



November 1, 2024

California Wildfire Safety Advisory Board
715 P Street, 20th Floor
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RE: Comments of the Joint Associations on the Advisory Opinion for the 2025 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 Advisory Opinion for the 2025 Wildfire Mitigation Plans of Publicly Owned Electric Utilities and Electrical Cooperatives* (Draft Advisory Opinion), issued on October 11, 2024. The Joint Associations thank the WSAB for its review and recommendations on the wildfire mitigation plans (WMPs) of the publicly owned electric utilities (POUs) and electric cooperatives (co-ops). The WSAB Board Members and staff possess industry, academic, and workforce experience that adds significant value to these recommendations.

As described in the Draft Advisory Opinion, this year’s Advisory Opinion differs from prior years because the specific recommendations grew out of six working group meetings that were held by the Joint Associations with both WSAB Staff and a subset of Board members. These working group meetings allowed for a highly detailed and technical discussion of various challenges that the POUs and co-ops face and focus on feasible and implementable potential improvements. Through these robust discussions, the working group participants were able to explore the benefits, costs, and potential unintended consequences of specific Board recommendations. The Joint Associations believe that the working group meetings have helped to improve the WSAB review and recommendation process. The WSAB’s current recommendations are focused on wildfire mitigation efforts and are geared toward presenting valuable input to POUs and co-ops that is informed by Board member expertise. In particular, many of the recommendations are targeted at helping the POU or co-op more clearly and

comprehensively describe the utility’s existing wildfire mitigation efforts to both the WSAB and the broader public.

The working group process that was used to develop the Draft Advisory Opinion should serve as a model for future years in order to both add value to the annual WMP review and recommendation process and limit the burden on WSAB staff and board members. The Joint Associations urge the WSAB to continue to use a working group process to discuss and evaluate future recommendations on POU and co-op WMPs.

While the Joint Associations support the Draft Advisory Opinion, we do recommend one modification for the introductory paragraph, and one modification to Section 6, as further described below.

1. Recommended Change to Introductory Paragraph.

On page 8, the Draft Advisory Opinion begins the discussion of the recommendations for the 2025 WMPs and future comprehensive revisions. The Joint Associations appreciate the WSAB’s annual review and assessment of the WMPs, but note that in many cases the WMPs are not significantly changed year over year, and some suggested revisions may not be incorporated until the next comprehensive review. As discussed during the working group meetings, the smaller POUs and co-ops prioritize annual resource spending, and only make substantive changes to their WMPs outside of the comprehensive review cycle only when critically necessary. As such, the Joint Associations suggest that the brief introductory paragraph on page 8 be amended as follows:

WSAB reviewed the POUs’ 2024 WMPs and WSAB–POU Working Group’s preliminary recommendations. WSAB provides the following recommendations for the development of updates to the POUs’ 2025 WMPs and future comprehensive WMPs. [It is expected that POUs will tailor the WSAB recommendations to their unique circumstances, prior to or during the next comprehensive revision.](#)

2. Recommended Change to Section 6.

The Joint Associations believe it is important that the Advisory Opinion recognize the distinction between the role of the independent evaluator relative to the POUs and co-ops versus the electrical corporations. As it pertains to the POUs and co-ops, the independent evaluator’s role is to review the comprehensiveness of the WMP. While specific suggestions on plan improvements are welcome, the suggestions set forth in the Draft Advisory Opinion could significantly expand the scope of work that the independent evaluator would need to do; assessing a WMP and providing recommendations on mitigation strategies and measures differs considerably from assessing the completeness of the plan. This is significant because the cost to retain an independent evaluator can be substantial and that cost increases with a broader scope of work. Furthermore, there is little to no value to the utility of an annual detailed review of the WMPs, particularly where year-over-year changes to the WMP are negligible. In

order to ensure that the Draft Advisory Opinion reflects these important points, the Joint Associations recommend the following changes:

PUC section 8387(c) requires POUs to “contract with a qualified independent evaluator with experience in assessing the safe operation of electrical infrastructure to review and assess the comprehensiveness of its wildfire mitigation plan.” The content and level of detail in the independent evaluator’s (IE’s) reports varied. IE reports most likely to contribute to wildfire risk mitigation will include evaluation of, and recommendations to improve, WMP strategy and specific projects. For example, the IE report submitted by Truckee Donner Public Utility District included detailed recommendations for future actions. The report stated, “As part of its pole replacement program, TDPUD should consider the use of steel or composite poles.” The IE reports submitted by the Lassen Municipal Utility District and Redding Electric Utility also contained tables showing that the IE made recommendations in its initial review that were addressed in an updated version. The WSAB observed that some IE recommendations within the reports were less specific and appeared to be more directed at format rather than substance. While the WSAB would prefer to see IE reports that provide specific recommendations to the POUs and cooperatives, we recognize that this would require a scope of work that is broader than the statutory requirement, and could come at a significant cost to the utilities. The WSAB also recognizes that there is likely de minimis value in such a detailed review annually, given that many WMPs do not change significantly year-over-year. Therefore, while not required by the statute, the WSAB encourages the POUs and cooperatives to engage IEs to provide comprehensive review and recommendations in years when they conduct a comprehensive review of their WMPs. Additionally, POUs and cooperatives should consider including a table or summary showing where IE recommendations were addressed in a future or updated WMP.

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.