



October 31, 2025

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

RE: Comments of Golden State Power Cooperative on the Draft Advisory Opinion to Publicly Owned Electric Utilities and Electrical Cooperatives

Dear Chair Block and Board Members,

Golden State Power Cooperative (GSPC) respectfully submits these comments to the California Wildfire Safety Advisory Board (WSAB or Board) on the *Draft Advisory Opinion to Publicly Owned Electric Utilities and Electrical Cooperatives* (Draft Advisory Opinion), issued on October 10, 2025. GSPC thanks the WSAB for its review and recommendations on the wildfire mitigation plans (WMPs) of the publicly owned electric utilities (POUs) and electric cooperatives (Cooperatives). The WSAB Board Members and staff possess industry, academic, and workforce experience that adds significant value to these recommendations.

I. Introduction

As described in the Draft Advisory Opinion, this year's Advisory Opinion focused on risk identification and preemptive de-energization. Both are important considerations for utility wildfire mitigation planning and execution, and GSPC appreciates the amount of time the WSAB has dedicated to providing guidance to help mitigate the risk of utility-caused wildfires. However, as discussed herein, GSPC has some specific concerns relating to the conclusions and assumptions underlying parts of the Preemptive De-energization focus area. We appreciate the WSAB has acknowledged that preemptive de-energizations can be "potentially disruptive." (Draft Advisory Opinion, p. 5) Despite this acknowledgment, we are concerned that the discussion in Section 3.2 does not reflect the input provided by GSPC during Joint Association Working Group meetings in regard to the trade-offs that should be weighed when considering a preemptive de-energization, especially for rural communities.

GSPC provides these comments to the WSAB from its unique perspective of representing utilities that are – by definition – located in rural and remote areas where de-energization of power lines has very different implications for residents, businesses, and first responders when dealing with high-fire threat conditions.



II. Comments on Preemptive De-energization

Section 3.2 of the Draft Advisory Opinion includes a comprehensive discussion of Preemptive De-energization (PSPS). As noted in the joint California Municipal Utilities Association and GSPC comments, this discussion identifies factors that utilities should consider for PSPS programs, depending on their specific needs. GSPC believes, however, that additional critical considerations are not adequately identified in the Draft Advisory Opinion, and in particular, that the Draft Advisory Opinion fails to specifically note that the PSPS should be a measure of last resort.

A key consideration in deciding whether to employ a PSPS is the analysis of the *consequences* of such an event. “PSPS are a kind of wildfire-mitigation strategies that balance the risk of power-line-ignited wildfires against the harms of power shutoff, particularly for vulnerable communities.”¹

As noted in the Draft Opinion, “Wildfire risk is the product of the *likelihood* that a fire could start, and the *consequence* of if it does.” (Id. P. 10) On a redflag warning day, the consequence of a PSPS could mean that a rural community has no emergency communication or means to pump water in the event of a human-caused wildfire. Preemptive de-energizations are not just potentially disruptive- they can have dire and life-threatening consequences on rural communities.

While the Draft Advisory Opinion note that preemptive de-energization has “proven to be effective,” not all PSPS events are effective or beneficial to the impacted communities. For example, the US EPA has noted that “[p]ower loss can have devastating impacts on drinking water and wastewater utilities and the communities they serve. Inoperable pumps at a drinking water utility can make firefighting difficult and cause local health care facilities and restaurants to close. Pressure loss can allow contaminants to enter the drinking water distribution system from surrounding soil and groundwater. For wastewater utilities, pump failure may lead to direct discharge of untreated sewage to rivers and streams or sewage backup into homes and businesses. Power loss can also impact water utilities through cascading infrastructure failures.”² As noted in one of the studies referenced in the Draft Advisory Opinion, when assessing the potential benefits versus risks of a PSPS, if a utility deems the potential public safety harm of a

¹ C. Huang et al., “A Review of Public Safety Power Shutoffs (PSPS) for Wildfire Mitigation: Policies, Practices, Models and Data Sources,” in IEEE Transactions on Energy Markets, Policy and Regulation, vol. 1, no. 3, pp. 187-197, Sept. 2023 <https://ieeexplore.ieee.org/document/10154121>, at 192.

² U.S. EPA (2019) <https://www.epa.gov/sites/default/files/2016-03/documents/160212-powerresiliencguide508.pdf>



PSPS to be greater than the potential benefit, a PSPS is not recommended.³ Furthermore, the California Public Utilities Commission (CPUC) has issued several decisions discussing the utilization of PSPS. Going as far back as 2012, the CPUC has directed investor-owned utilities to treat PSPS as a “last resort” measure.⁴

GSPC recommends that the Draft Opinion be revised to reflect that preemptive de-energization should be utilized as a last resort, not a foregone conclusion. This is particularly important when considering rural communities and unincorporated areas that rely upon water well-pumping or that lack redundancy of communications. It is also important for rural utilities that have radial transmission service which inhibits their ability to sectionalize their system to minimize the scope of the de-energization.

III. Conclusion

GSPC appreciates the thoughtful consideration that the WSAB has put into the analysis of myriad factors related to utility preemptive de-energization plans. However, in order to present a complete assessment and recommendation on this issue, we ask that the Draft Advisory Opinion acknowledge that such plans consider the consequences of a PSPS and should be employed as a measure of last resort for utilities. Thank you for your collaboration and consideration.

Respectfully,

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³ C. Huang et al., "A Review of Public Safety Power Shutoffs (PSPS) for Wildfire Mitigation: Policies, Practices, Models and Data Sources," in IEEE Transactions on Energy Markets, Policy and Regulation, vol. 1, no. 3, pp. 187-197, Sept. 2023 <https://ieeexplore.ieee.org/document/10154121>, at 192.

⁴ See Decision (D.) 21-06-034; D.12-04-024.