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EXECUTIVE SUMMARY

Under Public Utilities Code section 8387, publicly owned utilities and electrical cooperatives are required to submit wildfire mitigation plans (to the California Wildfire Safety Advisory Board "at least once every four years on a schedule determined by the California Wildfire Safety Advisory Board." This document sets forth the publicly owned utility and electrical cooperative submission schedule determined by the California Wildfire Safety Advisory Board.

The primary goal for the California Wildfire Safety Advisory Board in determining a schedule for WMP submission is to maximize the effectiveness of its advice and recommendations in reducing wildfire risk from publicly owned utilities and electrical cooperatives. The California Wildfire Safety Advisory Board weighed multiple considerations: freeing up utilities, especially those with less exposure to wildfire risk, to expend resources on priorities other than developing wildfire mitigation plans; increasing the opportunities for cooperative exchanges between the California Wildfire Safety Advisory Board and utilities; and focusing California Wildfire Safety Advisory Board resources on the highest-impact reviews. The schedule has three features: differences in reporting frequency; staggered submissions; and an optional draft plan. A table shows the schedule for publicly owned utility and cooperative wildfire mitigation plan submissions from 2026–2029.



1. INTRODUCTION

Senate Bill (SB) 254¹ came into effect on September 19, 2025. SB 254, among other things, amended Public Utilities Code sections 326.2 and 8387, relating to wildfire mitigation plans (WMPs) from publicly owned utilities (POUs) and electrical cooperatives (co-ops). The amendments to section 326.2 removed a requirement that the California Wildfire Safety Advisory Board (WSAB or the Board) provide an advisory opinion "to each" POU and co-op.

The amendments to section 8387 changed the requirement for POUs and co-ops to prepare and submit WMPs. The previous requirement was an annual submission by July 1 of each year. The requirement is now, "After January 1, 2026, a local publicly owned electric utility or electrical cooperative shall prepare a wildfire mitigation plan and shall submit the plan to the California Wildfire Safety Advisory Board at least once every four years on a schedule determined by the California Wildfire Safety Advisory Board." This document sets forth the schedule determined by the Board for POU and co-op submissions from 2026–2029.

2. GOAL

The primary goal for WSAB in determining a schedule for WMP submission is to maximize the effectiveness of WSAB's advice and recommendations in reducing wildfire risk from POUs and co-ops. Annual submissions may have challenged utilities, requiring them to expend resources to update plans rather than on other priorities. At the same time, reviewing up to 51 POU and co-op WMPs each year, as required until SB 254 came into effect, challenged the Board and staff. The amount of time available for review each year was constrained by the requirement to provide comments to each POU and co-op; the desire to provide input to POUs and co-ops in time to influence their subsequent annual submissions; the time needed for the Board's other duties; and the limits of a volunteer board with a small staff. The quantity of material and heterogeneity of POUs and co-ops add to the challenge.

In drafting a new schedule for WMP submissions, WSAB weighed multiple considerations: freeing up utilities, especially those with less exposure to wildfire risk, to expend resources on priorities other than developing plans; increasing the opportunities for cooperative exchanges between WSAB and utilities; and focusing WSAB resources on the highest-impact reviews.

¹ SB 254 (2025).

² Pub. Util. Code § 8387.

SCHEDULE FEATURES 3.

To address the considerations above and achieve the goal of maximizing effectiveness, the schedule has three features: differences in reporting frequency; staggered submissions; and an optional draft plan.

3.1 Reporting Frequency

POUs and co-ops are diverse. They vary in size from fewer than 100 customers to 1.6 million, making it the third-largest electric utility in California. They vary in location and geography, across the length and breadth of the state, in environments from fully urban to predominantly wildland and in a range of ecoregions. They also vary in the characteristics of their electrical systems: whether they own generation, transmission, and/or distribution, and how much of their system is underground.

As one way of distinguishing among utilities, WSAB has used the criterion of whether a POU or co-op has overhead facilities in the High Fire Threat District (HFTD). (Underground electrical facilities generally pose little wildfire risk.) The California Public Utilities Commission (CPUC) worked with utilities and other interested organizations to develop a statewide HFTD map.³ Areas designated Tier 2 and Tier 3 have "elevated" and "extreme" wildfire threat. The HFTD map is useful, though not infallible. The boundaries are always going to be somewhat arbitrary, and wildfire risk is not necessarily zero outside the HFTD. Each utility is ultimately responsible for identifying and managing its own wildfire risk inside and outside the HFTD.

The overlap of overhead facilities and the HFTD is the same criterion used for an "Alternative Reporting for POUs Without Overhead Electric Supply Facilities in the High Fire Threat District" in the Advisory Opinion for the 2025 Wildfire Mitigation Plans of Publicly Owned Utilities and Electrical Co-operatives. WSAB also used whether a utility has overhead facilities in the HFTD to identify 12 utilities to which it paid more attention in its 2025 review of WMPs. 5

The schedule for submission requires WMPs at the minimum frequency of once every four years for the 23 POUs and co-ops that have identified that they do not have overhead facilities in the HFTD. The schedule requires more frequent (once every two years) WMPs for the 28 POUs and co-ops with overhead facilities in the HFTD. This reduces the reporting burden for utilities from annual submissions, freeing up resources for other priorities, while maintaining iterative revision and improvement.

³ Fire-Threat Maps and Fire-Safety Rulemaking website.

⁴ 2024 Advisory Opinion.

⁵ 2025 Advisory Opinion.

3.2 Staggered Submissions

In addition to requiring fewer submissions in each year, the schedule staggers submission deadlines within a given year. Staggering reduces the number of submissions from up to 51 per year to 19 or 20. Spreading out the review process increases the opportunity for cooperative exchanges between utilities and Board members and staff.

The utilities submitting once every two years are divided into two groups of 14, with one group submitting in odd years and the other group in even years. Within a given year, these utilities have been randomly paired and will stagger their submissions every two weeks over the course of 10 weeks. The utilities submitting once every four years are divided into four groups of five or six utilities. Each year, utilities in one of the four groups must submit WMPs on the same date, rotating among the groups over four years.

3.3 Optional Draft Plan

The schedule includes an optional draft plan. A POU or co-op may submit a draft plan approximately six months before its WMP is due. Board members and staff would engage with the utility to discuss the draft plan, and any questions, resources, or opportunities. This collaborative exchange can improve the Board members' and staff's understanding of each utility and its plan, provide opportunities to share perspectives and resources to improve the draft plan, and indicate key areas of interest in advance of the Board's advisory opinion.

4. SCHEDULE

Table 1 displays the schedule for utility submissions for 2026 – 2029, sorted by submission date.

Table 1. Schedule for Publicly Owned Utility and Electrical Cooperative Wildfire Mitigation Plan Submissions, 2026–2029

Optional draft WMP due date	Final WMP due date	Utilities
March 20, 2026	September 18, 2026	Burbank Water and Power Riverside Public Utilities Department City of Biggs Cerritos Electric Utility City of Gridley Pittsburg Power Company Port of Stockton

Optional draft WMP due date	Final WMP due date	Utilities
		Valley Electric Association
April 3, 2026	October 2, 2026	Modesto Irrigation District Lassen Municipal Utility District
April 17, 2026	October 16, 2026	Silicon Valley Power Trinity Public Utility District
May 1, 2026	October 30, 2026	Banning Electric Utility Anza Electric Cooperative
May 15, 2026	November 13, 2026	Truckee Donner Public Utility District Redding Electric Utility
May 29, 2026	November 27, 2026	Northern California Power Agency Kirkwood Meadows Public Utility District
June 12, 2026	December 11, 2026	Anaheim Public Utilities Los Angeles Department of Water and Power
March 19, 2027	September 17, 2027	Pasadena Water and Power Glendale Water and Power Alameda Municipal Power Azusa Light and Water, City of Azusa City of Corona Eastside Power Authority Imperial Irrigation District Industry Public Utilities
April 2, 2027	October 1, 2027	Colton Electric Utility

Optional draft WMP due date	Final WMP due date	Utilities
		City of Shasta Lake
April 16, 2027	October 15, 2027	City of Lompoc Surprise Valley Electrification Corporation
April 30, 2027	October 29, 2027	Healdsburg Electric Department Turlock Irrigation District
May 14, 2027	November 12, 2027	Ukiah Electric Utility Transmission Agency of Northern California
May 28, 2027	November 26, 2027	San Francisco Public Utilities Commission Sacramento Municipal Utility District
June 11, 2027	December 10, 2027	City of Palo Alto Plumas-Sierra Rural Electric Co-Op
March 17, 2028	September 15, 2028	Burbank Water and Power Riverside Public Utilities Department Lathrop Irrigation District Lodi Electric Utility Merced Irrigation District Moreno Valley Utility City of Needles Port of Oakland
March 31, 2028	September 29, 2028	Modesto Irrigation District Lassen Municipal Utility District
April 14, 2028	October 13, 2028	Silicon Valley Power Trinity Public Utility District

Optional draft WMP due date	Final WMP due date	Utilities
April 28, 2028	October 27, 2028	Banning Electric Utility Anza Electric Cooperative
May 12, 2028	November 10, 2028	Truckee Donner Public Utility District Redding Electric Utility
May 26, 2028	November 24, 2028	Northern California Power Agency Kirkwood Meadows Public Utility District
June 9, 2028	December 8, 2028	Anaheim Public Utilities Los Angeles Department of Water and Power
		Pasadena Water and Power
		Glendale Water and Power
		Roseville Electric Utility
March 16, 2029	September 14, 2029	Power and Water Resource Pooling Authority
		Rancho Cucamonga Municipal Utility
		Vernon Public Utility
		Victorville Municipal Utility Services
		Colton Electric Utility
March 30, 2029	September 28, 2029	City of Shasta Lake
		City of Lompoc
April 13, 2029	October 12, 2029	Surprise Valley Electrification Corporation
Am vil 27, 2020	O-t-ch-2/25 2020	Healdsburg Electric Department
April 27, 2029	October 26, 2029	Turlock Irrigation District

Optional draft WMP due date	Final WMP due date	Utilities
May 11, 2029	November 9, 2029	Ukiah Electric Utility Transmission Agency of Northern California
May 25, 2029	November 23, 2029	San Francisco Public Utilities Commission Sacramento Municipal Utility District
June 8, 2029	December 7, 2029	City of Palo Alto Plumas-Sierra Rural Electric Co-Op

5. REFERENCES

Table 2. References

Citation	Reference
2021 Advisory Opinion	California Wildfire Safety Advisory Board, Advisory Opinion for the 2021 Wildfire Mitigation Plans of Electric Publicly Owned Utilities and Cooperatives, Published December 9, 2020, URL:(https://energysafety.ca.gov/wp-content/uploads/docs/misc/wsd/wsab-pou-guidance-advisory-opinion-approved-12.9.2020.pdf).
2024 Advisory Opinion	California Wildfire Safety Advisory Board, Advisory Opinion for the 2024 Wildfire Mitigation Plans of Electric Publicly Owned Utilities and Rural Electric Cooperatives, Published December 4, 2023, URL:(https://energysafety.ca.gov/wp-content/uploads/2025/06/wsabdraft-2024-wmp-pou-advisory-opinion-final-1.pdf).
2025 Advisory Opinion	California Wildfire Safety Advisory Board, Advisory Opinion for the 2025 Wildfire Mitigation Plans of Electric Publicly Owned Utilities and Rural Electric Cooperatives, Published December 4, 2024, URL:(https://energysafety.ca.gov/wp-content/uploads/2024/12/wsabadvisory-opinion-on-pou-2025-wmps-final.pdf).
Fire-Threat Maps and Fire-Safety Rulemaking website	California Public Utilities Commission (CPUC), <u>Fire-Threat Maps and Fire-Safety Rulemaking</u> , accessed Sep. 10, 2025, URL:(https://www.cpuc.ca.gov/industries-and-topics/wildfires/fire-threat-maps-and-fire-safety-rulemaking).
Pub. Util. Code § 8387	Public Utilities Code section 8387, Effective September 19, 2025, URL:(https://leginfo.legislature.ca.gov/faces/codes_displaySection.xhtml?lawCode=PUC&sectionNum=8387 .).
SB 254 (2025)	Senate Bill (SB) 254, Chapter 119, Statutes of 2025, URL:(https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=20 2520260SB254).





OFFICE OF ENERGY INFRASTRUCTURE SAFETY CALIFORNIA WILDFIRE SAFETY ADVISORY BOARD

www.energysafety.ca.gov

715 P Street 15th Floor Sacramento, CA 95814 <u>wsab@energysafety.ca.gov</u>

