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**VIA OEIS E-FILING**  
**2023-WSAB-WMP-GPSCA Docket**

Wildfire Safety Advisory Board  
715 P Street, 20<sup>th</sup> Floor  
Sacramento, CA 95814  
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**RE: COMMENTS OF THE CALIFORNIA ASSOCIATION OF SMALL AND MULTI-JURISDICTIONAL UTILITIES ON THE WILDFIRE SAFETY ADVISORY BOARD DRAFT RECOMMENDATIONS TO THE OFFICE OF ENERGY INFRASTRUCTURE SAFETY ON ADDITIONAL WILDFIRE MITIGATION PLAN REQUIREMENTS AND PERFORMANCE METRICS**

Bear Valley Electric Service, Inc. (“BVES”), Liberty Utilities (CalPeco Electric) LLC (“Liberty”), and PacifiCorp, d.b.a. Pacific Power (“PacifiCorp”) (collectively, the California Association of Small and Multi-Jurisdictional Utilities (“CASMU”)) provide the following comments on the Wildfire Safety Advisory Board’s (“WSAB” or “Board”) April 18, 2022 Draft Recommendations to Office of Energy Infrastructure Safety on Additional Wildfire Mitigation Plan Requirements and Performance Metrics (“Draft Recommendations”). After considering comments on the Draft Recommendations, the WSAB will submit its final recommendations to the Office of Energy Infrastructure Safety (“OEIS”) as it updates its 2023 Wildfire Mitigation Plan Guidelines and Performance Metrics applicable to the Investor-Owned Utilities (“IOUs”) and Small and Multi-Jurisdictional Utilities (“SMJUs”). The CASMU members are all SMJUs and provide the following comments in support of the Board’s recommendations to revise 2023 Wildfire Mitigation Plan (“WMP”) Guidelines (“Guidelines”) for the SMJUs.

According to the Draft Recommendations:

The Board continues to suggest that OEIS develop a revised set of Guidelines for the SMJUs and the Independent Transmission Owners (ITO), that have smaller service territories than the three large utilities. These separate and specific Guidelines could provide specific guidance to

the SMJUs and ITOs to help them best allocate limited resources and potentially relieve these smaller entities from more detailed reporting requirements that are more applicable for the large IOU service territories.

OEIS should consider a simplified template such as those the Publicly Owned Utilities (POUs) are now including generally in their WMPs, per the Board's request and recommendation. These summary templates may be too simplified for the large IOUs, but perfectly acceptable and reasonable for the smaller SMJU and ITO WMPs. At the same time, OEIS should continue to ensure that these jurisdictions are still providing WMPs that provide reviewers the information they need to understand wildfire risks, mitigation activities, and plans and targets in these areas.<sup>1</sup>

In consideration of the smaller service territories and more limited resources of the SMJUs, the Draft Recommendations include the following Board recommendation:

OEIS should consider creating separate guidelines for the SMJUs and ITOs and consider relieving them of some of the reporting requirements, while at the same time continuing to ensure sufficient information for understanding of wildfire mitigation efforts.<sup>2</sup>

CASMU supports the Board's Draft Recommendations and encourages the Board to adopt its recommendations as drafted. The Draft Recommendations recognize the unique characteristics and more limited resources of the CASMU members. Furthermore, the Draft Recommendations are consistent with prior recommendations from the Board<sup>3</sup> as well as direction from OEIS which has stated that it "will consider creating differentiation of WMP Guidelines for the SMJUs ... as part of the 2023 WMP Guidelines or beyond."<sup>4</sup>

CASMU appreciates this opportunity to provide comments and looks forward to working with the Board, OEIS, and interested stakeholders to further refine the 2023 WMP Guidelines.

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<sup>1</sup> Draft Recommendations, p. 12.

<sup>2</sup> Draft Recommendations, p. 13.

<sup>3</sup> See, e.g., the Board's June 28, 2021 Recommendations on the 2022 Wildfire Mitigation Plan Guidelines, Performance Metrics, and Safety Culture Assessment, pp. 6-7, available at <https://energysafety.ca.gov/wp-content/uploads/docs/misc/wsab/recommendations-on-the-2022-wmp-guidelines-issued-6.30.21.pdf>.

<sup>4</sup> OEIS October 29, 2021 Analysis and Recommendations on the Wildfire Safety Advisory Board's 2021 Recommendations Report, p. 16, available at <https://energysafety.ca.gov/wp-content/uploads/docs/misc/wsab/2021-energy-safety-recommendations-to-cpuc-on-wsab-report-8389.c-final.pdf>.

For the reasons outlined in the Draft Recommendations and based on the unique characteristics and more limited resources of the SMJUs, the Board should adopt its Draft Recommendations and continue to formally recommend that OEIS create separate WMP Guidelines for the SMJUs.

Respectfully Submitted,



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