Community Benefits Plan

Advanced Solutions to Mitigate Wildfire Risk

This Community Benefits Plan (CBP) enumerates a framework to ensure that federal investments in the *Advanced Solutions to Mitigate Wildfire Risk* project advance the following four priorities: (1) community and labor engagement; (2) investing in the American workforce; (3) advancing diversity, equity, inclusion, and accessibility (DEIA); and (4) the Justice40 Initiative.

Within *Advanced Solutions to Mitigate Wildfire Risk*, the vast and varied composition of the communities which are served by each Partner Utility, and the variety of community engagement efforts already employed among them, necessitates a unique approach to community engagement overall. The Community Engagement workstream will be led by the Fire Adapted Communities Learning Network (FAC Net)[1], a national network of place-based organizations working to build sustainable wildfire resilience capacity in fire-prone communities. They provide community-based leaders with resources, tools, and connections to reduce their wildfire risk and increase community resilience. FAC Net also provides strategy development, facilitation, and network design, and hosts a special learning community for people working on fire adaptation at the state scale. FAC Net's experience includes working with state resource agencies to develop strategic partnerships and plans, supporting the design and operations of state networks, and providing facilitation for statewide education programs. Below, Figure A: Community Benefits Plan Framework describes how this project will leverage FAC Net's specific expertise and unique experience to grow and expand the community engagement efficacy of the partner utilities.

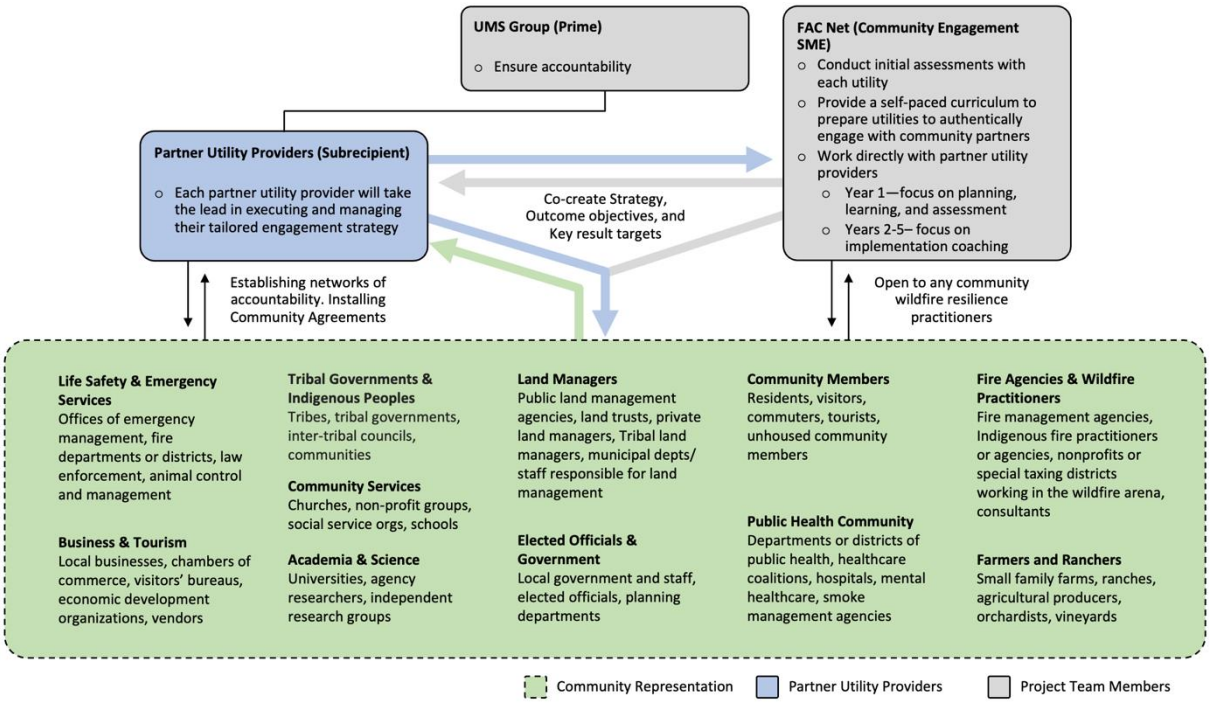

Figure A: Community Benefits Plan Framework

[1] The Fire Adapted Communities Learning Network (https://fireadaptednetwork.org/) is supported by a cooperative agreement between The Nature Conservancy, USDA Forest Service and agencies of the Department of the Interior through a subaward to the Watershed Research and Training Center.

1.0 Community and Labor Engagement

FAC Net will support the creation of a robust, tailored engagement strategy that is accountable to the communities within the service areas for each partner utility. The tailored approaches will be developed based on utility-specific implementation goals, the level of service and support required, the number and types of communities to be engaged[2], and the amount of in-house capacity the utility already possesses. Community engagement activities will begin once the engagement strategy is established and will run concurrently with partner utilities' development of community engagement capabilities. Table 1: Community Engagement Tasks lists the specific actions related to the community engagement workstream while Figure B: Community Engagement Timeline — Year 1 and Figure C: Community Engagement Timeline – Years 2-5 describe the workplan in a Gantt view.

Task	*Description*
1.0	**FAC Net initial engagement with Partner Utilities**
1.1	Cohort call with all Partner Utilities: • Review community engagement goals, project sites, and the full range of engagement options available via FAC Net. • Describe participation criteria and requirements so that utilities can select the best person from their team to participate in the work.
1.2	Conduct initial and annual assessments of community engagement efficacy for each Partner Utility: • Define specific community engagement needs. • Develop tailored approaches based on goals, level of service and support needed, number and types of communities to be engaging in, and how much in-house capacity is available. • Determine which of the community engagement modules, Table 2, are most applicable to that utility's needs, capacity, and experience with community engagement, in particular, their fluency with engaging underserved and disadvantaged communities.
2.0	**Provide a Self-paced Curriculum to Prepare Utilities to Authentically Engage with Community Partners**
3.0	**FAC Net directly works with each Partner Utility**

3.1	• Provide customized support services to the utilities on an individual basis as agreed upon in the scopes developed in Task 1:
	  ○ Year 1 – focus on planning, learning, and assessment, dependent on maturity.
	  ○ Years 2-5 – focus on implementation coaching, dependent on maturity.

4.0	**FAC Net convenes and supports the peer cohort**
4.1	Conduct quarterly calls. The cohort of community engagement individuals from the utilities share lessons and build peer relationships.
4.2	Develop collateral (e.g., briefings, stories, and other materials) that summarize learnings from these projects for broader knowledge sharing. Share content via FAC Net's national network and communications channels reaching thousands of community-based wildfire resilience practitioners
5.0	**FAC Net to design and lead a community engagement session as part of the GRIP Funding Regional symposium. (This task will only take place in the year(s) that the symposium is planned)**

Table 1: Community Engagement Tasks

[2] See Section
Justice40 Initiative for a detailed identification and analysis of communities within the Partner Utilities' service areas.

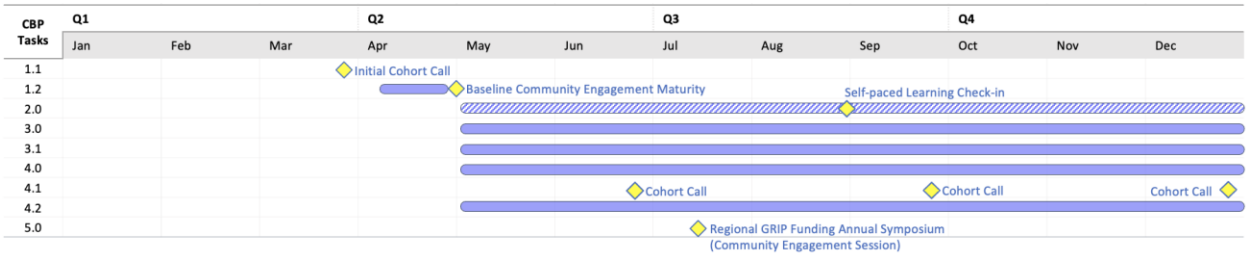

Figure B: Community Engagement Timeline — Year 1

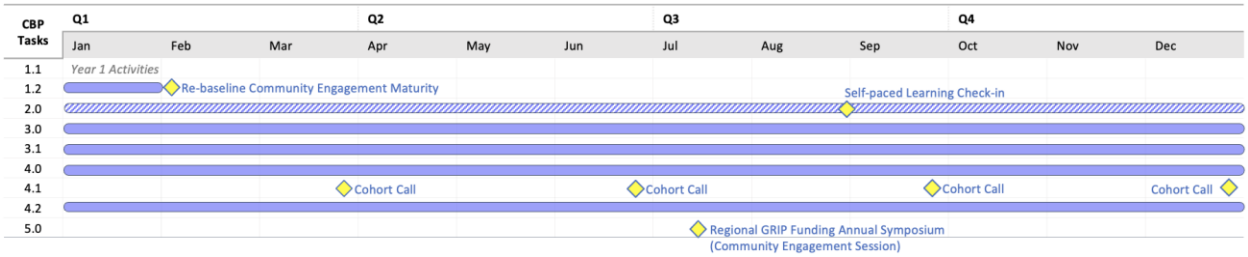

Figure C: Community Engagement Timeline – Years 2-5

As a first step, FAC Net will conduct an initial assessment of each partner utility's community engagement activities using the Spectrum of Community Engagement to Ownership[3]. This tool will identify a baseline to inform which training, resources, and services will be most beneficial to each utility and the communities they serve throughout the project.

Figure D: The Spectrum of Community Engagement to Ownership

Task 2.0 is explicitly focused on further enhancing the community engagement capabilities of each partner utility. FAC Net has created a self-paced learning curriculum to prepare each partner utility for authentic engagement with community partners (e.g., residents, land managers, fire agencies, wildlife practitioners, community services, farmers, and ranchers, etc.). Based on FAC Net's initial assessment, recommended community engagement learning modules will be provided, as described in Table 2: FAC Net - Self-paced Year 1 Curriculum to Prepare Utilities to Authentically Engage with Community Partners. The modules will be recommended based on applicability to utility partner needs, capacity, and experience with community engagement. In

[3] Developed by Rosa González of Facilitating Power, this tool has been piloted with municipal community-centered committees for racial equity and environmental justice at the cities of Portland, WA, Providence, RI, Seattle, WA, and Washington DC; and with the Building Healthy Communities Initiative in Salinas, CA. (https://movementstrategy.org/wp-content/uploads/2021/08/The-Spectrum-of-Community-Engagement-to-Ownership.pdf).

particular, the modules will address the utility's fluency in engaging underserved and disadvantaged communities[3].

Year 1 — Module Descriptions

1. Introduction to community engagement to advance wildfire resilience.

Community wildfire resilience overview

- Fire adaptation framing, tools, and case studies to provide a foundation for understanding community-based wildfire risk reduction and resilience.
- Principles for equitable community engagement

Assessing community engagement opportunities in your service area

- Where to find community-based partners and relevant wildfire strategies, plans, and collaboratives
- Engaging underserved communities: identifying communities most impacted by wildfire and ways to equitably partner with them to improve outcomes

2. Preparing for successful community engagement

Developing a tiered engagement strategy

- Types of engagement: beyond public meetings and a one-way flow of information
- Planning across scales of engagement: tools for working across an entire service area, tools for working with local governments, tools for working with place-based groups, partnerships, and collaboratives.

Shaping the purpose of your community engagement

- Designing to purpose: a review of options and methods
- The spectrum of public participation: how to design for a range of purposes.

Partnering with community-based groups

- Maximizing community benefits: ways to support local workforces and organizations engaged in mitigation and risk reduction efforts.
    - Overview of some of the types of organizations, partnerships, alliances and councils in the community wildfire adaptation space and ways to work together.
- How to structure your engagement if you will be working through intermediaries.

3. Planning and conducting successful community engagement events and initiatives

Workshops, events, and meetings

- Facilitation tools, skills, and considerations
    - Accessibility considerations and supports to maximize participation in virtual and in-person workshops (onsite childcare, travel stipends, functional needs accommodations)
- Agenda samples, options, and considerations
- How to get the most out of an event you didn't plan/aren't hosting (for when you are joining pre-formed wildfire coalitions or groups)

Engagement with key partners, existing coalitions, partnerships, and collaboratives

- Skills for equitable engagement with Tribes and Tribal governments
- Collecting project feedback as part of a larger set of wildfire resilience conversations

4. Shared accountability and adaptive management tools

Sharing results and information after an initial engagement

- Using project engagement to catalyze longer-term partnerships.
- How to contribute to and participate in community-based wildfire resilience work in the future

Assessing outcomes

- Community/utility partnership assessment scorecard templates.

Adapting future work

- Community wildfire resilience strategy tools for developing holistic approaches to resilience, including utility projects, resident engagement, landscape treatments, land use planning, and more.

Table 2: FAC Net - Self-paced Year 1 Curriculum to Prepare Utilities to Authentically Engage with Community Partners

Task 3.0 involves direct support between FAC Net and participant utilities based on specific needs and gaps identified in Tasks 1.0 and 2.0. As utility partners execute their community engagement work plan, FAC Net will provide guidance and support to ensure the best possible outcomes.

Tasks 4.0 and 5.0 support a key element of the project that includes the open sharing of lessons learned among the project coalition. FAC Net will convene the members of the coalition and conduct quarterly calls, with the goal of sharing and documenting the lessons learned by each utility and further building peer relationships. Collateral (e.g., briefings, stories) will be developed to summarize learnings from the project for knowledge sharing via FAC Net's national network and communications channels, ultimately reaching thousands of community-based wildfire resilience practitioners. Finally, FAC Net will design and lead a community engagement session as part of the GRIP Funding Regional symposium slated for years 2-5.

Labor Engagement

Project partner utilities have good relations with their local labor unions and have existing negotiated labor agreements, as well as apprenticeship programs, labor-management training partnerships, and quality pre-apprenticeship programs[4].

For the technologies being deployed within this project, additional external labor is not anticipated to be required for deployment. As such, it is expected that partner utilities' current employee base will be primarily utilized for implementation. In the event that opportunities for additional outside labor is required, UMS Group and FAC Net will work closely with partner utilities to try and leverage place-based groups' workforce capacity. Connections and partnerships with place-based workers will already be facilitated as part of the community engagement work FAC Net will be performing with the utilities. For example, in utility service areas where there are place-based fuel reduction crews, the community engagement process will create relationships between the utility and local organizations seeking work for their crews. This pipeline can serve to ensure that job quality and workforce continuity are maintained.

During project implementation, if unanticipated needs occur that require external labor, the grant administrator will work with the project partners and the applicable local labor, union labor party, and/or local business to ensure that they are engaged in a fair negotiation, with diversity, equity, and inclusion at the forefront. In some instances, the grant administrator may facilitate workforce or community agreements.

Tribal Engagement

This community benefits plan framework is designed to recognize and accommodate the varying regulatory, market, environmental, and sociopolitical contexts of the wildfire mitigation efforts of each organizational partner, and in particular, that of utilities. Utility activities associated with the project may be screened for cultural resource impacts at a level commensurate with the regulatory requirements and relevant risk management objectives set by each entity. This tailored approach will consider the number of federally recognized Tribes or Tribal communities present, land ownership, discretionary permitting, programmatic permits, federal license boundaries, and the potential to impact significant cultural resources.

[4] Please refer to Table 8: Additional Documentation Available Upon Request.

The community benefits framework goes beyond risk management by including communities as part of the screening for utility activities that fall outside of a regulatory nexus. The screening for risk management and Tribal engagement varies according to the potential to cause significant impacts, and uses a range of tools, as applicable to individual utility project scopes. Tools that may be considered include standard Best Management Practices (BMPs), Resource Protection Measures (RPMs) in the Environmental Release to Construction (ERTC), Automated Environmental Assessment (AEA) queries, Project Information Query (PIQ) searches, the Environmental Constraints Layer (ECL), and Cultural Alerts. Work with an elevated risk of impacting cultural resources is subject to Basic Screening and may also include Tribal engagement. Basic Screening mitigates the risk of disturbing locations known or suspected to include human remains and archaeological constituents protected by state laws. Tribal engagement may be used to avoid or lessen impacts on high-value resources that are significant to communities in utility service areas.

This framework includes leveraging Tribal community and labor engagement to prepare an evidenced-based strategic approach to proactively identify the project's economic opportunities, workforce development potential, possible indirect Smart Grid benefits, data sharing and sovereignty for Tribes, and environmental advantages. To accomplish this, project partners will team with FAC Net to complete a robust analysis that identifies the occupations, skills, and training requirements for the jobs that will flow from utility involvement in the project.

SMART Goals

The SMART goals associated with the project are listed in Table 3, below. Additional SMART goals related to individual utility deployments will be added in Year 1.

Time Period	***Goal***	***Metric***
Year 5	Utilities will (with assistance from FAC Net, as needed) increase their community engagement maturity. • Y1-Q1: Initial assessment • Y2-5: Re-baseline assessments	Increase partner utilities along the Spectrum of Community Engagement to Ownership by at least one level.[5]
Year 4	Perform ongoing in-person and/or virtual community engagement with actionable next-steps, clear follow-ups which demonstrate how feedback was considered and how/why it was or was not incorporated.	75% of the community outreach facilitated through this project will be with DACs[6]
EoY Year 1	Utilities will (with assistance from FAC Net, as needed) design community engagement plans focusing on identifying partnerships and opportunities for engagement with Fire-Risk communities and DACs.	Strategic Plan document
EoY Year 1	Utilities will (with assistance from FAC Net, as needed) identify direct benefits and engagement opportunities related to the technologies deployed as part of these grants as well as other community resources.	Updated SMART Goals
EoY Year 1	Utilities will complete assigned modules from self-paced learning curricula designed and provided by FAC Net.	100% completion rate
EoY Year 1	FAC Net will (alongside partner utilities) develop	Minimum of 4 case studies,

[5] See Figure D: The Spectrum of Community Engagement to Ownership
[6] See Table 5: DACs within Utility Service Providers Service Areas

Time Period	*Goal*	*Metric*
	collateral capturing learning from year one of the project.	briefings, or other materials
Years 2-5	Utilities will (with assistance from FAC Net, as needed) expand their support from communities within their service areas (e.g., integrating as partners in existing wildfire resilience coalitions, fire-safe councils, and other similar community-based groups).	Minimum of 1 new Letter of Support from community annually[7]
Years 2-5	DAC representation at the Annual Symposium to be at least 40% of the overall engaged communities by the end of the project (increase of 10% YoY).	Attendance over time
Years 2-5	Reduce outage frequencies and durations within DACs[6]. Using SAIDI - Excluding Major Event Days (MEDs), and SAIFI - Excluding Major Event Days (MEDs) (This SMART goal is related to Justice40 #8 (Table 7).	Overall Net Reduction/ 5-Yr Avg. Downward Trend
Years 2-5	Decrease in environmental exposure and burdens (This SMART goal is related to Justice40 #2 (Table 8) by reducing ignitions from utility equipment or contact between utility equipment and vegetation.	Overall Net Reduction / 5-Yr Avg. Downward Trend (Normalized by # Red Flag Warning (RFW) days)

Table 3: Community Benefits SMART Goals

2.0 Investing in the American Workforce

2.1 Attract, Train, and Retain a Skilled and Well-qualified Workforce

Each Partner Utility is actively engaged in attracting, training, and retaining a skilled and well-qualified workforce. partner utilities have collective bargaining agreements, labor-management partnerships, or other such agreements[8] which further describe the wages, benefits, and other worker supports provided by the partner utility's commitments to supporting workforce education or training, and the partner utility's efforts to engage employees in the design and execution of a workplace safety and health plan.

Additionally, the initial assessment using the Spectrum of Community Engagement to Ownership tool will identify areas for growth, and then support those enhancements over the course of the project. Depending on the organization, this will likely lead to the commitment of additional FTEs focused on community engagement activities.

2.2 Disclosure of Violations

Project partners have not reported any violations of the National Labor Relations Act, the Fair Labor Standards Act, the Occupational Safety and Health Act, the Service Contract Act, the Davis-Bacon Act, or Title VII of the Civil Rights Act.

2.3 Job Retention, Transition & Other Workforce Development Opportunities

Wildfires can have unpredictable impacts on local economies, and often create instability in the local labor market[9]. Factors such as the drifting of wildfire smoke can have significant and long-term impacts on communities dozens of miles from the fire itself[10]. Furthermore, Power outages

[7] See Community Representation in Figure A: Community Benefits Plan Framework.
[8] Please refer to Table 8: Additional Documentation Available Upon Request.
[9] https://ewp.uoregon.edu/largefires/content
[10] http://www.bayareaeconomy.org/files/pdf/BACEI_WildfireImpacts_Nov2021.pdf

caused by damaged infrastructure or from public safety power shutoffs (PSPS) events can cripple local businesses and put thousands of jobs at risk overnight.

By reducing overall wildfire ignition risks and creating better situational awareness that can help mitigate the effects of fires already in progress, this project will directly reduce impacts to communities and help avoid the crippling job market effects of catastrophic fires and PSPS events. Most of the solutions being deployed within this project will help utilities reduce the frequency and duration of power outages from non-wildfire causes like lightning, windstorms, vegetation fall-in, animals, etc. Some initial estimates gleaned from the DOE's Interruption Cost Estimator[11] (ICE) Calculator suggest the cost of a single average-sized outage event is between $1,000 and $2,000 for small commercial and industrial customers in the areas covered by this project.

Several coalition partners have existing protocols, processes, and procedures in place to ensure job quality and workforce continuity[12]. These will be upheld and implemented throughout the lifecycle of the project. Also, by establishing firm channels for sharing of lessons learned throughout implementation, the successes of these protocols, processes, and procedures can be conveyed to all project participants and taken up by others.

3.0 DEIA

This project is designed to be intentional in reducing barriers and will prioritize working directly with underrepresented businesses, training organizations serving workers facing system barriers to accessing quality jobs, and other project partners to help address DEIA. This includes having translators, childcare, and transportation available for community engagement activities, which is critical for equitable engagement.

Equally important is the work being done within the partner utilities. Each partner utility has DEIA policies in place and will be taking DEIJ (Diversity, Equity, Inclusion, Justice) training as part of their Community Engagement Development curriculum. Table 4: Partner Utility DEIA Statements includes specific DEIA statements from the Partner Utilities.

Utility Provider	***DEIA Statement***
Avista	As one of the leading utilities in the Northwest, Avista offers interesting career challenges and boundless opportunities to all our employees, to help them grow, contribute, and achieve. Together we continue to build a culture where difference is valued. By recruiting diverse perspectives we're able to deliver our best thinking in the work we do each day.
Burbank Water & Power	BWP has an inclusive work environment, including a DEI policy and corporate initiative, and dedicates resources to continual professional development of all employees.
Eugene Water & Electric Board	EWEB is in alignment with the State of Oregon's policy and best practices in DEI to ensure projects and funding is targeted to underserved and vulnerable populations. An internal DEI policy is being developed for adoption by our elected Board of Commissions in 2023. A key community partner, the Pure Water Partners (PWP), maintains the Justice, Equity, Diversity, and Inclusion committee focused on finding opportunities to increase the equitable distribution of program resources and community inclusion in project implementation. EWEB's purchasing policy ensures that minority businesses, women's business enterprises, and labor surplus area firms are used when possible. EWEB maintains an internal equal employment opportunity and affirmative action policy, as well

[11] https://icecalculator.com/home
[12] Please refer to Table 8: Additional Documentation Available Upon Request.

Utility Provider	*DEIA Statement*
	as discrimination and harassment-free workplace policy.
Inland Power & Light	IP&L has a corporate Affirmative Action and DEI policy. The purpose of the plan is to make employment decisions without regard to race, religion, color, national origin, citizenship, sex, sexual orientation, gender identity, veteran status, age, or disability status.
Klickitat County PUD	Klickitat PUD is an Equal Opportunity Employer.
Pacific Gas & Electric	PG&E is committed to fostering diversity, equity, inclusion, and accessibility (DEIA) internally and among the communities, we serve and closing the awareness and access gaps many disadvantaged communities experience. In conjunction with PG&E's Justice40 initiatives, our DEIA efforts will be the umbrella under which training and workforce development flow to DACs. PG&E will also leverage its Strategic Allies Leading Transparency (SALT) task force, which is an internal team designed to support DEIA within the broader organization. The SALT task force convenes cross-functional teams to facilitate uncomfortable conversations, help expose unfair practices, create a safe space for meaningful dialogue, and develop frameworks to drive lasting measures prioritizing human values. This approach also enables PG&E to influence diversity and inclusion goals beyond what is attainable by a single workgroup. By ensuring the open sharing of information, experiences, and processes, SALT becomes the vehicle toward sustainable change.

Table 4: Partner Utility DEIA Statements

All project partners support and encourage any stakeholders that deal with or work in emergency response practice and implement DEIA in their training, hiring, and contracting processes.

4.0 Justice40 Initiative

4.1 Identification of applicable disadvantaged communities

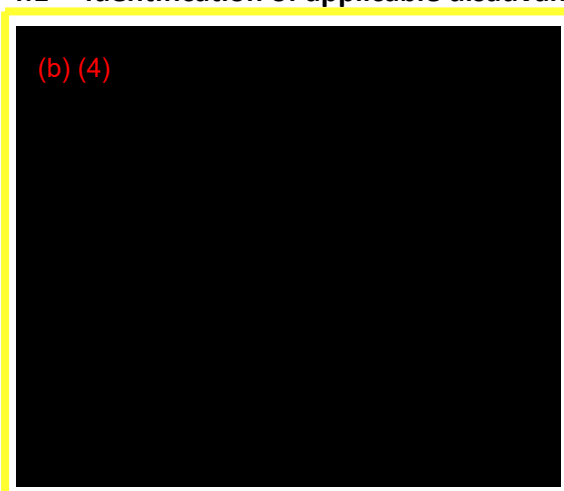

Figure E: Identified Disadvantaged Communities[13]

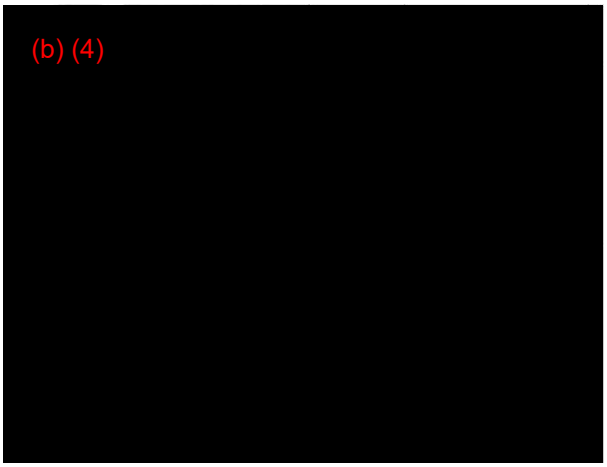

Figure F: Identified Communities at Wildfire Risk (at 11+%)[13]

Leveraging the Climate and Economic Justice Screening Tool [14] (CEJST), disadvantaged communities have already been identified within the service areas for each partner utility (see

[13] The mapping overlays and data analysis described within this section are publicly accessible: Denise Pena, "Utility Service Areas - WF Risk - DACs," Public.tableau.com (Slalom, February 22, 2023), https://public.tableau.com/app/profile/denise.pena4330/viz/UtilityServiceAreas-WFRisk-DACsv2/UtilityServiceAreas-WFRisk-DACs?publish=yes.

[14] Climate and Economic Justice Screening Tool (November 11, 2022), https://screeningtool.geoplatform.gov/.

Figure E, above). This tool presents community-level data at the Census tract level. However, utility service areas often cover many census tracts: some reside entirely within their service area boundary, and others span beyond their service area boundary. Therefore, the Centers of Population[15] dataset provided by the US Census Bureau was utilized to determine if a significant portion of a community is served by a given utility. The "centers of population" represents a weighted average that accounts for both the size and geographic location of the population within a census tract. Using this baseline, if the mean population center for a given census tract is located within that utility's service area, a significant portion of that community is considered to be served by that utility. See Table 5: DACs within Utility Service Providers Service Areas.

Utility Provider	***Total Census Tracts***	***Total DACs***	***DACs as % of Service Area***
Avista	137	59	43%
Burbank Water and Power	24	3	13%
Eugene Water & Electric Board	34	13	38%
Inland Power & Light	45	11	24%
Klickitat County PUD	1	1	100%
Pacific Gas & Electric	2232	701	31%
TOTAL	***2473***	***788***	***32%***

Table 5: DACs within Utility Service Providers Service Areas

CEJST was also leveraged to identify and map the projected risk to properties from wildfire against participant utility service territories (see Figure F). CEJST leverages a fire risk model compiled by First Street Foundation[16] that is based on a combination of fuels, weather, population, and fire movement variables. A percentage is provided for each census tract that indicates the share of properties at risk of fire in the next 30 years. Fire risk categories were constructed for each partner utility service area based on these percentages (Table 6, below).

(b) (4) [redacted]
[redacted]
[redacted]
[redacted]
[redacted]

Table 6: Fire Risk Categorization

4.2 Identification of Applicable Benefits

Justice40 benefits that are applicable/unapplicable to this project are described in Table 7, below.

#	***Justice40 Benefits***	***Applicability***	***Project Team Statement***
1	A decrease in energy burden	Indirect benefits	This project reduces the costs to the utility which they can pass along to customers. These implementations are necessary and with funding support, the lessened burden of cost can be realized by the customers too.
2	A decrease in environmental exposure	Direct benefits	This project's focus is on a decrease in environmental exposure and burdens through reductions in direct impacts from fires (e.g.,

[15] US Census Bureau, "Centers of Population," Census.gov, November 16, 2021, https://www.census.gov/geographies/reference-files/time-series/geo/centers-population.html.
[16] Firststreet.org, "First Street Foundation Wildfire Model Methodology Simplified," FirstStreet, May 16, 2022, https://firststreet.org/research-lab/published-research/first-street-foundation-wildfire-methodology-simplified/.

#	Justice40 Benefits	Applicability	Project Team Statement
	and burdens		destruction of personal property, local business impacts, and human casualties); improved air quality.
3	An increase in access to low-cost capital	Not applicable	The focus of this project is on leveraging innovative technologies to address wildfire, access to low-cost capital is not in scope.
4	An increase in high-quality job creation, the clean energy job pipeline, and job training for individuals	Indirect benefits	A workforce pipeline is anticipated to be developed and leveraged through FAC Net's many local network members. This pipeline can serve to ensure that job quality and workforce continuity are maintained.
5	Increases in clean energy enterprise creation and contracting (e.g., minority-owned or disadvantaged business enterprises)	Not applicable	The focus of this project is on leveraging innovative technologies to address wildfire, clean energy enterprise creation and contracting (e.g., minority-owned or disadvantaged business enterprises) is not in scope.
6	Increases in energy democracy, including community ownership	Indirect benefits	This project will provide opportunities for participant utilities to engage with communities to spread awareness about PSPS and wildfire events, along with tools for communicating about steps that may be taken to limit impacts. Armed with this knowledge, community members will be more informed about mitigations that may be taken (e.g., use of generators or solar panels for back-up power, community micro grids, etc.).
7	Increased parity in clean energy technology access and adoption	Indirect benefits	Having the ability to better understand wildfire risks may lead to the use of clean energy alternatives like solar and storage to support microgrids in high-risk, highly rural areas.
8	An increase in energy resilience including reduced outage frequency and/or duration	Direct benefits	The technologies being deployed through this project will provide reliability benefits and increase energy resilience, including reduced outage frequency and/or duration, and inform decision-making that may reduce both the scope and scale of PSPS events.

Table 7: Identification of Applicable Benefits

In addition, the project has been designed not only to address these benefits to the community but with the intention of positioning partner utilities as true stewards of the communities they serve. The framework of this Community Benefits Plan incorporates a holistic approach to benefiting communities with the goal of supporting partner utilities moving up the Spectrum of Community Engagement to Ownership and integrating the utilities as partners in existing wildfire resilience coalitions, fire-safe councils, and other similar community-based groups.

4.3 Anticipated Negative and Cumulative Environmental Impacts

Negative or cumulative environmental impacts are not anticipated for any communities, disadvantaged or otherwise. Most of the technology that will be implemented through this program will be software. These technologies will provide advanced situational awareness, improving the visibility of the environment and utility infrastructure. This data can inform communities and utilities in their discussions and actions.

4.4 Anticipated Flow of Benefits

Direct community benefits from this project generally fall into three categories, as described below. Project benefits will flow to all communities with fire risks in the utility service territories, including DACs and Tribal communities. Communities will receive the benefits associated with each category throughout the duration of the project, particularly in years 2-5 and beyond.

4.4.1 Benefits related to reduction in wildfire risk due to utility technology deployments.
These benefits, which directly support the Justice40 goal to decrease environmental exposure and burdens, include reductions in direct impacts from fires (e.g., destruction of personal property, local business impacts, and human casualties); improved air quality; reductions in second-order negative impacts (e.g., firefighting and emergency response costs borne by local taxpayers, or utility losses from damaged equipment or other liabilities borne by ratepayers); and increases in second-order positive impacts (e.g., increased property values and reduced homeowner insurance premiums).

The flow of these types of benefits is somewhat correlated with the pace of the technology deployment by each utility. As with any investment, partner utilities are committed to deploying technologies that reduce as much risk as possible, while also considering potential ratepayer impacts. For most, the first year of the project will be focused on planning this deployment mix and ensuring that foundational wildfire mitigation processes are in place before more significant investments are made. While this planning period somewhat delays the flow of benefits to communities, it is the most prudent approach and will create more value over the long term.

4.4.2 Benefits related to the reduction in frequency or duration of power outages.
While this project is focused primarily on addressing wildfire risks, the technologies deployed will also provide reliability benefits. This category of benefits directly supports the Justice40 goal to increase energy resilience including reduced outage frequency and/or duration. The flow of these benefits is also somewhat correlated with the rate of technology deployments.

4.4.3 Benefits related to increased community resilience due to direct engagement with utilities and knowledge sharing.
A key workstream within this project involves working with partner utilities to directly engage communities, particularly those that qualify as disadvantaged. This will expand the corridors for information sharing between communities and partner utilities and provide opportunities for the utilities to collaborate with communities to set and address common goals for community resilience. These goals will share a common overall framework based on best practices but will ultimately vary from community to community. As such, the flow of benefits will begin in Year 1 and increase in Years 2-5 and beyond as utilities develop their internal capabilities and establish key relationships within each locality. Ultimately, these types of benefits directly support the Justice40 goals to (1) increase energy resilience including reduced outage frequency and/or duration and (2) decrease environmental exposure and burdens, including reductions in direct impacts from fires.

Document	***Type***
(b) (4) [redacted]	Apprenticeship Plan
[redacted]	Union Agreement
[redacted]	Apprenticeship Plan
[redacted]	Collective Bargaining Agreement
[redacted]	Letter of Understanding
[redacted]	Memorandum of Agreement
[redacted]	Collective Bargaining Agreement

Table 8: Additional Documentation Available Upon Request