



October 31, 2025

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**RE: Comments of the Joint Associations on the Draft Guidance Advisory Opinion for the 2025 Wildfire Mitigation Plans of Publicly Owned Electric Utilities and Electrical Cooperatives**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 Opinions to Publicly Owned Electric Utilities and Electrical Cooperatives* (Draft Advisory Opinion), issued on October 10, 2025. The Joint Associations thank the board members and WSAB staff for their review and recommendations on the wildfire mitigation plans (WMPs) of the publicly owned electric utilities (POUs) and electric cooperatives (Co-ops). The WSAB’s review and recommendations provide valuable input to the wildfire mitigation efforts of these utilities and the ongoing collaboration with the WSAB has positively impacted the utility WMPs. The Joint Associations generally support the Draft Advisory Opinion and recommend its adoption. The Joint Associations also urge the Board to acknowledge the contextual clarifications noted below. Additionally, the Joint Associations support continuing the use of the current working group process between the WSAB and Joint Associations.

**1. Continued Support for Working Group Process.**

The WSAB’s 2023 Advisory Opinion recommended that the utilities and their representatives engage in meetings with the WSAB in order to “exchange information and ideas through discussions.” Based on this recommendation, a WSAB-POU and Co-op Working Group was formed for the 2024 WMP development and review cycle. This working group’s discussions provided a forum for the WSAB to engage in detailed and technical discussions on a wide variety of topics, which ultimately helped inform and shape the WSAB’s recommendations on the POU and Co-op’s 2024 WMPs.

The WSAB-POU and Co-op Working Group has continued to meet throughout 2025 and has facilitated discussions on a wide variety of topics relating to industry practices and the wildfire mitigation efforts of

the POU and Co-ops. The Joint Associations believe that this working group process provides value in encouraging two-way discussions between the WSAB and utilities and believe that ongoing quarterly discussions would continue to allow for greater understanding of POU and Co-op operations and help inform future advisory opinions. This improved communication is reflected in the Draft Advisory Opinion, and the Joint Associations support the continued engagement through this working group process.

## **2. Focus Areas for 2025 Advisory Opinion.**

This year's Advisory Opinion includes detailed recommendations for the POU and Co-op to consider in two areas: (i) risk identification, and (ii) preemptive de-energization. This section of the Draft Advisory Opinion provides a helpful overview of elements utilities can consider when contemplating the development of a preemptive de-energization plan, updating an existing plan, or expanding risk identification and/or de-energization programs. The Draft Advisory Opinion also identifies potential sources of information and helpful examples of approaches that other utilities have utilized. The Joint Associations greatly appreciate the significant work that the WSAB put into reviewing and identifying the potential elements to consider in developing these tools.

Because the POU and Co-op are extremely diverse with widely varying systems and risk profiles, each individual utility's approach to these programs will necessarily differ greatly, and not all of the listed examples and program elements may be applicable to all POU and Co-ops. Each POU and Co-op, being informed by the resources outlined in the Advisory Opinion, will assess potential modifications to its risk identification and de-energization programs in the context of the guidance it receives from its governing board as well as the needs of its community.

For example, in considering the wildfire mitigation benefits of increasing the use of preemptive de-energizations, POU and Co-ops must weigh the potential harm that could result during high wildfire risk conditions if the loss of power negatively affects local communications systems and the ability to pump water for wildfire suppression. These program assessments must occur within a holistic assessment informed by local wildfire experiences and expertise, and weighed against the risk of the likelihood of utility infrastructure causing an ignition. As recommended by the Draft Advisory Opinion, engagement with local agencies and the community helps to inform these considerations.

Similarly, each POU and Co-op must assess the relative value of different sources of information and significance to the utility's specific geographic region. While the Draft Advisory Opinion is correct that the California Public Utilities Commission's (CPUC) High Fire Threat District (HFTD) map was adopted in 2018, that HFTD mapping effort was specifically focused on the wildfire risks *posed by electric utility infrastructure*. More recent risk maps, such as CalFIRE's Fire Hazard Severity Zone maps are assessing *generalized wildfire risk* rather than risks specific to utility infrastructure. It is therefore important for the POU and Co-ops to assess relative value of newer sources of general risk data against the older but more specifically applicable HFTD maps. The Joint Associations note the

CMUA filed comments at the CPUC supporting a six-year revision cycle for HFTD map rather than the current 10-year cycle in order to align the map boundaries with the most recent data and technology improvements. The Joint Associations anticipate that the CPUC will initiate a rulemaking to update the existing HFTD map in the near future and plan to provide recommendations on improvements to the map development cycle and process.

The Joint Associations greatly appreciate the significant work that WSAB board members and staff have invested in the development of these focus area recommendations and support the WSAB's continued efforts to identify areas for collaboration and improvement.

### **3. Corrections to Advisory Opinions for Specific Utilities.**

#### **A. City of Gridley**

The City of Gridley 2025 Wildfire Mitigation Plan was approved by the City Council on October 21, 2025. It was submitted to the WSAB on October 22, 2025.<sup>1</sup>

#### **B. City of Biggs**

The City of Biggs 2025 Wildfire Mitigation Plan was approved by the City Council on October 27, 2025, and was submitted to the WSAB on October 31, 2025.<sup>2</sup>

#### **C. Pittsburg Power Company**

The Pittsburg Power Company's 2025 Wildfire Mitigation Plan was presented to its governing board on June 18, 2025, and was submitted to the WSAB on October 6, 2025.<sup>3</sup>

#### **D. City of Palo Alto**

The Advisory Opinion for the City of Palo Alto should be revised as follows:

##### **4.29 City of Palo Alto**

WSAB commends the City of Palo Alto Utilities (CPAU) for substantially reducing its wildfire risk by undergrounding its overhead lines in the HFTD Tier 2. The undergrounding is scheduled for completion this fiscal year (~~2025~~June 2026). WSAB commends CPAU for its contributions to an innovative gas monitoring network for early detection of wildfire. To the best of WSAB members' and staff's knowledge, this technology is not widely used by either POUs or IOUs. WSAB recommends that CPAU:

- Report on the status of its underground project in its next WMP, and its efforts to reduce risk from remaining infrastructure, e.g., clearing distances for pad-

<sup>1</sup> [Gridley Wildfire Mitigation Plan - 2025.](#)

<sup>2</sup> [Biggs 2025 Wildfire Mitigation Plan.](#)

<sup>3</sup> [PPC 2025 Wildfire Mitigation Plan.](#)

mounted transformers, whether it is using lower-flammability oils, dead-front equipment, etc.

- Report the results, benefits, and challenges of deploying gas monitoring technology, to inform broader adoption decisions in the utility community.

The Joint Associations thank the WSAB for its consideration of these comments.

Sincerely,

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