmrs/year-archive/2020/id-10670-mini-packet-01212020.pdf?t=53268.17%20