



November 14, 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 2026-2029 Wildfire Mitigation Plan Schedule for 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) respectfully submit these comments to the California Wildfire Safety Advisory Board (WSAB or Board) on the *Draft 2026-2029 Wildfire Mitigation Plan Schedule for Publicly Owned Electric Utilities and Electrical Cooperatives* (Draft Submission Schedule), issued on October 31, 2025. The Joint Associations thank the WSAB for preparing the Draft Submission Schedule for the wildfire mitigation plans (WMPs) and recommend that during this initial reporting cycle, the WSAB remain flexible and adjust the submission schedule as necessary based on input from the individual utilities and lessons learned.

I. Introduction

The Joint Associations appreciate that the proposal was informed by the legislative intent to allow modifications to the current annual WMP submission schedule and the desire expressed by the POUs and cooperatives to prioritize limited resources on the implementation of their mitigation plans. Changes to the WMP submission schedule also accommodates the WSAB's desire to provide meaningful feedback to the publicly owned utilities (POUs) and electrical cooperatives (Co-ops) without having to complete an in-depth review of 51 plus plans each year.

The Joint Associations supported Senate Bill (SB) 254 (stats. 2025) and the revisions to Public Utilities Code section 8387 that provides for submission of the POU and cooperative WMPs to the WSAB at least once every four years. This change enables the utilities to expend greater resources on the execution of critical wildfire mitigation practices. The POU and Co-op WMPs are informed by myriad factors, including experiences and lessons learned throughout the utility community, the expertise of

utility personnel carrying out the work, and inter-utility forums and informational sharing sessions, to name a few. Another important element is the regular meetings between the Joint Associations and the WSAB. The relationship that the POUs and Co-ops and the WSAB have cultivated allows for a candid discussion and exchange of ideas.

II. Comments on the WSAB Proposal

With this in mind, in this letter, the Joint Associations recommend that the WSAB consider adjustments to the Draft Submission Schedule to do the following:

- clarify that any WMPs submitted more frequently than once every four years are revisions to the prior WMP rather than entirely new WMPs;
- re-group submission deadlines for utilities in ways that provide co-benefits and reduce administrative burdens;
- seek input directly from individual utilities on the staggered submission deadlines within a calendar year in order to align with the internal processes and needs of those utilities; and
- clarify that the optional process for early consultation on draft WMPs can include the review of subparts of a draft WMP or specific topics that may be included in a WMP.

1. Reporting Frequency

The Draft Submission Schedule proposes a WMP reporting frequency of once every four years for POUs and Co-ops, consistent with SB 254. Additionally, the WSAB proposes that that POUs and Co-ops with overhead facilities in the High Fire Threat District (HFTD) would submit WMPs to the WSAB on a two year cycle rather than every four years. The Joint Associations recommend that to the extent the WSAB adopts a submission schedule more frequent than the once every four year cycle required by SB 254, the WSAB characterize these interim submissions as "revisions" to the prior plan rather than full WMPs. Under this approach, the POUs and Co-ops with overhead facilities in the HFTD could develop a base WMP once every four years and then provide a revised version of that plan in the second year of that four-year cycle. These revised versions could be more focused on updating data points and describing progress on mitigation projects that occurred in this interim period. This approach would help reduce the burden on both the utilities updating their plans as well as the WSAB in reviewing the WMPs. Additionally, with the staggered submission proposal, the WSAB would be able to focus its review on the POUs and Co-ops that are submitting a base WMP in an individual year and provide a more limited review of the revisions to base plans.

2. Grouping of Submission Deadlines

The Joint Associations encourage the WSAB to consider grouping the submission deadlines for POUs and Co-ops in ways that provide co-benefits. For example, there are benefits to aligning the due dates of similarly-situated utilities so that those POUs and Co-ops can collaborate in the plan development

process. In this context, "similarly-situated" could include geographic proximity or utility category. Additionally, there are groups of POUs and Co-ops that engage in joint solicitation and procurement of services to support WMP development and review. Grouping these POUs and Co-ops in the same year can help with this joint procurement process and help to reduce the costs of these services. Finally, grouping deadlines regionally can provide benefits to the WSAB as they travel for meetings and tours. The Joint Associations encourage direct engagement with the POUs and Co-ops to help identify the groupings that would provide the most co-benefits.

3. Staggered Submission Deadlines

The Draft Submission Schedule includes staggered deadlines within each calendar year. The Joint Associations encourage the WSAB to seek direct input from the individual POUs and Co-ops about those deadlines. There are a variety of specific needs and challenges that may apply to individual utilities where some dates may better align with their internal processes or resource challenges. For example, there may be times of the year where key staff are focused on wildfire mitigation efforts and not available to support the WMP development process. As another example, having a single date for WMP submission for similarly situated utilities could enhance the ability of the POUs and Co-ops to share information and collaborate on new technologies and lessons learned. Finally, the Joint Associations note that while such an approach could result in the WSAB receiving more WMPs at one time, it does not change the total amount of time that the WSAB has to review the plans, conduct outreach to the POUs and Co-ops, and prepare an advisory opinion.

4. Optional Draft Plan Consultation Process

The Draft Submission Schedule includes an optional process where a POU or Co-op can share a draft WMP six months before the deadline for submitting the completed WMP in order to receive feedback from the WSAB. The Joint Associations appreciate this proposal and agree that this type of informal engagement can be beneficial. Further, the Joint Associations believe this proposal would be enhanced by the ability to share portions of a draft WMP and/or topics that the POU or Co-op may include in the WMP. Limiting the consultation to complete WMP drafts could limit the usage of this optional process. The WMP development process takes many months, the utilities would need to start nearly a year in advance of the actual deadline in order to utilize an optional review process limited to full WMP drafts. Despite a utility's desire the utilize this optional process, such extended timeline could pose challenges to utility staff and could also lead to information in the WMP becoming stale by the time it is actually submitted. To address this, the Joint Associations encourage the WSAB to clarify that this optional review process is also available for individual elements within a WMP or even just specific topics that may not yet be part of plan. By modifying the process and providing flexibility, the WSAB will increase the ability of individual POUs and Co-ops to engage with the WSAB.

5. <u>Updating the Submission Schedule and Cadence</u>

The development of the WMPs takes many months and requires coordination across local governments and governing bodies. Having a set schedule for plan submission is important to give the POUs and Coops the certainty necessary for things such as soliciting consultants, resource and staff planning, and governing body review and approval processes. The Joint Associations appreciate that the current proposal covers the period 2026 to 2029, providing that certainty for the next four years. The Joint Associations recommend that during this initial four-year cycle, the WSAB be open to adjusting the due dates as the WSAB receives input from individual utilities. Even within that initial phase, there should be a process by which POUs and Co-ops can have the cadence of their plan submittals changed. For example, the City of Palo Alto's ongoing infrastructure undergrounding program is scheduled to be completed within the next few years. This will change the miles of overhead infrastructure Palo Alto has in the HFTD, which should allow for less frequent submittals. The Joint Associations recommend that the final Plan Submittal Schedule acknowledge changes of this nature.

The legislative underpinnings of SB 254 stressed the importance of energy affordability. The Joint Associations appreciate the steps taken in the Draft Submittal Schedule to address the direction provided by SB 254 and we urge the WSAB to continue to work with the POUs and Co-ops to develop a final schedule for plan submissions that occur less frequently, but at least every four years. The cost to a POU or Co-op of *executing* the wildfire mitigation measures and programs set forth in the WMPs does not change based on the frequency in which the formal plan is updated and submitted for review. However, there are administrative costs associated with that process, costs which could adversely impact electricity affordability. Reducing the frequency of submitting formal, revised WMPs when substantive updates to the plans are not necessary would help alleviate undue costs for the utilities and their ratepayers.

III. Conclusion

The Joint Associations thank the WSAB for its consideration of these comments and look forward to the ongoing collaboration with the WSAB.

Sincerely,

Priscilla Quiroz

Manager of Energy Policy

Príscilla Quiroz

California Municipal Utilities Association

Jessica Nelson

General Manager

Golden State Power Cooperative