

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

August 13, 2026

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

RE: Pacific Gas and Electric Company's Comments on the Public Workshop on Senate Bill 254 Implementation and Wildfire Mitigation Plan Updates.

Dear Mr. Marino:

Pacific Gas and Electric Company ("PG&E") provides the following comments 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).

I. Comments:

PG&E's comments address, generally, Follow up Questions 7 through 10, which address wildfire initiative expenditures and the obligations imposed on electrical corporations. Based on the questions presented, PG&E assumes Energy Safety is referencing Public Utilities Code Section 8386.3(c)(1) which states:

An electrical corporation shall not divert revenues authorized by the commission to implement the approved wildfire mitigation plan to any programs or activities outside of the plan approved pursuant to Section 8386.4.

Section 8386.3(c)(1)(A) further requires an electrical corporation to notify the California Public Utilities Commission by advice letter of "[t]he date when the electrical corporation projects that it will have spent, or incurred obligations to spend, its entire annual revenue requirement for vegetation management in its wildfire mitigation plan not less than 30 days before that date."

Over the last several years, California's wildfire risk reduction framework has matured significantly. Utilities have developed more advanced risk governance processes and incorporated them into the Risk Assessment Mitigation Phase (RAMP), the General Rate Case (GRC), and accountability reports such as the Risk Spending Accountability

Report (RSAR) and the forthcoming Risk Mitigation Accountability Report (RMAR). As those frameworks have evolved, the Wildfire Mitigation Plan (WMP) has increasingly operated as a parallel reporting structure rather than an integrated component of the overall risk management and regulatory process.

SB 254 gives Energy Safety a unique opportunity to modernize the WMP framework by aligning it more directly with the risk models, mitigation portfolios, organizational structures, and spending categories already used in the RAMP and GRC processes and associated reports. Doing so would improve transparency, strengthen accountability, reduce administrative burden, and allow regulators and stakeholders to focus on the wildfire mitigations that deliver the greatest safety benefits to Californians. With that objective in mind, PG&E respectfully submits this general response to the Follow-Up Questions for Stakeholders.

PG&E recommends that Energy Safety modernize the WMP framework by focusing on the four related principles below:

- A. Align the WMP with existing risk and regulatory frameworks.
- B. Eliminate redundant tracking systems and identifiers.
- C. Align accountability with revenue authorization.
- D. Focus accountability where risk reduction and spending matter most.

A. Align the WMP with Existing Risk and Regulatory Frameworks and Leverage Existing Reporting

As a threshold matter, Questions 7 through 10, which relate to wildfire expenditures, illustrate several ambiguities that complicate alignment between the WMP, RAMP, and GRC. The questions refer at different points to “wildfire initiatives” and “mitigation activities,”¹ while the current WMP structure treats Category, Initiative, and Activity as distinct levels of taxonomy. Any implementation of SB 254 should be explicit about which hierarchical level applies in each context, and whether a requirement is intended to apply to one or multiple levels.

Utilities currently expend substantial resources responding to reporting requests that require information to be reconstructed in formats that differ from how work is planned, forecasted, budgeted, and tracked internally as well as from existing accountability reporting such as the RSAR and RMAR. One instance of this is Energy Safety-defined mitigation activities in the current WMP guidelines do not map cleanly onto RAMP mitigations, even when both describe the same underlying risk reduction work. For example, PG&E’s 2024 RAMP presents Overhead System Hardening (WLDIFR-M002) as inclusive of Covered Conductor, Pole Replacement, Replacement of Non-Exempt

Equipment, and related work. By contrast, Energy Safety treats Distribution Pole Replacement as a distinct mitigation activity from Covered Conductor and includes replacement of various types of Non-Exempt Equipment within the Equipment Maintenance and Repair *initiative*. These gaps run in both directions: an individual RAMP mitigation may cover only part of an Energy Safety activity, and an individual Energy Safety activity or initiative may cover only part of a corresponding RAMP mitigation or control.

The same misalignment exists between the WMP taxonomy and the GRC. GRC programs and WMP activities frequently do not align: a GRC forecast item, usually presented at a Major Work Category (MWC) or Maintenance Activity Type (MAT) level, may fund more than one WMP activity or only part of one. GRC forecasts are also often adopted at a broader program level than Energy Safety's WMP expenditure table tracks, and they typically do not split HFTD from non-HFTD spending unless the item is presented that way in the GRC.

Utility accounting systems add a further layer of difficulty. PG&E's cost model, for example, tracks budgets, forecasts, and actual expenditures through orders, with no native field linking an order to a WMP Category, Initiative, or Activity. Those orders are instead tied to GRC-driven attributes that allow PG&E to plan, forecast, and record costs in a manner that ties back to a funding source such as the Wildfire Mitigation Balancing Account (WMBA). PG&E has recently worked to build a WMP taxonomy reporting layer into its system of record, but that layer is inherently unstable because the WMP taxonomy may change from cycle to cycle.

Regulators, stakeholders, and utilities would all benefit from a streamlined approach that reduces time spent reconciling data across forums and increases time spent analyzing wildfire risk reduction outcomes. To meet the need of Energy Safety to have a common view of all the utilities, the utilities along with Energy Safety could work together to find a framework that provides a common view in the WMP while still allowing for the level of granularity that fits within their RAMP and GRC structures.

For these reasons, PG&E recommends that the WMP financial framework should align to the RAMP and GRC and their associated accountability reports, rather than requiring GRC forecasts and expenditure data to be transformed to fit a separately defined WMP taxonomy. Energy Safety, in collaboration with the CPUC, should develop a framework in which each utility defines its own lowest-level units of work at the same granularity used to present forecasts and recorded costs in the GRC, with a required mapping of those units to standardized WMP Categories or Initiatives. For example, rather than identifying Distribution Pole Replacements and Reinforcements as a standalone WMP Activity, Energy Safety could provide a broader section for Pole Programs and allow

utilities to present those programs in the same format, with the same scope, and the same identifying codes used in the RAMP and GRC.

Aligning the WMP with existing risk and regulatory frameworks and their associated accountability reports, Energy Safety would have the transparency it seeks to hold utilities accountable while preserving utilities' required flexibility as prudent operators to reallocate funding for changing circumstances that occur within the GRC cycle. This would also mitigate the need for additional requirements related to expenditure changes for wildfire initiatives, suggested in Questions 7 and 10, because utilities' spending and risk reduction relative to adopted amounts are already presented in existing accountability reports.

B. Eliminate Redundant Tracking Systems

One of the most significant inefficiencies in the current structure is the need to track substantially similar activities using multiple identification systems and identification systems or numbers that change across cycles. A common and consistent set of identifiers across RAMP, GRC, WMP, and accountability reporting would create a clear and auditable line of sight from risk identification, to cost forecasting and authorization, to expenditure tracking and accountability reporting. Such alignment would reduce reconciliation efforts, minimize reporting inconsistencies, and improve stakeholders' ability to understand how authorized spending supports wildfire risk reduction.

This issue bears directly on the inefficiencies raised in Question 5 and the data management issues raised in Question 8. As noted above, PG&E's extension of the WMP taxonomy into its reporting systems is an additional data layer that has required order-level review of more than \$6 billion in annual expenditures. Although PG&E has made, and continues to make, improvements in this area, the inefficiency could be substantially reduced by allowing utilities to present WMP financial data at the level of detail already supported by their systems of record and their GRCs.

C. Align Accountability with Revenue Authorization

A utility-driven one-to-one relationship between GRC funding and WMP work is both achievable and valuable. However, a reporting structure built on a separately defined WMP taxonomy makes it more challenging to ensure that revenue required to implement WMP work is not diverted, because the reported categories do not correspond to the categories in which that revenue requirement was requested, litigated, and adopted. The durable solution is to align the WMP with the proceedings that create the revenue requirement. WMP initiative identifiers should align with RAMP mitigation and control identifiers and their associated risk reduction unit valuations that

carry forward into the GRC. Under that structure, a single identifier would follow each activity from risk assessment, to funding, to execution and reporting, making the relationship a property of the system rather than an after-the-fact reconciliation and making any diversion of authorized revenue structurally visible rather than forensically reconstructed.

At the highest level, this framework could be supported by a balancing account covering all work described in the WMP, which would also address concerns around accountability and transparency. A balancing account coextensive with the WMP would reduce the fragmentation among numerous accounts that currently exist. Given that balancing account treatment is a ratemaking function, this element would fall to the Commission to establish in coordination with Energy Safety's reporting framework, if Energy Safety wants to pursue this path. A balancing account approach would directly and indirectly address the financial implications associated with Follow-Up Questions 2, 3, 6, 7, 9, and 10.

D. Focus Accountability Where Risk and Spending Matter Most

A modernized WMP should also recognize that not every activity warrants the same level of granular financial tracking. Applying uniform tracking obligations across all activities imposes substantial administrative burdens without necessarily improving oversight. Energy Safety should instead focus on the relatively small number of mitigation programs that drive the majority of wildfire risk reduction and spending. In PG&E's case, for example, the top five capital activities reported in its revised 2025 year-end filing comprise 93% of total capital expenditures, and the top five expense activities comprise 81% of total operating expenditures. By contrast, the long tail of lower-cost activities is often the most difficult to track, because costs may be tied to employee time in roles that support multiple WMP activities or a combination of WMP and non-WMP work.

An "80/20" approach, which focuses on tracking the highest spend and risk reduction activities, would allow Energy Safety to concentrate on reporting and accountability on the highest-impact mitigations: those where most resources are invested and where the greatest risk reduction is achieved. By emphasizing major mitigation programs rather than requiring extensive reporting on low-cost, low-impact, and difficult-to-track activities, Energy Safety could improve both the quality and usefulness of oversight. This approach directly or indirectly addresses efficiency and other concerns in questions 2, 5, 6, and 8.

II. Conclusion

Ultimately, the objective should be to create a WMP framework that reflects how utilities manage wildfire risk. Utilities assess risk through the RAMP, seek funding through the GRC, execute mitigation programs through operational organizations, and report results through accountability mechanisms. The WMP should serve as a strategic link across those activities rather than operating a separate system with unique taxonomies, tracking structures, and reporting expectations.

Aligning the WMP with the RAMP and GRC processes would strengthen accountability by creating a consistent, traceable connection between identified risk, authorized funding, mitigation activities, expenditures, and outcomes. This approach would allow Energy Safety to focus less on managing reporting complexity and more on evaluating the effectiveness of wildfire mitigation efforts, which is ultimately the purpose of the WMP.

III. Closing

PG&E appreciates the opportunity to provide these comments.

If you have any questions or require additional information, please contact me at jay.leyno@pge.com.

Sincerely,

/s/ Jay Leyno