July 16, 2026

Via Electronic Filing

Director Forest Kaser
Office of Energy Infrastructure Safety
California Natural Resources Agency
Sacramento, CA, 95184

Subject: **Public Advocates Office's Informal Questions for Stakeholders Regarding the SB 254 Implementation**

Docket: **WMP Guidelines**

Dear Director Kaser,

The Public Advocates Office at the California Public Utilities Commission (Cal Advocates) respectfully submits the following proposed questions and comments on the Energy Safety and California Public Utilities Commission Public Workshop regarding SB 254 Implementation.

Please contact Iain Fisher (Iain.Fisher@cpuc.ca.gov) or Nat Skinner (Nathaniel.Skinner@cpuc.ca.gov) or with any questions relating to these comments.

We respectfully urge the Commission and the Office to raise the important questions herein for discussion at the upcoming workshop.

Sincerely,

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I. INTRODUCTION

The Public Advocates Office at the California Public Utilities CPUC (Cal Advocates) provides these questions for consideration at the upcoming Office of Energy Infrastructure Safety (Energy Safety) and the California Public Utilities CPUC (CPUC) Public Workshop on the implementation of Senate Bill (SB) 254 to be held on July 30, 2026.

SB 254 amends Public Utilities Code § 8386 and establishes new requirements that will apply beginning with the first General Rate Case (GRC) filed after January 1, 2027.[1] The amendments to Public Utilities Code Section 8386 seek to improve coordination among wildfire mitigation planning, risk assessment, and utility ratemaking processes. Specifically, implementation of SB 254 requires that the CPUC:

- Ensure consistency between the Risk Assessment Mitigation Phase (RAMP) and the Wildfire Mitigation Plan (WMP) (Public Utilities Code § 8386(h)(12));[2]
- Consider cost of the WMP as part of the GRC (Public Utilities Code § 8386.4)[3];
- Evaluate and determine the reasonableness of the cost and revenue requirements related to a WMP (Public Utilities Code § 8386.4)[4] and;
- Ensure that revenues authorized by the CPUC shall not be diverted to non-WMP purposes (Public Utilities Code § 8386.3).[5]

In addition to the July 30th workshop, the CPUC plans to hold Risk-Based Decision Framework (RDF) workshops during the fourth quarter of 2026.[6] Energy Safety also is undertaking development of its 2027 WMP Guidelines.[7]

Cal Advocates appreciates the opportunity to suggest questions to be addressed in the proposed SB 254 workshop and recognizes efforts by the CPUC and Energy Safety to ensure

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[1] Public Utilities Code section 8386(c)(1).

[2] Public Utilities Code section 8386(h)(12).

[3] Public Utilities Code section 8386.4.

[4] Public Utilities Code section 8386.4.

[5] Public Utilities Code section 8386.3.

[6] *Order Instituting Rulemaking to Refine the Risk-Based Decision-Making Framework for Electric Gas Utilities*, May 7, 2026, at 17.

[7] *Wildfire Mitigation Plan Submission Schedules*, January 26, 2026, at 2. "In 2026, Energy Safety will revise its WMP Guidelines to incorporate new requirements according to Senate Bill 254."

that the proposed amendments to SB 254 improve the effectiveness, efficiency, and coordination of wildfire mitigation planning and oversight for California's investor-owned electric utilities. This will be achieved by integrating wildfire planning with the CPUC's ratemaking process and clarify the collaborative process between Energy Safety and the CPUC. In these comments, Cal Advocates provides questions intended to improve consistency within the WMP RAMP and GRC processes and better connect wildfire planning with utility funding decisions. Given the significant impacts of the SB 254 requirements, Cal Advocates believe that Energy Safety and the Commission should address the following issues questions that are discussed below.

II. RECOMMENDED QUESTIONS FOR THE JOINT WORKSHOP

A. General Questions

1. Is the alignment of the RAMP, WMP, and GRC currently scoped into any other CPUC proceeding or similar process at Energy Safety?

One of the objectives of SB 254 is to align the timelines for the Risk Assessment Mitigation Phase (RAMP), Wildfire Mitigation Plan (WMPs), and General Rate Cases (GRCs) processes.[8] It is important that the workshop address this question because SB 254 fundamentally changes the relationship between each of these processes, requiring greater coordination amongst them. A formal process, concluded by the end of 2027 and coordinated jointly by both the CPUC and Energy Safety, is critical to providing timely alignment of the RAMP, WMP, and GRC.

B. Questions Regarding the RDF, RAMP, and WMP.

1. Consistency between the RDF, RAMP, and WMP is required: How and in what way(s) can should the CPUC and OEIS ensure such consistency?

SB 254 is intended to better integrate wildfire risk assessment, wildfire mitigation planning, and ratemaking.[9,10] Clarifying and establishing consistency amongst the RDF, RAMP, and WMP processes will promote the use of common risk assumptions, methodologies, and performance metrics, resulting in more transparent and efficient regulatory review.

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[8] Public Utilities Code section 8386 and 8386.4.

[9] Public Utilities Code section 8386(c)(1).

[10] Public Utilities Code section 8386(d)(12).

a. What additional information, if any, is necessary from the RDF to support the cost-per-avoided ignition metric required in the WMP?

The cost-per-avoided ignition metric is intended to demonstrate the effectiveness and cost-efficiency of wildfire mitigation investments.[11] Identifying any additional RDF information needed to support this metric will help ensure that utilities use consistent assumptions in their calculations of the metric.

2. Is any information required by PU Code 8386(h) parts (12) and (13) not currently included in both the RAMP and WMP?

This question is important to determine whether existing utility filings satisfy statutory requirements and whether additional information is needed. Identifying any potential gaps will improve consistency between proceedings and reduce the need for supplemental filings or duplicative reporting requirements. Furthermore, identifying any gaps between the information required under PUC section 8386(h)(12) and (13) and the information currently provided through the RAMP and WMP processes will help determine whether additional reporting requirements, data standards, or procedural changes are needed.

3. Wildfire mitigation initiatives will be raised simultaneously in the IOUs' RAMP applications at the CPUC and their WMP filings at Energy Safety.

As SB 254 links the timing of wildfire mitigation planning to a utility's GRC and RAMP processes by requiring the WMP to be filed one year before the GRC or concurrently with the RAMP,[12] it is important that the same mitigation initiatives are presented consistently across all proceedings. It is also crucial that Energy Safety and the CPUC have a coordinated framework and that establishes how changes in either the RAMP or the WMP are communicated and how any inconsistencies or contradictions are resolved. According to Cal Advocates we believe that this coordinated framework should be ready by PG&E's RAMP and WMP filings during mid 2028.

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[11] Public Utilities Code section 8386.6(h)(13)

[12] Public Utilities Code section 8386(c)(1).

a. What structure should the record of the wildfire mitigation initiatives take to ensure that risks identified by utilities, stakeholders, or the CPUC and its staff in the RAMP can be traced to the Energy Safety-approved WMP and utilities' GRC applications?

Cal Advocates supports Energy Safety's proposed "crosswalk" table which would serve as a record to guide and link wildfire initiatives and activities found in the GRC to the wildfire mitigation activities in the WMPs.[13] The "crosswalk" would serve as a clear and traceable record and be essential to demonstrate how identified risks translate into specific mitigation programs and funding requests that are presented by the utilities. Establishing the "crosswalk" is important as it will aid in transparency and allow accurate recording of mitigation initiatives from risk identification through implementation and cost recovery.

b. How does information from the approved RAMP inform the approved WMP?

Cal Advocates believes that the RAMP offers the enterprise risk context for the WMP by identifying and prioritizing the wildfire risk within the wider set of risks that each utility has to address. The CPUC and Energy Safety should clarify how the approved RAMP informs the approved WMP to ensure that wildfire mitigation strategies are supported by the underlying risk assessment; and that utilities apply a consistent risk-based approach throughout the regulatory process.

c. How are any differences between the RAMP and WMP resolved in the GRC application?

Differences between the RAMP and WMP could result in inconsistencies between proposed mitigation activities and the funding requested in the GRC. The CPUC and Energy Safety should develop a process of reconciliation for any material differences between the risk, wildfire mitigation initiatives, and cost estimated presented in the RAMP, WMP, and GRC applications.

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[13] Energy Safety Workshop, *Revised Wildfire Mitigation Plans Pursuant to Public Utilities Code section 8386.4(b)(3) and Wildfire Mitigation Plan Updates,* May 7, 2026.

C. Questions Regarding WMP Costs Within the GRC and the Reasonableness and Revenue Requirements of the WMP Costs.

1. What structure should the utilities' GRC testimony take so that proposed revenue requirements of the WMP initiatives can be reviewed independently of all other revenue requirements proposed in the GRC?

SB 254 requires the CPUC to evaluate the reasonableness of WMP-related costs as part of the GRC process. WMP related costs should appear in a manner, for example, as a separate exhibit, such that the costs can be easily identified, reviewed, and evaluated together on their own, and not mixed in with other forecasts within the GRC. A standardized structure for GRC testimony will enable the CPUC, Energy Safety, and stakeholders to clearly identify, review, and evaluate wildfire mitigation costs separately from other utility expenditures.

2. What structure should the CPUC's GRC decision regarding the WMP revenue requirement take to ensure that the impact of the CPUC's decision on the WMP is evident and clearly communicated to Energy Safety?

The degree to which the CPUC authorizes funding for WMPs will affect the targets set for each utility for the WMP implementation phase. The CPUC and Energy Safety need to establish what information should be included in the CPUC's GRC decisions. It is important that decisions clearly identify the potential impacts that changes in funding would have on WMP initiates so that the implications of the changes on the WMP compliance targets are clearly understood by both the CPUC and Energy Safety. The GRC decision should include a specific section addressing WMP-related revenue requirements to facilitate the CPUC's ability to ensure compliance through auditing and other methods. This section should include but not be limited to the following: a comparison of the utility's requested costs, the CPUC-authorized amounts, and any disallowed, deferred, or modified expenditures and an evaluation of initiatives from previous GRC cycles that have not been completed. The decision should identify the specific WMP initiatives affected by the CPUC's determinations and explain how changes to authorized funding may impact implementation, scope, timing, or expected wildfire risk reduction outcomes. A transparent structure will improve coordination between the agencies and ensure that the WMP accurately reflects the CPUC's ratemaking determinations.

3. What CPUC reporting requirements related to expenditure changes for wildfire initiatives should be imposed on the utilities?

SB 254 requires greater accountability for wildfire mitigation expenditures throughout implementation of the RDF, WMP, and GRC. Cal Advocates recommends that the CPUC seek formal feedback from parties and establish clear and consistent reporting requirements for utility expenditure changes related to wildfire initiatives. These reporting requirements would be used to evaluate whether changes to utilities wildfire mitigation spending have remained consistent with identified wildfire risks. Furthermore, appropriate reporting requirements will allow the CPUC and Energy Safety to monitor whether authorized funding is being spent as intended and provide timely visibility into material changes that could affect wildfire mitigation outcomes or future funding requests.

a. How do these align with or differ from WMP implementation auditing and reporting requirements to Energy Safety for the WMP?

The CPUC's reporting requirements should complement, rather than duplicate, Energy Safety's implementation, auditing and reporting requirements. Identifying areas of overlap and developing consistent reporting expectations will reduce duplicative efforts and ensure both agencies receive the information needed to fulfill their respective statutory responsibilities.

4. What efficiencies in reporting and reviewing could be developed between OIES and CPUC?

SB 254 creates the opportunity for greater coordination between Energy Safety and the CPUC and establishes an opportunity to streamline regulatory oversight. Developing a formal process where common reporting formats, coordinated review schedules, and shared data requirements can improve regulatory efficiency and provide a more consistent framework for evaluating wildfire mitigation planning, implementation, and cost recovery.

D. Questions Regarding Ensuring WMP Costs Are Not Diverted to Non-WMP Work.

1. What auditing should the CPUC undertake to ensure that authorized WMP revenue requirements are spent on WMP initiatives and not diverted outside of WMP activities?

SB 254 requires that revenues authorized for wildfire mitigation activities be used exclusively for those purposes.[14] The CPUC needs to clearly define and establish an auditing framework that the utilities would need to follow, as it is essential to verify compliance, promote accountability, and provide confidence to stakeholders that ratepayer-funded wildfire mitigation investments are being implemented correctly and in a timely manner as approved by the CPUC.

2. What requirements other than auditing should the CPUC implement that would ensure that authorized WMP revenue requirements are not diverted to other purposes?

Auditing serves as an important oversight tool, however the current language within SB 254 does not include any additional requirements or processes to help ensure that authorized WMP revenue requirements are being spent in an appropriate manner. Other controls such as standardized accounting practices, expenditure assignment and tracking, certification requirements, and periodic reporting requirements are necessary and must be established to prevent any inappropriate use of authorized funds by a utility. Establishing these additional requirements will strengthen financial accountability and support effective implementation of SB 254.[15,16]

3. What reporting requirements are necessary to make public both the findings of the audits of authorized WMP spending and any other requirements established by the CPUC or Energy Safety?

The CPUC and Energy Safety should consider establishing reporting requirements, as public reporting is essential to promote transparency and enable stakeholders to evaluate whether utilities are complying with the requirements of SB 254, the Public Utilities Code, and CPUC decisions. Consistent reporting of audit findings and WMP implementation results will

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[14] Public Utilities Code section 8386.3.6(c)(1).

[15] Public Utilities Code section 8386.3.6(c)(1).

[16] Public Utilities Code section 8386.4.

strengthen regulatory oversight, facilitate meaningful stakeholder participation, and provide greater accountability for the expenditure of ratepayer-funded wildfire mitigation investments.

4. What measures or metrics are necessary to ensure authorized risk reduction work in the WMPs and GRC is actually completed by the utilities?

SB 254 strengthens the connection between approved WMP activities and the CPUC's authorization of funding through the GRC.[17] To effectively implement the statute, the CPUC and Energy Safety should establish clear performance measures and implementation metrics to verify that utilities complete the approved wildfire mitigation activities and achieve the intended risk reduction outcomes. Developing measures and standardized metrics will improve oversight and allow for verification that the authorized funding by the CPUC is being used to achieve a measurable amount of risk reduction and utilities are delivering intended safety benefits from what is stated in the WMPs and GRC.

5. What consequences should the utilities bear for incorrect recording of costs or reallocation of WMP authorized funds to the non-WMP components of the GRCs?

Legislation requires that an electrical corporation may not divert revenues authorized by the CPUC for implementation of the approved WMP to programs or activities outside the approved WMP.[18] Establishing clear consequences, appropriate remedies and enforcement mechanisms will discourage improper accounting practices, promote accurate financial reporting, and ensure that authorized wildfire mitigation funding is used solely for its intended purpose by the investor-owned electrical IOUs.

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[17] Public Utilities Code section 8386.3.6(c)(1).

[18] Public Utilities Code section 8386.3.6(c).

III. CONCLUSION

Cal Advocates greatly supports the coordinated efforts between Energy Safety and the CPUC with the upcoming workshop to discuss SB 254 implementation. Cal Advocates respectfully requests that both the Office of Energy Infrastructure Safety and the California Public Utilities CPUC consider the questions so they can be discussed in the upcoming joint workshop.

Respectfully submitted,

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