



November 22, 2023

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

RE: Comments of the Joint Associations on the Draft Guidance Advisory Opinion for the 2024 Wildfire Mitigation Plans of Publicly Owned Electric Utilities and Electrical Cooperatives

Dear Chair Block and Board Members,

The California Municipal Utilities Association (CMUA) and Golden State Power Cooperative (GSPC) (collectively the “Joint Associations”) respectfully submit these comments to the California Wildfire Safety Advisory Board (WSAB or Board) on the *Draft Guidance Advisory Opinion for the 2024 Wildfire Mitigation Plans of Publicly Owned Electric Utilities and Electrical Cooperatives* (Draft Guidance Advisory Opinion), issued on November 15, 2023.

California’s publicly owned electric utilities (POUs) and electric cooperatives (Cooperatives) greatly appreciate the WSAB’s review of the POUs’ and Cooperatives’ wildfire mitigation plans (WMPs). The Joint Associations – individually and on behalf of their members – have strived to work with the WSAB since the Board first began reviewing the POU and Cooperatives WMPs. The Joint Associations appreciate the statement in the Draft Guidance Advisory Opinion that the WSAB “views continued participation by these organizations as essential to allow the WSAB to meet its statutory responsibilities while being comprehensive, efficient, and respectful of the POU community’s unique status as public power providers that are not subject to CPUC or WSAB regulation.”¹ The Joint Associations believe that the recommendations set forth in the Draft Guidance Advisory Opinion provide a solid foundation for further collaboration between the WSAB and POUs and cooperatives.

The Joint Associations believe that the Draft Guidance Advisory Opinion’s discussion of how the WMP review process has evolved as well as the limitations inherent in the current review and comment process underscores the importance of a collaborative approach moving forward. The recommendation to have the POUs, cooperatives, and Joint Associations participate in joint meetings and work groups with the WSAB members and staff will allow the Board and the utilities alike an opportunity to share

¹ Draft Guidance Advisory Opinion at 4.

information, explain approaches taken by individual utilities, discuss recommendations for specific geographic areas, and gain a deeper understanding of the unique and individual elements of each POU and cooperative service territory. The Joint Associations believe that such an approach would optimize the ability of the WSAB to share its considerable expertise with the POUs and cooperatives, as appropriate, given each individual utility's needs and characteristics.

The Joint Associations appreciate the WSAB's willingness to proactively engage with the POUs and cooperatives and look forward to future collaborations and feedback moving forward.