



February 17, 2022

LEG 2022-0024

**Via E-Mail Only**

Wildfire Safety Advisory Board  
Email: [wsab@energysafety.ca.gov](mailto:wsab@energysafety.ca.gov)

Re: **SMUD Comments on Draft Guidance Advisory Opinion for the 2022 Wildfire Mitigation Plans of Publicly Owned Electric Utilities and Electrical Cooperatives**

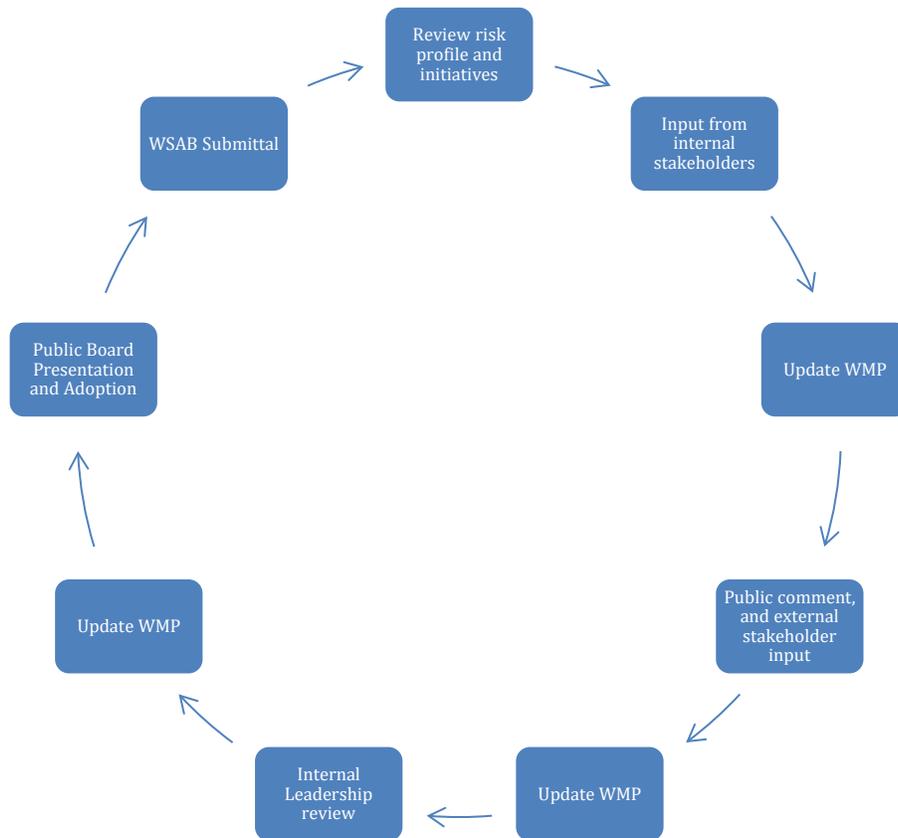
Dear Chair Block and Board Members:

The Sacramento Municipal Utility District (SMUD) appreciates the opportunity to review the California Wildfire Safety Advisory Board (Board) draft Guidance Advisory Opinion for the 2022 Wildfire Mitigation Plans of Publicly Owned Electric Utilities and Electrical Cooperatives (“Draft Guidance”), and is happy to provide input in accordance with your February 10, 2022, notice letter. SMUD thanks the Board and staff for the careful thought that went into preparing the Draft Guidance. We look forward to working with the Board and staff to clarify and address the recommendations included in the Draft Guidance as part of our 2022 and future WMP submittals.

**Background**

SMUD is pleased with the Board’s recognition that SMUD takes its annual Wildfire Mitigation Plan (WMP) review and update process seriously, and with the commendation of SMUD’s “exemplary description of comprehensive wildfire mitigation strategies.” SMUD’s 2021 WMP was developed through an organization wide enterprise risk management process, made available to our public safety partners and communities for review and comment, reviewed by a qualified independent evaluator, and presented to SMUD’s elected governing board of directors at two separate meetings noticed in accordance with the Ralph M. Brown Open Meeting Act. SMUD’s governing board adopted the 2021 WMP in November 2020; the 2021 WMP was submitted to the Board on July 1, 2021, together with an Informational Response and Recommended Metrics that were approved at a duly noticed public meeting in June 2021 by SMUD’s governing board as a supplement to the 2021 WMP.

SMUD's overarching goal continues to be providing safe, reliable, environmentally sustainable and economic service to our community. SMUD appreciates the Board's expertise and guidance in strengthening its wildfire mitigation efforts to meet this goal. The wildfire mitigation planning process is a year-round effort and includes a continuous process as shown in the chart below.



SMUD's WMP update is substantially completed by Q1 in each year to accommodate public comment and governing board action at a noticed public meeting, prior to the statutory July 1 deadline for submittal to the Board.

To the greatest extent possible in light of the timing for issuance of the Draft Guidance, SMUD intends to address the Board's recommendations specific to SMUD's WMP in our 2022 WMP submittal. SMUD also looks forward to considering many of the more global recommendations included in the Draft Guidance as part of SMUD's comprehensive plan review and update to occur for its 2023 WMP submittal.

#### SMUD comments on individual recommendations in the Draft Guidance.

We provide the following responses and clarifications to the Board's recommendations for SMUD's 2022 WMP provided on pages 69-70 of the Draft Guidance.

### 1. Context Setting Information Table:

The Board...encourages the upfront template and other enhancements included in the informational response should be included in the WMP itself where appropriate...

SMUD will integrate the context setting table contained in its Informational Response into its 2022 WMP. SMUD will review and update the data included in the table during its triennial review and update process.

### 2. WMP adoption and budget processes:

The Board encourages SMUD to provide a short paragraph in future WMPs that describes the adoption and public comment processes Utility followed for the WMP being submitted (including resolutions if feasible), along with information about budget processes for any potential or expected mitigation expenses.

The adoption and public comment process followed by SMUD are described in Chapter 10 of the 2021 WMP. The process includes preparation of the WMP through an organization wide, cross functional working group and an extensive public outreach to its first responders, local agencies, community-based organizations and public, including posting the draft WMP for an advertised public comment period. SMUD retains a qualified independent evaluator (QIE) when substantive changes are made, to review the plan for compliance with statute and industry standard. The WMP and QIE report is then presented to SMUD's Board of Directors in a publicly noticed meeting, for adoption.

SMUD will update Chapter 10 of the 2022 WMP to include information regarding SMUD's budget process as provided in our Informational Response. SMUD adopts its budget through open and public processes. Program commitments reflected in any given budget are impacted by many factors, including risk evaluations, system condition and requirements, emergency occurrences, economy, legislation, environment, and liability exposure. These commitments are consistently under evaluation, and program priorities can change if any of these factors shift.

### 3. Wildfire safety information page:

The Board encourages SMUD to have an easier to find wildfire safety link and to include additional wildfire safety information at that link, including not just the 2021 (or current) WMP but also include links to allow perusal of WMP history, that is – public access to former WMPs, IE reports, and any supplemental filings. The Board notes that SMUD's current link to the IE Report from 2019 does not appear to work.

SMUD appreciates the Board's comments regarding SMUD's wildfire safety webpage. SMUD maintains this page on its organization website. The address of

this webpage is [www.smud.org/wildfiresafety](http://www.smud.org/wildfiresafety). We are reviewing and revising the webpage to ensure that the link to the current WMP is easily located and accessible. The 2021 WMP can be found at [https://www.smud.org/-/media/Documents/In-Our-Community/Safety/0864-20\\_2021SMUDWildfireMitigationPlan.ashx](https://www.smud.org/-/media/Documents/In-Our-Community/Safety/0864-20_2021SMUDWildfireMitigationPlan.ashx), a direct link to which is found mid-way through the webpage with the title “View Wildfire Mitigation Plan.”

In addition, the WMPs submitted by SMUD in 2020 (the 2019 WMP) and in 2021 (the 2021 WMP) are available under the “Resources” section found at the bottom of the webpage, under “Wildfire Mitigation” with the tab “Get Details”. The Independent Evaluation reports for each plan are also available at that location on the current webpage. SMUD acknowledges that this placement is not easily located and as noted above is reviewing and revising the webpage to ensure that these links are more accessible.

#### 4. Change updates:

The Board encourages SMUD to continue to include appropriate changes that reflect changing programs, changing conditions, and changing risks, as well as incorporate changes recommended by the Board and any IE Report where feasible...the Board would appreciate the inclusion of the up-front template developed in the Board’s 2021 Guidance Advisory Opinion in future WMPs

SMUD undertakes an annual review and update of its WMP using an enterprise risk management approach and will continue to provide plan updates to reflect new initiatives and lessons learned. As noted above, SMUD intends to integrate the context setting table contained in our Informational Response into its 2022 WMP. We also plan to provide a plan-to-plan change summary as a new appendix to the 2022 WMP.

#### 5. Wildfire mitigation strategies:

The Board commends SMUD for an exemplary description of comprehensive wildfire mitigation strategies in the 2021 WMP...The Board looks forward to updates on these innovative strategies in future WMPs.

SMUD appreciates the Board’s confidence in SMUD’s WMP presentation of our wildfire mitigation strategies. As part of its annual WMP update process SMUD reviews the status of its wildfire prevention and mitigation strategies and initiatives. Each year’s WMP reflects changes and additions to these initiatives based on technology reviews, changing risk factors and prioritizations, experience, and many other factors.

## 6. Metrics:

The Board commends SMUD's extensive set of metrics for evaluating their WMP, including those in the 2021 WMP and the separate extensive metrics filing. The Board looks forward to substantive information on SMUD's progress by these metrics in future WMPs.

SMUD continues to identify and implement new metrics to evaluate the performance and effectiveness of its WMPs and wildfire prevention and mitigation initiatives. We appreciate the guidance of the Board and the independent evaluators adding to the experience of our internal subject matter experts in this process. Each year's WMP reflects changes and additions to these metrics.

We appreciate the Board's anticipation of substantive information on metric progress. During the nascent period of each metric, SMUD works to accumulate sufficient data to intelligently analyze the metric outcomes. It may take several years before adequate data is accumulated to test assumptions and performance. SMUD will update future WMPs to reflect performance measurement outcomes of prior WMPs and initiatives based on these metrics.

### Conclusion

As a member of the California Municipal Utilities Association (CMUA) SMUD echoes the Board's appreciation for CMUA's involvement and thanks the Board for working closely with CMUA and the POU community. SMUD again thanks the Board and staff for their recommendations and looks forward to working with you to ensure these recommendations are actionable and can be reflected in SMUD's 2022 WMP and future submittals.

Sincerely,



Maria Veloso Koenig  
Director, Distribution Planning and Operations

### Copy: **California Wildfire Safety Advisory Board**

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