



October 31, 2025
California Wildfire Safety Advisory Board
715 P Street, 20th Floor
Sacramento, CA 95814
WSAB@energysafety.ca.gov

Re: Sacramento Municipal Utility District's Comments on the Wildfire Safety Advisory Board's *Draft Advisory Opinions to Publicly Owned Electric Utilities and Cooperatives*

Chair Block and Board Members:

The Sacramento Municipal Utility District (SMUD) appreciates the opportunity to comment on the Wildfire Safety Advisory Board's (WSAB) *Draft Advisory Opinions to Publicly Owned Electric Utilities and Cooperatives* issued October 10, 2025 (Draft Advisory Opinion). We thank the Board members and staff for their dedication and the thoughtful analysis reflected throughout the document. The detailed review of wildfire mitigation plans statewide provides valuable input for all publicly owned utilities (POUs) and electrical cooperatives to consider in developing wildfire mitigation strategies. In these comments, SMUD recognizes the benefits of the ongoing WSAB-POU working group process, largely supports the Draft Advisory Opinion, with certain context, and acknowledges and agrees with WSAB's recommendations on SMUD's 2025 update to its 2023-2025 Wildfire Mitigation Plan (WMP). SMUD also joins the "Joint Associations" comments submitted by the California Municipal Utilities Association (CMUA).

WSAB-POU Working Group Process

Since the last Advisory Opinion, publicly owned electric utilities, including SMUD, continue to meet regularly with representatives from WSAB. SMUD appreciates the transparent and open partnership that has developed through these meetings between WSAB staff and POUs. These meetings provide a forum to candidly discuss wildfire mitigation and prevention efforts, lessons learned, and challenges. The collaboration has allowed utilities and the WSAB to build a better understanding of utility governance processes and operations, and the varied needs of our individual communities. In turn, this information has provided WSAB the foundation to offer value-added recommendations in its Wildfire Mitigation Plan (WMP) review and advisory opinions. SMUD has actively participated in these meetings and encourages the WSAB to continue its collaborative working group approach as future opinions and recommendations are developed.

Draft Advisory Opinion Context

SMUD appreciates the WSAB's effort to promote continual advancement and maturation of POU wildfire mitigation planning, reflected in the detailed discussion of WSAB's 2025 focus areas, Risk Identification (Section 3.1) and Preemptive De-energization (3.2). These sections provide a thorough summary and identify factors for POU consideration when updating or expanding their risk identification and/or de-energization programs. However, it is also important that each section recognize POU diversity and acknowledge not every recommendation will apply to each POU or each POU in the same way. Each utility has unique risk factors based on varying size, customer and resource base, local geographies, fuel loads, and infrastructure designs. This diversity often requires different wildfire mitigation methodologies that consider these many factors.

We commend WSAB's thoughtful identification of the many elements for utility consideration in formulating a de-energization plan that addresses the individual utility's risk and community needs. It is important that the Advisory Opinion be clear that the WSAB is not suggesting that every element is essential to the effectiveness of every utility's plan. The WSAB's Advisory Opinions are referenced by third parties such as insurers, bond rating agencies, and litigation counsel. Any approach that could be misunderstood by such third parties to imply a POU is not diligently pursuing all appropriate mitigation methodologies, because it has not adopted every element of a de-energization program referenced in the Draft Advisory Opinion, could have far-reaching economic and other consequences. We urge the Board to recognize in the Advisory Opinion that not every element in the guidance will be universally applicable or appropriate for every utility or community.

SMUD's 2025 Update to its 2023-2025 Wildfire Mitigation Plan

SMUD particularly thanks WSAB for its careful review of our 2025 update to SMUD's 2023-2025 WMP, and for the constructive feedback provided. We concur with the Board's recommendation and confirm our intent to incorporate an assessment of the revised Fire Hazard Severity Zones (FHSZ) maps as part of our ongoing risk identification and mitigation activities. We agree that it is important to assess the relative value of these newer sources of broad fire risk data against the older but more utility-specific High Fire Threat Districts (HFTD).

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Once again, we thank the Board members and staff for their collegial engagement and for fostering a culture of continuous improvement. SMUD agrees with the WSAB view that WMPs are iterative and are a tool for continual advancement and maturation.

/s/

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