



OFFICE OF ENERGY INFRASTRUCTURE SAFETY
WILDFIRE SAFETY ADVISORY BOARD

**DRAFT 2026–2029 WILDFIRE
MITIGATION PLAN SCHEDULE FOR
PUBLICLY OWNED UTILITIES AND
ELECTRICAL COOPERATIVES**

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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 wildfire mitigation plan submission schedule determined by the California Wildfire Safety Advisory Board.

The primary goals for the California Wildfire Safety Advisory Board in determining a schedule for wildfire mitigation plan submission are to maximize the effectiveness of publicly owned utility and electrical cooperative wildfire mitigation plan development and to maximize the effectiveness of the California Wildfire Safety Advisory Board’s 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; focusing California Wildfire Safety Advisory Board resources on the highest-impact reviews; and balancing certainty and flexibility.

The schedule has three features: differences in reporting frequency; rotating submissions; and opportunities for early collaborative exchange. 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, with a comprehensive revision once every three years. 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.”² This document sets forth the schedule determined by the Board for POU and co-op submissions from 2026–2029.

Board staff published a draft version of this document on October 31, 2025, with a request for public comments by November 14, 2025. The California Municipal Utilities Association (CMUA) and Golden State Power Cooperative (GSPC) together submitted a comment letter as the “Joint Associations.” The Sacramento Municipal Utility District (SMUD) also submitted a comment letter. Board staff had additional conversations with POU and co-op representatives, including a meeting of the WSAB–POU and Co-op Working Group. Specific comments are addressed with additions in the relevant sections below.

2. GOALS

The goals for WSAB in determining a schedule for WMP submission are to maximize the effectiveness of POU and co-op WMP development and 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: enabling utilities, especially those with less exposure to wildfire risk, to expend resources on priorities other than developing plans; increasing the opportunities for cooperative

¹ SB 254 (2025).

² Pub. Util. Code § 8387.

exchanges between WSAB and utilities; focusing WSAB resources on the highest-impact reviews; and balancing certainty and flexibility.

3. SCHEDULE FEATURES

To address the considerations above and achieve the goal of maximizing effectiveness, the schedule has three features: differences in reporting frequency; rotating submissions; and opportunities for early collaborative exchanges.

3.1 Reporting Frequency

POUs and co-ops are diverse. They vary in size from fewer than 100 customers to 1.6 million. 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 POU’s 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.⁴ 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 POU’s 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 POU’s 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. This reporting frequency also reduces the number of submissions from up to 51 per year to 19 or 20.

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

⁴ 2024 Advisory Opinion.

⁵ 2025 Advisory Opinion.

The Joint Associations requested that WMPs submitted more frequently than once every four years be characterized as revisions rather than new plans. Iteration in planning is an essential part of the WMP process. WSAB encourages and expects each submitted WMP to build on the previous submission and demonstrate growing maturity. Each WMP should report on the progress of initiatives planned in the previous WMP and state clear goals for future years. The field of wildfire risk mitigation is changing quickly, with new technologies and services, pilot projects, and lessons learned. Over time, if the field and a utility's plan mature to a point where a four-year plan is likely to progress with few changes, a less frequent WMP submission may become appropriate. For now, the schedule remains unchanged. In its comment, SMUD supported the reporting frequency in the first draft schedule.

In conversation, a utility raised a question about the duration of a WMP. Some utilities took the previous requirement of an annual plan with a comprehensive revision once every three years to imply that the duration of a plan should be three years. The change in the statutory requirements removed that implication. WSAB recommends that utilities that submit WMPs once every four years make the duration of their plans four years. WSAB recommends that utilities that submit WMPs once every two years and make the duration of their plans at least two years, with longer durations at the discretion of the utility.

Finally, in conversation some utilities raised concerns that requiring a WMP once every two years instead of once every three years could imply that utilities were expected to contract for independent evaluators' reports every two years. To clarify, WSAB does not expect to review an independent evaluator's report of any utility's WMP more frequently than once every four years.

3.2 Rotating Submissions

The first draft schedule, in addition to requiring fewer submissions in each year, staggered submission deadlines within a given year. Spreading out the review process would increase the opportunity for utilities to have collaborative exchanges with Board members and staff.

Stakeholder comments on the staggered submissions were divided. SMUD wrote, "SMUD also supports the Draft Schedule's staggered approach to reporting deadlines."⁶ The Joint Associations wrote, "The Joint Associations encourage the WSAB to seek direct input from the individual POUs and Co-ops about those deadlines... 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."⁷ In conversation, utilities emphasized the latter point.

Continued collaboration within the community of POUs and co-ops is important and merits support. WSAB members and staff will rely, at least initially, on more collaboration before the submission deadline. This schedule incorporates stakeholder feedback by revising the

⁶ SMUD Comment Letter, page 2.

⁷ Joint Associations Comment Letter, page 3.

deadlines for final submission to the first Friday in October each year, for all utilities submitting that year.

As in the initial draft schedule, in this version of the schedule the utilities that submit WMPs 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. The utilities that submit WMPs 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.

The Joint Associations “encourage the WSAB to consider grouping the submission deadlines for POU and Co-ops in ways that provide co-benefits,”⁸ specifically mentioning geographic proximity or utility category. In conversation, GSPC requested that its members (Anza Electric Cooperative, Plumas-Sierra Rural Electric Cooperative, Surprise Valley Electrification Corporation, and Trinity Public Utilities District) be grouped together. This version of the schedule makes several changes from the initial draft to group utilities by association and geography. Most Northern California utilities with overhead facilities in the HFTD will submit WMPs in even years, and GSPC members and most Southern California utilities with overhead facilities in the HFTD will submit in odd years.

3.3 Early Collaborative Exchanges

The first draft schedule included an optional draft WMP. The intent of this provision was for Board members and staff to engage with each utility to discuss its draft WMP, and any questions, resources, or opportunities. This collaborative exchange would improve the Board members’ and staff’s understanding of each utility and its WMP, provide opportunities to share perspectives and resources to improve WMPs, and indicate key areas of interest in advance of the Board’s advisory opinion.

The Joint Associations commented that “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... 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.”⁹ Incorporating that proposal, this version of the schedule changes the name of the period for discussion to “Early Collaborative Exchanges.” WSAB encourages utilities to collaborate with Board members and staff during this period for all the benefits intended from a draft WMP.

3.4 Schedule Changes and Consultation

WSAB’s timely determination of the schedule is important to allow utilities to plan their WMP development and submissions. However, the ability to change the schedule based on lessons learned and additional information could improve the schedule for utilities, individually or collectively, and for WSAB. The Joint Associations “recommend that during this initial four-

⁸ Joint Associations Comment Letter, page 2.

⁹ Joint Associations Comment Letter, page 3.

year cycle, the WSAB be open to adjusting the due dates as the WSAB receives input from individual utilities.”¹⁰ WSAB members and staff welcome ongoing input. WSAB may determine a different schedule in the future, responding to input and continuing to balance certainty and flexibility.

4. SCHEDULE

Table 1 displays the schedule for utility submissions for 2026–2029, sorted by the period for early collaborative exchanges and then alphabetically.

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

Early Collaborative Exchanges	Final WMP due date	Utilities
March 2–May 22, 2026	October 2, 2026	City of Biggs City of Gridley Healdsburg Electric Department Lassen Municipal Utility District Lodi Electric Utility Pittsburg Power Company Redding Electric Utility Roseville Electric Utility City of Shasta Lake Ukiah Electric Utility Valley Electric Association
March 30–June 19, 2026	October 2, 2026	Modesto Irrigation District Northern California Power Agency Silicon Valley Power Turlock Irrigation District

¹⁰ Joint Associations Comment Letter, page 4.

Early Collaborative Exchanges	Final WMP due date	Utilities
April 27–July 17, 2026	October 2, 2026	Kirkwood Meadows Public Utility District Los Angeles Department of Water and Power City of Palo Alto San Francisco Public Utilities Commission Truckee Donner Public Utility District
March 1–May 21, 2027	October 1, 2027	Azusa Light and Water City of Banning Electric Utility Burbank Water and Power Colton Electric Utility City of Corona Glendale Water and Power Imperial Irrigation District City of Needles Pasadena Water and Power Rancho Cucamonga Municipal Utility Victorville Municipal Utility
March 29–June 18, 2027	October 1, 2027	Anaheim Public Utilities Anza Electric Cooperative City of Lompoc Surprise Valley Electrification Corporation Riverside Public Utilities Department
April 26–July 16, 2027	October 1, 2027	Plumas-Sierra Rural Electric Cooperative Sacramento Municipal Utility District

Early Collaborative Exchanges	Final WMP due date	Utilities
		Transmission Authority of Northern California Trinity Public Utility District
March 6–May 26, 2028	October 6, 2028	Healdsburg Electric Department Eastside Power Authority Lassen Municipal Utility District Lathrop Irrigation District Merced Irrigation District Moreno Valley Utility Power and Water Resource Pooling Authority Redding Electric Utility City of Shasta Lake Ukiah Electric Utility
April 3–June 23, 2028	October 6, 2028	Modesto Irrigation District Northern California Power Agency Silicon Valley Power Turlock Irrigation District
May 1–July 21, 2028	October 6, 2028	Kirkwood Meadows Public Utility District Los Angeles Department of Water and Power City of Palo Alto San Francisco Public Utilities Commission Truckee Donner Public Utility District
March 5–May 25, 2029	October 5, 2029	Alameda Municipal Power Cerritos Electric Utility

Early Collaborative Exchanges	Final WMP due date	Utilities
		City of Banning Electric Utility Burbank Water and Power Colton Electric Utility Glendale Water and Power Industry Public Utilities Port of Oakland Pasadena Water and Power Port of Stockton Vernon Public Utility
April 2–June 22, 2029	October 5, 2029	Anaheim Public Utilities Anza Electric Cooperative City of Lompoc Surprise Valley Electrification Corporation Riverside Public Utilities Department
April 30–July 20, 2029	October 5, 2029	Plumas-Sierra Rural Electric Cooperative Sacramento Municipal Utility District Transmission Authority of Northern California Trinity Public Utility District

5. REFERENCES

Table 2. References

Citation	Reference
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