



**Jay Leyno**  
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**VIA ELECTRONIC FILING**

**Docket: WMP-Guidelines**

May 21, 2026

Tony Marino  
Acting Director  
Office of Energy Infrastructure Safety  
715 P Street, 20th Floor  
Sacramento, CA 95814

**RE: Bear Valley Electric Service, Inc., Liberty Utilities, Pacific Gas and Electric, PacifiCorp, San Diego Gas & Electric and Southern California Edison Company's Comments on the Public Workshop on Public Utilities Code section 8386.4(b)(3) and Wildfire Mitigation Plan Updates.**

Dear Mr. Marino:

Bear Valley Electric Service, Inc.; Liberty Utilities (CalPeco Electric) LLC; Pacific Gas and Electric Company; PacifiCorp d/b/a Pacific Power; San Diego Gas & Electric; and Southern California Edison (collectively "the Joint Utilities") hereby provide comments addressing the Office of Energy Infrastructure Safety's ("Energy Safety") May 7, 2026 Public Workshop GRC Crosswalk Example related to Senate Bill 254 (SB 254) and Electrical Corporations' implementation of their Wildfire Mitigation Plans (WMPs). The Joint Utilities have limited the comments below to the topic of Public Utilities Code section 8386.4(b)(3) and WMP Updates.

**I. GRC Crosswalk Template**

The Joint Utilities appreciate the opportunity to provide feedback on the GRC Crosswalk Example presented by Energy Safety during the May 7, 2026 Virtual Public Workshop. As discussed during the workshop, crosswalking revenue authorization from an electrical corporation's GRC decision to its WMP creates significant practical challenges. GRC proceedings generally address expenditures at a categorical level, such as distribution capital or operations and maintenance and may comprise multiple programs and initiatives. As a result, GRC determinations may not address discrete WMP initiatives or programs. Instead, they are likely to reflect adjustments to overall proposed expenditures, and the electrical corporation determines what programs will be impacted by the disallowance.

Additionally, it may not be feasible for an electrical corporation to rebalance its wildfire mitigation portfolio in a way that significantly closes the gap in risk reduction between the WMP that received preliminary approval from Energy Safety and the adjusted plan following the issuance of a GRC decision. For example, where capital investments are the greatest driver of risk reduction activities, reductions in authorized capital investments in a GRC decision cannot necessarily be offset through additional operations and maintenance activities. As a result, there may be inherent limitations on an electrical corporation's ability to maintain the same level of risk reduction in its previously submitted WMP.

The Joint Utilities have also provided additional, detailed comments within the attached excel GRC Crosswalk for Energy Safety's consideration. In addition to the comments provided in the excel GRC crosswalk, it is important to note that the GRC allows shifting of resources across mitigations, but the WMP does not currently allow any post-authorization flexibility without submitting a petition to amend. The Joint Utilities request that Energy Safety enable the same flexibility afforded in GRCs to shift resources across programs for WMPs. This flexibility would uphold WMP goals while adapting to GRC decisions.

Depending on the complexity of the mechanism for post-test-year adds, it may take additional time to calculate post-test-year authorized amounts. Therefore, the utilities may need to submit a revision after the initial 45-day submittal.

The Joint Utilities also propose that this crosswalk be used following an associated GRC decision. It may be used to support a petition to amend by identifying and documenting any misalignment between the GRC and the WMP.

Given the condensed timeframe, the Joint Utilities have provided the most comprehensive feedback currently feasible. We anticipate providing additional comments once draft guidelines are made available.

## II. Conclusion

The Joint Utilities appreciate the opportunity to provide these comments.

If you have any questions or require additional information, please contact me at [jay.leyno@pge.com](mailto:jay.leyno@pge.com), David LeBlond (SCE) at [david.leblond@sce.com](mailto:david.leblond@sce.com), Kari Kloberdanz (SDG&E) at [kkloberdanz@sdge.com](mailto:kkloberdanz@sdge.com), Paul Marconi (BVES) at [Paul.Marconi@bvesinc.com](mailto:Paul.Marconi@bvesinc.com), Melissa Swenson (PacifiCorp) at



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Sincerely,

*/s/ Jay Leyno*