



November 30, 2020

California Wildfire Safety Advisory Board
505 Van Ness Avenue
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RE: Comments of the Joint Associations on the Draft Guidance Advisory Opinion for the 2021 Wildfire Mitigation Plans of Publicly Owned Electric Utilities and Electrical Cooperatives

Dear Chair Edwards and Board Members,

The California Municipal Utilities Association (CMUA), Golden State Power Cooperative (GSPC), Northern California Power Agency (NCPA), and Southern California Public Power Authority (SCPPA) (collectively the “Joint Associations”) respectfully submit these comments to the California Wildfire Safety Advisory Board (WSAB) on the *Draft Guidance Advisory Opinion for the 2021 Wildfire Mitigation Plans of Publicly Owned Electric Utilities and Electrical Cooperatives* (Draft Guidance Advisory Opinion), issued on November 13, 2020.

I. INTRODUCTION

California’s publicly owned electric utilities (POUs) and electric cooperatives (co-ops) greatly appreciate the thoughtful and thorough efforts of the WSAB in providing initial recommendations for the POU and co-op wildfire mitigation plans (WMPs). We recognize that the WSAB brings a broad range of industry, academic, and workforce experience to the WMP process. We thank the members of the WSAB for offering their valuable time and expertise for the benefit of the people of the state of California. The POUs and co-ops look forward to collaborating with the WSAB to improve the state’s wildfire mitigation efforts. As public agencies and community-owned utilities, the POUs and co-ops must prioritize their expenditures to the uses that will result in the greatest safety improvements based on that entity’s knowledge of local conditions, the preferences of its community, and direction of its governing board. Unlike the state’s investor owned utilities (IOUs), the POUs and co-ops do not have shareholders, and thus all expenditures must come from either increases in rates or from reductions in other spending, including wildfire mitigation.

As the WSAB engages with the POUs and co-ops to provide feedback on the WMPs, the Joint Associations urge the WSAB to use caution in how its recommendations are structured. Given the WSAB’s role, it is possible that its recommendations could be construed as expressions of minimum industry standards. This is particularly concerning because many of the WSAB’s recommendations appear to exceed the statutory requirements of Public Utilities Code § 8387, and are thus out of scope for the WMPs. Further, many of the recommendations appear to select a very specific approach to one

aspect of wildfire mitigation that might be appropriate for certain regions of the state, but not others, and that should not be identified as a minimum requirement for all POU or co-op WMPs. If the WSAB elevates certain wildfire mitigation strategies, that may come at the cost of other mitigation efforts to the detriment of overall safety. In these comments, the Joint Associations urge the WSAB to narrow and clarify its recommendations to ensure that the local governing boards have the necessary flexibility to select the wildfire mitigation strategies best suited to their local conditions. Further, the Joint Associations recommend that the WSAB consider converting some recommendations to be matters pursued on a collective level, rather than described as minimum requirements for all entities. The WSAB's Guidance Advisory Opinion should serve to highlight the strategies that have been successful, in order to foster information-sharing and collaboration. To the extent that the WSAB, POUs, and co-ops identify appropriate areas, they could jointly recommend the allocation of funds by the Legislature to specific projects or specific activities that would help reduce wildfire risks.

With this in mind, the following sections provide some overall considerations in response to the Draft Guidance Advisory Opinion.

A. Minimum Plan Requirements Versus Informational Reporting

The WSAB should be mindful that there is a distinction between the elements that *must* be included in a WMP to be complete under Public Utilities Code § 8387 and information that *would be helpful* for the WSAB in reviewing WMPs. The Joint Associations urge the WSAB to collaborate with the POUs and co-ops to determine if there is a better way to provide relevant information to the WSAB without such information being considered a requirement for inclusion in the WMPs.

B. Entity-Specific Advisory Opinions

While the Joint Associations understand the limited resources available to the WSAB, individualized and timely recommendations for each utility, rather than broad industry-wide recommendations, would be beneficial. The size, structure, and characteristics of the individual POUs and co-ops vary across the state to such an extent that it is nearly impossible for a single recommendation to be appropriate for all WMPs.

C. Timeline for Responding to WSAB Recommendations

The Draft Guidance Advisory Opinion recommends changes to be incorporated into the next WMPs, which will be reported to the WSAB by July 1, 2021. However, the WMP development process varies greatly across the different POUs and co-ops. WMPs have a lengthy development timeline that involves community outreach, review by third parties, and review or approval by boards or commissions that are under their ultimate governing authority. Further, the individual governing authorities may have specified timelines for the adoption of subsequent plans and the approved budgets necessary to implement such measures. Because of this, many of the 2021 WMP updates or associated budgets have already been adopted and there is no realistic option to further update these plans before July 2021. The WSAB's direction to the POUs and co-ops should recognize this timing. The Joint Associations recommend that the WSAB's advisory opinions set a goal of having the POUs and co-ops respond to recommendations by the next *comprehensive* plan revision, which must occur at least once every three

years.¹ We all must recognize that this is an iterative process that involves constant improvement over time.

D. Differences Between the IOU WMPs and the POU and Co-op WMPs

As the WSAB develops recommendations for the POU and co-op WMPs, the IOU WMPs can serve as a useful source of information. But the WSAB must recognize that there are substantial differences that must be considered before making direct comparisons or seeking to directly copy any elements of the IOU review process. First, the POUs are governmental agencies subject to open meeting and transparency requirements that give their communities a direct role in the development and adoption of local safety requirements. Second, the POUs and co-ops are generally much smaller in terms of service territory, distribution system, and number of customers. As such, many POUs and co-ops have limited staffing and resources available, particularly for experimental or untested mitigation efforts.

E. Differences Among the POUs and Co-ops

One challenge of providing the WSAB’s recommendations in a single generalized document is that some recommendations may only be applicable to a subset of entities. In particular, while many POUs are departments within municipal governments, some POUs are municipal utilities districts, irrigation districts, and public utility districts. Furthermore, electric cooperatives have a distinct structure in which their locally elected board of directors is autonomous from municipal government. Each of these different types of POU and co-ops serve different functions, have different relationships with other local agencies, and have different authorities. As the WSAB considers its recommendations, the Joint Associations ask that the WSAB be mindful of the structure of each entity and the actual authority that these entities have to act on these recommendations.

F. Bifurcate Recommendations

Public Utilities Code § 8387 required each POU and co-op to submit a WMP before January 1, 2020. The statute also requires each POU and co-op to annually “update” the WMP and submit a “comprehensive revision” every three years.

As noted above, some POUs have already approved, or are in the process of approving, their annual update due to the WSAB by July 1, 2021. Others are in the planning process for their WMP annual update. The Draft Guidance Advisory Opinion provides recommendations that could be incorporated into an update. However, other recommendations could be more appropriate for a comprehensive revision given the additional resources and work that would be involved.

The Joint Associations respectfully request that the WSAB bifurcate its recommendations into two categories: (1) “update recommendations” for those recommendations that can reasonably be incorporated into an annual update; and (2) “comprehensive revision recommendations” for those recommendations that are more appropriate for a tri-annual comprehensive revision. This bifurcation would give the WSAB more time to work with the Joint Associations on the recommendations that would amount to a comprehensive revision for utilities.

¹ Cal. Pub. Util. Code § 8387(b)(1).

II. RESPONSES TO WSAB DRAFT GUIDANCE ADVISORY OPINION RECOMMENDATIONS

Recommendation 1: Future Wildfire Mitigation Plans Should Be Organized to Introduce Baseline Risk Profile Upfront and Increase Information Accessibility, Bearing in Mind Federal Infrastructure Protection Protocols

The Joint Associations oppose the development of a simple, generic risk categorization that would be assigned to each POU or co-op. Such a designation could have adverse or unintended consequences for any entity that is designated as high-risk, including the cost of insurance, credit ratings, and liability. Further, such a designation is likely to be incorrect. As we have seen over the past decade, wildfire risk profiles have changed drastically from the historical trends, and thus, there is a good chance that a POU or co-op would be mischaracterized by the use of a particular moniker. There are a wide variety of complex factors that impact a specific region's wildfire risk, and in particular, the risks to a specific community based on the transmission and distribution system of an electric utility.

However, the Joint Associations agree that it would be helpful to identify certain key characteristics in a standardized format similar to the table included in the Draft Guidance Advisory Opinion.² There may be commonalities among the many POUs and co-ops that will support comparison of certain aspects of WMPs with similar characteristics. Such designations may help streamline the WSAB's review of these plans and provide useful comparisons of different approaches to similar problems. Obviously, even similar POUs and co-ops may reasonably choose different approaches based on local preferences and the direction of their governing boards.

This table could be a "cover sheet" that all POUs and co-ops could provide with their WMPs when they are submitted to the WSAB. Further, the Joint Associations recommend additional granularity in the available options for such a cover sheet. In particular, the "Location/Topography" category provides limited value because "Rural/Forested" includes a wide-range of fire risk. For example, a rural area that is heavily forested will have a different risk profile than a rural area that is primarily desert. Therefore, the Joint Associations recommend that the "Location/Topography" options include: (i) urban, (ii) rural/forested, (iii) rural/desert, and (iv) rural/agricultural. Similarly, the Joint Associations recommend adding "agricultural" as an additional customer class.

Additionally, there may be value in including a category that reflects the risk levels for the entity's territory that are assigned by CalFIRE's Fire and Resource Assessment Program, Fire Threat Map (FRAP Map). The FRAP Map provides the generalized fire threat risk for an area, which is distinct from the CPUC Fire Threat Map, which looks specifically at the risk of a powerline-ignited wildfire. Furthermore, checking a box associated with a Fire Threat Risk area may be misleading if only a small portion of the POU or co-op service territory falls within that zone. To avoid misinterpreting overall risk/threat levels within a service territory, checkboxes should be replaced with an estimated percentage of territory within a specified threat area.

Finally, there may be limits on a POU or co-op's ability to include detailed information on transmission, distribution, or generation assets due to federal and state protections regarding the confidentiality of

² Draft Guidance Advisory Opinion at 7.

critical infrastructure information. The WSAB should ensure that their requirements are consistent with the relevant federal and state limits on sharing such information.

Recommendation 2: Include Information about Governing Body Approval

As directed by Public Utilities Code § 8387(b)(3), POU and co-ops must present their WMPs to their local governing board at a public meeting. After this process has occurred, the POU or co-op must then submit their WMP to the WSAB. Because the WMP has been finalized before being presented to its local governing board, information on that approval process is unlikely to be included in the actual WMP. The POU or co-op could alternatively include relevant information on adoption in any cover sheet or other appropriate documentation submitted with the WMP to the WSAB. For example, the table described above could include a section for including this information.

The Joint Associations appreciate recommendations on monitoring and tracking performance. However, in reviewing this portion of POU and co-op WMPs, the WSAB should be mindful that it will likely take several years for new mitigation measures to be implemented and to begin having measurable impacts. This area of the WMPs will likely evolve over the initial years of any new mitigation measure or program.

Finally, budgeting and funding is an area solely within the authority of each entity's governing board. These efforts and processes are not relevant to the WSAB's assessment of the comprehensiveness of a POU or co-op's WMP. The Joint Associations recommend that budget-related items be removed from the Draft Guidance Advisory Opinion.

Recommendation 3: Independent Evaluations of the Wildfire Mitigation Plans Should Be More Specific and Less Repetitive

As specified in Public Utilities Code § 8387(c), the independent evaluator should "review and assess the comprehensiveness of [the POU's] wildfire mitigation plan" and provide feedback on whether the POU met each of the elements of the statutory mandates. The Joint Associations have concerns with how the Draft Guidance Advisory Opinion characterizes the purpose and role of the independent evaluator. The Draft Guidance Advisory Opinion recommends that the independent evaluator both determine if the WMP meets industry standards and provide recommendations on how the POU should meet those industry standards.

First, while there are some clearly-applicable industry standards that all POU and co-ops follow for important aspects of the WMPs, there is no overarching applicable industry standard for WMPs. Many of the areas addressed by WMPs involve rapidly changing risks, where the industry as a whole is testing multiple different approaches. In these emerging areas, there is not a single "industry standard." Further, "industry standard," depending on how it is interpreted, could also impose a standard on a utility that is not feasible from an operational or fiscal standpoint. For example, an "industry standard" for a large IOU could be infeasible for a small POU. For this reason, the Joint Associations recommend using the term "safe industry practices that are feasible" rather than "industry standard." It could also be helpful if the WSAB considered offering its expertise and a public forum to facilitate the sharing of safe industry practices.

In addition, it is not the role of the independent evaluator to decide what the relevant industry standard is for a specific element of the plan. Simply because utilities in other areas of the state or country have utilized a specific approach does not make that approach an “industry standard.” In particular, the CPUC’s Utility Wildfire Mitigation Maturity Model was developed specific to the CPUC-jurisdictional utilities without the intent to be applied to POU and co-ops. The POU and co-ops were not involved in the development of that tool and as described above, there are fundamental differences between the IOUs and the POU/co-ops. Further, the WSAB plays a much more limited role in its review of the POU and co-op plans than the CPUC does in approving the expenditures of the IOUs. As such, the CPUC’s Utility Wildfire Mitigation Maturity Model should not be termed an “industry standard” and should not be directly used to evaluate POU or co-op WMPs. There may be lessons learned from the IOU responses to the model that could provide useful insights for future POU and co-op WMPs, but it is not properly directly applied to POU and co-ops. Finally, the independent evaluator is not directed to recommend the best approach to meet any industry standards. It is the role of the POU or co-op governing board to verify what the applicable industry standard is (if one exists) and chart out the best course to meet such standard, specific to the local conditions and community needs. The independent evaluator’s role is not to second guess the specific decisions of these governing boards, but to ensure that the WMPs are comprehensive and consistent with the relevant statutory requirements.

The Draft Guidance Advisory Opinion raises concerns about the repetitive nature of some of the independent evaluator reports. The Joint Associations think that this is useful criticism, but do note that due to the list of specific statutory requirements and the independent evaluator’s role, that some degree of repetitiveness is to be expected. Particularly when some statutory requirements are not directly applicable to the POU or co-op, a detailed and specific analysis is not necessary or useful.

Finally, Public Utilities Code § 8387 does not specify a frequency for when independent evaluations must occur. While some POU and co-ops may choose to do so on an annual basis, others may decide to align the independent evaluations with the three-year comprehensive revision cycle. Further, the fact that the WSAB will be evaluating and reviewing the POU and co-op plans every year reduces the need for annual independent evaluations. The WSAB’s Guidance Advisory Opinion should recognize that independent evaluations do not need to occur each year.

Recommendation 4: Create Wildfire Mitigation Plan Templates Based on Utility Groupings, for Example Risk Profile and Type of Publicly Owned Utility

The Joint Associations agree that identifying common characteristics could help streamline the review process by grouping similar entities together. While similar POU or co-ops may still approach risk mitigation in different ways, there may be value for the WSAB in evaluating similarly-situated POU and co-ops together. While some groupings may be helpful, the Joint Associations are concerned that the use of “templates” could result in a one size-fits-all format that is not conducive to each POU and co-op’s individual needs. Rather than creating different plan “templates,” the WSAB should collaborate with the POU and co-ops to develop a checklist or cover sheet that would help identify these relevant characteristics. Beyond the characteristics described in response to recommendation 1 above, additional characteristics could include:

- High Fire Threat District Tier (HFTD);
- geographic size or miles of powerline maintained by the POU or co-op;

- number of customers served;
- customer demographic; and
- socio-economic elements.

Nevertheless, if the WSAB desires the use of templates, the Joint Associations welcome the opportunity to work with the WSAB in the coming months to develop different templates that can be utilized by the diverse group of utilities. Any such templates should be based on factual characteristics and not a new risk identifier in order to avoid unintended consequences such as adverse impacts on credit ratings, obtaining insurance, and liability. The templates should be designed to help streamline reporting if, for example, certain analyses are not applicable to a utility. Moreover, since the characteristics of a utility can change over time, each utility and its governing board would be in the best position to determine which template it should use each year. As such, the Joint Associations recommend allowing each utility to decide which template to utilize when developing its WMP.

As described above, the Joint Associations oppose assigning a simple risk identifier to each POU and co-op. A high-risk designation could have unintended consequences for the individual entity and would likely only serve a limited value. In determining if such risk designations would be appropriate the WSAB should consider the following:

- Risk profiles and appropriate mitigation measures are determined by more than just geographic location and infrastructure type;
- Assigning a specific risk-level to the POU or co-op could have adverse impacts on credit ratings, obtaining insurance, and liability;
- Templates designed to take into account the risk profiles referenced above assume that all POUs and co-ops within the specific risk profile are otherwise the same, which they are not;
- All POUs and co-ops must meet all of the statutory requirements for WMPs specified in Public Utilities Code § 8387 and there is no mechanism to exempt a POU or co-op from any elements simply on the basis of a “low-risk” determination.

Recommendation 5: Describe how Investor Owned Utility Public Safety Power Shutoffs Impact the Publicly Owned Utilities

Not all POUs and co-ops are similarly impacted by IOU public safety power shutoff (PSPS) events. Many POUs and co-ops are located in different balancing authority areas than the IOUs and face very low probabilities of losing service even due to a transmission-level PSPS event. It is therefore unnecessary for these POUs and co-ops to prepare a comprehensive analysis of potential IOU PSPS event risks. The WSAB’s Guidance Advisory Opinion should reflect this distinction between entities and clarify that the same level of detail is not required for all WMPs. For the POUs and co-ops that are transmission dependent on the relevant IOU, those POUs and co-ops will clearly include the relevant information and impacts as part of their WMPs.

Additionally, it is important to note that POUs and co-ops that are transmission customers of an IOU are dependent upon the provision of the PSPS-related information from that IOU. Timely receipt of that information is necessary for the POUs’ and co-ops’ own communications to their customers. The POUs and co-ops would appreciate the WSAB's support in ensuring that the IOUs provide proper coordination and sharing of this essential PSPS information with transmission-dependent utilities.

Recommendation 6: Describe Communication Plans Alerting Customers about IOU PSPS, or Other Wildfire Related Service Interruptions

Similar to the response for Recommendation 5, the POU's and co-ops that may be impacted by IOU PSPS events will include comprehensive information on the communication plans for alerting their customers about an impending IOU PSPS event. However, for those POU's and co-ops where this risk is remote, the WMPs will not have that level of detail.

Recommendation 7: Highlight Particular System Hardening and Grid Design Improvements

The Joint Associations are concerned that WSAB recommendations may be inappropriately deemed an endorsement of one mitigation tool over another, and thus urge caution in how the WSAB characterizes various risk mitigation strategies and how the individual POU's and co-ops should assess the appropriateness of one strategy over another. The Draft Guidance Advisory Opinion requests that future WMPs include detailed analysis of system hardening plans and the methodology for why specific options were selected. The WSAB should ensure that its recommendations do not elevate system hardening over alternative approaches to reducing risk that may be more appropriate for certain entities, such as increased inspections or greater trim clearances. The best and most cost effective approach to system hardening and risk mitigation will depend on each POU's unique characteristics and the preferences of POU's community and governing board. The WSAB should ensure that the wording of its recommendations do not prioritize one approach over another.

Further, the Draft Guidance Advisory Opinion discusses issues that are outside the scope of the WMPs, such as backup generation to certain loads and potential supply shortages. The obligations for maintaining backup generation may be customer obligations in many circumstances. Further, while some POU's and co-ops may choose to discuss these items in their WMPs, these are not statutory requirements and should not be treated as necessary for a comprehensive WMP.

Recommendation 8: Highlight Particular Infrastructure Inspection Plans for Regular and Post Incident Inspections

The Joint Associations have no comment on this recommendation.

Recommendation 9: Utilities with Undergrounded Lines Should Analyze and Prepare for Black Swan Events

As described above, POU's and co-ops must direct their staff and financial resources to the activities that provide the greatest return on their investment, particularly for safety and reliability activities. It is unlikely that a utility with little risk, including a fully-undergrounded POU, would be able to justify devoting substantial resources, such as creating engineering teams, to studying black swan events. Further, if a POU has already expended significant resources towards fire risk reduction by undergrounding their systems, those POU's should not bear an additional burden solely due to their undergrounding actions.

Instead, the Joint Associations recommend that the WSAB’s discussion of black swan events be recharacterized as a goal for California’s electric industry as a whole. The WSAB should look for ways to stimulate discussion and collaboration on these topics among all POU’s, co-ops, and IOU’s, as well as industry experts and academics. In this way, these risks could be evaluated and confronted without unduly burdening any individual entity.

Recommendation 10: Highlight Particular Wildfire Risks Associated with System Design and Construction

The Joint Associations urge caution in proposing new GO 95 requirements as part of this process. First, the Joint Associations note that GO 95, Rule 31.1 already specifies:

Electrical supply and communication systems shall be designed, constructed, and maintained for their intended use, *regard being given to the conditions under which they are to be operated*, to enable the furnishing of safe, proper, and adequate service.

For all particulars not specified in these rules, design, construction, and maintenance should be done in accordance with accepted good practice *for the given local conditions known at the time* by those responsible for the design, construction, or maintenance of communication or supply lines and equipment.³

Therefore, local conditions and specific identified risks, including those associated with topography, are already required by GO 95 and are common considerations for POU’s and co-ops. Any changes to GO 95 requirements would have statewide impacts, including on the IOU’s, and would need to be adopted through a CPUC process. Such recommendations should be coordinated with the other stakeholders involved in such a CPUC process. In discussing potential changes to GO 95 rules with a broader group, more information on feasibility and access to information could inform any such proposals.

Further, the Joint Associations are not aware of any POU that has sought an exemption from GO 95 for any unique or experimental installations. Such an element may not be a necessary part of the WMPs.

Recommendation 11: Address Weather Modeling and Technology Partnerships

The Joint Associations agree that the topic of weather monitoring technologies and strategies is relevant and future WMPs can provide greater details on this topic if the WMP did not already do so. As noted in the Draft Guidance Advisory Opinion, some POU’s and co-ops may utilize or rely on information from IOU facilities or facilities maintained by other governmental agencies. Such collaboration achieves the goal of reducing fire risks while being cost effective. However, the language in the Draft Guidance Advisory Opinion states that intelligence assets are “generally” more cost effective than system upgrades. While this may be true in certain circumstances, the Joint Associations recommend removing or qualifying this statement so that it does not imply that POU and co-op WMPs must include specific technology types over or in-place-of system upgrades. Further, the reasons why a specific technology may not be utilized by a POU or co-op can be due to a wide variety of factors and is within the discretion of the relevant governing board. The reasons why various technologies were not selected should not be a required part of a WMP.

³ GO 95, Rule 31.1 (emphasis added).

Recommendation 12: Describe Utility Requirements for Vegetation Above and Below Electrical Lines

The Joint Associations appreciate the feedback that this recommendation provides and the POU and co-ops will evaluate what additional information concerning vegetation management can be provided in WMPs. However, the Joint Associations recommend narrowing this language to clarify that this assessment is only applicable to the vegetation that has the potential to impact the facilities of the POU or co-op. Management of vegetation that is not within the jurisdiction of the POU or co-op, and that does not pose a realistic fire threat to the POU or co-op, should not be part of its WMP. The POU and co-ops should focus their efforts on identified risks and not unnecessarily study or evaluate vegetation not likely to impact their system. Finally, the WSAB should clarify what is meant by “enhanced vegetation management.”

Recommendation 13: Personnel Qualifications Related to Vegetation Evaluation and Safety Compliance

The POU and co-ops have a long history of employing experts with detailed knowledge specific to the local environment that poses risks to the POU or co-ops’ system. In evaluating the qualifications of the POU and co-op employees and contractors, the experience and local knowledge are key factors that should be considered.

The Draft Guidance Advisory Opinion raises concerns that certain workers might not have the qualifications required to perform certain work based on Cal/OSHA standards. However, the clearance distances specified in GO 95 do not translate to the distance that a worker will actually be from power lines. Obviously, if a POU or co-op trims beyond the minimum clearance requirements, then the workers will be much farther away than this minimum standard. The time of trim guidelines in GO 95 probably provide a better concept of relative distances involved in this type of work. Further, Cal/OSHA requirements are outside the scope of the WMPs and should be addressed in the appropriate forum. The Joint Associations recommend deleting this discussion from the Guidance Advisory Opinion.

Recommendation 14: Innovative Approaches to Vegetation and Forest Management

Utilizing alternative approaches to vegetation management, such as adopting requirements applicable to homeowners, is only an option for POU that are divisions of a municipality. These types of innovative solutions are only relevant to those POU that have the authority to impose such requirements. Because only a subset of POU have such an ability, this should not be treated as a minimum requirement for WMPs.

III. CONCLUSION

The Joint Associations appreciate the opportunity to provide these comments to the WSAB on the Draft Guidance Advisory Opinion and thank the WSAB for its consideration of these comments. We recognize that this is a new process and look forward to working collaboratively with the WSAB as we refine our WMPs.

Sincerely,



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