# Board Finance & Audit Committee Meeting and Special SMUD Board of Directors Meeting

Date: Tuesday, December 9, 2025

Time: Scheduled to begin at 6:00 p.m.

Location: SMUD Headquarters Building, Auditorium

6201 S Street, Sacramento, CA





# AGENDA BOARD FINANCE & AUDIT COMMITTEE MEETING AND SPECIAL SMUD BOARD OF DIRECTORS MEETING

Tuesday, December 9, 2025 SMUD Headquarters Building, Auditorium 6201 S Street, Sacramento, California Scheduled to begin at 6:00 p.m.

#### Remote Telephonic Location: 2005 Kalia Rd Honolulu, HI 96815

This Committee meeting is noticed as a joint meeting with the Board of Directors for the purpose of compliance with the Brown Act. In order to preserve the function of the Committee as advisory to the Board, members of the Board may attend and participate in the discussions, but no Board action will be taken. The Finance & Audit Committee will review, discuss and provide the Finance & Audit Committee's recommendation on the following agendized item(s):

#### Virtual Viewing or Attendance:

Live video streams (view-only) and indexed archives of meetings are available at: <a href="https://www.smud.org/Corporate/About-us/Company-Information/Board-Meetings/Watch-or-Listen-online">https://www.smud.org/Corporate/About-us/Company-Information/Board-Meetings/Watch-or-Listen-online</a>

Zoom Webinar Link: Join Board Finance & Audit Committee Meeting Here

Webinar/Meeting ID: 160 057 6678

**Passcode: 857178** 

Phone Dial-in Number: 1-669-254-5252 or 1-833-568-8864 (Toll Free)

#### Verbal Public Comment:

Members of the public may provide verbal public comment by:

- Completing a sign-up form at the table outside of the meeting room and giving it to SMUD Security.
- Using the "Raise Hand" feature in Zoom (or pressing \*9 while dialed into the telephone/toll-free number) during the meeting at the time public comment is called. Microphones will be enabled for virtual or telephonic attendees when the commenter's name is announced.

#### Written Public Comment:

Members of the public may provide written public comment on a specific agenda item or on items not on the agenda (general public comment) by submitting comments via email to <a href="mailto:PublicComment@smud.org">PublicComment@smud.org</a> or by mailing or bringing physical copies to the meeting. Email is not monitored during the meeting. Comments will not be read into the record but will be provided to the Board and placed into the record of the meeting if received within two hours after the meeting ends.

#### **INFORMATIONAL ITEMS**

1. Bethany Ryers
PRINCIPAL
BAKER TILLY US, LLP

SMUD's 2025 Financial Statements Independent Audit

Plan.

Presentation: 10 minutes Discussion: 2 minutes

#### **DISCUSSION ITEMS**

2. Matthew Powell

Discuss approving Side Letter Agreements between SMUD and the **Public Safety Officers' Association** for the **California Public Employees' Retirement System (CalPERS)** reporting of their holiday pay as required by the Fair Labor Standards Act and documenting the monetary value for the maintenance of required clothing.

Presentation: 10 minutes
Discussion: 2 minutes

Jon Olson

Discuss authorizing the Chief Executive Officer and General Manager to execute, substantially in form attached, Firm Storage Service (FSS) schedules with Central Valley Gas Storage, LLC, for:

- a. 1 Bcf of natural gas storage service for the period April 1, 2026, through March 31, 2031; and
- b. Natural gas injection service for the period March 1, 2026, through April 1, 2026.

Presentation: 10 minutes Discussion: 5 minutes

4. Josh Langdon

Discuss authorizing the Chief Executive Officer and General Manager to negotiate and award contracts to

Acuren Inspection, Inc.; Alisto, Inc.;

**Kleinfelder, Inc.**; and **Prime EPC** (collectively, the **Contracts**) to provide gas pipeline owners engineering services for a five-year period from January 2, 2026, to January 2, 2031, for a total aggregate not-to-exceed amount of \$5 million across the **Contracts**.

Presentation: 5 minutes

Discussion: 1 minute

5. Emily Bacchini

Discuss approving an increase to the aggregate contract not-to-exceed amount for Environmental Compliance and Program Development Services for Contract No. 4600001299 with **AECOM Technical Services, Inc.**, Contract No. 4600001309 with

**Kleinfelder, Inc.**, and Contract No. 4600001315 with **Brown and Caldwell** (collectively, the **Contracts**) by \$2.2 million, from \$8.8 million to \$11 million, across the

three Contracts.

Presentation: 8 minutes Discussion: 2 minutes

#### **INFORMATIONAL ITEMS (cont.)**

6. Jennifer Restivo Provide the Board with SMUD's financial results from

the 10-month period ending October 31, 2025, and a summary of SMUD's current Power Supply Costs.

Presentation: 5 minutes Discussion: 1 minute

7. Claire Rogers Internal Audit Services Reports: Rancho Seco Quality

Assurance, Joint Pole Processing, and Customer

Assistance – MED Rate. Discussion: 1 minute

8. Public Comment.

9. Rob Kerth Summary of Committee Direction.

Discussion: 1 minute

#### ANNOUNCEMENT OF CLOSED SESSION AGENDA

#### 1. Conference with Real Property Negotiators.

Pursuant to Section 54956.8 of the Government Code:

Property:

Assessor's Parcel Number (APN) 073-0080-081-0000 in Sacramento County

SMUD Negotiator:

Emily Bacchini, Interim Director, Safety, Environmental & Real Estate Services

**Negotiating Parties:** 

Frank Family Trust and Paul Frank

**Under Negotiation:** 

Price and terms

#### 2. Public Employee Performance Evaluation.

Pursuant to Section 54957 of the Government Code:

- a. CEO and General Manager;
- b. Chief Legal & Government Affairs Officer; and
- c. Special Assistant to the Board.

Members of the public shall have up to three (3) minutes to provide public comment on items on the agenda or items not on the agenda, but within the jurisdiction of SMUD. The total time allotted to any individual speaker shall not exceed nine (9) minutes.

Members of the public wishing to inspect public documents related to agenda items may click on the Information Packet link for this meeting on the <u>smud.org</u> website or may call 1-916-732-7143 to arrange for inspection of the documents at the SMUD Headquarters Building, 6201 S Street, Sacramento, California.

ADA Accessibility Procedures: Upon request, SMUD will generally provide appropriate aids and services leading to effective communication for qualified persons with disabilities so that they can participate equally in this meeting. If you need a reasonable auxiliary aid or service for effective communication to participate, please email <a href="mailto:Toni.Stelling@smud.org">Toni.Stelling@smud.org</a>, or contact by phone at 1-916-732-7143, no later than 48 hours before this meeting.

SSS No.	
ACC 25-032	

#### **STAFFING SUMMARY SHEET**

Committee Meeting & Date
Finance & Audit – 12/9/25
Board Meeting Date
N/A

				TO		1					ТО		
				10							10		
1.	Lisa Limcaco												
2.	Jose Bodipo-M	Iemba				7.							
3.	Scott Martin					8.							
4.	Lora Anguay					9.	Lega	al					
5.						10.	CEC	<b>3</b> C	Gener	al I	Manager		
Con	sent Calendar	Yes		x No If no, schedu	ıle a dry run presentation.	Bud	geted	х	Yes		No (If no, exp section.)	olain in Cos	t/Budgeted
	M (IPR)				DEPARTMENT						MAIL STOP	EXT.	DATE SENT
	ke Wilson				Accounting						B352	5743	11-24-25
	RRATIVE:	G) (I II		2025 5	10			. D1					
Red	quested Action:	SMUI	D'	s 2025 Financia	l Statements External	Indep	enden	it Pla	an.				
	Summary:	they b	oeg	gin their fieldwo	Auditor is preparing for ork, they will present th	neir au	ıdit pl	an t	o the F	inaı	nce and Audi	t Commi	ttee. Financial
		statem	ne	nts are required	to be audited by an Inc	depen	dent A	Audi	tor in c	orde	er to access c	redit mar	kets.
	<b>Board Policy:</b> (Number & Title)				2-14, External Auditor	Relat	ionshi	ip; S	Strategi	c D	irection SD-3	3, Access	s to Credit
	Benefits:	To pro	ov	ride information	to the Board of Direct	ors re	gardir	ng th	ne plani	ned	work of the	Independ	lent Auditor.
(	Cost/Budgeted:	The co	os	t of this presenta	ation is included in the	conti	act fo	r the	e annua	al au	udit of SMUI	D's finan	cial statements.
	Alternatives:	Not to	Not to present the planned work of the Independent Auditor.										
A	ffected Parties:	Accou	Accounting										
	Coordination:	Accou	un	ting									
	Presenter:	Betha	ny	Ryers, Principa	al, Baker Tilly US, LL	P							

Additional Links:		
Additional Links.		

SUBJECT

SMUD's 2025 Financial Statement Independent Audit Plan

ITEM NO. (FOR LEGAL USE ONLY)

ITEMS SUBMITTED AFTER DEADLINE WILL BE POSTPONED UNTIL NEXT MEETING.



Bethany Ryers, CPA
Principal – Energy & Utilities, Baker Tilly

Bethany is a Principal in the Baker Tilly Energy and Utilities Team and has been with Baker Tilly US, LLP since 2006. She specializes in providing auditing, accounting, and consulting services to utilities. She counts among her clients some of the largest public power systems in the United States and is helping them with implementing the latest Governmental Accounting Standards Board (GASB) statements. She is involved with a number of state electric, water, and wastewater organizations and is also a member of the AICPA (The American Institute of Certified Public Accountants) and several state accounting associations.

SSS No. PSS 25-009	

#### **STAFFING SUMMARY SHEET**

Committee Meeting & Date
Finance & Audit – 12/09/25
Board Meeting Date
December 11, 2025

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				ТО						ТО		
1.	Matthew Pow	ell			6.							
2.	Scott Martin											
3.	3. Lora Anguay											
4.	Jose Bodipo-N	Летbа			9.	Lega	ıl					
5.					10.	CEO	&	Gener	al I	Manager		
Cor	nsent Calendar	X Yes		<b>No</b> If no, schedule a dry run presentation.	Bud	geted	)	Yes		No (If no, exp	olain in Cos	t/Budgeted
	OM (IPR)	I.		DEPARTMENT					1	MAIL STOP	EXT.	DATE SENT
	tthew Powell			People Services & St	trategi	ies				B251	5371	11/14/25
	RRATIVE:											
Re	quested Action			Side Letter Agreements (SLAs) betw								
				for the California Public Employees'								
				ed by the Fair Labor Standards Act (I	LSA	) and d	loci	umentii	ng t	ne monetary	value for	tne
		mam	maintenance of required clothing.									
	Summary		SMUD staff is seeking Board approval to fulfill a CalPERS requirement that the Board publicly approve									
			etroactive language for the PSOA 2019-2023 Memorandum of Understanding (MOU) for holiday pay, to nsure compliance with CalPERS Government Code section 20636, and California Code of Regulations									
					it Cod	le secti	on	20636,	and	d California (	Code of I	Regulations
		(CCI	(), 1	Title 2, Section 571(b)(1).								
				taff is also seeking Board approval to								
				language for the PSOA 2023-2026 M								
		to en	sure	compliance with CalPERS Government	nent C	ode se	ctio	on 2063	36, a	and 2 CCR §	571(b)(1	).
	<b>Board Policy</b>	: Gove	rna	nce Process GP-3, Board Job Descrip	tion,	j) Take	su	ch othe	er ac	ction as may	be requir	ed by law.;
	(Number & Title	) Strat	egic	Direction SD-8, Employee Relations	5						_	•
	Benefits	: Ensu	re re	egulatory and reporting compliance w	vith go	overnn	nen	t code i	for l	PSOA benefi	its.	
	Cost/Budgeted	: The	isso	ciated costs are factored into the bi-w	reekly	payro	ll c	ontribu	ıtioı	ns for retiren	nent / pen	sion purposes.
	Alternatives	: If no	ap	proved, this could jeopardize the emp	loyee	's fina	l pe	ension o	calc	ulations and	non-com	pliance with
		CalPERS requirements / Public Employees Retirement Law.					•					
A	ffected Parties	: Publ	c Sa	afety Officers' Association (PSOA) a	nd SN	ИUD						
	Coordination	: Executive Office, People Services & Strateg				es, Employee Relations, Legal, and CalPERS						
	Presenter	: Matt	new	Powell, Interim Director, People Ser	vices	& Stra	iteg	gies				

Additional Links:		

SUBJECT
Public Safety Officers' Association (PSOA) Side Letter Agreements

ITEM NO. (FOR LEGAL USE ONLY)

Powering forward. Together.



December 1, 2025 LR 25-026

Shaun Du Fosee, Labor Consultant for PSOA Mastagni Holstedt 1912 I Street Sacramento, CA 95811

Roy Todd, PSOA 6100 Folsom Blvd., Mailstop K111 Sacramento, CA 95819

Subject: CalPERS: Uniform Allowance

The purpose of this side letter is to formalize the agreement between Sacramento Municipal Utility District (SMUD) and the SMUD Public Safety Officers' Association ("PSOA") to modify Article 19, Miscellaneous, Section 1, Uniforms and Work Clothing, in the 2023 – 2026 Memorandum of Understanding ("MOU") between the parties. All other terms and conditions of the existing MOU, including under Article 19, Section 1, shall remain in full force and effect.

CalPERS issued a determination regarding the compliance of Uniform Allowance, which is subject to Government Code Sections 20636, and California Code of Regulations(CCR), Title 2, Section 571(b)(1)(F).

Currently, the PSOA MOU between SMUD and PSOA references another document for uniforms and work clothing. CCR § 571(b)(1)(F) states that one of the requirements of special compensation is that it "Does not reference another document in lieu of disclosing the item of special compensation".

This side letter intends to clarify the language in the MOU, to include uniforms and maintenance.

**Current Language** 

Public Safety Officers' Associate (PSOA) MOU: Article 19- Miscellaneous

#### 1. UNIFORMS AND WORK CLOTHING

Uniforms and work clothing shall be issued in accordance with SOAP 005.

#### Updated/Revised Language

#### Public Safety Officers' Associate (PSOA) MOU: Article 19- Miscellaneous

#### 1. UNIFORMS AND WORK CLOTHING

SMUD will be the sole authority for determining the type of uniform and equipment to be purchased and utilized. SMUD will purchase and provide maintenance services for the uniforms through a third-party vendor. Each member of the Uniformed Security Operations Force will be measured and fitted by the uniform supplier for the uniform issuance.

The laundry and maintenance of the uniform will be up to \$554.05 each fiscal year based on the cost of maintaining and laundering of the uniform. The value of the uniform provided is reported to CalPERS as compensation subject to retirement contributions for employees in classic retirement tiers (not PEPRA). Individual articles of the uniform are replaced as needed.

Compensation will be reported in conformance with the Public Employees' Retirement Law, enabling regulations, and CalPERS' administrative interpretations and guidance. No compensation is included for pension purposes unless affirmatively permitted by CalPERS and applicable law.

If the above language reflects your understanding of our agreement, please sign in the space provided below.

Michelle Dungca

Michelle Dungca, Principal Labor Relations Analyst

Shaun A Du Fosee

Shaun Du Fosee, Labor Consultant PSOA

Roy Todd, PSOA President

Powering forward. Together.



December 1, 2025 LR 25-029

Shaun Du Fosee, Labor Consultant for PSOA Mastagni Holstedt 1912 I Street Sacramento, CA 95811

Roy Todd, PSOA 6100 Folsom Blvd., Mailstop K111 Sacramento, CA 95819

Subject: CalPERS: Holiday Pay

The purpose of this side letter is to formalize the agreement between Sacramento Municipal Utility District (SMUD) and the SMUD Public Safety Officers' Association ("PSOA") to retroactively modify Article 7, Holidays, Section 2 (B), Regular Holiday Pay, in the 2019 – 2022 Memorandum of Understanding ("MOU") between the parties. All other terms and conditions of the MOU shall remain in full force and effect.

CalPERS issued a determination regarding the compliance of Holiday Pay, which is subject Government Code Sections 20636, and California Code of Regulations Section (CCR) 571(b).

The 2019-2022 MOU between SMUD and PSOA was unintentionally silent on positions that are required to work without regard to a holiday. In the subsequent 2023-2026 MOU, the intended language for Holiday Pay was corrected to codify existing practice. This side letter clarifies that the intended language also applies to 2019-2022 MOU (effective January 1, 2019- December 31, 2022), to align with the current 2023-2026 MOU language regarding Holiday Pay.

Original 2019-2022 Language

Public Safety Officers' Associate (PSOA) MOU: Article 7- Holidays

#### 2. HOLIDAY PAY

- B. Regular Holiday Pay
- 1) When a holiday falls on an employee's regularly scheduled workday, the employee will be given the day off and will be compensated for the number of hours the

employee is regularly scheduled to work on that day. When a holiday is observed on an employee's regular day off, the employee is credited with 8 hours of personal leave.

Updated/Revised Language Applicable to the 2019-2022 MOU (currently reflected in the 2023-2026 MOU)

#### Public Safety Officers' Associate (PSOA) MOU: Article 7- Holidays

#### 2. HOLIDAY PAY

- B. Regular Holiday Pay
- 1) When a holiday falls on an employee's regularly scheduled workday, the employee will be compensated for the number of hours the employee works on that day.
- 2) Employees who work on a holiday shall be paid at the double-time rate of pay for the hours worked in addition to holiday pay as specified below.
- 3) When a holiday is observed on an employee's regular day off, the employee is credited with 8 hours of personal leave

Compensation will be reported in conformance with the Public Employees' Retirement Law, enabling regulations, and CalPERS' administrative interpretations and guidance. No compensation is included for pension purposes unless affirmatively permitted by CalPERS and applicable law.

If the above language reflects your understanding of our agreement, please sign in the space provided below.

Michelle Dungca, Principal Labor Relations Analyst

Shaun Du Fosee, Labor Consultant PSOA

Rov Todd. PSOA President

Michelle Dungca

Shaun A Du Fosse

SSS N	No. ET	&C 2	5-050		

#### STAFFING SUMMARY SHEET

Committee Meeting & Date
Finance & Audit – 12/09/25
Board Meeting Date
December 11, 2025

	то					ТО								
1.	Ryan McManus						6.	Scott Martin						
2.	Jennifer Restivo					7.	Lora A	Lora Anguay						
3.	Suresh Kotha					8.	Jose B	Bod	ipo-M	em	ba			
4.	Brandy Bolde	n					9.	Legal						
5.	Frankie McDe	erm	ott				10.	10. CEO & General Manager						
Cor	Consent Calendar X Yes No If no, schedule a dry run presentation.					e a dry run presentation.	Bud	geted	X	Yes		No (If no, exp section.)	olain in Cos	t/Budgeted
FROM (IPR) DEPARTMENT									MAIL STOP	EXT.	DATE SENT			
Cha	Chad Adair Energy Trading & Co					ontracts A404 6151 11/14/25					11/14/25			
NA	NARRATIVE:													

#### **Requested Action:**

Authorize the Chief Executive Officer and General Manager, or his designee, to execute, substantially in form attached, Firm Storage Service (FSS) schedules with Central Valley Gas Storage, LLC, for:

- a. 1 Bcf of natural gas storage service for the period April 1, 2026, through March 31, 2031; and
- b. Natural gas injection service for the period March 1, 2026, through April 1, 2026.

#### **Summary:**

SMUD has a contract for 1 billion cubic feet (Bcf) of storage inventory with a storage provider in Northern California that expires on March 31, 2026. A Request for Proposals (RFP) was issued to replace this contract upon expiration, and SMUD received offers from three storage providers. Central Valley Gas Storage, LLC, provided traditional bids and was the successful bidder for a five-year term. This new 1 Bcf transaction will maintain SMUD's storage capacity of 3 Bcf of inventory with injection rates of 10,000 Dth per day and withdrawal rates of 20,000 Dth per day. Reservation charge will be \$3.72 million per year. Variable charges are expected to average \$45,000/year. The contract term will run from April 1, 2026, through March 31, 2031. The increased cost is due to high volatility in natural gas and high demand for contracting across the entire state of California. This transaction will represent half of our total natural gas storage services and ensure the ability to provide reliability and flexibility during summer peaks and winter weather events and potential arbitrage opportunities.

Included in this contract is the ability for early injection that will allow SMUD to begin injecting gas into the Central Valley Gas Storage facility as early as March 1, 2026. This will give Gas Trading the flexibility to move gas from our existing expiring contract into the new agreement.

**Board Policy:** (Number & Title)

Strategic Direction SD-4, Reliability – natural gas storage supports peak load deliverability and provides protection against a failure of a transport path.; Strategic Direction SD-2, Competitive Rates – natural gas storage provides opportunities to reduce the overall cost of gas to SMUD through price arbitrage.

**Benefits:** 

SMUD benefits by providing reliability, operational flexibility and helps maintain stable commodity costs.

Cost/Budgeted:

Purchase of gas storage under the new agreement beginning April 1, 2026, has been included in the

Commodity Budget forecast.

Alternatives:

The alternative is to pursue more expensive gas storage; do not obtain storage.

**Affected Parties:** 

SMUD and Central Valley Gas Storage, LLC

**Coordination:** 

Energy Trading & Contracts, Risk, Treasury, Resource Planning and Legal

**Presenter:** 

Jon Olson, Director, Energy Trading & Contracts

Additional Links:			

SUBJECT

Contract for Natural Gas Storage and Injection Services

ITEM NO. (FOR LEGAL USE ONLY)

ITEMS SUBMITTED AFTER DEADLINE WILL BE POSTPONED UNTIL NEXT MEETING.

SMUD-1516 10/15 Forms Management

Page 1

#### APPENDIX FSS

#### FIRM STORAGE SERVICE

Appendix to CVGS/Sacramento Municipal Utility District Storage Services Agreement dated 10/23/2017. Transaction # CV-SMD-FS-1002

Central Valley Gas Storage, LLC (CVGS) and Sacramento Municipal Utility District (Customer) hereby adopt Service Schedule FSS, along with the previously executed Storage Services Agreement, and CVGS's Tariff, including its General Terms and Conditions and Transaction Management Procedures, and agree to the additional provisions contained in this Appendix FSS dated 11/17/2025:

Transaction Start Date:	4/1/2026	Transaction End Date:	3/31/2031
Injection Rights Start Da	te: 4/1/2026	Injection Rights End Date:	3/31/2031
Withdrawal Rights Start	Date: 4/1/2026	Withdrawal Rights End Date:	3/31/2031
Firm Inventory Capacity	MSQ:	1,000,000	Dekatherms
Minimum Storage Quan	ity/MinSQ:	-	Dekatherms
Maximum Daily Quantit	y/MDQ:		Dekatherms
Firm MDIQ: Inventor	y less than or equal to 100% of MSQ	10,152	Dekatherms/Day
Inventor	y more than% and less than or equal to%	of MSQ -	Dekatherms/Day
Inventor	y greater than% OF MSQ	-	Dekatherms/Day
Firm MDWQ: Inventor	y greater than% of MSQ	-	Dekatherms/Day
Inventor	y more than% and less than or equal to%	of MSQ -	Dekatherms/Day
Inventor	y less than or equal to 100% of MSQ	20,000	Dekatherms/Day

Point of Receipt:	CVGS/PG&E Citygate	Point of Delivery:	CVGS/PG&E Citygate
Inventory Demand Rate			per Dekatherm per month
Injection Demand Rate		N/A	per Dekatherm per month
Withdrawal Demand Rate		N/A	per Dekatherm per month
Injection Commodity Rate		N/A	per Dekatherm Injected
Withdrawal Commodity Rate		N/A	per Dekatherm Withdrawn
Inventory Transfer Fee		\$0.0000000	per Dekatherm Transferred
Authorized Overrun Rate		To be negotiated - as applicable	
Fuel Charge			Retention per Dekatherm Injected
Other Charges:			

The parties agree that by affixing their signatures hereto that this Appendix FSS is final and binding in accordance with Article 2 of Service Schedule FSS.

This Appendix FSS shall at all times be subject to changes or modifications by the California Public Utilities Commission as said Commission may direct, from time to time, in the exercise of its jurisdiction.

	Sacramento Municipal Utility District	Central Valley Gas Storage, LLC				
PER:		PER:				
NAME:		NAME:	Sam B. Wallace			
TITLE:		TITLE:	Chief Commercial Officer			

4/1/2026

#### APPENDIX FSS

Transaction Start Date:

#### FIRM STORAGE SERVICE

Transaction End Date:

Appendix to CVGS/Sacramento Municipal Utility District Storage Services Agreement dated 10/23/2017. Transaction # CV-SMD-FS-1001

Central Valley Gas Storage, LLC (CVGS) and Sacramento Municipal Utility District (Customer) hereby adopt Service Schedule FSS, along with the previously executed Storage Services Agreement, and CVGS's Tariff, including its General Terms and Conditions and Transaction Management Procedures, and agree to the additional provisions contained in this Appendix FSS dated 11/17/2025:

3/1/2026

Transaction Start Date.	3/1/2020	Transaction En	u Daic. 7/1/2020
Injection Rights Start Da	te: 3/1/2026	Injection Rights	s End Dat 4/1/2026
Withdrawal Rights Start	Date: 3/1/2026	Withdrawal Rig	ghts End I 4/1/2026
Firm Inventory Capacity	MSQ:	23	2,500 Dekatherms
Minimum Storage Quant	ity/MinSQ:	-	Dekatherms
Maximum Daily Quantity	y/MDQ:		Dekatherms
Firm MDIQ: Inventor	y less than or equal to 100% of MSQ	7,0	Dekatherms/Day
Inventor	y more than $\_\_$ % and less than or equal to $\_$	% of MSQ -	Dekatherms/Day
Inventor	y greater than% OF MSQ	-	Dekatherms/Day
Firm MDWQ: Inventor	y greater than% of MSQ	0	Dekatherms/Day
Inventor	y more than% and less than or equal to _	% of MSQ -	Dekatherms/Day
Inventor	y less than or equal to 100% of MSQ	-	Dekatherms/Day
Point of Receipt:	CVGS/PG&E Citygate	Point of Delive	ry: CVGS/PG&E Citygate
Inventory Demand Rate			per Dekatherm per month
Injection Demand Rate	N/A		per Dekatherm per month
Withdrawal Demand Rat	e <i>N/A</i>		per Dekatherm per month
Injection Commodity Ra	te N/A		per Dekatherm Injected
Withdrawal Commodity	Rate N/A		per Dekatherm Withdrawn
Inventory Transfer Fee	\$0.00	000000	per Dekatherm Transferred
Authorized Overrun Rate	To be	negotiated - as applic	cable
Fuel Charge			Retention per Dekatherm Injected
	ll volumes will be transferred to new contract		

The parties agree that by affixing their signatures hereto that this Appendix FSS is final and binding in accordance with Article 2 of Service Schedule FSS.

This Appendix FSS shall at all times be subject to changes or modifications by the California Public Utilities Commission as said Commission may direct, from time to time, in the exercise of its jurisdiction.

	Sacramento Municipal Utility District	Central Valley Gas Storage, LLC
PER:		PER:
NAME:		NAME:
TITLE:		TITLE:

SSS No. SCS 25-304	

#### STAFFING SUMMARY SHEET

Committee Meeting & Date
Finance & Audit - 12/09/25
Board Meeting Date
December 11, 2025

	то										ТО			
1.	. Casey Fallon						6.							
2.	2. Josh Langdon					7.								
3.	3. Lora Anguay					8.								
4.	4. Jose Bodipo-Memba					9.	9. Legal							
5.	Scott Martin						10.	CEO	&	Gener	al I	Manager		
Cor	Consent Calendar X Yes No If no, schedule a dry run presentation.				Bud	geted	Х	Yes		No (If no, exp section.)	olain in Cos	st/Budgeted		
FROM (IPR) DEPARTMENT										MAIL STOP	EXT.	DATE SENT		
Daı	Daniel Manfredi Procurement									EA404	6283	11/21/25		
NAI	NARRATIVE:													

#### **Requested Action:**

Authorize the Chief Executive Officer and General Manager, or his designee, to negotiate and award contracts to Acuren Inspection, Inc.; Alisto, Inc.; Kleinfelder, Inc.; and Prime EPC (collectively, the "Contracts") to provide gas pipeline owners engineering services for a five-year period from January 2, 2026, to January 2, 2031, for a total aggregate not-to-exceed amount of \$5 million across the Contracts.

#### **Summary:**

Request for Proposals Doc5245423100 (RFP) was issued in July 2025 to solicit qualified firms to provide Gas Pipeline Owners Engineering Services to support Power Generation projects. A majority of SMUD s available power generation relies on high-pressure gas transmission pipelines. Any errors or vulnerabilities could pose safety and/or reliability concerns, depending on the location of the issue. Therefore, it is imperative that the gas pipelines be maintained and constantly inspected.

The solicitation was issued with a provision to award multiple contracts for a five-year period. Individual Task Orders will be issued on an as-needed basis. The Task Orders under the Contracts are yet to be defined but are known to require services such as detailed studies which could include transmission pipeline, metering and regulation, valve station design, engineering consolation, and 49 CFR Part 192 program compliance and audits.

**Recommendation:** Award to the Highest Evaluated Responsive Proposers: Acuren Inspection, Inc.;

Alisto, Inc.; Kleinfelder, Inc.; and Prime EPC

Proposers Notified by Procurement: 41
Proposers Downloaded: 8

Pre-Proposal Conference Attendance: 10

Proposals Received: 4

Responsive Proposals Received	<u>P/F</u>	10 Points SEED	60 Points Technical	30 Points Pricing	Total Score	Over all Rank	Proposal Amount	Evaluated Proposal Amount	Proposed Award Amount
Alisto Inc.	P	10	41.25	30.00	81.25	1	\$1,094,000	\$1,039,300	NTE
Kleinfelder, Inc.	P	10	47.50	21.37	78.87	2	\$1,513,982	\$1,459,282	\$5,000,000, Aggregate of
Prime EPC	P	-	41.50	24.10	65.60	3	\$1,293,900	\$1,293,000	all Task Orders
Acuren Inspection , Inc.	Р	-	42.00	17.82	59.82	4	\$1,749,900	\$1,749,900	Olucis

<u>Comments</u>: The contracts include non-standard SMUD contract terms. SMUD staff, including Risk and Legal, are still negotiating the non-standard terms.

#### Supplier Diversity Program:

Alisto, Inc. and Kleinfelder, Inc. committed 20% Supplier Education & Economic Development (SEED) subcontracting participation for the duration of the contracts. Prime EPC has recently been approved as a SEED prime vendor but was not registered at the time of bidding.

**Board Policy:** (Number & Title)

Board-Staff Linkage BL-8, Delegation to the CEO with Respect to Procurement; Strategic Direction SD-7, Environmental Leadership; Strategic Direction SD-10, Innovation; Strategic Direction SD-13, Economic

Development

**Benefits:** 

The Contracts will provide gas pipeline engineering services to help maintain the stability and integrity of SMUD s gas pipeline assets and operations. SMUD Procurement achieved approximately \$201,625 in cost

savings through a best and final negotiation.

Cost/Budgeted:

\$5,000,000 Budgeted for 2026-2031 by Power Generation

**Alternatives:** 

Alternative 1) Break up the scope of services and solicit contracts for the individual categories of service. This option would require additional SMUD resources to manage the contracts. Alternative 2) SMUD could hire internally specialized engineering resources to perform the work in-house. Due to current staffing shortages nationwide, this option would likely not materialize in the time and effort needed to on board

internal resources.

Affected Parties: Coordination: Power Generation, Supply Chain Services, and Contractor Power Generation, Supply Chain Services, Risk, and Legal

**Presenter:** Josh Langdon, Director, Power Generation

Additional Links:			

SUBJECT

**Contract Award for Gas Pipeline Owners Engineering Services** 

ITEM NO. (FOR LEGAL USE ONLY)

ITEMS SUBMITTED AFTER DEADLINE WILL BE POSTPONED UNTIL NEXT MEETING.

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SSS No. SCS 25-291	

#### **STAFFING SUMMARY SHEET**

Committee Meeting & Date
Finance & Audit – 12/09/25
Board Meeting Date
December 11, 2025

	ТО				то								
1.	Casey Fallon				6.	Jose Bodipo-Memba							
2.	Emily Bacchini					7.							
3.	Frankie McDermott					8.							
4.	Scott Martin					9.	9. <b>Legal</b>						
5.	Lora Anguay					10.	CEO	&	Gener	al I	Manager		
Cor	Consent Calendar X Yes No If no, schedule a dry run presentation.			Bud	geted	Х	Yes		No (If no, exp section.)	olain in Cos	t/Budgeted		
FROM (IPR) DEPARTMENT									MAIL STOP	EXT.	DATE SENT		
Doug Moore Procurement										EA404	7069	11/13/25	
NAI	NARRATIVE:									•		•	

#### **Requested Action:**

Approve an increase to the aggregate contract not-to-exceed amount for Environmental Compliance and Program Development Services for Contract No. 4600001299 with AECOM Technical Services, Inc., Contract No. 4600001309 with Kleinfelder, Inc., and Contract No. 4600001315 with Brown and Caldwell (collectively, the "Contracts") by \$2.2 million, from \$8.8 million to \$11 million, across the three Contracts.

#### **Summary:**

The Contracts were originally awarded via Resolution No. 19-07-02, adopted on July 18, 2019, to AECOM Technical Services, Inc., Brown and Caldwell, and Kleinfelder, Inc. for Environmental Compliance and Program Development Services for the period from September 16, 2019, to August 18, 2022, with an optional two-year extension for a total not-to-exceed ("NTE") aggregate amount of \$8 million. This Contract Change requests approval to increase the total NTE aggregate amount from \$8.8 million to \$11 million to allow the contractors to provide SMUD uninterrupted services, enabling ongoing and upcoming projects to proceed without delay while SMUD develops a Request for Proposals (RFP) and awards replacement contracts by July of 2026. The additional funding is necessary to ensure that SMUD can sustain our environmental initiatives and meet regulatory standards effectively as demand for environmental expertise and the critical importance of environmental compliance increases in all aspects of SMUD's operations.

The following is a summary of contract changes to date.

<b>Contract Actions</b>	Amount	Cumulative Total (NTE)	Description
Original Contracts	\$6,000,000	\$6,000,000	• 4600001299 AECOM
			<ul> <li>4600001315 Brown and Caldwell</li> </ul>
			• 4600001309 Kleinfelder
Contract Change	\$0	\$6,000,000	Extended expiration
			• 4600001299 CC1 AECOM
			• 4600001309 CC1 Kleinfelder
			<ul> <li>Extend expiration and increase rates</li> </ul>
			• 4600001315 CC1 Brown and Caldwell
Contract Change	\$0	\$6,000,000	Added subcontractor(s)
			• 4600001299 CC2 AECOM
			• 4600001309 CC2 Kleinfelder
Contract Change	Increase	\$8,000,000	Administrative CC to add Board-approved funding
	\$2,000,000		up to \$8M for option years
			• 4600001299 CC3 AECOM
			<ul> <li>4600001315 CC2 Brown and Caldwell</li> </ul>
			<ul> <li>4600001309 CC3 Kleinfelder</li> </ul>

Contract Change	\$0	\$8,000,000	<ul> <li>Extended Expiration</li> <li>4600001299 CC4 AECOM</li> <li>4600001315 CC3 Brown and Caldwell</li> <li>4600001309 CC4 Kleinfelder</li> </ul>
GM Contingency Contract Change	Increase \$800,000	\$8,800,000	Increase total aggregate NTE amount by GM Contingency, and increase unit rates  • 4600001299 CC5 AECOM  • 4600001315 CC4 Brown and Caldwell  • 4600001309 CC5 Kleinfelder
Pending Board Action	Increase \$2,200,000	\$11,000,000	Increase total aggregate NTE amount  • 4600001299 AECOM  • 4600001315 Brown and Caldwell  • 4600001309 Kleinfelder

**Board Policy:** Board-Staff Linkage BL-8, Delegation to the CEO with Respect to Procurement; Strategic Direction SD-4,

(Number & Title) Reliability; Strategic Direction SD-6, Safety Leadership

**Benefits:** The ability to sustain our environmental initiatives and meet regulatory standards effectively.

Cost/Budgeted: \$11,000,000; Budgeted for 2019-2026 by Safety, Environmental & Real Estate Services

Alternatives: Do not approve contract change and resume Environmental efforts once SMUD completes the current RFP

(est. July 2026). This would impact SMUD's ability to sustain our environmental initiatives and meet

regulatory standards effectively.

Affected Parties: Environmental, Health & Safety Services, Supply Chain Services, and Contractors

Coordination: Environmental, Health & Safety Services, Supply Chain Services, and Legal

Presenter: Emily Bacchini, Interim Director, Safety, Environmental & Real Estate Services

Ad	ditio	nal	Lin	ks:

SUBJECT	Contract Change for Environmental Compliance	ITEM NO. (FOR LEGAL USE ONLY)
	and Program Development Services	

ITEMS SUBMITTED AFTER DEADLINE WILL BE POSTPONED UNTIL NEXT MEETING.

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SSS No. CFO 24-020

#### **STAFFING SUMMARY SHEET**

Committee Meeting & Date
FINANCE & AUDIT - 2025
Board Meeting Date
N/A

ТО										ТО				
1.	Jose Bodipo-Memba					6.								
2.	Lora Anguay						7.							
3.	Scott Martin													
4.							9.	Lega	l					
5.							10.	CEO	&	Gene	ral	Manager		
Cor	sent Calendar	Yes	;	X	No If no, sched	ule a dry run presentation.	Bud	geted	Х	Yes		No (If no, exp section.)	olain in Cos	t/Budgeted
Lis	M (IPR) a Limcaco					DEPARTMENT Accounting						MAIL STOP B352	EXT. 7045	DATE SENT 12/18/23
NAI	RRATIVE:													
	Requested Action:				ne Board with ower Supply (	SMUD's financial rest Costs.	ults fo	or the y	ear-	-to-da	te p	eriod and a s	ummary	of SMUD's
	Summary:					D's financial results fo the Board of Directors		e year-to-date period and a summary of SMUD's current						
	Board Policy: (Number & Title) Benefits:		/ide	e B	oard member	P-3, Board Job Descrip s with information rega		; SMUI	O's	finan	cial	position and	SMUD'	s current power
,	Cost/Budgeted:	Incl	ude	ed i	in budget for i	nternal labor.								
	Alternatives:	Pro	ide	e ir	nformation via	n written memo/report t	to the	Board.						
A	ffected Parties:	Acc	oun	ntir	ng									
	Coordination:	Acc	oun	ntir	ng									
	Presenter:	Lisa	Li	mc	eaco, Director	of Accounting & Cont	roller							

Additional Links:			

SUBJECT
SMUD's Financial Results & Power Supply Costs

ITEM NO. (FOR LEGAL USE ONLY)

ITEMS SUBMITTED AFTER DEADLINE WILL BE POSTPONED UNTIL NEXT MEETING.

# SACRAMENTO MUNICIPAL UTILITY DISTRICT OFFICE MEMORANDUM

TO: Distribution DATE: November 26, 2025 ACC 25-031

FROM: Michael Wilson / Lisa Limcaco

#### SUBJECT: OCTOBER 2025 FINANCIAL RESULTS AND OPERATIONS DATA

We are attaching the financial and operating reports for the ten months of 2025. They include sales and generation statistics and other selected data.

The change in net position is an increase of \$435.2 million compared to a budgeted increase of \$165.7 million, resulting in a favorable variance of \$269.5 million.

We prepared these statements on the accrual basis of accounting, and they conform to generally accepted accounting principles. The bases for the budget amounts are:

- 1) Budgeted electric revenues are based on the Forecast of Revenues by the Pricing Department, adjusted for unbilled revenues; and
- 2) Budgeted operating expenses reflect the 2025 Budget approved by the Board of Directors on December 12, 2024.

#### **Change in Net Position Year To Date**



#### SACRAMENTO MUNICIPAL UTILITY DISTRICT EXECUTIVE SUMMARY For the Ten Months Ended October 31, 2025

#### **Net Position**

• The change in net position is an increase of \$435.2 million compared to a budgeted increase of \$165.7 million, resulting in a favorable variance of \$269.5 million.

#### Revenues

- Revenues from sales to customers were \$1,579.8 million, which was \$3.6 million higher than planned. The increase is primarily due to:
  - Higher than planned commercial sales of \$12.5 million.
  - o Lower residential sales of \$11.6 million primarily due to a decrease in customer usage.
  - Lower provision for uncollectible accounts of \$2.4 million. The current balance of the accumulated provision is sufficient to cover the write-offs of arrears.
- Revenues under the California Global Warming Solutions Act (Assembly Bill [AB] 32) were \$16.8 million. This is due to carbon allowances sold through the state sanctioned quarterly auctions.
- Low Carbon Fuel Standard (LCFS) revenues were \$6.5 million due to LCFS credit sales.
- Other electric revenues increased by \$6.2 million, primarily due to higher than anticipated field service charges, and other miscellaneous service revenue.
- Non-cash revenues transferred to the stabilization fund were \$27.0 million, of which \$17.0 million was for AB-32, \$6.5 million was for LCFS, and \$3.5 million was for the annual WAPA Hydro Generation Adjustment. Funds are deferred until SMUD has qualified program expenses (projects that reduce carbon emissions or electric vehicle programs) to recognize revenue.
- Non-cash revenues transferred from the rate stabilization fund were \$31.1 million, of which \$11.2 million was for revenue recognized for AB-32, \$12.7 million was for LCFS and Community Impact Plan, and \$7.2 million was for revenue recognized for the annual Hydro Generation Adjustment.

#### Commodities, Purchased Power, and Production

- SMUD's generation was lower by 589 GWh (9.1 percent); JPA and other generation was lower by 310 GWh (6.3 percent); and Hydro generation was lower by 279 GWh (18.1 percent).
- Purchased power expense of \$351.7 million, less surplus power sales of \$102.3 million was \$249.4 million. This was \$5.5 million lower than planned mainly due to favorable market prices and milder weather, which resulted in increased power procurement and a reduction in thermal and hydro generation.
- Production operations cost of \$251.0 million less surplus gas sales of \$61.6 million, was \$189.4 million, which was \$41.2 million lower than planned. This is primarily due to reduced costs for carbon allowances, fuel, and the operation of hydro and thermal assets.
  - Carbon allowances decreased by \$16.9 million, primarily due to lower market prices, which reduced excess thermal sales and eliminated the need for additional carbon allowances. This was further impacted by a decline in carbon prices.
  - Fuel costs of \$137.3 million less surplus gas sales of \$61.6 million, was \$75.7 million, which was \$16.1 million lower than planned, primarily due to the reduction in thermal generation because of the milder-than-expected weather conditions and lower fuel prices.
  - Hydro production expenses were \$3.1 million lower, primarily driven by reduced labor costs, decreased outside services, and the later than planned start time of mitigation studies at Union Valley.
  - Other power generation expenses decreased by \$3.0 million, primarily due to lower operational costs at thermal plants.
- The "power margin", or sales to customers less cost of purchased power, production operations costs and gas hedges included in investment revenue was \$1,140.1 million, which was \$49.4 million higher than planned. The power margin as a percentage of sales to customers was 72.2 percent, which was 3.0 percent higher than planned. This is due to higher sales to customers and lower production costs due to lower carbon allowances, fuel expenses, and operating costs of the thermal plants.

#### Other Operating Expenses

- All other operating expenses were \$851.0 million, which was \$84.3 million lower than planned.
  - Transmission and distribution operations expenses were down \$28.8 million primarily due to lower transmission fees than planned.
  - Customer service and information expenses were down \$11.6 million primarily due to lower participation in My Energy Optimizer Partner Plus, delays to School Hosted Solar program, and transportation electrification projects.
  - Administrative & General expenses were down \$31.7 million primarily due to delayed start to projects such as Agile product teams, SAP S4 HANA, and Extended Day Ahead Market, lower spend compared to plan on the ZCES Grant Strategy project, along with the cancellation of the Enterprise Asset Analytics project.
  - Public Good expenses were higher by \$1.9 million primarily due to increased spending related to
    Distributed Energy Solutions commercial programs such as Smart Homes, Complete Energy Solutions
    as well as more participation in low income building electrification programs such as the Community
    Impact Plan Meadowview project.
  - Transmission and distribution maintenance expenses were \$7.4 million lower than planned, primarily due to lower vegetation management costs and improved tree work efficiency.
  - Non-cash depreciation and amortization was lower by \$10.3 million primarily due to certain projects that were scheduled for completion but are still underway.

#### Non-operating Revenues and Expenses

- Other revenue, net, was \$113.6 million higher than planned primarily due to payments received from the Inflation Reduction Act (IRA) and IRS Investment Tax Credit programs for clean energy projects, grant revenue, higher interest income, a Rancho Seco Solar power purchase agreement payment, and a gain on the Sacramento Municipal Utility District Financing Authority bond defeasance.
- Interest charges were \$9.3 million lower than planned due to lower interest on long-term debt and commercial paper expenses.

# SACRAMENTO MUNICIPAL UTILITY DISTRICT STATEMENTS OF REVENUES, EXPENSES AND CHANGES IN NET POSITION For the Month Ended October 31, 2025 (thousands of dollars)

<b>(</b>		Actual	,	Budget		Over (Under)	Percent of Increase (Decrease)
ODEDATING DEVENUES							
OPERATING REVENUES	Φ	100 171	Φ	120 010	Φ	(46 620)	(40.0) 0/
Sales to customers	\$	122,171	\$	138,810	\$	(16,639)	(12.0) %
Sales of surplus power		7,635		3,366		4,269	126.8
Sales of surplus gas		7,693		-		7,693	
SB-1 revenue (deferral)/recognition, net		217		-		217	00.0
Other electric revenue		4,058		3,298		760	23.0
Revenue from rate stabilization fund Total operating revenues		2,236 144,010		1,926 147,400		(3,390)	(2.3)
Total operating revenues		144,010		147,400		(3,390)	(2.3)
OPERATING EXPENSES							
Operations							
Purchased power		43,244		42,866		378	0.9
Production		22,563		18,197		4,366	24.0
Transmission and distribution		8,201		12,158		(3,957)	(32.5)
Customer accounts		5,223		5,057		166	3.3
Customer service and information		10,024		10,093		(69)	(0.7)
Administrative and general		18,124		20,712		(2,588 <sup>°</sup> )	(12.5)
Public good		5,571		5,126		445	8.7
Total operations		112,950		114,209		(1,259)	(1.1)
Maintaga							
Maintenance		0.400		2.400		0.004	07.0
Production		6,403		3,409		2,994	87.8
Transmission and distribution  Total maintenance		12,198 18,601		12,083 15,492		115 3,109	1.0 20.1
Total Maintonanos		10,001		10,102		0,100	20.1
Depreciation and amortization							
Depreciation and amortization		24,266		25,243		(977)	(3.9)
Amortization of regulatory asset		4,103		3,883		220	5.7
Total depreciation and amortization		28,369		29,126		(757)	(2.6)
Total operating expenses		159,920		158,827		1,093	0.7
OPERATING INCOME (LOSS)		(15,910)		(11,427)		(4,483)	39.2
NON-OPERATING REVENUES AND EXPENSES							
Other revenues/(expenses)							
Interest income		4,112		2,502		1,610	64.3
Investment revenue (expense)		(362)		2,002		(362)	*
Unrealized holding gains (losses)		(382)		_		(382)	*
Revenue - CIAC		2,111		- 1,821		290	15.9
Other income (expense) - net		(1,016)		1,621		(1,177)	(731.1)
Total other revenues		4,463		4,484		(21)	(0.5)
				·		` '	, ,
Interest charges						<b></b>	,,,, -·
Interest on long-term debt		8,414		9,396		(982)	(10.5)
Interest on commercial paper and other		42		125		(83)	(66.4)
Total interest charges		8,456		9,521		(1,065)	(11.2)
CHANGE IN NET POSITION	\$	(19,903)	\$	(16,464)	\$	(3,439)	20.9 %

<sup>\*</sup> Equals 1000% or greater.

# SACRAMENTO MUNICIPAL UTILITY DISTRICT STATEMENTS OF REVENUES, EXPENSES AND CHANGES IN NET POSITION For the Ten Months Ended October 31, 2025 (thousands of dollars)

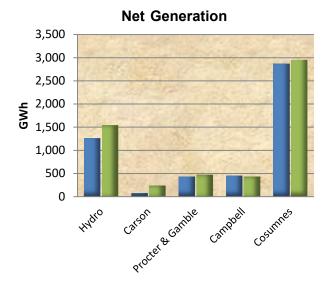
		Actual		Budget		Over (Under)	Percent of Increase (Decrease)
OPERATING REVENUES							
Sales to customers	\$	1,579,832	\$	1,576,193	\$	3,639	0.2 %
Sales of surplus power	Ψ	102,264	*	117,555	Ψ	(15,291)	(13.0)
Sales of surplus gas		61,622		-		61,622	*
SB-1 revenue (deferral)/recognition, net		1,176		-		1,176	*
AB-32 revenue		16,780		-		16,780	*
LCFS revenue		6,457		-		6,457	*
Other electric revenue		39,270		33,055		6,215	18.8
Revenue to rate stabilization fund		(27,012)		-		(27,012)	*
Revenue from rate stabilization fund		31,055		22,694		8,361	36.8
Total operating revenues		1,811,444		1,749,497		61,947	3.5
OPERATING EXPENSES Operations Purchased power		351,668		372,418		(20,750)	(5.6)
Production		251,011		230,614		20,397	8.8
Transmission and distribution		76,799		105,564		(28,765)	(27.2)
Customer accounts		70,799 50,859		49,048		1,811	3.7
Customer service and information		77,224		88,841		(11,617)	(13.1)
Administrative and general		167,260		198,993		(31,733)	(15.9)
Public good		58,212		56,281		1,931	3.4
Total operations		1,033,033		1,101,759		(68,726)	(6.2)
Maintenance		1,000,000		., ,		(00,1=0)	(=:=)
Production		44,094		44,410		(316)	(0.7)
Transmission and distribution		102,223		109,649		(7,426)	(6.8)
Total maintenance		146,317		154,059		(7,742)	(5.0)
Depreciation and amortization  Depreciation and amortization		233,353		243,657		(10,304)	(4.2)
Amortization of regulatory asset		40,997		38,828		2,169	5.6
Total depreciation and amortization		274,350		282,485		(8,135)	(2.9)
Total operating expenses		1,453,700		1,538,303		(84,603)	(5.5)
OPERATING INCOME		357,744		211,194		146,550	69.4
NON-OPERATING REVENUES AND EXPENSES Other revenues (expenses)							
Interest income		40,142		25,184		14,958	59.4
Investment revenue (expense)		(894)		-		(894)	*
Unrealized holding gains		458		-		458	*
Revenue - CIAC		18,260		18,153		107	0.6
Gain on extinguishment of debt		2,930		-		2,930	*
Other income (expense) - net		100,127		4,096		96,031	*
Total other revenues		161,023		47,433		113,590	239.5
Interest charges		04.504		00.040		/7.050\	(0.0)
Interest on long-term debt		81,564		88,916		(7,352)	(8.3)
Interest on commercial paper and other		2,012		3,989		(1,977)	(49.6)
Total interest charges	Φ.	83,576	Φ.	92,905	Φ.	(9,329)	(10.0)
CHANGE IN NET POSITION	\$	435,191	\$	165,722	\$	269,469	162.6 %

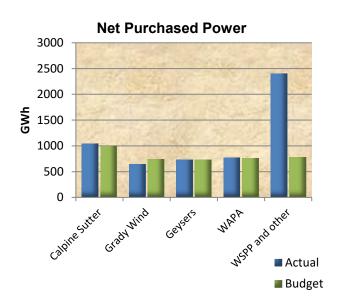
<sup>\*</sup> Equals 1000% or greater.

#### SACRAMENTO MUNICIPAL UTILITY DISTRICT SOURCES AND USES OF ENERGY - COMPARED TO BUDGET For the Period Ended October 31, 2025

			Increase			Increase
	Moi	nth	(Decrease)	Year t	o Date	(Decrease)
Sources of Energy (GWh)	Actual	Budget	Percentage	Actual	Budget	Percentage
Net Generated						
Hydro	68	44	54.5	1,262	1,541	(18.1)
Carson Power Plant	29	44	(34.1)	79	243	(67.5)
Procter & Gamble Power Plant	30	52	(42.3)	439	474	(7.4)
Campbell Power Plant	94	106	(11.3)	456	437	4.3
Cosumnes Power Plant	-	49	(100.0)	2,871	2,948	(2.6)
Other	33	57	(42.1)	744	797	(6.6)
Total net generation	254	352	(27.8)	5,851	6,440	(9.1)
Purchased Power less transmission	losses:					
CalEnergy	19	19	0.0	159	186	(14.5)
Calpine Sutter	167	183	(8.7)	1,045	996	4.9
Drew Solar	25	24	4.2	274	265	3.4
Feed in Tariff	14	15	(6.7)	184	192	(4.2)
Geysers	75	74	1.4	730	730	0.0
Grady Wind	76	74	2.7	647	741	(12.7)
Rancho Seco PV II	16	26	(38.5)	260	300	(13.3)
WAPA	58	41	41.5	773	761	1.6
WSPP and other	332	108	207.4	2,400	779	208.1
Other long term power	35	52	(32.7)	446	527	(15.4)
Total net purchases	817	616	32.6	6,918	5,477	26.3
Total sources of energy	1,071	968	10.6	12,769	11,917	7.1
Uses of energy:						
SMUD electric sales and usage	775	820	(5.5)	8,823	8,888	(0.7)
Surplus power sales	267	114	134.2	3,721	2,659	39.9
System losses	29	34	(14.7)	225	370	(39.2)
Total uses of energy	1,071	968	10.6 %	12,769	11,917	7.1 %
* Change aguals 1000% or mare				,		

<sup>\*</sup> Change equals 1000% or more.





Net generation is lower than planned for the ten-month period.

- Hydro generation is lower than planned (18.1 percent).
- JPA generation is lower than planned (6.3 percent).

Purchased power, less surplus power sales, is higher than plan (13.4 percent).

# SACRAMENTO MUNICIPAL UTILITY DISTRICT STATEMENTS OF NET POSITION

# October 31, 2025 and 2024 (thousands of dollars)

(tilousalius of uoliais)					
		<u>Total</u>			
		2025	202	24 (restated)	
ELECTRIC UTILITY PLANT				, ,	
Plant in service, original cost	\$	7,958,845	\$	7,459,094	
Less accumulated depreciation	Ψ	4,032,917	Ψ	3,828,089	
Plant in service - net		3,925,928		3,631,005	
Construction work in progress		797,729		843,949	
Investment in Joint Power Agencies		43,656		41,102	
Total electric utility plant - net		4,767,313		4,516,056	
RESTRICTED ASSETS					
Restricted for payment of debt service		50,436		32,676	
JPA funds		27,709		36,307	
Nuclear decommissioning trust fund		10,261		9,832	
Rate stabilization fund		346,346		216,087	
Other funds		62,547		66,241	
Due (to) from unrestricted funds (decommissioning)		(6,684)		(6,684)	
Due (to) from restricted funds (decommissioning)		6,684		6,684	
Less current portion		(127,567)		(119,507)	
Total restricted assets		369,732		241,636	
CURRENT ASSETS					
Cash, cash equivalents and investments					
Unrestricted		776,361		705,435	
Restricted		127,567		119,507	
Accounts receivable - net		325,925		301,764	
Lease receivable		496		679	
Energy efficiency loans due within one year		139		139	
Interest receivable		6,664		5,656	
Lease interest receivable		23		30	
Regulatory costs to be recovered within one year		93,524		76,701	
Derivative financial instruments maturing within in one year		16,479		12,955	
Inventories		208,557		170,110	
Prepaid gas to be delivered within one year		44,772		40,853	
Prepayments and other		38,277		42,277	
Total current assets		1,638,784		1,476,106	
NONCURRENT ASSETS					
Regulatory costs for future recovery					
Decommissioning		91,781		95,170	
Pension		591,959		514,251	
OPEB		297,721		295,177	
Bond Issues		71		662	
Derivative financial instruments		304		204	
Derivative financial instruments		39,617		30,812	
Prepaid gas		702,832		747,602	
Lease receivable		16,217		16,928	
Energy efficiency loans - net		68		198	
Other		95,588		66,496	
Total noncurrent assets		1,836,158		1,767,500	
TOTAL ASSETS		8,611,987		8,001,298	
DEFENDED OUTEL OWO OF DECOURAGE					
DEFERRED OUTFLOWS OF RESOURCES		00.040		00.400	
Accumulated decrease in fair value of hedging derivatives		28,248		62,166	
Deferred ODER outflows		167,353		151,166	
Deferred ARO outflows		50,990		56,729	
Deferred ARO outflows		299		1,043	
Unamortized bond losses - other		26,161		30,620	
TOTAL ASSETS AND DEFENDED OUTFLOWS OF RESOURCES		273,051	Φ.	301,724	
TOTAL ASSETS AND DEFERRED OUTFLOWS OF RESOURCES	\$	8,885,038	\$	8,303,022	

# SACRAMENTO MUNICIPAL UTILITY DISTRICT STATEMENTS OF NET POSITION

# October 31, 2025 and 2024 (thousands of dollars)

	<u>Total</u>				
		2025	202	24 (restated)	
LONG-TERM DEBT - NET	\$	3,250,367		3,258,982	
CURRENT LIABILITIES					
Accounts payable		161,311		134,473	
Purchased power payable		38,273		34,539	
Credit support collateral obligation		6,508		8,950	
Long-term debt due within one year		130,825		138,065	
Accrued decommissioning		7,471		7,140	
Interest payable		39,610		43,445	
Accrued interest liability		177		200	
Accrued salaries and compensated absences		69,966		56,006	
Derivative financial instruments maturing within one year		25,941		41,035	
Customer deposits		6,012		2,192	
Lease and subscription software liability		35,279		33,723	
Other		54,926		55,530	
Total current liabilities		576,299		555,298	
NONCURRENT LIABILITIES					
Accrued decommissioning - net		105,826		108,485	
Derivative financial instruments		2,683		23,157	
Net pension liability		282,182		225,212	
Net OPEB liability		38,769		49,478	
Lease liability		18,901		46,354	
Other		145,451		88,283	
Total noncurrent liabilities		593,812		540,969	
TOTAL LIABILITIES		4,420,478		4,355,249	
DEFENDED INFLOWO OF DECOUDED					
DEFERRED INFLOWS OF RESOURCES  Accumulated increase in fair value of hedging derivatives		56,093		43,636	
Deferred pension inflows		765		8,416	
Deferred OPEB inflows		15,238		30,616	
Deferred lease inflows		15,803		16,815	
Regulatory credits		1,094,429		844,905	
Unamortized bond gains - other		31,363		29,865	
Unearned revenue		3,560		3,782	
TOTAL DEFERRED INFLOWS OF RESOURCES		1,217,251		978,035	
		.,= ,=		2.0,000	
NET POSITION					
Balance at beginning of year		2,812,118		2,586,698	
Net increase for the year		435,191		383,040	
TOTAL NET POSITION		3,247,309		2,969,738	
TOTAL LIABILITIES, DEFERRED INFLOWS OF RESOURCES AND NET POSITION	\$	8,885,038	\$	8,303,022	

#### SACRAMENTO MUNICIPAL UTILITY DISTRICT STATEMENTS OF CASH FLOWS For the Period Ended October 31, 2025

(thousands of dollars)

		Month	Ye	ar to Date
CASH FLOWS FROM OPERATING ACTIVITIES	•	0.4.0.00=		4 504 404
Receipts from customers	\$	216,687	\$	1,594,181
Receipts from surplus power and gas sales		24,788		164,899
Other receipts		1,777		80,631
Payments to employees - payroll and other		(30,983)		(372,087)
Payments for wholesale power and gas purchases		(37,686)		(447,309)
Payments to vendors/others		(35,685)		(452,510)
Net cash provided by operating activities		138,898		567,805
CASH FLOWS FROM NONCAPITAL FINANCING ACTIVITIES				(00.750)
Repayment of debt		-		(33,750)
Receipts from federal and state grants		6,989		15,404
Interest on debt		(713)		(38,250)
Net cash provided by (used in) noncapital financing activities		6,276		(56,596)
CASH FLOWS FROM CAPITAL AND RELATED FINANCING ACTIVITIE	S			
Construction expenditures		(58,285)		(426,437)
Contributions in aid of construction		2,821		24,553
Net proceeds from bond issues		-		331,574
Repayments and refundings of debt		-		(264,820)
Issuance of commercial paper		-		75,000
Repayments of commercial paper		-		(75,000)
Other receipts/payments - net		(1,138)		93,252
Interest on debt		(153)		(92,558)
Lease receipts/payments - net		(7,605)		(36,664)
Net cash used in capital and related financing activities		(64,360)		(371,100)
CASH FLOWS FROM INVESTING ACTIVITIES				
Sales and maturities of securities		147,185		903,755
Purchases of securities		(152,457)		(808,871)
Interest and dividends received		4,825		40,866
Investment revenue/expenses - net		(368)		(883)
Net cash (used in) provided by investing activities		(815)		134,867
Net increase in cash and cash equivalents		79,999		274,976
Cash and cash equivalents at the beginning of the month and year		611,808		416,831
Cash and cash equivalents at October 31, 2025	\$	691,807	\$	691,807
Cash and cash equivalents included in:				
Unrestricted cash and cash equivalents	\$	624,869	\$	624,869
Restricted and designated cash and cash equivalents		50,060		50,060
Restricted and designated assets (a component of the total of		•		,
\$369,731 at October 31, 2025)		16,878		16,878
Cash and cash equivalents at October 31, 2025	\$	691,807	\$	691,807

SSS No. IAS 2025-6	

# **BOARD AGENDA ITEM**

## **STAFFING SUMMARY SHEET**

Committee Meeting & Date	_
Finance & Audit	
December 9, 2025	
Board Meeting Date	

				TO.	1					TO		
ТО								ТО				
1.	1. Scott Martin			6.								
2.	Lora Anguay				7.							
3.	Jose Bodipo-M	lemba			8.							
4.					9.	Legal	l					
5.					10.	CEO	&	Genei	ral l	Manager		
Cor	nsent Calendar	Yes		<b>No</b> If no, schedule a dry run presentation.	Bud	geted	х	Yes		No (If no, exp section.)	plain in Cos	t/Budgeted
FRC	OM (IPR)			DEPARTMENT						MAIL STOP	EXT.	DATE SENT
	ire Rogers			Internal Audit Servic	es					B409	7122	11/25/25
	RRATIVE:	T 0	<u></u>									
Re	quested Action:			onal agenda item to provide Board ports issued by Internal Audit Service		oers wit	th t	he opp	port	unity to ask	questions	s and/or discuss
		recent	rep	onts issued by internal Audit Service	<b>.</b> S.							
	Summary:	Repor	ts is	ssued by Internal Audit Services:								
<u>Title</u>									<u>F</u>	Report N	<u>umber</u>	
	<ul> <li>Rancho Seco Audit Report 20-A-03</li> </ul>										280	08003
Joint Poles Audit Report									280	07882		
Customer Assistance - MED Rate									280	07980		
	<b>Board Policy:</b>		-Sta	aff Linkage BL-3, Board-Internal Au	ditor	Relatio	nsh	ip				
	(Number & Title)											
	Benefits:	N/A										
	Cost/Budgeted:	N/A	N/A									
	Alternatives:	N/A										
	Tittel littly es.	14/11	1.0/4.3									
A	affected Parties:	SMUI	SMUD Board and Internal Auditor									
	Coordination:	Intern	Internal Audit Services									
	Presenter:	Claire	Claire Rogers, Director, Internal Audit Services									

Additional Links:		

SUBJECT		ITEM NO. (FOR LEGAL USE ONLY)
OUDJECT		TILIVINO. (FOR LEGAL OSL ONLI)
	Internal Audit Services Reports	

## SACRAMENTO MUNICIPAL UTILITY DISTRICT

Office Memorandum

**TO**: Board of Directors **DATE**: November 6, 2025

Audit No. 25-A-003

28008003

FROM: Claire Rogers

SUBJECT: RANCHO SECO AUDIT REPORT NO. 25-A-003

Every five years an audit is conducted by an independent auditor to evaluate the adequacy of the Rancho Seco Quality Assurance and Audit Programs and the effectiveness of the programs' implementation. SMUD's Internal Audit Services (IAS) Department contracted to have this audit conducted by an independent auditor. The results are documented in the attached report.

Various routine audits are regularly conducted as part of the Rancho Seco Quality Assurance and Audit program. Because these audits focus on standard compliance, they are typically not shared with the Board or executive management team. However, this particular audit assesses whether the Quality Assurance and Audit program itself meets the requirements set by the Nuclear Regulatory Commission. Given the importance of this evaluation, this report is shared with the Board and executive management team.

It was the independent auditor's conclusion that these programs are in full compliance with applicable regulations. Implementation of the recommendations for program improvement presented in Attachment B of the attached report will strengthen the existing programs and will be implemented. The recommendations from the previous audit are currently in progress.

Attachment: Rancho Seco Quality Assurance Audit Report No. 25-A-003

cc:

Paul Lau Laura Lewis Frankie McDermott Scott Martin Farres Everly Suresh Kotha

Brandy Daniels-Bolden Jose Bodipo-Memba Lora Anguay

Josh Langdon

Rancho Seco Audit 25-A-003

Audit Title: Quality Assurance (QA) & Audit Programs Audit No.: 25-A-003

Audited Criteria: 10 CFR 72.144 & 72.176 Audit Areas: RSQM 2 & 18

Audit Start Date: September 29, 2025

Audit Completion Date: October 2, 2025

Report Issue Date: October 22, 2025

Organization(s) Audited: Quality Assurance

### Purpose:

Ensure the adequacy of the Sacramento Municipal Utility District (SMUD) Rancho Seco QA Program. Assess the effectiveness of QA Program implementation by examining areas that support QA Manual Section II (QA Program) and Section XVIII (Audits). The performance of this audit satisfies the requirement specified in the Rancho Seco Quality Manual (RSQM), criteria XVIII, 6.1.d.

### Scope:

This audit determined the adequacy and effectiveness of QA Program criteria by reviewing audit schedules, interviewing personnel, and examining applicable audit and surveillance records. The audit verified that QA elements were addressed in the QA program, audits were performed at required frequency, and qualified personnel conducted audits and surveillances.

### **Audit Team:**

Thomas Voss (Audit Team Leader)

### **Program Evaluation:**

The Rancho Seco QA Program and Audit Program are effectively implemented in accordance with established standards, procedures, and commitments. Rancho Seco maintains a system of planned and periodic audits consistent with regulations, commitments, and procedures. Plans, checklists, and audit reports are well-prepared by qualified individuals. Audit personnel demonstrate appropriate qualifications and independence. The maintenance and reduction of active site QA program documents is an ongoing concern identified in the previous 2020 audit of this area and identified in subsequent audits of other areas. The Manager, Rancho Seco Assets (MRSA) and the Program Manager, Regulatory Compliance – Power Generation have an acceptable plan to address this issue, with actions in-progress.

Rancho Seco Audit 25-A-003

### **Program Implementation Evaluation:**

The QA and Audit Programs remain effective overall. Minor deficiencies were identified in auditor qualification records and procedure clarity. Deficiencies include documentation inconsistencies in Lead Auditor certification documents, outdated audit procedure language, and limited resources for QA document maintenance. These items were captured in Potential Deviation from Quality PDQ 25-019 and nine Recommendations. The deficiencies are administrative in nature and do not compromise the independence or technical quality of the QA and Audit Programs.

#### Conclusion:

The Rancho Seco QA Program and Audit Program are effectively implemented in accordance with established standards, procedures, and commitments. Minor concerns related to auditor qualification documentation, outdated procedures, and limited resources for QA document maintenance are recognized but do not compromise program integrity. Corrective actions and recommendations have been provided to address these issues.

Thomas Voss	Digitally signed by Thomas Voss Date: 2025.11.06 15:32:19 -06'00'		
ıdit Team Leader		Date	

Audit Team Leader

(Note: This report was issued on October 22, 2025, and corrected on November 6, 2025

to add the Report Issue Date on page 1.)

Ryder Couch Digitally signed by Ryder Couch Date: 2025.11.06 15:07:25 -08'00'				
Program Manager, Regulatory Compliance Approval  Linda Wong  Digitally signed by Linda Wong  Date: 2025.11.06 15:01:21  -08'00'	Date			
Manager, Internal Audit Services Approval	Date			

### Attachments:

Appendix A: Audit Performance Discussion

Appendix B: Recommendations

Rancho Seco Audit 25-A-003

### **Appendix A – Audit Performance Discussion**

### **Overview and Methodology**

Audit 25-A-003 was conducted September 29 through October 2, 2025, to evaluate implementation of the Rancho Seco Quality Assurance (QA) and Audit Programs against RSQM Criteria II and XVIII and applicable requirements of 10 CFR 72.144, and 10 CFR 72.176. Additional audit criteria were from 10 CFR 71 Subpart H and from NRC Reg. Guides 1.144 and 1.146 with associated ANSI N45.2 standards. Audit methods included document reviews (procedures, plans, checklists, records), interviews with site personnel, and verification of audit schedules and auditor qualifications. Observations of in-process activities were limited to records retrieval and storage.

### **Quality Assurance Program Implementation**

The QA Program is established by the RSQM and implementing procedures (e.g., RSNAP-001, RSAP-0302). The program defines QA applicability to Important-to-Safety SSCs and provides for performance under controlled conditions and with independent quality verification. Interviews with the management staff confirmed awareness of responsibilities and independence. The program provides personnel training and indoctrination. Due to an apparent backlog of needed QA Program improvements, a Recommendation was written to ensure adequate resources are available for QA Program maintenance. Recommendations in this audit area are #s 1 through 5.

### Audit Program Effectiveness

Planned and periodic audits are implemented under RSQM Chapter XVIII and RSAP-1306. Review of audits from 2021 through 2025 verified use of written checklists, documentation of objective evidence, and independence of auditors. Recommendations in this area are #s 6 and 7.

### **Auditor and Surveillant Qualification**

Auditor and Lead Auditor qualifications were assessed per RSQM Chapter XVIII and RSAP-1306 Section 8. Records confirmed only qualified personnel performed audits. However, documentation discrepancies were found (missing signatures, absent written exam records) and documented in PDQ 25-019. These administrative deficiencies do not compromise the technical integrity of the program. Recommendations in this area are #s 8 and 9.

### **Corrective Actions and Previous Audit Results**

Review of PDQs from the 2020 audit of this area (PDQs 20-026, 20-027, and 20-028) found two closed and one open item. Timeliness of other corrective actions from audits after year 2020 was not satisfactory. Resourcing actions are in progress to address backlog. Tracking is maintained in the Rancho Seco Commitment Tracking system.

Rancho Seco Audit 25-A-003

### Appendix A (continued)

### References

- 1. IFSAR, Vol. 1, Ch. 11, Rev. 9, Quality Assurance
- 2. RSLBD-010, Rev. 5, Rancho Seco Quality Manual (RSQM)
- 3. RSNAP-001, Rev. 5, Nuclear Organization, Responsibilities, and Authorities
- 4. RSNAP-005, Rev. 01, Potential Deviation from Quality
- RSNAP-012, Rev. 1, General Employee Training CAT 1
- 6. RSAP-0302, Rev. 17, Configuration Identification
- 7. RSAP-1301, Rev. 6, Corrective Action Program
- 8. RSAP-1306, Rev. 12, Quality Audits and Surveillance Reports
- 9. RSAP-1310 Rev. 09, Deviation from Quality
- 10. RSAP-0601, Rev. 10, Nuclear Records Management
- 11. RSF-007, Rev. 1, GET CAT 1 Quality Assurance
- 12. RSF-134, Rev. 1, Training Attendance Roster, Course Number STO1GO100 Cat-1, for employees 16228, 20348, and 20953
- 13. DPG 22-072 (5/25/2022) and DPG 24-257 (5/21/2024), Biennial 10 CFR 72.48(d)(2) Reports
- 14. Audit Reports (2020 2025)
- 15. Auditor and Lead Auditor qualification and certification records
- 16. NRC Inspection Reports (3/25/2021; 12/14/2021; 8/16/2024)
- 17. Rancho Seco Commitment Tracker (RSCT)
- 18. Records Code Lists
- 19. SMUD Organizational Chart, CEO to Rancho Seco

### **Persons Contacted**

<u>Name</u>	<u>Title</u>	<b>Entrance</b>	<u>Exit</u>
Josh Langdon	Director, Power Generation	Χ	Х
Linda Wong	Manager Auditing, Internal Audit Services	X	Х
Ernie Miller	Manager, Rancho Seco Assets	X	Х
Ryder Couch	Program Manager, Regulatory Compliance –	X	Х
	Power Generation		
Oksana Bardosh	Paragon Energy, On Site Manager	X	Х
David	Assistant Superintendent, Rancho Seco	X	Х
Schwarzbart	Assets		
Joseph Orosco	Paragon Energy, Operations Supervisor		Х
Matt Criswell	Principal Mechanical Engineer	X	Х
Theresa Zuck	Office Technician		

Rancho Seco Audit 25-A-003

## **Appendix A (continued)**

## Potential Deviations from Quality (PDQ):

The QA and Audit Programs remain effective overall. Minor administrative deficiencies were documented under PDQ 25-019, specifically involving incomplete auditor qualification documentation, missing signatures, and absent written exam records. These are administrative in nature and do not compromise independence or technical quality.

Rancho Seco Audit 25-A-003

### Appendix B – Recommendations

- 1. Ensure adequate resources available for QA Program activities, such as corrective actions and procedure maintenance. For example, concerns noted during this audit and previous audits indicate procedures do not always effectively and efficiently define and implement the QA Program. An example noted in this audit is RSAP-1306 allows not initiating a PDQ if a deviation is corrected before completion of the audit. The requirements for initiating a PDQ do not allow this exception.
- 2. Revise RSAP-0302, Rev 17, Configuration Identification. Attachment 6, step 2.4 states: "... the QAP does apply to procurement of the auditing services for the outside, independent Fire Protection audit." However, QA audit of Fire Protection is neither required nor performed.
- Revise RSNAP-012 (General Employee Training CAT 1) to specifically state the CAT 1, Module 4 training is "QA Program indoctrination", as required by 10 CFR 72.144 (d). Additionally, add the "indoctrination" wording to the RSQM, section II, step 4.10.
- 4. Require the contracted auditors to correctly enter the Program Manager, Regulatory Compliance title on audit report signature blocks. Review of seven audit reports for years 2023, 2024, and 2025 found the signature block is titled "Program Manager, Reliability Compliance." The title should be Program Manager, <u>Regulatory</u> Compliance.
- 5. Determine if a specific management review of the QA Program should be documented annually. 10 CFR 72.144 (e) requires review of "the status and adequacy of the quality assurance program at established intervals."
- 6. Revise RSAP-1306 to remove the allowance in step 6.6.3.3 for not initiating a PDQ if a deviation is corrected before completion of the audit.
- 7. Revise RSAP-1306, section 9 to require retention of the records required by NRC Regulatory Guide 1.144, Section C.7, including the following: audit schedules, plans, checklists, reports, written replies, and record of completion of corrective actions.
- 8. Revise RSAP-1306, Att. 5, Experience: "auditing/surveillances, score 3". Surveillances are not acceptable for Lead Auditor certification.
- 9. Revise RSAP-1306, step 8.1.1 to include the NRC Reg. Guide 1.146/ANSI N45.2.23-1978, step 2.3.4 requirement: "nuclear quality assurance audit within the year prior to his qualification."



# **Joint Poles**

# **Executive Summary**

Internal Audit Services (IAS) has completed a review of Joint Pole Processing. The purpose of this audit was to evaluate the processes in place to manage joint pole processing and invoicing. This audit was included in the 2025 IAS Audit Plan.

Section 9511 of the California Public Utilities Code allows communications companies to access space on SMUD utility poles. Often these companies either lease space on SMUD poles—paying an annual rate based on the cost of ownership and SMUD covering maintenance and replacement costs—or they co-own sections of poles, sharing all related expenses. Line Assets' Line Design team is responsible for reviewing and approving all joint pole attachment requests, ensuring joint pole information is accurately recorded, and initiating the billing of communications companies for all applicable joint pole costs.

Our review confirmed the accuracy and appropriateness of charges for a sample of joint pole work and attachment applications. Some joint pole work was invoiced more than five years after completion, which Line Design explained was due to old paper-based processes and a significant backlog that existed at the time; in some cases, the team may not have been informed that work was finished, which delayed billing. The team sometimes discovers completed but unbilled work while processing new jobs and subsequently initiates billing. We confirmed that more recent joint pole work was consistently billed within six months of completion, indicating improved timeliness.

The Accounting department's Accounts Receivable-Other (ARO) team accurately tracks outstanding joint pole account balances, and the Revenue Assurance team is effectively addressing outstanding balances. We also confirmed that recent analyses have been conducted to establish an accurate pole attachment lease rate, and that current rates comply with California's Public Utilities Code lease rate requirements.

Finally, Line Design maintains a process to track joint pole attachment requests, approval dates, and confirmation of attachments. While co-owners are followed up with if confirmation is missing, there is not an efficient way to follow-up with tenants. The Line Design team plans to send reminders to tenants to reduce future unauthorized and unconfirmed attachments.

IAS would like to thank the Line Design team for their cooperation and support during this audit. We would also like to thank the Revenue Assurance and Accounts Receivable – Other teams for the assistance they provided.

**ERM Dashboard** 

**T&D Line Assets - Poles** 

# **Internal Audit Services**

# Joint Pole Processing

Audit Report 28007882







# **Joint Pole Processing**

# Internal Audit Services Report

## **Background:**

Internal Audit Services (IAS) has completed a review of Joint Pole Processing. The purpose of this audit was to evaluate joint pole processes. This audit was included in the 2025 IAS Audit Plan.

Section 9511 of the California Public Utilities Code requires local publicly owned utilities to make appropriate space and capacity on their poles for use by communications service providers (communications companies). These companies must request approval to attach to SMUD poles through an application process; attachments are unauthorized when they are made without having been approved by SMUD's Line Design teams. Communications companies may choose to lease space as a tenant on the pole and pay an annual rate for each attachment while SMUD is responsible for all maintenance and replacement costs; the lease rate is governed by section 9512 of the Public Utilities Code, which limits the lease amount to the annual cost of ownership for the usable space occupied by the tenant. If a pole is replaced, tenants are responsible for the costs associated with transferring their attachments. Alternatively, communications companies may choose to co-own a section of SMUD poles and pay a share of all costs related to maintenance or replacement of the pole. For co-owned poles, the Northern California Joint Pole Association (NCJPA) is responsible for calculating the costs of transactions and preparing bills of sales to be invoiced.

Line Assets' Line Design team is responsible for reviewing and approving all joint pole attachment requests, ensuring joint pole information is accurately recorded, and for initiating the billing of communications companies for joint pole attachment applications, maintenance, replacement, and lease costs. Accounting's Revenue, Commodities, and Accounts Receivable Other (ARO) group is responsible for invoicing related to joint poles, and for tracking and reporting outstanding joint pole accounts balances. They report outstanding joint pole invoice balances to the Revenue Assurance team in Customer Operations & Assistance each month, who is responsible for reaching out to the communications companies about outstanding invoice balances.

# Scope:

The scope of this audit included all information related to joint pole processing including all related applications, forms, job files, tracking sheets, and other documents (electronic and paper), SAP data, all applicable policies and procedures, and joint pole accounting and billing data and documentation.

## **Objectives:**

The objectives of this audit were to:

- 1. Evaluate the accuracy and timeliness of the joint pole billing process.
- 2. Evaluate the process for authorizing and tracking joint pole attachments.



## **Summary:**

IAS interviewed Line Design staff to understand the processes in place to review and approve attachment requests, and to bill joint pole co-owners and tenants for applicable costs. We also interviewed accounting staff and revenue assurance staff to understand how communications companies are invoiced, as well as how outstanding invoices are tracked and what processes were in place to collect outstanding balances. We also obtained and reviewed California Public Utilities Code requirements, as well as desk procedures related to joint pole processing and billing. Finally, we reviewed the NCJPA handbook to understand billing requirements for co-owned poles.

We reviewed a sample of invoices to communications companies to confirm the accuracy and timeliness of Line Design's and Accounting's billing processes. While all the invoices included accurate and appropriate charges for joint pole work or applications for attachments, we noted that some joint pole work was invoiced over five years after the work was completed. The Line Design team attributed these delays to the manual paper processes and significant backlog of work that existed at the time this joint pole work was done. In some instances, the team may not have been informed that the work was completed, preventing them from initiating billing. The team explained that they sometimes discover completed but unbilled joint pole work while processing new jobs and applications, and, as with the invoices in our sample, will complete billing promptly after the work is identified. We confirmed that for these cases billing appears to be initiated promptly after unbilled work is discovered. We also verified that the more recent joint pole work in our sample was billed within six months of completion, demonstrating that current processes allow for more timely billing.

We determined that the ARO team accurately tracks outstanding joint pole account balances, and that the Revenue Assurance team has effectively addressed outstanding balances. The balance of outstanding invoices varies from month to month depending on pole work and applications, but we noted several communications companies have outstanding balances that are well over a year old—some up to five years old. The Revenue Assurance team has been working to reach the appropriate contacts at these communications companies to address the balance; during the course of this audit, they successfully recovered over \$6.5 million of a \$7.75 million overdue balance from one account alone.

For leased poles, we also confirmed that recent analyses have been performed to determine an accurate pole attachment lease rate, and that the rates currently charged to tenants complies with the requirements of California's Public Utilities Code.

Finally, we confirmed Line Design has a process for authorizing and tracking joint pole attachment requests. Specifically, they track incoming requests, record the date the request was approved, and record attachment information when they receive confirmation of attachment. Joint pole co-owners and tenants are required to notify SMUD when they have attached to a pole; the Line Design team follows up with co-owners that have been approved to attach but have not confirmed their attachment; however, the team indicated that there is not an efficient way to follow up with tenants who have applied but have not attached; instead, they plan to remind communication



companies of their obligation to notify SMUD of their attachments through a notification letter, and will consider updating their makeready applications and approval emails to include language about the notification requirement.

### **Conclusion:**

Joint pole billing is accurate and appropriate, and the Line Design team is working to address a backlog and unprocessed joint pole work to ensure timely invoicing. The Accounts Receivable – Other team accurately tracks outstanding balances for joint pole accounts, and the Revenue Assurance team has been successful in collecting overdue balances. Additionally, lease rates for tenant attachments comply with statutory requirements. Finally, the Line Design team has a process for tracking pole attachment requests and has a plan to improve their process for addressing unconfirmed and unauthorized attachments.

IAS would like to thank Line Design for their cooperation and support during this audit. We would also like to thank the Revenue Assurance and Accounts Receivable – Other teams for the assistance they provided.



# **Customer Assistance – MED Rate**

# **Executive Summary**

Internal Audit Services (IAS) has completed a review of the Customer Assistance – MED Rate program. The purpose of the audit was to evaluate the processes in place to manage and deliver customer assistance programs, with a specific focus on the Medical Equipment Discount (MED) Rate program. This audit was included in the 2025 IAS audit plan.

SMUD, as a community-owned nonprofit utility, offers the MED Rate program to offset the cost of energy for approximately 8,300 residential customers who use qualifying electrically powered medical devices at home. The program provides a \$15 monthly discount on energy charges, with additional discounts available up to 30% of monthly energy charges for qualifying medical equipment prescribed by a health professional. Covered devices include dialysis cyclers, electric wheelchairs, oxygen concentrators, ventilators (excluding CPAP/BIPAP), and extraordinary heating or cooling needs related to medical conditions. Participants typically recertify every two years, or every four years if permanently certified by their physician.

IAS completed an evaluation of SMUD's MED Rate program and identified areas needing improvement to ensure alignment with published Rate Schedule MED, policy compliance and program integrity. While eligibility verification is performed, there was an instance where one application was missing the required health professional signature, and we became aware of the use of "on-the-spot" enrollments. Approximately 10% of recertifications were inconsistent with established timeframes due to manual date extensions used to manage workload and SAP system issues related to customer move events. The process of providing additional discounts beyond the standard \$15 credit showed gaps such as missing supervisor approvals, inaccurate logging of exceptions within SAP records, the auditor's recalculation of exceptions using the Customer Assistance team's decision matrix not aligning with the total number of exceptions provided to the participant, and discounts exceeding limits, linked in part to outdated procedures and potential billing issues. Recommendations include enforcing qualified health professional signature requirements, improving recertification processes, strengthening exception controls, and updating procedures.

IAS would like to thank Customer Operations & Assistance for their cooperation and support in conducting this audit. We also commend the staff for their hard work, commitment, and dedication to serving SMUD customers during times of need.

**ERM Dashboard** 

**Changing Customer Expectations** 



# Internal Audit Services

# Customer Assistance – MED Rate

Audit Report #28007980







# **Customer Assistance – MED Rate**

# Internal Audit Services Report

## **Background:**

As a community-owned, not for profit utility, SMUD is committed to delivering public-good programs to assist our customer-owners. One such initiative is the Medical Equipment Discount (MED) Rate, which provides a monthly discount to residential customers who require specific electrically powered medical devices at home. The primary purpose of this program is to help customers offset the energy costs associated with prescribed medical equipment essential to their health.

Currently, approximately 8,300 customers participate in the MED Rate program. To qualify for the MED Rate discount, customers must submit a completed application accompanied by certification from a qualified health professional confirming the medical necessity of the device. Currently, the program covers in-home dialysis cyclers, electric wheelchairs, oxygen concentrators, ventilators (excluding CPAP or BIPAP machines), and extraordinary heating (when utilizing an electric heat pump or resistant heat) or airconditioning, due to a medical condition. Typically, participants recertify every two years; however, for those with permanent needs as certified by their physician, recertification is required every four years.

Effective January 1, 2011, qualifying accounts receive a \$15 discount on their monthly energy charges. If this amount does not adequately address the customer's medical-related electricity usage, additional discounts—referred to as exceptions—may be granted in \$15 increments, up to a maximum of 30% off monthly energy charges. Customers seeking further assistance may contact SMUD to discuss eligibility for other qualifying medical devices.

In response to the COVID-19 pandemic and in alignment with other utilities, SMUD made a temporary policy change in April 2020 by suspending all MED Rate recertifications, discontinuing drops from the program, and waiving the requirement for qualified health professional signatures on applications. Subsequently, in August 2022, an online MED Rate application portal was introduced on SMUD's website, allowing customers to select qualifying devices and receive immediate approval without submitting a health professional's signature or full documentation.

In that same month, Customer Assistance—the team within Customer Operations & Assistance responsible for supporting the MED Rate program—learned that these changes were inconsistent with the published Rate Schedule MED (Tariff), which mandates completion of an application and certification from a qualified health professional. Recertifications resumed in April 2023, but the reinstatement of the signature requirement on applications was not implemented until November 2023. Notably, due to competing organizational priorities, the online portal that granted immediate approval without documentation remained accessible until it was finally removed on January 12, 2024.



## Scope:

The audit focused on evaluating customer assistance programs, specifically the MED Rate program. The audit period was January 1, 2023 to July 31, 2025.

## **Objectives:**

The objectives of the audit were to evaluate the SMUD MED Rate program and assess whether it's operating in alignment with its procedures.

## **Summary:**

IAS conducted interviews with staff from Customer Assistance (CA) to gain an understanding of their roles and responsibilities related to the SMUD MED Rate program. We also reviewed key program documentation, including the Tariff, the Rate Policy and Procedures Manual for MED Rate, and other relevant procedures.

To evaluate whether MED Rate program eligibility was properly validated prior to enrollment and in accordance with the Tariff and program procedures, IAS performed sampling of participant accounts. We evaluated whether eligibility criteria—such as rate qualification, qualifying medical equipment, and the presence of a qualified health professional's signature—were appropriately verified before enrollment. While rate qualification and medical equipment eligibility were confirmed, we identified an instance where required qualified health professional signature was missing and became aware of the use of "on-the-spot" enrollments during home visits and outreach events which do not require qualified health professional signatures until recertification. This underscores the need to ensure that only applications containing valid qualified health professional signatures are approved, in full compliance with Tariff requirements.

IAS also reviewed a sample of participant accounts to evaluate the timeliness of recertifications. Approximately 10% of recertifications were found to be inconsistent with established timeframes. This was primarily due to manual extensions of recertification dates to manage staff workload, as well as system-related issues within SAP connected to participant move-in and move-out activities. The SAP-related issue was previously unidentified by the CA team, who have since initiated an IT ticket to address it. This finding highlights an opportunity to improve the consistency and timeliness of recertifications through process and system enhancements.

Furthermore, the audit identified gaps in the management of exceptions—additional discounts granted beyond the standard \$15 credit. Specifically, there were missing documented supervisor approvals for accounts with three or more exceptions, inaccuracies in logging exceptions within SAP, the auditor's recalculation of exceptions using the CA team's decision matrix did not align with the total number of exceptions provided to the participant, and one instance where the discount provided exceeded the allowable maximum limit. These issues appear to be driven, in part, by outdated procedures and potential billing issues; this emphasizes the importance of strengthening exception approval and documentation processes, as well as updating procedures to reliably verify eligibility for extraordinary heating exceptions.



Finally, IAS reviewed a sample of accounts flagged through internal error reporting and concluded that staff resolved reported errors in a timely manner.

### **Conclusion:**

IAS completed an evaluation of SMUD's MED Rate program and identified several areas requiring improvement to ensure compliance with program procedures and maintain program integrity. While eligibility for rate qualification and qualifying medical equipment is verified, there was an instance where required qualified health professional signature was missing and we became aware of the use of "on-the-spot" enrollments. Recertifications are not always conducted within the required timeframes, with approximately 10% of participants recertification timeframes being inconsistent with standard timeframes due to manual extensions of recertification dates to manage workload and system issues in SAP related to move-in and move-out events. The process for managing exceptions revealed missing documented supervisor approvals, inaccurate recording in SAP, the auditor's recalculation of exceptions using the Customer Assistance team's decision matrix not aligning with the total number of exceptions provided to the participant, and a case where the discount exceeded the allowable maximum, partly due to outdated procedures and possible billing issues.

To address these issues, we recommend strengthening controls to require a qualified health professional's signature prior to enrollment, ensuring uniform and timely recertifications through process and system improvements, enhancing exception approval and documentation processes, and updating procedures to verify eligibility for extraordinary heating exceptions. Management has begun the process of addressing SAP system challenges and is encouraged to continue these efforts to uphold program fairness, accuracy, and compliance with SMUD policies.

IAS would like to thank Customer Operations & Assistance for their cooperation and support in conducting this audit. We also commend the staff for their hard work, commitment, and dedication to serving SMUD customers during times of need.



# **Customer Assistance – MED Rate**

## **Observations**

Observation 1 Quali	Qualified Health Professional Signatures			
Risk Ranking	Category	Department(s) Responsible	Planned Completion Date	
Medium	Process Improvement	Customer Operations & Assistance	1/1/2026	

### Criteria:

Per SMUD's Medical Equipment Discount Program Rate Schedule MED (Tariff), effective July 1, 2017, an application must be completed along with certification from a qualified health professional stating that a medical need exists to qualify.

### **Conditions:**

A review of a sample of MED Rate program enrollments revealed one recently approved application lacked the necessary qualified health professional's signature, indicating non-compliance with Tariff requirements.

Additionally, during the audit IAS became aware that "on-the-spot" enrollments can occur during home visits or outreach events which enroll participants without the required qualified health professional signature. These enrollments rely on staff assessment and documentation is not expected until the one-year recertification.

### Causes:

The application approved without the required qualified health professional's signature was likely the result of an oversight. Additionally, staff indicate that on-the-spot enrollments are infrequent, not documented in the program's official guidelines, and reserved for exceptional circumstances.

### Effects:

Though we recognize the desire to help vulnerable customers and provide positive customer experiences, permitting enrollment in the MED Rate program without a qualified health professional's signature undermines the program's integrity by diminishing confidence that only eligible customers receive benefits. This practice may lead to inconsistent application of the enrollment process across the participant population and is not in alignment with requirements outlined in the Tariff.

### Recommendations:

CA should ensure that only applications containing a valid signature from a qualified health professional are approved, in accordance with Tariff requirements. Additionally, CA should update the MED Rate procedures to explicitly require obtaining a valid medical professional's signature prior to enrollment—including during home visits and outreach events—and discontinue the practice of on-the-spot enrollments unless all Tariff required information is obtained at that time.



### **Management Responses:**

The Customer Assistance (CA) team agrees with IAS's recommendation.

CA will take the following corrective actions to ensure that MED Rate applications are completed, including a valid signature from a qualified health professional.

- 1. All MED Rate applications received and processed will include a valid signature from a qualified health professional stating that a medical need exists to qualify. Applications received without a certification from a qualified health professional will be returned to the customer, using the existing application return process.
- Quality assurance checks will be conducted on MED Rate applications to ensure applications being processed are complete and contain a valid signature from a qualified health professional.
- 3. Customer Assistance team members responsible for enrolling customers on MED Rate will be notified that on-the-spot enrollments are not permissible.
- 4. CA will explore updating the Medical Equipment Discount Program Rate Schedule MED (Tariff) to include an on-the-spot enrollment option for vulnerable customers who are at risk. Exploration will not commence till next rate process, which will take place in 2027.

It is anticipated that corrective action items 1-3 will be implemented by January 1, 2026.

Observation 2 MED	Rate Recertifications		
Risk Ranking	Category	Department(s) Responsible	Planned Completion Date
Low	Process Improvement	Customer Operations & Assistance	1/1/2026

### Criteria:

SMUD Rate Policy and Procedures Manual No. 05-03 - Residential Medical Equipment Discount (MED) Rate, Section 8.1, requires periodic recertification within a 12-48 month timeframe. The Customer Assistance (CA) team follows a standard recertification process, with a possible variation by a few months before or after, as follows: participants verified by a qualified health professional to have a permanent need for any qualified medical device are recertified every 48 months; those enrolled "on the spot" are required to recertify after 12 months; and all other participants must recertify every 24 months. Participants who fail to provide requested documentation within 90 days of their recertification date are dropped from the MED Rate.



### **Conditions:**

IAS tested whether participants remained enrolled past their recertification expiration dates and found that about 10% of recertification timeframes were inconsistent with standard timeframes, showing negative or irregular durations. Reviewing a sample of accounts with off-cycle recertification dates identified two main causes:

- 1) Move-In/Move-Out Activities There appears to be a system issue within SAP that causes recertification dates to become misaligned when participants move in or out during their recertification period, resetting the cycle to 30 days after the new move-in date and extending the due date by up to three months. For moves outside the recertification window, SAP retains the original recertification date but incorrectly updates the "valid from" or MED Approval Date to the move date.
- 2) Extensions of Recertification Dates One participant's due date was extended twice and affected by a move event, resulting in a total extension of 601 days (1 year and 7 months) beyond the original due date.

### Causes:

For participants who move, SAP appears to be modifying some key dates within the system that is impacting their recertification period. This issue was unknown to the CA team, who have since opened an IT ticket to resolve it.

Additionally, to manage workload, the CA team monitors upcoming monthly recertifications in SAP, aiming to maintain a pending recertification queue between 350 and 400 accounts each month. When this threshold is exceeded, staff determine how many accounts need to be pushed out, selects a new recertification date to be noted within SAP, and then SAP automatically selects accounts to apply recertification extensions to.

### **Effects:**

Participants who remain enrolled in the MED Rate without timely recertification may be receiving discounts longer than intended or despite no longer meeting eligibility requirements. Additionally, due to the random selection process SAP uses for extending recertification dates, combined with system errors related to participant move-in and move-out events, the recertification process could be unequally applied across the program population.

### Recommendations:

CA should ensure that the recertification process is applied uniformly to all participants and in alignment with established timeframes, while also updating procedures to reflect the modified process. Additionally, CA should ensure SAP system improvements are implemented that maintain accurate and consistent recertification dates throughout move-in and move-out events. It is noted that the CA team has proactively initiated an IT ticket (INC0150849) to address the current tracking issues related to participant moves; continued monitoring and follow-up on this effort are recommended to ensure timely resolution.



### **Management Responses:**

The Customer Assistance (CA) team agrees with IAS's recommendation.

CA will take the following corrective actions to ensure that the recertification process is applied uniformly to all participants and in alignment with established timeframes, while also updating procedures to reflect the modified process.

- 1. The SMUD Rate Policy and Procedures Manual No. 05-03 Residential Medical Equipment Discount (MED) Rate, Section 8.1 will be updated to ensure Section 8.1 states that the recertification process is applied uniformly to all participants and in alignment with established timeframes.
- 2. The SMUD Rate Policy and Procedures Manual No. 05-03 Residential Medical Equipment Discount (MED) Rate will be updated to address when the recertification queue exceeds 450 accounts, it allows the team the ability to push out recertifications and select new recertification dates to be noted within SAP., and ensure SAP automatically selects accounts to apply recertification extensions to.
- The CA team initiated an IT ticket (INC0150849) to address the current tracking issues related to participant moves. This ticket has been completed and the SAP system errors related to participant move-in/move-out events were fixed on September 15, 2025.

It is anticipated that all corrective action(s) will be implemented by January 1, 2026.

Observation 3 MED Rate Exceptions				
Risk Ranking	Category	Department(s) Responsible	Planned Completion Date	
Low	Process Improvement	Customer Operations & Assistance	4/1/2026	

#### Criteria:

The SMUD MED Rate Tariff specifies that if the standard \$15 discount does not adequately address a household's medical electricity needs, customers may contact SMUD to explore eligibility for additional assistance. The SMUD MED Rate Application Business Rules detail the criteria for receiving additional discount increments (exceptions) of \$15, with a maximum total discount capped at 30% of the participant's monthly energy charges. Furthermore, the MED Rate Equipment Exceptions procedure requires three or more exceptions to be approved by a supervisor and that staff are to update the SAP Contact Log with the appropriate exception-related activity code.

### **Conditions:**

IAS reviewed a sample of exception requests during the audit period, evaluating compliance with program requirements and verifying billing against the 30% maximum MED discount limit for amounts exceeding \$15. Several issues were identified in the exception process based on the samples reviewed:



- For 100% of accounts with three or more exceptions, supervisor approval was not documented.
- In 80% of sampled accounts, exceptions were not accurately logged in SAP within the Contact Log.
- In 80% of sampled accounts, the auditor's recalculation of exceptions using the CA team's decision matrix did not align with the total number of exceptions provided to the participant.
- One sampled account was found to be receiving a discount of 71.2% on the tested invoice, significantly exceeding the program's 30% maximum discount limit.

### Causes:

The CA team does not retain the completed exception decision matrix used to determine approved exceptions. As a result, we cannot definitively identify the causes of the errors—or confirm whether the matrix was consistently utilized. Based on our analysis, the most common reasons for exceptions exceeding IAS calculations likely include:

- 1) Inclusion of ineligible equipment, such as gas heating systems and electric beds, in exception calculations.
- 2) Granting exceptions to participants with only one qualifying piece of equipment, despite program rules requiring more than one.
- 3) Data entry errors, such as placing information in incorrect fields within the matrix.

Additionally, the CA team could not fully explain how an account received a discount exceeding the 30% maximum limit but suggested may be related to a billing issue. Furthermore, the MED Rate procedures for verifying electric heating eligibility are outdated, preventing CA staff from effectively confirming eligibility based on that type of equipment.

### Effects:

Inaccurate calculation of exceptions provided to participants results in non-compliance with the MED Rate exception process and the application of incorrect discount amounts. Additionally, the absence of updated procedures means there is no effective method to verify whether a customer uses gas or electric heating before granting an extraordinary heat exception.



### **Recommendations:**

CA should ensure that the correct number of exceptions are provided to MED Rate participants and accurately recorded within SAP in accordance with program guidelines. Procedures should be updated to include a reliable method for verifying electric heat pump or resistant heat usage for participants requesting extraordinary heat exceptions. Supervisor review should be documented prior to approving any account with three or more exceptions. Additionally, CA should consider retaining the decision matrix to enhance and streamline the review and approval process.

Furthermore, CA should investigate the potential billing issue that may be allowing MED Rate discounts to exceed the 30% maximum limit for participants receiving exceptions beyond the standard \$15 discount.

### **Management Responses:**

The Customer Assistance (CA) team agrees with IAS's recommendation.

CA will take the following corrective actions to ensure that the correct number of exceptions are provided to MED Rate participants and accurately recorded within SAP in accordance with program guidelines, that the SMUD MED Rate Application Business Rules are updated to include a reliable method for verifying electric heat pump or resistant heat usage for participants requesting extraordinary heat exceptions, and that a Supervisor reviews exception requests and documents prior to approving any account with three or more exceptions.

- The SMUD MED Rate Application Business Rules will be updated to include verbiage that addresses a reliable method for verifying electric heat pump or resistant heat usage for participants requesting extraordinary heat exceptions and create an exception decision matrix to enhance and streamline the review and approval process.
- 2. A Supervisor will be required to approve any accounts with three or more exceptions. This approval will be documented in SAP with Supervisor name, approval date, and appropriate exception-related activity code.
- 3. Quality assurance checks will be conducted on MED Rate applications with exceptions to ensure the correct number of exceptions are provided to MED Rate participants and to ensure data/documentation is accurately recorded in SAP
- 4. Explore and if applicable address, the potential billing issue that may be allowing MED Rate discounts to exceed the 30% maximum limit for participants receiving exceptions beyond the standard \$15 discount. Will work with IT on feasibility and submit a ticket if warranted. If the issue is not related to a billing issue, the team will work with IT to create a process that monitors MED Rate discounts that may exceed the 30% maximum limit. This process will be incorporated in the SMUD MED Rate Application Business Rules. If IT work is required, that work will be completed within the scope of the S/4 Hana implementation.

Corrective actions 1-3 will be completed by April 1, 2026.



# **Appendix A - Observation Definitions**

**Observation:** Audit observations are risk ranked using the guidance below and focused on policy, compliance and operational improvement opportunities of the audited area.

### Risk Rankings:

### **Extremely High**

- Material loss of assets or financial impact; or
- Severe legal, regulatory or compliance sanctions; or
- Cessation of business services for the foreseeable future; or
- Critical impact in achieving SMUD's goals and objectives; or
- Major deterioration in customer metrics and surveys. Irreparable negative media coverage and damage to SMUD's reputation; or
- Widespread loss of confidence from employees. Unable to fill critical positions for a long period of time

### High

- Significant loss of assets or financial impact; or
- Significant legal, regulatory or compliance sanctions; or
- · Widespread disruption of service levels and interruption of business functions; or
- Significant delays or modification of operational goals and objectives; or
- Significant deterioration in customer metrics and surveys; Significant negative media and erosion of trust; or
- Significant loss of confidence from employees. Significant increase in unanticipated employee separations. Slight impact to fill critical positions

### **Medium**

- Moderate loss of assets or financial impact; or
- Moderate legal, regulatory or compliance sanctions; or
- Moderate operational impact to service levels or business disruption; or
- Moderate delays or modification to goals and objectives; or
- Moderate decline in customer metrics and surveys. Modest negative media; or
- Moderate loss of confidence from employees. Moderate increase in unanticipated employee separations. Little to no impact to critical positions

### Low

- Minor loss of assets or financial impact; or
- Minor legal, regulatory or compliance sanctions; or
- Minor operational impact to service levels and business activity; or
- Minor delays or modifications to goals and objectives; or
- Slight decline in customer metrics and surveys. Limited public criticism; or
- Minor loss of confidence from employees. Slight increase in unanticipated employee separations. No impact to critical positions

### Components:

<u>Criteria</u> – The standards, measures, or expectations used in making an evaluation and/or verification (the correct state)

<u>Conditions</u> – The situation that you found, supported by evidence and characterized by facts, measurements, examples, etc. (the current state)

Causes - The reasons for the difference between expected and actual conditions

Effects – The actual or potential risks or exposure the organization faces if the causes and the conditions continue.

SSS No.	
BOD 2025-004	

# **BOARD AGENDA ITEM**

**STAFFING SUMMARY SHEET** 

Committee Meeting & Date
FINANCE & AUDIT - 2025
Board Meeting Date
N/A

ТО												ТО			
1.	Scott Martin	Martin													
2.	Lora Anguay	guay													
3.	Jose Bodipo-M	/lemba			8.										
4.						9.	Legal	l							
5.							10.	CEO & General Manager							
Cor	nsent Calendar	Yes		х	No If no, sched	ule a dry run presentation.	Bud	geted	х	Yes		No (If no, explain in Cost/Budgeted section.)			
FRC	OM (IPR)	•				DEPARTMENT						MAIL STOP	EXT.	DATE SENT	
Rol	b Kerth / Crystal	l Hende	Henderson Board Office									B307	5424	12/29/24	
NARRATIVE:														•	
Re	quested Action:	: A su	A summary of directives is provided to staff during the committee meeting.												
	Summary:	to su	The Board requested an ongoing opportunity to do a wrap up period at the end of each committed to summarize various Board member suggestions and requests that were made at the meeting to the will of the Board. The Finance & Audit Committee Chair will summarize Board member recome out of the committee presentations for this meeting.									to make clear			
	Board Policy: (Number & Title)		Governance Process GP-4, Board/Committee Work Plan and Agenda Planning states the Board will focus on the results the Board wants the organization to achieve.												
	Benefits		Having an agendized opportunity to summarize the Board's requests and suggestions that arise during the committee meeting will help clarify the will of the Board.												
	Cost/Budgeted:	Incl	Included in budget for internal labor.												
	Alternatives:	: Not	Not to summarize the Board's requests at this meeting.												
A	ffected Parties:	: Boan	Board of Directors, Board Office and Executive Office												
	Coordination	ordination: Crystal Henderson, Special Assistant to the Bo													
	Presenter:	: Rob	Rob Kerth, Finance & Audit Committee Chair												

SUBJECT Summary of Committee Direction - Finance & Audit Committee ITEM NO. (FOR LEGAL USE ONLY)

SMUD-1516 10/15 Forms Management