



November 14, 2025
California Wildfire Safety Advisory Board
715 P Street, 20th Floor
Sacramento, CA 95814
WSAB@energysafety.ca.gov

Re: Sacramento Municipal Utility District's Comments on the Wildfire Safety Advisory Board's *Draft Advisory Opinions to Publicly Owned Electric Utilities and Cooperatives*

Chair Block and Board Members:

The Sacramento Municipal Utility District (SMUD) appreciates the opportunity to comment on the Wildfire Safety Advisory Board's (WSAB) *Draft 2026–2029 Wildfire Mitigation Plan (WMP) Schedule for Publicly Owned Utilities and Electrical Cooperatives* (Draft Schedule). SMUD thanks Board members and staff for the thoughtful approach to interpreting recent amendments to Public Utilities Code Sections 326.2 and 8387, effected through Senate Bill (SB) 254 (2025). SMUD supports the WSAB's primary goal, as described in the Draft Schedule, of designing a process that maximizes the effectiveness of the WSAB's advice and recommendations, while also reducing the administrative burden on both WSAB and utility staff. As discussed below, SMUD believes that several elements of the Draft Schedule — including the reporting frequency, a staggered submittal schedule, and continuing the current qualified independent evaluator requirements — strike an appropriate balance that meets the WSAB's goals, as well as furthering the overall goal of encouraging utility wildfire planning maturation.

As explained in the Draft Schedule, SB 254 made several statutory changes that allow for more flexibility in WMP submission requirements. Namely, the POU and co-op WMP submissions are now required at a frequency of at least once every four years rather than every year. To implement these changes, the Draft Schedule proposes a new submission frequency and staggering submission deadlines, among other proposed changes. It also introduces an opportunity for utilities to discuss aspects of their draft plans with the WSAB prior to submittal.

SMUD supports the reporting frequency as provided in the Draft Schedule. The Draft Schedule requires utilities with overhead facilities in the High Fire Threat District (HFTD) to submit their WMPs every two years, and utilities without such overhead facilities to submit reports every four years. Biennial submission, in comparison to the current annual submission, materially reduces the reporting burden and will allow for more thoughtful incorporation of WSAB recommendations into utility WMPs. SMUD's wildfire mitigation planning process involves substantial investment of time and resources,

including reviews with subject matter experts, assessment of prior years' activities, and evaluation of planned activities and new developments in wildfire mitigation. SMUD has also benefited from meeting with WSAB Board Members and staff and anticipates this beneficial coordination will continue. These activities occur regardless of the WMP reporting process. Because the process of preparing WMPs requires additional time for preparation, public comment, and presentation to our governing board, the proposed biennial submittal schedule reduces the time spent on process and allows for more staff time to be devoted to core wildfire mitigation and other operational functions. SMUD supports the Draft Schedule's biennial reporting frequency as applied to SMUD for the 2026-2029 reporting period and appreciates the WSAB's emphasis on the purpose and function of WMPs.

SMUD also supports the Draft Schedule's staggered approach to reporting deadlines. SMUD would submit WMP documents to WSAB by November 2027 and November 2029. SMUD appreciates setting its deadline in the fourth quarter of the reporting year because it avoids burdening SMUD Transmission & Distribution Maintenance and Planning (TDMP) staff with WMP preparation during storm season and wildfire season, and avoids overlap with operations and maintenance planning cycles. Given TDMP staff's key role in the preparation of the WMP, scheduling SMUD's deadline in the fourth quarter significantly reduces the workload during key times of the year and allows for more focused engagement on WMP preparation. This proposal will allow SMUD to submit its 2026-2029 WMP by November 2027 and make necessary revisions in 2029. This provides continuity in SMUD's WMP submittals and is a reasonable balance of interests.

Finally, SMUD understands that the Draft Schedule does not propose changes to the requirement for a qualified independent evaluation. (See Public Utilities Code 8387(c).) Given SB 254 made no changes to this requirement, SMUD expects that utilities will continue to interpret this requirement to apply at least once every four years or where the utility identifies material changes in its WMP. This approach allows utilities to determine when an independent evaluation may be beneficial and effective, while not unnecessarily devoting resources toward the independent evaluation of a plan that may only include insubstantial changes compared to prior plans.

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SMUD thanks Board members and staff for the transparency, thought, and effort to balance multiple objectives that is reflected in the Draft Schedule.

/s/

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