VERSION (FINAL)

Independent Evaluator's Report

Los Angeles Department of Water and Power 2027-2028 Wildfire Mitigation Plan

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Prepared for:

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Acronyms and Abbreviations

Acronym/Abbreviation	Definition
CAL FIRE	California Department of Forestry and Fire Protection
CPUC	California Public Utilities Commission
DC	direct current
F	degrees Fahrenheit
FEMS	Fire and Environmental Monitoring System
HFTD	High Fire-Threat District
IEMS	Iowa Environmental Mesonet
IOU	investor-owned utility
ISO	International Organization for Standardization
kV	kilovolt
LADWP	Los Angeles Department of Water and Power
LAFD	Los Angeles Fire Department
mph	miles per hour
NWS	National Weather Service
OEM	Office of Emergency Management
POU	publicly owned utility
PUC	Public Utilities Code
RFW	Red Flag Warning
SCE	Southern California Edison
WFTIIC	Wildland Fire Training and Information Interagency Center
WMP	Wildfire Mitigation Plan
WSAB	Wildfire Safety Advisory Board
WUI	Wildland-urban interface

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1 Introduction

Publicly owned electric utilities and electric cooperatives in California are required to construct, maintain, and operate their electrical equipment in a manner that minimizes the wildfire risk posed by that equipment. This requirement includes preparing a Wildfire Mitigation Plan (WMP) that documents a utility's understanding of wildfire risk and risk drivers in its service territory, as well as the wildfire risk-reduction strategies it uses to mitigate those risks. Publicly owned electric utilities and electric cooperatives are also required to have their WMP evaluated by a qualified independent evaluator with experience assessing the safe operation of electrical infrastructure.

Dudek's fire prevention team worked with the Los Angeles Department of Water and Power (LADWP) to review its current WMP, evaluate its ongoing and new wildfire mitigation strategies, and prepare this Independent Evaluator's Report for LADWP's 2027-2028 WMP.

1.1 Scope and Intent

Dudek worked with LADWP to prepare this Independent Evaluator's Report to satisfy the requirements of Public Utilities Code (PUC) Section 8387(c). This report is specific to LADWP's 2027-2028 Wildfire Mitigation Plan. It contains a review of the elements within the WMP, as well as the results of Dudek's review of data provided by LADWP and publicly available data sources regarding wildfire risk in LADWP's service territory and LADWP's wildfire risk-reduction strategies. Dudek's review of the LADWP WMP assessed the following elements:

i. Regulatory Requirements

ii. LADWP's understanding of the wildfire risk and risk drivers in its service territory

iii. LADWP's wildfire mitigation strategies

This Independent Evaluator's Report is intended to satisfy PUC requirements and provide LADWP with an assessment of the comprehensiveness of its WMP. Recent guidance from the California Wildfire Safety Advisory Board (WSAB) indicated that its current focus areas are risk identification and preemptive de-energization (WSAB 2025). However, LADWP is currently updating its fire-risk analysis process by incorporating new tools and risk modeling into its existing risk-assessment framework. This new process is still under development and was not available for review with the current WMP. As noted in the WMP, LADWP is continuing to refine its data requirements, modeling capabilities, and infrastructure priorities, and will be continuing to incorporate stakeholder input throughout this ongoing evaluation. While it continues strengthening its operational readiness, LADWP will implement de-energization of powerlines under the circumstances outlined in Section 7.2.6.1. Therefore, Dudek's independent evaluation of LADWP's WMP does not assess the WSAB-recommended areas of risk identification and preemptive de-energization.

1.2 Changes to the WMP Submittal Process

The Wildfire Safety Advisory Board (WSAB) published several guidance documents in late 2025 and early 2026 that included information about changes to the WMP submittal process for publicly owned electric utilities. Changes to

PUC Section 8387 revised the WMP submittal requirement for POUs from annual submission to submission up to every four years on a schedule determined by the WSAB. The schedule requires more frequent WMP submissions for POUs with overhead lines in the HFTD which includes LADWP (WSAB, 2025a). To distribute the WMP review workload, the WSAB modified the submission dates for POU WMPs. The WSAB's new guidance establishes a staggered submittal process in which a select group of POUs submits its WMP each year for WSAB review. In March 2026, the WSAB published the final WMP submittal schedule for more than 50 California public electric utilities. The state's public utilities were divided into groups, and each group was assigned a final submittal date for its 2027-2028 WMP during the first week of October. LADWP is in a group whose WMPs are due on October 2, 2026. Under the new WMP submittal guidance, LADWP's next WMP submittal date will be in October 2028.

The changes to the WSAB submittal schedule do not affect the requirement in PUC Section 8387(b)(3) to present the WMP at an appropriately noticed public meeting and accept comments from the public and other agencies. LADWP will present the WMP at a public meeting of the Board of Water and Power Commissioners after submitting the Plan to WSAB.

1.3 Qualifications of the Independent Evaluator

PUC Section 8387(c) states that a public electric utility must contract with a qualified independent evaluator with experience assessing the safe operation of electrical infrastructure to review and assess the comprehensiveness of its WMP.

Dudek's Fire Prevention Planning team has prepared independent evaluator reports, wildfire risk assessments, and wildfire mitigation plans for publicly owned electric and water utilities and independent transmission operators since the State of California began requiring these plans for publicly owned utilities in 2019. Additionally, Dudek has worked with and prepared fire-prevention planning documents for new energy projects across California and the Pacific Northwest. Dudek's Fire Prevention Planning team includes National Fire Protection Association Certified Wildfire Mitigation Specialists and fire protection engineers.

1.4 Assessment Methods

Dudek fire prevention planners prepared this Independent Evaluator's Report using LADWP's draft 2027-2028 Wildfire Mitigation Plan, as well as conversations with staff from LADWP. These conversations, together with the LADWP 2027-2028 WMP, were used to evaluate LADWP's service territory, utility-ignited wildfires, potential ignition events, and the wildfire risk drivers described in the WMP. Dudek also used publicly available datasets, including:

- Weather and climate data (FEMS, WFTIIC, IEMS)
- Fuels and Fire Danger data (FEMS, WFTIIC)
- Local fire history (CAL FIRE)
- SCE local fire history (CPUC)

These datasets were used to assess the fire environment in LADWP's service territory and to independently verify the environmental wildfire risk drivers described in the WMP.

2 LADWP Service Territory

2.1 LADWP Service Territory Fire Environment Summary

The Los Angeles Department of Water and Power's service territory covers 2,317 square miles, including the City of Los Angeles and Owens Valley in eastern California. Additionally, LADWP co-owns and operates transmission lines outside these two service areas, including a line that runs northeast from Los Angeles through Owens Valley to an intertie near Mono Lake on the California–Nevada border (Pacific DC Intertie), and another series of transmission lines that runs east from Los Angeles through the Mojave Desert to an intertie near Primm, Nevada. Because of a combination of terrain, vegetation, weather conditions, and a large wildland–urban interface (WUI), LADWP's service territory experiences frequent wildfires during extended periods of hot, dry, and windy weather in summer and fall (June through November). During drought years or when winter rainfall is minimal, fires can occur year-round. Wildfire risk, as indicated by the frequency of Red Flag Warnings issued by the National Weather Service, peaks from late September through December (IEMS, n.d.). LADWP's service territory includes urban areas within the Los Angeles city limits and areas of the Owens Valley where wildfire risk is relatively low, regardless of potential ignition sources or likelihood, because there is insufficient combustible vegetation to sustain a wildfire. Wildfire risk increases in areas where LADWP equipment and lines cross undeveloped open space with unmanaged vegetation or where development is intermixed with open space. Areas of higher wildfire risk occur within the WUI in the Los Angeles city limits, including the Santa Monica Mountains along the Pacific Coast, the Verdugo Mountains separating the San Fernando Valley from the Crescenta Valley, and the foothills and mountainous areas of the San Gabriel Mountains along the city's northern and western edges. In these areas, steep slopes and continuous grass, brush, and tree cover can sustain wildfire spread and, when conditions permit, extreme fire behavior, including crown fires, rapid fire runs, and long-range spotting. Although Owens Valley contains considerably more open space than the area within the Los Angeles city limits, its vegetation cover is more limited and consists primarily of sparse desert scrub on the valley floor along the Highway 395 corridor. Wildfire risk increases along the edges of the Owens Valley service area in the foothills of the Inyo Mountains and the eastern foothills of the Sierra Nevada, where slopes become steeper and vegetation cover more continuous. Approximately 21% of LADWP's service territory (the Los Angeles city limits and Owens Valley) is located within a CPUC High Fire-Threat District (HFTD). LADWP's transmission lines that extend beyond these service areas pass through HFTDs, particularly where they cross the San Gabriel Mountains outside Los Angeles. LADWP's equipment and line footprint within HFTDs is greatest in the Los Angeles area, where the utility has the most customers and infrastructure. In Owens Valley, LADWP's equipment and line footprint within HFTDs is smaller than in the Los Angeles area because there are fewer customers and less infrastructure. Along transmission-line corridors, LADWP's equipment and line footprint is generally limited to areas immediately adjacent to the lines and towers.

LADWP's service territory has experienced numerous wildfires. Wildfire occurrence has been most frequent in the Los Angeles portion of the service territory, which has experienced large fires with overlapping historical fire perimeters throughout its wildland–urban interface (WUI) areas. Within this portion of LADWP's service territory, the Santa Monica, Verdugo, and San Gabriel Mountains have the highest fire frequencies (CAL FIRE 2026). The most significant recent wildfire was the 2025 Palisades Fire, whose perimeter included a portion of the city's west side in the Santa Monica Mountains and resulted in the destruction of more than 6,800 structures and 12 deaths (CAL FIRE, n.d.). The Owens Valley portion of LADWP's service territory has similarly experienced frequent wildfires, with

overlapping fire perimeters on the eastern slopes of the Sierra Nevada and along the Owens River. Several of these fires approached or had perimeters that overlapped LADWP transmission lines.

2.2 High Fire Threat Districts

The California Public Utilities Commission (CPUC) designates areas with an increased risk of utility-associated wildfires as High Fire-Threat Districts. 21% of LADWP's service territory is within an HFTD. In the Los Angeles area, this includes portions of the service territory in the Santa Monica, Verdugo, and San Gabriel Mountains. Within Owens Valley, this includes portions of the service territory on the eastern side of the Sierra Nevada, west of State Highway 395. LADWP's transmission-line corridors extending north and west of Los Angeles pass through HFTDs as they cross the Transverse Ranges bordering the Los Angeles area. The 500-kV lines extending east toward the Nevada border do not pass through any additional HFTDs once they are east of the San Gabriel or San Bernardino Mountains. The transmission lines extending north through Owens Valley to the Nevada border cross additional HFTDs beginning near the community of Olancha and continuing north to the Nevada border. Most HFTDs in LADWP's service territory or near its transmission lines are classified as Tier 2 Elevated. Tier 3 Extreme areas are limited to the north side of the Verdugo Mountains and the south-facing slopes of the San Gabriel Mountains in the Los Angeles area. LADWP's transmission lines extending north and east also pass through Tier 3 HFTDs as they cross the Sierra Pelona, San Gabriel, and San Bernardino Mountains (CPUC, n.d.).

3 Independent Evaluator Review of Regulatory Compliance

Public Utilities Code (PUC) Section 8387 creates two requirements for each publicly owned electric utility (POU) in California. First, each POU is required to construct, maintain, and operate its electrical lines and equipment in a manner that minimizes wildfire risk. Second, each POU is required to prepare a wildfire mitigation plan and submit it to the California Wildfire Safety Advisory Board (WSAB) at least once every four years.

PUC Section 8387 contains several subsections that outline the elements required in WMPs prepared by POUs. Publicly owned utilities have been preparing WMPs since 2019 and, with support from power agency associations, have successfully produced WMPs containing the elements required by PUC Section 8387(b)(2) for several years. Table 1 provides a regulatory crosswalk showing each element required by PUC Section 8387(b)(2) and its location in LADWP's 2027-2028 WMP.

Table 1. PUC Section 8387(b)(2) Crosswalk Table

PUC 8387 subsection	PUC 8387 subsection summary	Location within the WMP	Dudek Comments
§8387(a)	Utility shall construct, maintain, and operate electrical lines and equipment to minimize wildfire risk.	Sections 6.0 Wildfire Risk Control Programs; 7.0 Wildfire Risk Mitigation Strategies; Sections 7.1 and 7.2	**Meets Requirements**

PUC 8387 subsection	PUC 8387 subsection summary	Location within the WMP	Dudek Comments
§8387(b)(2)(A)	Identify responsible persons and their responsibilities for executing the WMP.	Section 3.0 LADWP Organization and Responsible Persons	**Meets Requirements**
§8387(b)(2)(B)	Describe the objectives of the WMP.	Section 2.1 WMP Objectives	**Meets Requirements**
§8387(b)(2)(C)	Describe preventive strategies and programs to minimize wildfire risks, including consideration of climate change.	Sections 6.0 and 7.0 and all subsections; Sections 5.3.2, 7.1.2, and 7.1.3 discuss climate-related risks and adaptation	**Meets Requirements**
§8387(b)(2)(D)	Describe metrics used to measure implementation of the WMP and assumptions behind those metrics.	Sections 10.0 and 10.1, including Risk Assessment, Risk Buydown, Outcome, Reliability, and Performance Metrics	**Meets Requirements**
§8387(b)(2)(E)	Explain how prior metrics and performance results informed the current WMP.	Sections 1.4 Results and Accomplishments; 10.2 Impacts of Metrics on WMP; Appendix D Metrics	**Meets Requirements**
§8387(b)(2)(F)	Provide protocols for disabling reclosers and de-energizing portions of the system while considering public-safety impacts and critical infrastructure.	Sections 7.2.5 Energy Control Center; 7.2.6 Incident-Based De-Energization	**Meets Requirements with Clarification.** Proactive de-energization protocols are under development
§8387(b)(2)(G)	Provide customer-notification procedures for de-energization events, including notification of public safety agencies, first responders, healthcare facilities, and telecommunications providers.	Sections 7.2.6.1, 7.3.1 Impacts on Public Safety, 7.3.2 Customer Notification Protocols, and 7.3.3 Communications Infrastructure	**Meets Requirements**
§8387(b)(2)(H)	Provide plans for vegetation management.	Sections 6.4 Vegetation Management Programs – Power System and 6.5 Vegetation Management Program – Water System	**Meets Requirements**
§8387(b)(2)(I)	Provide plans for inspection of electrical infrastructure.	Section 6.1 Inspection and Maintenance Program – Power System	**Meets Requirements**
§8387(b)(2)(J)(i)	Identify, describe, and prioritize wildfire risks and risk drivers associated with utility design, construction, operation, and maintenance.	Sections 5.3 and 5.3.1; Table 5-1 Risk Drivers and Risk Consequences	**Meets Requirements**

PUC 8387 subsection	PUC 8387 subsection summary	Location within the WMP	Dudek Comments
§8387(b)(2)(J)(ii)	Identify wildfire risks and drivers associated with topographic and climatological conditions throughout the service territory.	Sections 5.3.2 Risks and Risk Drivers Associated with Topographic and Climatological Risk Factors; Section 4.0 Service Territory Overview	**Meets Requirements**
§8387(b)(2)(K)	Identify geographic areas presenting higher wildfire threats than existing CPUC fire-threat maps and identify potential map expansion areas.	Sections 4.2 High Fire Threat Districts; 5.4.1 Assets in Fire Threat Zones; Appendix B Fire Threat Maps	**Meets Requirements**
§8387(b)(2)(L)	Provide a methodology for identifying and presenting enterprise-wide safety and wildfire risks.	Sections 5.1 Enterprise Risk Management Program; 5.2 Risk Management Strategy and Tools; 5.4 Wildfire Risk Assessment	**Meets Requirements**
§8387(b)(2)(M)	Describe how service will be restored following a wildfire.	Section 8.11 Wildfire Recovery and Service Restoration	**Meets Requirements**
§8387(b)(2)(N)(i)	Describe processes to monitor and audit implementation of the WMP.	Sections 10.3 Processing WMP Updates and WMP Monitoring; 10.4 Independent Evaluation and Internal Auditing	**Meets Requirements**
§8387(b)(2)(N)(ii)	Describe processes to identify and correct deficiencies in the WMP and implementation.	Sections 10.3, 10.4, and 10.5 Continuous Improvement	**Meets Requirements**
§8387(b)(2)(N)(iii)	Describe processes to monitor and audit effectiveness of infrastructure inspections, including contractor inspections.	Sections 6.1.3 Post-Inspection Activities; 6.3.3 Quality Auditing; 10.3 through 10.5	**Meets Requirements**
§8387(b)(3)	Present WMP at a publicly noticed meeting, accept public comments, and verify compliance with applicable requirements.	Section 9.1 WMP Presentation to LADWP Board; Section 9.3 Public Comment; WMP notes Board presentation will occur following filing	**Pending**
§8387(c)	Obtain a qualified independent evaluator review; publish report and present findings at a public meeting.	Section 10.4 Independent Evaluation and Internal Auditing	**Pending**

Overall Assessment: The review found that the WMP addresses all major requirements of PUC Section 8387. The draft WMP provides a direct response to every substantive requirement in PUC Section 8387 and includes a statutory cross-reference table in Section 2.4 that aligns with the regulatory requirements. Some areas warrant further detail because the programs are still under development and complete information is not yet available, or

because the WMP does not describe the links among fire risk drivers (Section 5), wildfire mitigation strategies (Sections 6 and 7), and the WMP metrics tracked in Section 10.

4 Wildfire Mitigation Strategy Review and Understanding

According to PUC Section 8387(c), the Independent Evaluator's role is to "review and assess the comprehensiveness of [the utility's] wildfire mitigation plan." Dudek interprets this language as requiring an assessment of whether the utility:

A. Understands the wildfire risks present in its service territory.

B. Understands the specific wildfire risks associated with its equipment and operations.

C. Implements effective mitigation strategies to address these risks.

4.1 LADWP's Understanding of Wildfire Risk in Its Service Territory

Wildfire risks and risk drivers are not divided into the two categories described in PUC Section 8387(b)(2)(J). Instead, Section 5.0, Wildfire Risk Management Program, identifies five wildfire risk drivers, which are listed in Figure 5-1, LADWP Wildfire Risk Bowtie:

1. Extreme weather and climate change
2. Vandalism and human factors
3. Foreign object contact with LADWP equipment
4. Vegetation contact with LADWP equipment
5. LADWP equipment failures due to condition or design

Additional risk drivers are also identified in Table 5-1, Risk Drivers and Risk Consequences. The risk drivers listed in this figure are also included in the equivalent figure in the 2025 WMP (Figure 3, LADWP Wildfire Risk Bowtie). LADWP's 2027-2028 WMP also reviews wildfire risks and threats in Appendix B, LADWP Fire Threat Maps. Within Section 5.0, risks and risk drivers associated with design, construction, operation, and maintenance, as well as topographic and climatological risk factors, are discussed in Sections 5.3.1 and 5.3.2, respectively. Outage data for each wildfire risk driver from 2019 through 2024 are discussed in subsequent sections and summarized using charts from Appendix D and Section 10. Of the five wildfire risk drivers listed above, only vandalism and human factors are not discussed in detail in the WMP.

Outage information for distribution, subtransmission, and transmission systems in HFTDs addresses some, but not all, of the wildfire risk drivers listed in Figure 5-1. Outage information and data are provided in Section 10.0, Metrics, Monitoring, and Continuous Improvement, and Appendix D, LADWP Metrics. Approximately 14.5% of distribution

outages from 2019 through 2024 occurred in HFTDs; approximately 3.7% of subtransmission outages occurred in HFTDs; and approximately 52.5% of transmission outages occurred in HFTDs.

A high proportion of outages attributed to unknown factors is common across all three systems: distribution, subtransmission, and transmission. Among known factors, the three leading outage causes differ by system. For distribution, the three leading causes were utility work/operation, equipment/facility failure, and vegetation. For subtransmission, they were contact by a non-vegetation object, equipment/facility failure, and wire-to-wire contact. For transmission, they were fire not ignited by LADWP, equipment/facility failure, and force majeure excluding fire.

4.1.1 Extreme Weather and Climate Change

The influence of weather and climate is detailed in Section 5.3.2, Risks and Risk Drivers Associated with Topographic and Climatological Risk Factors. This section acknowledges climate change as a key driver of increasing wildfire risk and extent in California, including wildfires within Los Angeles County and LADWP's service territory. LADWP understands the seasonal drivers of wildfire risk and how they affect the prevention and mitigation strategies used under current environmental conditions, including drought and Santa Ana winds.

The WMP also acknowledges how climate and weather affect LADWP's operations and the need for wildfire risk reduction. To better prepare for the effects of extreme weather and climate change, LADWP's Office of Emergency Management (OEM) plans to establish a Climate Resiliency Team that will provide specialized expertise to support LADWP's preparedness and response efforts. These efforts will include monitoring and assessing weather conditions, wildfire risk, and other climate-related hazards that may affect LADWP operations, infrastructure, and the communities it serves.

Although weather and climate are not specifically reported in the LADWP Metrics (Appendix D), weather and climate phenomena may influence other metrics reported there and throughout the WMP, such as Red Flag Warnings and Red Flag Alerts. Red Flag Warnings (RFWs) are issued by the National Weather Service when extreme fire-weather conditions—for example, sustained winds of 15 mph or greater, relative humidity below 25%, and temperatures above 75 degrees Fahrenheit—are occurring or expected to occur shortly (NWS, n.d.). Red Flag Alerts, by contrast, are issued by the City of Los Angeles when weather conditions create an extremely high potential for a fast-moving brush fire. These conditions are defined as wind speeds of 25 mph or more and humidity of 15% or less (LAFD, n.d.). From 2019 through 2024, the number of Red Flag Warnings varied: 2019 had 0, and 2023 had 2. The years 2020, 2021, 2022, and 2024 had substantially more warnings—24, 27, 12, and 39, respectively (IEMS, 2026). During the same period, Red Flag Alerts were fewer but relatively consistent: 2019 (4), 2020 (2), 2021 (5), 2022 (5), 2023 (3), and 2024 (4).

Although high winds and low humidity are identified as factors that may influence wildfire behavior, the WMP does not explicitly discuss or state specific metrics for these factors or other factors that may correlate with outages. However, the WMP defines Red Flag Days as days within the Los Angeles Fire Department Fire Zone or Very High Fire Hazard Severity Zones when wind speeds exceed 25 mph and humidity is below 15%. To monitor these Red Flag Day conditions, LADWP uses weather-monitoring systems that collect and transmit critical environmental data and plans to implement additional technologies. Both are detailed in Section 6.2.5, Additional Wildfire Mitigation and System Hardening Efforts.

4.1.2 Vandalism and Human Factors

Although vandalism and human factors are not discussed in detail in the WMP beyond their mention in Figure 5-1 and Table 5-1, vandalism is reported in LADWP metrics for outage events from 2019 through 2024. Distribution outage events in HFTDs associated with "Vandalism/Theft" numbered fewer than 100 per year, accounting for 2% to 3% of total outage events. "Vandalism/Theft" was not a category in the subtransmission outage events analyzed. Transmission outage events in HFTDs associated with "Vandalism/Theft" accounted for less than 3% of total outage events, and that percentage was reported only for 2022.

4.1.3 Foreign Object Contact with LADWP Equipment

Similar to vandalism and human factors, foreign-object contact with LADWP equipment is not discussed in detail in the WMP. Although foreign objects are referenced elsewhere in the document, those references do not address foreign-object contact with LADWP equipment as a wildfire risk.

Outage events caused by foreign objects are reported in LADWP's metrics for 2019 through 2024. Distribution outage events in HFTDs associated with "Contact from Object (Non-Vegetation)" numbered approximately 100 or more per year, accounting for 2% to 4% of total outage events. Subtransmission outage events associated with "Contact from Object (Non-Vegetation)" varied: 2019 and 2021 each had only one associated event, while 2024 had 10. Transmission outage events in HFTDs associated with "Contact from Object (Non-Vegetation)" accounted for 2% to 11% of total outage events.

4.1.4 Vegetation Contact with LADWP Equipment

Because vegetation contact with LADWP equipment is recognized as a wildfire risk driver, Table 1-1, Results and Accomplishments, in the WMP reports that the following vegetation-management practices were performed:

- Performed line clearance tree trimming on approximately 215,000 trees per year.
- Patrolled the clearances between conductors and vegetation of 100% of transmission and distribution lines at least once per calendar year.
- Completed 100% of routine inspections for power system vegetation management.

Additionally, Section 3.0, LADWP Organization and Responsible Persons, identifies many groups that participate in vegetation management to reduce the potential for vegetation contact with LADWP equipment. The Vegetation Management Group, housed within the Distribution Construction and Maintenance Division, prunes and removes vegetation that may interfere with the power system by maintaining required clearances between vegetation and department conductors and facilities. It conducts multiple patrols on a 12-month cycle and performs on-the-spot inspections for other LADWP groups and ratepayers as needed. The Electric Trouble Section within the Distribution Operations Division supports vegetation management by conducting emergency line-clearance tree trimming and by switching or de-energizing distribution circuits so vegetation-management crews can work safely. The Power Design and Construction Division conducts vegetation management for LADWP substations by monitoring and controlling vegetation growth through monthly station inspections and routine landscape maintenance by the Electrical Station Maintenance Group. The Substation Operations and Maintenance Division also conducts

vegetation management for LADWP substations through monthly station inspections and routine landscape maintenance by the Electrical Station Maintenance Group. The Property Management Group within the Metro Section of the Water Operations Division oversees vegetation management.

In addition to the groups described above, three of the eight Wildfire Safety Subcommittees identify vegetation management among their core focus areas. Additional information about vegetation-management programs and metrics is provided in Section 6.4, Vegetation Management Programs – Power System; Section 6.5, Vegetation Management Program – Water System; and Section 10.1.5.1, Inspection and Vegetation Management Metrics. LADWP's metrics for 2019 through 2024 indicate that these actions have produced measurable results. Distribution outage events in HFTDs associated with "Vegetation Caused" accounted for 9% to 24% of total outage events. Subtransmission outage events in HFTDs associated with "Vegetation Caused" included only two events in 2023. Transmission outage events in HFTDs associated with "Vegetation Caused" accounted for 0% of total outage events.

Although brush is mentioned in reference to vegetation clearance, specific vegetation communities present within the LADWP service area are not explicitly mentioned within the WMP.

4.1.5 LADWP Equipment Failures Due to Condition or Design

Three of the eight Wildfire Safety Subcommittees have core focus areas related to equipment and infrastructure in HFTDs and other high-risk areas, while five subcommittees ultimately monitor LADWP equipment. Measures LADWP has implemented to reduce the wildfire risk posed by the utility's overhead electrical lines and equipment include the following:

- Rigorous construction standards in HFTDs, discussed in Section 7.1,"Design, Construction, and Infrastructure,"
- Robust vegetation management program, discussed in Section 6.4, "Vegetation Management Programs – Power System," and
- Collaboration with fire agencies, discussed in Section 3.6, "Office of Emergency Management (OEM)"

Additional information about actions taken to improve LADWP equipment and wildfire preparedness is provided in Section 6.1, Inspection and Maintenance Program – Power System, and Section 7.1, Engineering, Design, and Construction. Metrics related to some of the maintenance activities are provided in Appendix D.

Appendix D also presents outage-event data for HFTDs from 2019 through 2024. The categories "Equipment/Facility Failure" and "Wire-to-Wire Contact" most closely correspond to the risk factor "LADWP Equipment Failures Due to Condition or Design." Distribution outage events in HFTDs associated with "Wire-to-Wire Contact" accounted for less than 1% of total outage events. Subtransmission outage events associated with "Wire-to-Wire Contact" varied; each year had at least one associated event, and 2021 had six. Transmission outage events associated with "Wire-to-Wire Contact" accounted for 0% of total outage events. Distribution outage events in HFTDs associated with "Equipment/Facility Failure" accounted for 11% to 16% of total outage events. Subtransmission outage events associated with "Equipment/Facility Failure" ranged from 0% to 34%, depending on the year. Each year had at least one associated event, and 2021 had six. Transmission outage events associated

with "Equipment/Facility Failure" accounted for 0% to 15% of total outage events, depending on the year. Specific event counts were not provided for transmission outages.

4.2 LADWP Wildfire Risk Mitigation Strategies

As identified in Section 5.0, Wildfire Risk Management Program, LADWP equipment's potential to ignite a wildfire—and to be affected by a nearby wildfire—depends on environmental conditions, including extended drought, weather patterns, vegetation type and density, and terrain.

Additionally, approximately 14% of LADWP's total overhead distribution circuit miles and 15.1% of its total overhead transmission circuit miles are within Tier 2 and Tier 3 High Fire-Threat Districts. The risk of LADWP equipment igniting a wildfire is highest during the summer months, when hot, dry conditions prevail. Although summer conditions promote ignition, the combination of dry fuels and high winds in fall contributes to larger and more destructive fires. These seasonal differences are important considerations when LADWP implements prevention and mitigation strategies during summer and fall.

LADWP deploys several wildfire mitigation strategies intended to reduce the risk of its equipment starting a wildfire. Compared with previous versions, this WMP has been substantially restructured. Many new sections were added to expand, consolidate, and revise information from the previous WMP and to accommodate new content. In particular, Section 5.0 is new and discusses LADWP's inaugural Enterprise Risk Management division, including its design, influence on the WMP, and alignment with ISO 31000 principles. Additionally, metrics are consolidated in Section 10.0, Metrics, Monitoring, and Continuous Improvement.

Table 2 consolidates information from Table 5-1, Risk Drivers and Risk Consequences, and Figure 5-1, LADWP Wildfire Risk Bowtie. It presents the identified wildfire risk drivers, corresponding mitigation measures and programs, and potential consequences if those risks are not addressed.

Table 2 LADWP Wildfire Risk Driver to Risk Mitigation Strategy Comparison

Wildfire Risk Drivers	Mitigation Measures and Programs	Potential Risk Consequences if not Addressed	Comment
Extreme weather and climate change - High wind event - Changing weather patterns - Extended drought conditions	- Construction standards - Operational protocols - Blocking reclosers	- Costly, incremental operational procedures needed for field and office personnel to prepare for and operate during high wind events - Unplanned power outages with potential	LADWP continues to expand wildfire situational awareness capabilities within HFTD areas through deployment of advanced cameras and weather stations, which also supports early wildfire detection, operational response, grid

Wildfire Risk Drivers	Mitigation Measures and Programs	Potential Risk Consequences if not Addressed	Comment
		for long durations due to damage restoration and expanded pre-restoration wildfire safety patrols - Wildfire potentially caused by LADWP or other means and affecting LADWP customers - Increased customer claims resulting from outage or wildfire damages - Long-term increased administrative and regulatory requirements needed to design, engineer, and construct fire resilient infrastructure	resiliency, and public safety.
Vandalism and human factors	- Construction standards - Operational protocols		Although vandalism and human factors aren't expanded upon in the WMP aside from mention in Figure 5-1 and Table 5-1, vandalism is reported in LADWP metrics from 2019 to 2024 with regard to outage events.
Foreign object contact with LADWP equipment - Wildlife contact - Mylar / metallic balloon contact	- Covered conductors - Avian protection		Foreign object contact with LADWP equipment is not elaborated on in the WMP. It is only mentioned in Figure 5-1 and Table 5-1 as a wildfire risk. There are more mentions in the document referencing foreign objects though not about foreign object contact with LADWP equipment as a fire risk.
Vegetation contact with LADWP equipment	- Vegetation management programs - Transmission and distribution vegetation management programs		Programs are further addressed in Section 6.4, Vegetation Management Programs – Power System, and Section 6.5, Vegetation Management Program – Water System.

Wildfire Risk Drivers	Mitigation Measures and Programs	Potential Risk Consequences if not Addressed	Comment
LADWP equipment failures due to condition or design - Conductor failure - Conductor slap - Pole / hardware failure - Aging infrastructure	- Power system Reliability Program - Transmission and distribution maintenance and inspection plans - Construction standards		LADWP discusses improvements to and hardening of infrastructure in Section 7.0, Wildfire Risk Mitigation Strategies.

4.3 LADWP Proactive De-energization

LADWP recognizes that more detailed data is needed, including wind and weather information, equipment failure and ignition records, and up-to-date vegetation data, to responsibly implement proactive de-energization. Improving this modeling is one of LADWP's top priorities, and it plans to provide a major update in its next WMP or sooner if needed.

LADWP is initially reviewing circuits and feeders in Tier 3 areas to determine where technology upgrades could support future proactive de-energization, followed by reviews of Tier 2 and non-HFTD areas. It has begun working with various stakeholders and is expanding this outreach to ensure all potential impacts are fully considered, including safety, reliability, customer notifications, and financial effects on customers and communities.

LADWP will continue to collect data, assess operational considerations, and refine its understanding as it develops potential proactive de-energization strategies and procedures. Until full operational readiness is achieved, including enhanced meteorological forecasting, expanded weather monitoring capabilities, improved fire spread modeling, and other critical operational tools, LADWP will implement incident based de-energization measures in accordance with the circumstances outlined in Section 7.2.6.1.

5 Wildfire Mitigation Strategy Execution

Under PUC Section 8387, POUs must construct, maintain, and operate electrical lines and equipment to minimize wildfire risk. Wildfire Mitigation Plans for POUs document each utility's understanding of wildfire risks in its service territory, as well as the mitigation strategies it has implemented to minimize those risks. Although not a requirement specific to POUs, LADWP's 2027-2028 WMP documents its recent wildfire mitigation accomplishments. Detailing these accomplishments demonstrates the utility's progress in implementing its wildfire mitigation strategies. LADWP's 2027-2028 WMP describes two general categories of accomplishments: recent 2025–2026 accomplishments related to post-fire recovery initiatives or specific system-hardening projects, and accomplishments related to ongoing wildfire mitigation and system-reliability programs. These accomplishments are detailed below.

5.1 Post Palisades Fire Recovery

In addition to the loss of life and structures, the 2025 Palisades Fire damaged more than 20 miles of LADWP overhead distribution lines and required the replacement of more than 1,800 poles. After the Palisades Fire, LADWP completed the following restoration and improvement work in 2025:

A. Rebuilt the electric distribution system to its original configuration.
B. Hardened 7 miles of 4.8-kV distribution lines with steel poles.
C. Developed plans to underground and upgrade 45 miles of overhead distribution lines as part of the Long-Term Rebuild and Recovery Plan.
D. Installed about 2 miles of underground conduit and 32 substructures on Sunset Boulevard.
E. Restored service to standing structures by March 21, 2025.

5.2 Power System Reliability Program

LADWP's Power System Reliability Program is a long-term system-hardening program that includes replacing or upgrading equipment in HFTDs to reduce wildfire risks. LADWP replaced the following assets from 2018 through 2024:

A. 5,478 poles
B. 10,886 crossarms
C. 2,277 transformers
D. 25.58 miles of conductor

5.3 Vegetation Inspection and Management

LADWP met all its vegetation-management activity targets in 2025, completing routine inspections on 100% of its distribution and transmission lines. These inspections occur once per year outside HFTDs and twice per year within HFTDs. The WMP does not specify how much vegetation management was conducted in 2025, but it indicates that approximately 215,000 trees are trimmed annually.

5.4 Operations and Protocols

LADWP's WMP details operational protocols that apply within an HFTD or an LAFD Fire Zone when the NWS has issued an RFW. These protocols include modifying system settings for circuits in HFTDs to block reclosers on 4.8- and 34.5-kV circuits in Tier 3 HFTD areas. Additionally, LADWP fieldwork is limited to activities essential for public safety, and field crews must take additional precautions when working on energized equipment and lines. According to LADWP's WMP, RFWs were issued by the NWS from 2020 through 2024, as shown in Table 3.

Table 3 Red Flag Warning Occurrence

Year	2019	2020	2021	2022	2023	2024
Number of Red Flag Warnings	0	24	27	12	2	39

Based on the WMP and conversations with LADWP staff, LADWP implemented its Red Flag Warning Condition operating protocols for the duration of each NWS-issued RFW shown in Table 3.

5.5 Asset Inspections

LADWP conducts asset inspections at the following frequency:

- Distribution patrol inspections (once per year)
- Distribution detailed inspections (once every three years for underground structures and once every five years for overhead and pad-mount structures)
- Transmission patrol inspections (twice per year)
- Transmission detailed inspections (every 10 years)

6 Conclusion

LADWP's service territory contains areas of elevated wildfire risk because steep mountainous terrain and continuous chaparral, grasslands, and woodlands, combined with a prolonged fire season punctuated by extreme fire-weather events, are conducive to large wildfire growth. Within these high-fire-hazard areas, significant portions of LADWP's overhead circuits and facilities are close to continuous unmanaged vegetation and could ignite a wildfire if an ignition event—such as vegetation contacting an energized line or an equipment failure—occurred. Although LADWP has not been responsible for any recent large catastrophic wildfire, its service territory has experienced several recent destructive wildfires, including the 2025 Palisades Fire in the Los Angeles area and the 2026 Rock Fire in Owens Valley.

LADWP's 2027-2028 Wildfire Mitigation Plan is a comprehensive document that addresses each required element of PUC Section 8387(b)(2). The review assessed whether the plan satisfies applicable PUC requirements, reflects an appropriate understanding of wildfire risk and risk drivers in LADWP's service territory, and identifies mitigation strategies responsive to those risks. LADWP's 2027-2028 WMP demonstrates an understanding of the wildfire risks present in its service territory through partnerships with the Los Angeles Fire Department and the City of Los Angeles Emergency Operations Center; the use of weather and fire-danger monitoring for real-time analysis during fire season; wildfire outlook products; and an operating protocol based on the occurrence of extreme fire-weather conditions. For example, LADWP has a robust vegetation inspection and management program that prioritizes HFTD areas. The WMP also demonstrates LADWP's investment in long-term wildfire risk-reduction strategies, including a power-system reliability program that has steadily increased annual accomplishments in upgrading LADWP equipment with wildfire risk-reduction features, such as replacing wooden poles with steel poles and replacing bare-wire conductors with covered conductors. These improvements reduce the likelihood that LADWP equipment in high-fire-hazard areas will ignite a fire.

LADWP is currently developing an expanded fire-risk analysis process and proactive de-energization protocols. These efforts include using existing and proposed LADWP cameras and weather stations to support wildfire detection, predictive fire-spread modeling, and fire-danger forecasting. Additionally, the utility is investigating tools for monitoring and detecting faults and equipment failures.

In summary, LADWP's 2027-2028 Wildfire Mitigation Plan addresses each required element of Public Utilities Code Section 8387 and demonstrates a proactive and risk-informed approach to wildfire prevention, operational readiness, and system resiliency. Based on information in the WMP and conversations with LADWP staff, the utility is committed to continuous improvement of their wildfire mitigation program both in their ongoing wildfire mitigation programs and the new protocols for risk analysis and proactive de-energization that are under development. LADWP has developed a WMP that supports both regulatory compliance and the ongoing protection of public safety, utility infrastructure, and the communities it serves.

7 References

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