Pacific Gas and Electric Company

**Jay Leyno**
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**VIA ELECTRONIC FILING** **Docket: WMP-Guidelines**

July 16, 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 Questions on the Public Workshop on Senate Bill 254 Implementation 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 questions addressing the Office of Energy Infrastructure Safety's ("Energy Safety") July 30, 2026 Public Workshop related to Senate Bill 254 (SB 254) and Electrical Corporations' implementation of their Wildfire Mitigation Plans (WMPs). The Joint Utilities have limited the questions below to the topic of SB 254 Implementation.

## I. Wildfire Mitigation Plan (WMP) submissions:

1. When should utilities expect to file the 2028-2031 WMP next year?
2. The Joint Utilities recommended eliminating the requirement to submit a redline of the Base Plan as part of the WMP Update process. How is Energy Safety evaluating this recommendation, and what rationale will support its decision to adopt or reject it?
3. Due to staggered WMP submission schedules, the Joint Utilities recommended that ACIs be submitted only as part of the next Base WMP, consistent with the proposed treatment of WMP Updates, and that ACIs be limited to individual utilities rather than Joint Utilities. How is Energy Safety evaluating this recommendation, and what considerations will influence whether and how it is incorporated into the final requirements?

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## II. Commission rulemakings and processes (e.g., General Rate Cases, Risk Assessment Mitigation Phases, etc.):

1. The Joint Utilities requested that Energy Safety allow utilities to shift resources across programs in WMPs, similar to the flexibility provided in GRCs, to accommodate changes resulting from GRC decisions while continuing to meet WMP objectives. What is Energy Safety's perspective on this recommendation, and what factors are being considered in assessing its adoption?
2. How do the PUC and Energy Safety plan to account for the flexibility enabled in the GRC versus the current strictness of targets in the WMP. Given how far WMPs are being submitted in the future, will the utilities have the ability to apportion funds so long as the targeted risk reduction is occurring?
3. If a utility files a WMP and a year thereafter files a GRC with an approved WMP, as per SB 254, what if the CPUC ruling on the GRC is substantially delayed? In this scenario, the Joint Utilities are concerned about the extended regulatory uncertainty associated with approved WMP obligations not aligning with rate recovery signaling. The Joint Utilities suggest that cumulative WMP targets could help utilities manage adherence to recently approved WMPs during periods of uncertainty over WMP-GRC alignment.
4. How precise does Energy Safety expect the 1-year alignment between WMP filing and GCR filing to be, and have Energy Safety and the CPUC considered some flexibility here to accommodate extenuating circumstances that could cause a utility to delay filing a GRC?

## III. Energy Safety Guidelines

1. Recognizing the scope of the changes required under SB 254, the Joint Utilities requested that the final WMP Guidelines be provided at least six months before the first WMP submission deadline. What is Energy Safety's perspective on this recommendation, and how is it considering the need for implementation time when establishing the schedule for releasing the final Guidelines?
2. The Joint Utilities recommended a three-prong approach for a WMP update. Will updates be allowable, and if so, will they occur annually?
3. The Joint Utilities proposed adopting cumulative WMP targets across the Base WMP period for all targets to provide greater flexibility in implementation and align target achievement with the multi-year planning horizon. Could you discuss whether this approach is being considered and the potential benefits, challenges, or implementation considerations associated with adopting it?
4. How does Energy Safety interpret the treatment of 2028 targets under the new Base WMP framework? The Joint Utilities understand that utilities will have the

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opportunity to modify their 2028 targets as part of the upcoming 2028–2031 Base WMP. Is this an accurate understanding?

## IV. Other related topics:

1. To maintain consistency between the WMP cycle period and the approved GRC, how is Energy Safety considering the use of a consistent Risk Modeling Methodology across these processes, and what factors will influence whether that methodology remains unchanged over the WMP cycle?
2. The Joint Utilities proposed the use of an interim Cost Per Avoided Ignition framework while longer-term approaches continue to be developed and refined. What is Energy Safety's perspective on this recommendation, and what considerations are being taken into account in assessing its potential adoption?
3. Request confirmation on the submission schedule for the following two cross-utility ACIs:
    i. Joint Study for Mitigation Activity Effectiveness Estimates
    ii. Grid Hardening and Inspection Joint Studies

    Both ACIs require that we "complete and provide a joint study and report by March 1, 2028, to the 2026-2028 Base WMP Docket (#2026-2028-Base-WMPs), and include that report in its subsequent Base WMP submission." Energy Safety's Revised Wildfire Mitigation Plan Submission Schedules released on April 9th states that,

    "All electrical corporations' next Base WMPs must report progress on all areas for continued improvement identified in Energy Safety's Decisions on 2026-2028 WMPs, unless the area for continued improvement sets a different due date (e.g., cross-utility requirements with mid-cycle reporting)."

    We interpret this to mean that the cross-utility studies and reports for both of these ACIs are due by March 1, 2028. Full studies and reports will be submitted to the docket by March 1, 2028, and then included again in our subsequent WMP submission. Seeking confirmation this is the correct interpretation.
4. Point of clarification for joint-ACI: Further Evaluation of Climate Change Impact on Extreme Scenarios:
    "Provide a joint report with the other large electrical corporations and SMJUs evaluating the potential climate change impacts on wildfire risk over a fifty-year period to better understand potential risk reduction when implementing mitigations."

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Question: We interpret the fifty-year period to align with the same period covered in the most recent CAVA filing, is that correct?" As this is a joint response, smaller utilities may struggle answering this fully and may also be working on other studies concurrent with this response.

5. The Joint Utilities recommend having a consistent Independent Evaluator for the duration of the WMP Base Plan. It would promote efficiency since the Independent Evaluator would only need to come up to speed with the WMP Base Plan in the first year, as they would already be familiar with the WMP Base Plan in subsequent years. Therefore, it is recommended to allow each utility to select an Independent Evaluator from the list of approved Independent Evaluators in the year of the first Independent Evaluator review for a WMP Base Plan and to allow the option for that Independent Evaluator to be used for the duration of the WMP Base Plan even if the Independent Evaluator list is updated. What is Energy Safety's perspective on this recommendation?
6. The Joint Utilities recommend allowing more than 60 days to contract an Independent Evaluator after the list of approved Independent Evaluators is released. Allowing more time will facilitate a more competitive bid process with Independent Evaluators having more time to review requirements and refine bids. It would also allow utilities more adequate time to solicit bids, review proposals, and contract with an Independent Evaluator. What is Energy Safety's perspective on this recommendation?

## V. Conclusion

The Joint Utilities appreciate the opportunity to provide these questions.

If you have any questions or require additional information, please contact me at jay.leyno@pge.com, David LeBlond (SCE) at david.leblond@sce.com, Kari Kloberdanz (SDG&E) at kkloberdanz@sdge.com, Paul Marconi (BVES) at Paul.Marconi@bvesinc.com, Melissa Swenson (PacifiCorp) at Melissa.Swenson@pacificorp.com, or Jordan Parrillo (Liberty Utilities) at jordan.parrillo@libertyutilities.com.

Sincerely,

*/s/ Jay Leyno*