



Workshop Slides and Recording

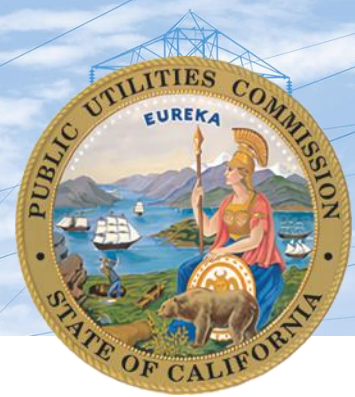
Energy Safety and California Public Utilities Commission July 30, 2026, Virtual Workshop on SB 254 Implementation

The Office of Energy Infrastructure Safety and California Public Utilities Commission held a virtual public workshop to address pre-submitted topics and questions from the public regarding Senate Bill 254 implementation on July 30, 2026. A recording of the meeting can be found on Energy Safety's YouTube channel at the link below. The slides presented during the meeting are attached to this document.

Workshop Recording: [Energy Safety's Workshop on Implementation of Senate Bill 254 – July 30, 2026 \(youtube.com\)](https://www.youtube.com/watch?v=...)

During the workshop, Energy Safety and the CPUC presented the following questions to attendees and stakeholders:

1. What makes preparing a redlined version of the WMP difficult? What technological approaches would make it easier?
2. Do stakeholders have thoughts about what the CPUC should consider, if anything, to make sure that any flexibility provided in GRCs does not impede Energy Safety's ability to hold the utilities accountable?
3. How will utilities prepare for potential revenue uncertainty during the test year/first year of WMP period? What interim relief, or other accounts, could be used? Are there other uncertainties utilities face?
4. What circumstances do utilities see as leading to a delayed GRC filing? Note that a late WMP Decision should not delay a GRC filing.
5. What inefficiencies have stakeholders observed in Energy Safety and CPUC reports and reviews?
6. What information do stakeholders think would be beneficial for CPUC decision-makers to understand to help ensure CPUC's decision on WMP work is evident and clearly communicated to Energy Safety? What outcomes or structures do utilities need to support their Revised WMP filing?



7. Regarding wildfire initiative expenditures: What additional requirements do stakeholders think should be imposed related to expenditure changes for wildfire initiatives?
8. Regarding wildfire initiative expenditures: Do stakeholders think there are data management issues or reporting requirements that would make costs easier to track to the mitigation activity? Is already enough data to ensure the revenue required to implement the WMP is not diverted to other activities? Is there value in a 1-to-1 relationship between GRC funding-to-WMP activity? Could this type of requirement potentially be addressed by Staff Resolution?
9. Regarding wildfire initiative expenditures: What requirements, other than auditing, do stakeholders have in mind that would ensure authorized WMP revenue requirements are not diverted to other purposes?
10. Regarding wildfire initiative expenditures: What would be an effective procedural way to create a consequence for utilities who incorrectly record costs or reallocation of WMP authorized funds?
11. How do ECs propose to clarify for the CPUC the impact a proposed settlement agreement or a proposed decision will have on a WMP? Assuming Energy Safety is to make a ministerial decision on whether to approve a revised WMP subsequent to a GRC decision, how is it proposed to make clear in the record of a GRC proceeding the impact of a given GRC decision on the WMP?

Stakeholders may provide written responses or comments limited to the questions and topics provided above and discussed during the workshop via e-filing in the WMP Guidelines docket¹ and by email to the service lists of the following Commission proceedings: R.18-10-007², A.25-05-009³, A.23-05-010⁴, and A.22-05-016⁵, by August 13, 2026.

¹ [Docket #WMP-Guidelines](#)

² Order Instituting Rulemaking to Implement Electric Utility Wildfire Mitigation Plans Pursuant to Senate Bill 901.

³ Application of Pacific Gas and Electric Company for Authority, Among Other Things, to Increase Rates and Charges for Electric and Gas Service Effective on January 1, 2027.

⁴ Application of Southern California Edison Company (U 338-E) For Authority to Increase Its Authorized Revenues for Electric Service In 2025, Among Other Things, and to Reflect That Increase in Rates.

⁵ Application of San Diego Gas & Electric Company (U 902 M) for Authority, Among Other Things, to Update its Electric and Gas Revenue Requirement and Base Rates Effective on January 1, 2024.

ENERGY SAFETY & PUBLIC UTILITIES COMMISSION JOINT WORKSHOP

Senate Bill 254 Implementation & Related Topics

July 30, 2026





Introductions



ENERGY SAFETY

Patrick Doherty	Program Manager, Performance Assessment Division (PAD)
Will Dundon	Sr. Utilities Engineer Supervisor, Electric Safety Policy Division (ESPD)
Nicole Dunlap	Program Manager, ESPD
Steve Kerr	WMP Supervisor, ESPD
Dakota Smith	WMP Supervisor, ESPD

CA PUBLIC UTILITIES COMMISSION

Tyler Dunaway	Utilities Engineer, Safety Policy Division (SPD)
Arnold Son	Wildfire & Safety Performance Supervisor, SPD
Henry Sweat	Sr. Utilities Engineer, SPD

SAFETY MESSAGE

- Be aware of your surroundings
- Know your emergency exits and evacuation route
- Take regular breaks; get up and stretch
- Keep emergency contact information readily available



AGENDA & TIME ALLOTMENTS

Senate Bill 254 Background & Workshop Purpose	1:00 – 1:05 PM
Discussion of pre-submitted questions	1:05 – 2:00 PM
<i>Break</i>	<i>2:00 – 2:10 PM</i>
Continued discussion of pre-submitted questions & open Q&A as time allows	2:10 – 2:50 PM
Wrap up and Adjournment	2:50 – 3:00 PM

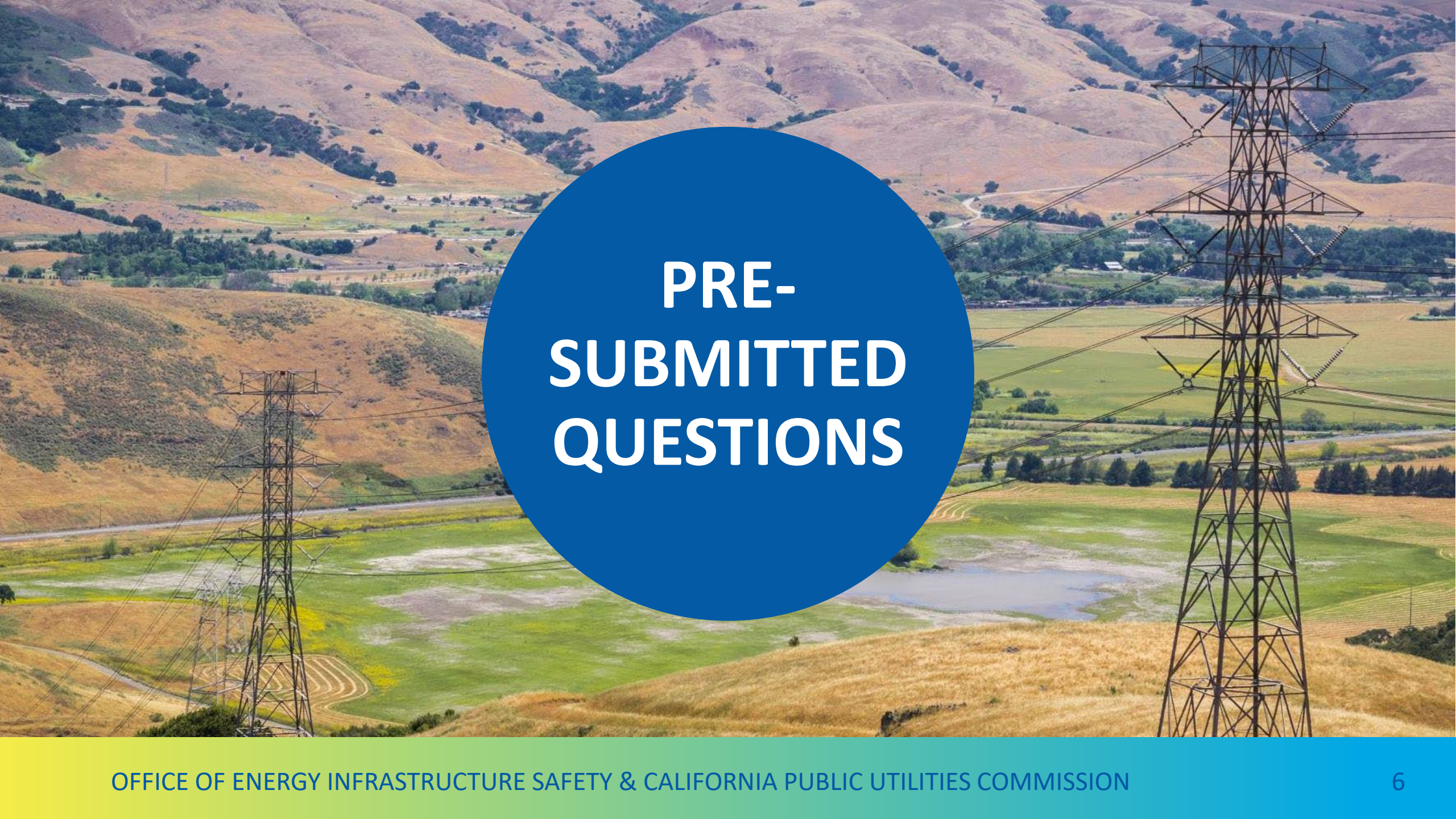
SB 254 BACKGROUND & WORKSHOP PURPOSE

Senate Bill 254 (SB 254), effective September 19, 2025, set forth requirements to bring the Wildfire Mitigation Plan (WMP) and General Rate Case (GRC) processes into alignment.

Electrical corporations and stakeholders pre-submitted questions for Energy Safety and CPUC to address during today's workshop.

Questions have been grouped into the following topics:

- WMP Submissions
- WMP/GRC Alignment & Differences
- Risk Methodology & Metrics
- Performance Assessment Process



PRE- SUBMITTED QUESTIONS



WMP SUBMISSIONS

WMP SUBMISSION QUESTIONS (1/9)

1. When should utilities expect to file 2028-2031 WMPs next year?

WMP SUBMISSION QUESTIONS (2/9)

2. The Joint Utilities recommended eliminating the requirement to submit a redline of the Base Plan as part of the WMP Update.

WMP SUBMISSION QUESTIONS (3/9)

3. Will WMP Updates be allowable, and if so, will they occur annually?

WMP SUBMISSION QUESTIONS (4/9)

4. The Joint Utilities proposed adopting cumulative WMP targets across the Base WMP period for all targets.

What are the potential benefits and challenges of implementing cumulative targets?

WMP SUBMISSION QUESTIONS (5/9)

5. How does Energy Safety interpret the treatment of 2028 targets under the new Base WMP framework?

WMP SUBMISSION QUESTIONS (6/9)

6. Are the studies and reports for the following 2 cross-utility ACIs due on March 1, 2026?
- *Mitigation Active Effectiveness Estimates*
 - *Grid Hardening and Inspection*

WMP SUBMISSION QUESTIONS (7/9)

7. For the cross-utility ACI on *Further Evaluation of Climate Change Impact on Extreme Scenarios*, does the fifty-year period align with the same period covered in the most recent CAVA filing?

WMP SUBMISSION QUESTIONS (8/9)

8. Is there an opportunity to use experimental design/pilots to improve calculation of mitigation effectiveness?

WMP SUBMISSION QUESTIONS (9/9)

9. Will there be consistent expectations in the level granularity for mitigation effectiveness?



WMP & GRC ALIGNMENT AND DIFFERENCES

WMP & GRC ALIGNMENT QUESTIONS (1/12)

10. The Joint Utilities request that Energy Safety allow utilities to shift resources across programs in WMPs, similar to the flexibility provided in GRCs.

WMP & GRC ALIGNMENT QUESTIONS (3/12)

11. 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?

WMP & GRC ALIGNMENT QUESTIONS (2/12)

12. How precise does Energy Safety expect the 1-year alignment between WMP filing and GCR filing to be?

Have Energy Safety and CPUC considered some flexibility to accommodate extenuating circumstances that could cause a utility to delay filing a GRC?

WMP & GRC ALIGNMENT QUESTIONS (4/12)

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

WMP & GRC ALIGNMENT QUESTIONS (5/12)

14. What efficiencies in reporting and reviewing could be developed between Energy Safety and the CPUC?

WMP & GRC ALIGNMENT QUESTIONS (6/12)

15. 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?

WMP & GRC ALIGNMENT QUESTIONS (7/12)

16. 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?

WMP & GRC ALIGNMENT QUESTIONS (8/12)

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

WMP & GRC ALIGNMENT QUESTIONS (9/12)

18. 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?

WMP & GRC ALIGNMENT QUESTIONS (10/12)

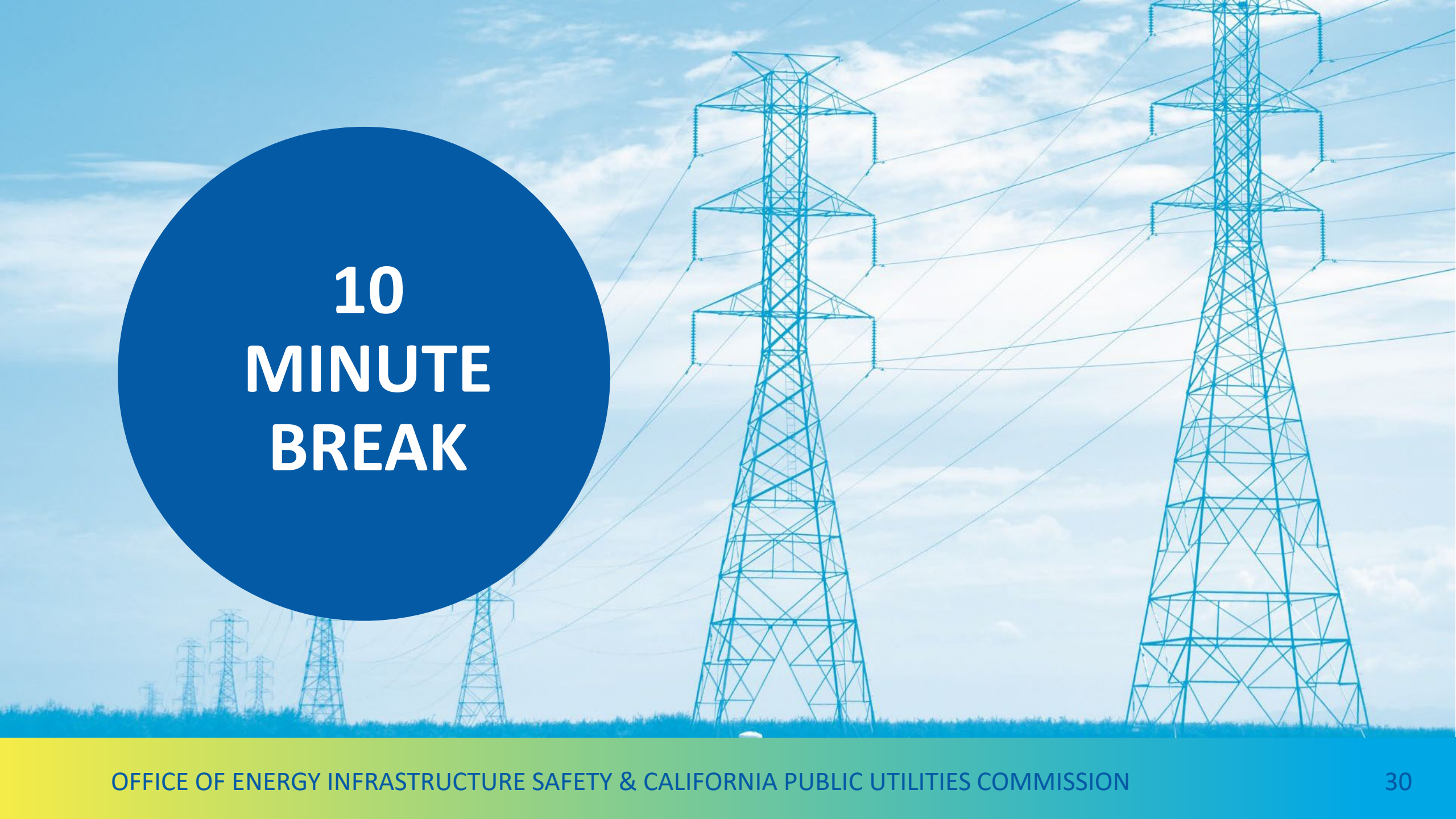
19. What requirements other than auditing should the CPUC implement that would ensure that authorized WMP revenue requirements are not diverted to other purposes?

WMP & GRC ALIGNMENT QUESTIONS (11/12)

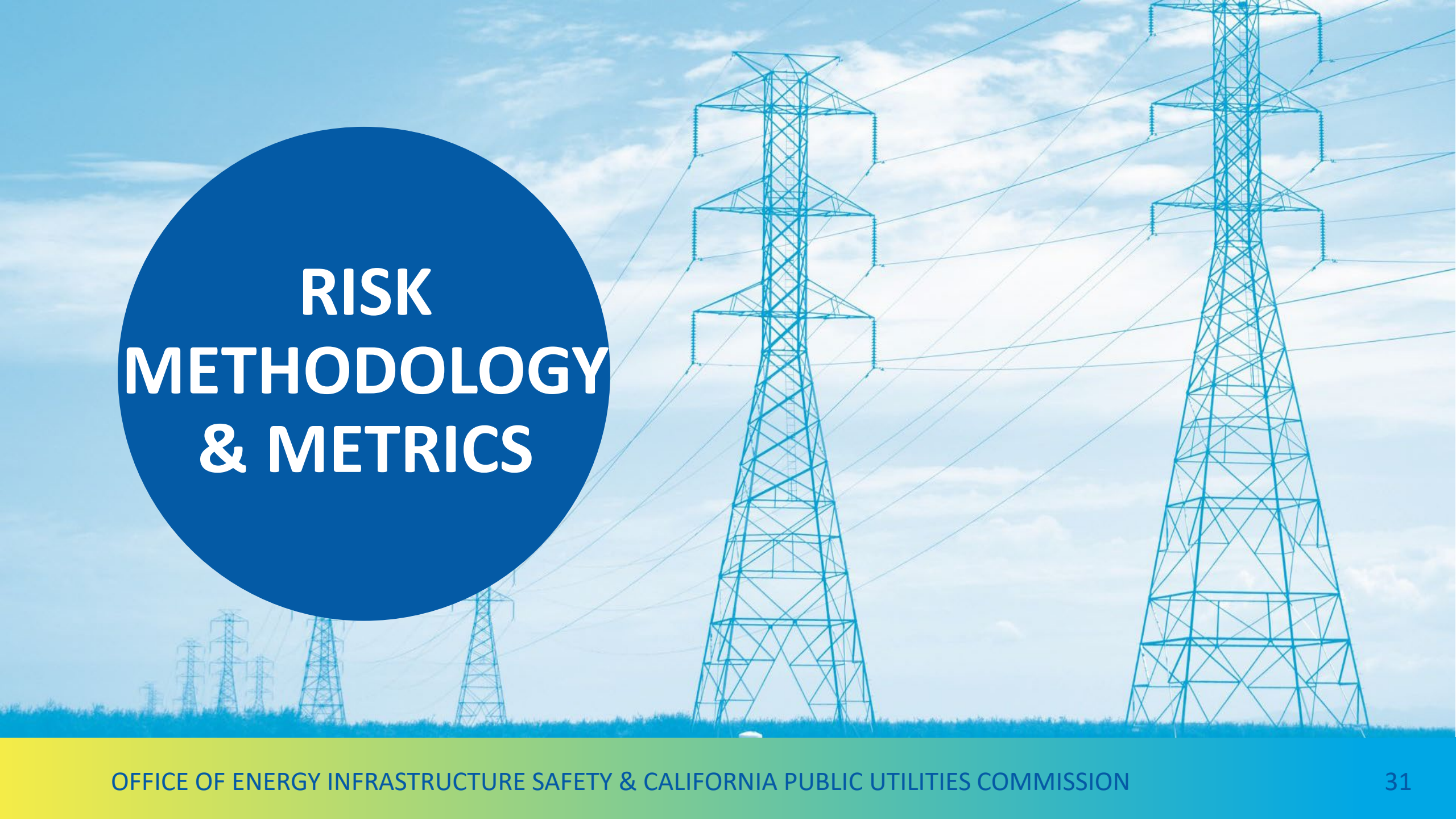
20. What reporting requirements are necessary to make public both the findings of the audits of authorized WMP spending, and any other requirements established by the CPUC or Energy Safety?

WMP & GRC ALIGNMENT QUESTIONS (12/12)

21. 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?



10 MINUTE BREAK



RISK METHODOLOGY & METRICS

RISK METHODOLOGY & METRICS QUESTIONS (1/8)

22. How is Energy Safety considering the use of a consistent risk modeling methodology across the WMP and GRC processes?

RISK METHODOLOGY & METRICS QUESTIONS (2/8)

23. The Joint Utilities proposed the use of an interim Cost Per Avoided Ignition framework while longer-term approaches continue to be developed and refined.

RISK METHODOLOGY & METRICS QUESTIONS (3/8)

24. How will cost-per-avoided-ignition methodologies interact with other methodologies - RSE/CBA/MAVF/etc.?

RISK METHODOLOGY & METRICS QUESTIONS (4/8)

25. Is there consideration that cost per avoided ignition may be used as a part of determination of cost recovery?

RISK METHODOLOGY & METRICS QUESTIONS (5/8)

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

RISK METHODOLOGY & METRICS QUESTIONS (6/8)

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

RISK METHODOLOGY & METRICS QUESTIONS (7/8)

28. What structure should the record of the wildfire mitigation initiatives take to ensure that risks identified in the RAMP can be traced to the approved WMP and GRC applications?

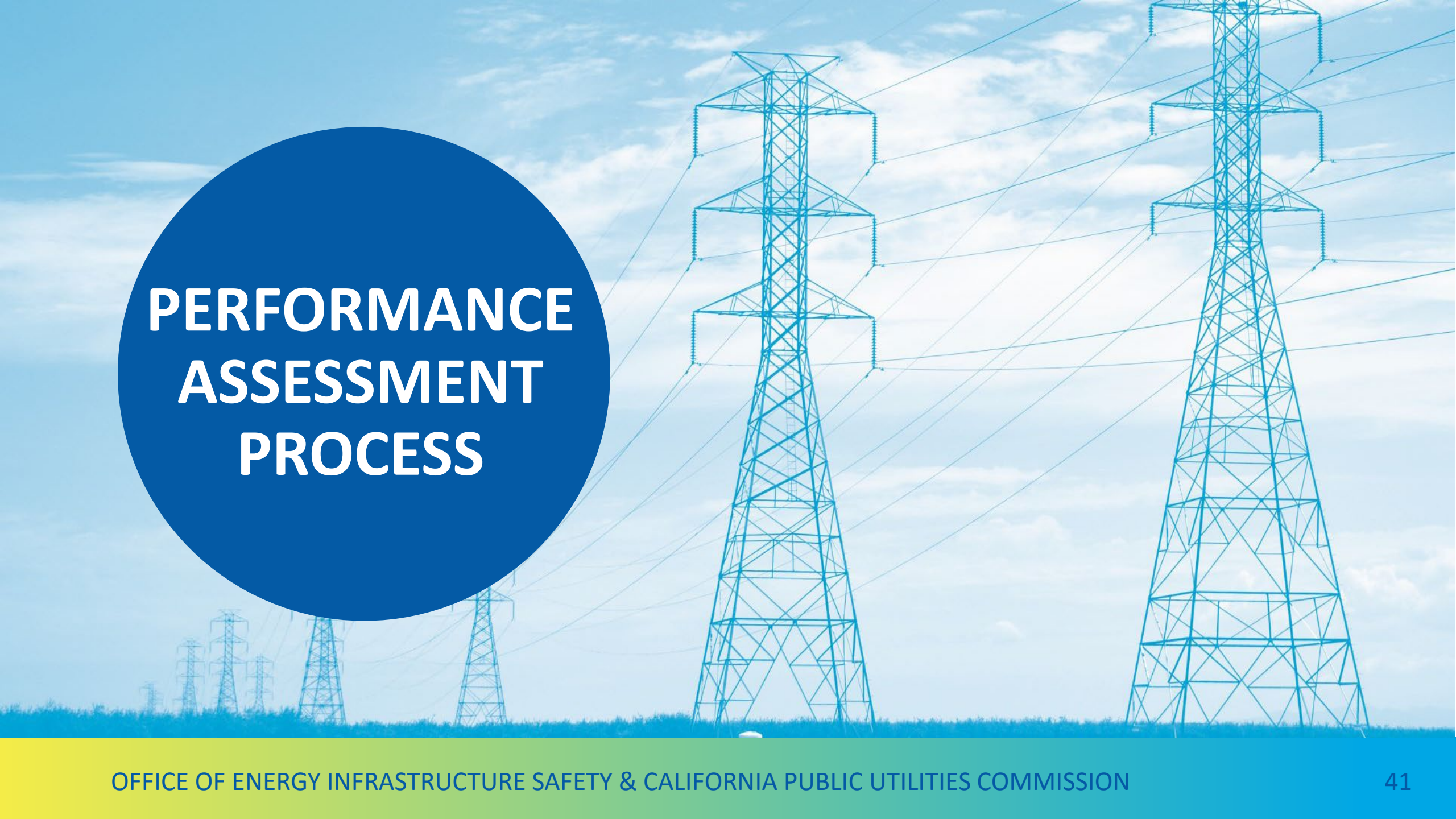
RISK METHODOLOGY & METRICS QUESTIONS (7/8)

Submission & Decision Sequence

1. Utilities submit **RAMP & WMP** at the same time, using same risk methodology approach.
2. **CPUC reviews RAMP**, Energy Safety reviews WMP simultaneously and coordinate together.
3. Utilities use RAMP & WMP results to inform its **GRC application**.
4. GRC process is carried out, resulting in a **GRC decision**, record, testimony, settlements, etc.
5. Utilities **submit a Revised WMP** to Energy Safety to align its WMP initiatives w/ revenue authorized in the GRC.
6. Energy Safety **evaluates the Revised WMP** from a risk reduction perspective and issues a decision.
7. The **approved WMP** is the WMP that follows the Revised WMP decision.
8. Energy Safety will assess **performance** of that approved, post-GRC decision, WMP.

RISK METHODOLOGY & METRICS QUESTIONS (8/8)

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



PERFORMANCE ASSESSMENT PROCESS

PERFORMANCE ASSESSMENT PROCESS QUESTIONS (1/3)

30. The Joint Utilities recommend having a consistent Independent Evaluator for the duration of the WMP Base Plan.

PERFORMANCE ASSESSMENT PROCESS QUESTIONS (2/3)

31. The Joint Utilities recommend allowing more than 60 days to contract an Independent Evaluator after the list of approved Independent Evaluators is released.

PERFORMANCE ASSESSMENT PROCESS QUESTIONS (3/3)

32. How do [CPUC reporting requirements related to expenditure changes] align with or differ from WMP implementation auditing and reporting requirements to Energy Safety for the WMP?



OPEN Q&A

HOW TO PARTICIPATE

If You Wish to Speak:

- Press the “**Raise Hand**” button in Teams; participants will be unmuted in the order hands are raised.
- For dial-in users via telephone, press **#5** to raise or lower your hand.
- Use the **Chat** feature to submit a question at any time.



WRAP-UP



Providing Written Comments

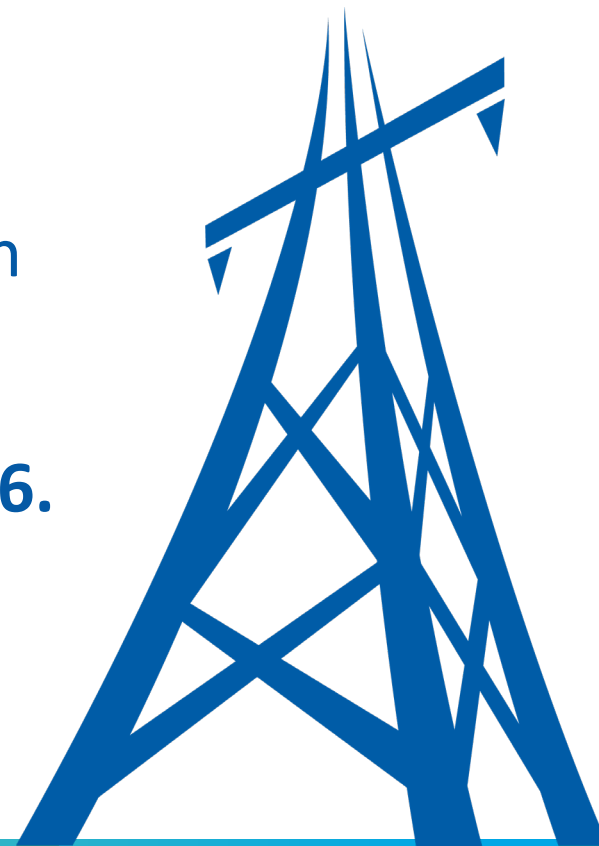
SUBMITTING WRITTEN COMMENTS

Stakeholders may provide written responses or comments about the topics discussed today.

Submit comments to Energy Safety's WMP Guidelines Docket, or by emailing the service lists of the Commission proceedings listed below.

Written comments are due by Thursday, August 13, 2026.

Commission Proceedings: R.18-10 007, A.25-05-009, A.23-05-010, A.22-05-016





Contact Information



OFFICE OF ENERGY INFRASTRUCTURE SAFETY

715 P Street, 15th floor
Sacramento, CA 95814

916.902.600

www.energysafety.ca.gov

CALIFORNIA PUBLIC UTILITIES COMMISSION

505 Van Ness Avenue
San Francisco, CA 94102

415.703.2782

www.cpuc.ca.gov