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February 5, 2026

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

RE: Request to Modify 2026-2029 Wildfire Mitigation Plan Schedule for Publicly Owned Electric Utilities and Electrical Cooperatives

Dear Chair Block and Board Members,

Lassen Municipal Utility District (LMUD) is a locally governed utility overseen by an elected Board of Directors. The LMUD service territory covers 1,900 square miles in Lassen County and serves approximately 10,500 meters. The mission of LMUD is to provide reliable service at the most reasonable cost with a focus on safety and sustainability. Our Wildfire Mitigation Plan is a critical component of our strategy to deliver on our mission and serve our community.

I. Background

The Wildfire Safety Advisory Board (WSAB) approved the *2026-2029 Wildfire Mitigation Plan Schedule for Publicly Owned Utilities and Electrical Cooperatives* (Schedule) in December of 2025. The approved Schedule was responsive to much of the feedback from parties and was significantly amended compared to the draft Schedule. Specifically, the amended Schedule incorporated stakeholder feedback by revising the schedule to remove the staggered reporting throughout each year to recognize the importance of collaboration among POU's and co-ops. It also recognized the efficiencies and co-benefits to be gained by grouping utilities that are represented by utility associations. Finally, the Schedule emphasized the importance of both scheduling certainty and flexibility.

The Schedule divides 28 POU's and co-ops with overhead facilities in the High Fire Threat Districts (HFTD) into two groups and requires half of them to submit their Wildfire Mitigation Plans (WMP) in even years and half of them to submit in odd years. Lassen Municipal Utility District (LMUD) was grouped with other utilities with due dates in *even* years.

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II. Request

For reasons detailed below, Lassen Municipal Utility District (LMUD) requests the WSAB modify its Schedule to move the Final Wildfire Mitigation Plan Due Date for Lassen Municipal Utility District to *odd* years.

III. Reasoning

A) Flexibility: Section 3.4 of the Schedule keeps the door open for adjusting the schedule of due dates. Specifically, the Schedule states:

“...(T)he ability to change the schedule based on lessons learned and additional information could improve the schedule for utilities, individually or collectively, and for the WSAB... WSAB members and staff welcome ongoing input. WSAB may determine a different schedule in the future, responding to input and continuing to balance certainty and flexibility.”

LMUD appreciates that the WSAB welcomes our input. We also appreciate that the Schedule incorporated stakeholder feedback that emphasized the importance of both schedule certainty and flexibility. LMUD believes our request is unique and that the WSAB has the capacity to be flexible to amend the Schedule.

B) Collaboration:

Section 3.2 of the Schedule states, “Continued collaboration within the community of POU’s and co-ops is important and merits support.” The Schedule incorporated stakeholder feedback by revising the draft schedule to recognize the co-benefits that could be gained by grouping utilities that are represented by different utility associations. These benefits can range from sharing best-practices to sharing contractors to perform analyses that may be cost-prohibitive for individual small utilities.

LMUD is currently pursuing membership in Golden State Power Cooperative (GSPC), the association representing California’s electric cooperatives and rural utilities, and has an action item on the LMUD Board agenda for March 31. GSPC has previously facilitated collaboration among members to jointly solicit contractors to assist members with comprehensive revisions to their WMPs. GSPC intends to coordinate a similar effort for members for their next WMP. LMUD believes it would be a significant value to collaborate with GSPC members, both in the reduction of costs and the collective impact of data-sharing for risk reduction. However, all of the other GSPC members were placed in the group with WMP due dates in *odd* years. Therefore, LMUD needs to be placed in the same group to maximize collaboration with GSPC.

Collaboration among utilities also provides a significant benefit to the WSAB. Indeed, the WSAB has recommended standard formatting and other structural refinements of POU WMPs to facilitate efficient review. While we recognize that each utility is unique,

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joint contractors will certainly produce individual WMPs that will have significant similarities that may expedite WSAB review. Through GSPC, LMUD would also have more representation at the Joint Associations Working Group meetings with the WSAB, further increasing productive dialogue with the WSAB.

C) Cost-effectiveness:

SB 254 stressed the importance of energy affordability. LMUD appreciates that the WSAB Schedule was responsive to small utilities that sought to keep costs down by gaining efficiencies through collaboration. Collaborative opportunities are particularly important for small utilities that often lack internal staffing and technical expertise. As a small utility serving just 10,500 meters, LMUD's budget constraints are also worth considering; small cost-savings are more impactful for small utilities. In an effort to support affordable electric service for our community, we ask the WSAB to help us maximize our cost-effectiveness through collaboration with GSPC.

D) Special Circumstances:

LMUD was recently awarded the Wildfire Insights and Support for Electric (WISE) Utilities Grant for technical assistance. The WISE grant will strengthen LMUD's wildfire risk management, preparedness, and resilience. Through this grant, LMUD has begun working with vendor Pyrologix to provide advanced wildfire risk modeling. Due to the timing of this grant, we would like to prioritize working with our vendor during 2026 to better inform our WMP amendments, which we request to submit in October 2027.

IV. Conclusion

LMUD believes our request has significant merit and will reduce costs for our rate-payers and improve our WMP outcomes. Section 2 of the Schedule states, "The goals for the WSAB in determining a schedule for WMP submission are to maximize the effectiveness of POU and co-op WMP development and to maximize the effectiveness of the WSAB's advice and recommendations in reducing wildfire risk from POU's and co-ops." Approving LMUD's request to modify the Schedule would achieve both of these goals.

We want to thank the WSAB staff for being available to discuss our unique circumstances. We appreciate the Board's consideration of our request.

Sincerely,

Signed by:



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Nick Dominguez

General Manager

Lassen Municipal Utility District