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VIA ELECTRONIC FILING

Office of Energy Infrastructure Safety
California Natural Resources Agency
715 P Street, 20th Floor
Sacramento, CA 95814

RE: Mussey Grade Road Alliance Comments on SB 254 Implementation Workshop

The Mussey Grade Road Alliance (MGRA or Alliance) files these comments pursuant to the instructions provided during the July 30, 2026 SB 254 Implementation Workshop,¹ stating that OEIS will be accepting comments until August 13, 2026, and that these may be filed on the WMP Guidelines docket or sent to specified Commission service lists. MGRA is an intervenor at OEIS and is therefore filing on the WMP-Guidelines docket.

The Alliance comments are authored by the Alliance expert, Joseph W. Mitchell, Ph.D.

Respectfully submitted this 13th day of August, 2026,

By: /S/ ***Diane Conklin***

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¹ OEIS; Workshop Slides and Recording; Energy Safety and California Public Utilities Commission July 30, 2026 Virtual Workshop on SB 254 Implementation. (Slides)
<https://efiling.energysafety.ca.gov/EFiling%5CGetPublicDocument.aspx?documentId=61060>

By: /S/ ***Joseph W. Mitchell***_____

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MUSSEY GRADE ROAD ALLIANCE COMMENTS ON ENERGY SAFETY AND CALIFORNIA PUBLIC UTILITIES COMMISSION JULY 30, 2026, VIRTUAL WORKSHOP ON SB 254 IMPLEMENTATION

The Mussey Grade Road Alliances' (MGRA or Alliance) appreciates the invitation of the Office of Energy Structure (OEIS or Energy Safety) and California Public Utilities Commission (CPUC or Commission) to comment on matters raised during the July 30, 2026 joint workshop on SB 254 implementation.

1. INTRODUCTION

MGRA has been involved in reviewing Wildfire Mitigation Plans since they were first initiated and prior to the existence of OEIS as an organization. Energy Safety has frequently used MGRA analysis and findings in its own WMP evaluations. These contributions were significant enough that the Commission determined that they were compensable, and so MGRA and other intervenors have been able to fully participate in WMP evaluations without cost to themselves until the passage of SB 254. SB 254 has severed the formal link between the Commission and OEIS by removing the ratification requirement from the PUC code. As WMPs transition to the GRC timeline and are considered in the GRC evaluation, the ability to trace substantive contributions might to some extent be restored. However, in the meantime, the 2026-2028 WMPs and 2028-2031 WMPs are currently “orphaned” and have no formal link to any Commission process, blocking the path to any intervenor compensation claim. This needs to be remedied.

MGRA has also been involved in the RAMP/GRC cycles for the three major utilities on a regular basis since 2019. MGRA's focus has been on cost effective wildfire mitigation, and MGRA's WMP work and GRC work often utilized and complimented each other. From the standpoint of administrative efficiency, SB 254 is generally a “Good Idea”, in that it should reduce replication of effort on the part of the utilities and stakeholders and provide clear guidelines as to how findings in the WMP will make their way into utility safety spending. However, integrating the disparate GRC and WMP processes will require more than a workshop. They will require formal coordinated effort between OEIS and the CPUC. MGRA suggests that an expedited rulemaking would best serve the purposes of all stakeholders and regulators by allowing open issues to be resolved before problems are late-discovered after the integration process is underway.

There are also technical issues regarding cost-per-avoided-ignition that MGRA has previously addressed in an earlier filing on this docket.² Since this was a topic at the workshop, MGRA’s main points from that filing will be summarized here.

2. JOINT WORKSHOP TOPICS

In instructions provided in the Workshop Slides, Energy Safety instructed respondents to limit comments to topics raised on page 1 and 2 of the Workshop Slides and topics discussed in the Workshop. MGRA responds to specific issues raised during the WMP presentation.

2.1. WMP & GRC Alignment and Differences

2.1.1. Question 13:

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

The answer to this question given during the presentation was “no”. However, there are a number of areas that still need to be addressed. The very fact that the questions posed at the workshop are open questions means additional coordination will be needed to integrate the two now disparate processes. MGRA suggests that an expedited rulemaking on the Commission side would enable formal requirements to be issued to utilities prior to the filing of the first joint WMP/RAMP, which will be by PG&E in 2028. This rulemaking would also enable the Commission to formalize the status of the WMP within the Commission processes by ratification, which would also enable open issues with regard to intervenor participation in OEIS processes to be settled. A rulemaking should be preferred to the alternative of a Resolution process, as it allows stakeholders more input.

2.1.2. Question 14

“What efficiencies in reporting and reviewing could be developed between Energy Safety and the CPUC?”

² OEIS Docket WMP-Guidelines; Mussey Grade Road Alliance Comments on Implementation of Cost-per-Avoided Ignition and Wildfire Mitigation Plan (WMP) Schedule Pursuant to Senate Bill 254 Requirements; April 27, 2026. (MGRA Ignition Comments)

As noted during MGRA's answer during the Workshop, intervenor review provides an important input during the WMP review process. The value of this review has been recognized by the Commission. In D.23-08-039, it states:

*"In ratifying Energy Safety's Action Statement, we recognize the importance of intervenor participation that contributed to Energy Safety's Action Statement. We also recognize the Commission's broader role in wildfire safety regulation, including ratemaking allowances and enforcement of WMPs that is impacted by Energy Safety's work in reviewing and approving an electrical corporation's WMP."*³

By continuing to ratify the WMPs, the Commission could ensure that full public review can be supported by the intervenor program, especially in the interim period when WMPs are transitioning to the GRC schedule.

2.2. Risk Methodology and Metrics Questions

2.2.1. Question 24

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

As noted in the Introduction, MGRA has submitted a detailed filing on cost-per-avoided-ignition metrics. Generally, it cautions that while cost-per-avoided-ignition can be informative, it should not serve as a replacement for other metrics. All ignitions are not equal, and some ignition drivers are far more likely to lead to catastrophic wildfire than others. Also, some ignition locations are more likely to result in catastrophic wildfire than others due to either elevated likelihood, elevated consequence, or both. For example, areas with high wind face higher outage and ignition probability and also increased consequences if rapid wildfire growth into populated areas is possible.

Introducing ignition-related metrics provides an opportunity to obtain additional data regarding outage probability that can differentiate between drivers that couple likelihood to consequence and thus present a higher risk of catastrophic wildfire.

³ D.23-08-039; pp. 2-3.

2.2.2. Question 26

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

MGRA Ignition Comments suggest that:

“The methodology ultimately adopted should classify ignition drivers into potentially wind-induced and wind-independent categories. Drivers that are potentially wind-induced should be given a higher weight in decision-making. Consequently, mitigations that show a low cost per avoided ignition for potentially wind-induced drivers should be given a higher relative weight during decision-making.”⁴

3. CONCLUSION

MGRA supports additional process, including rulemaking, to ensure that the WMPs are correctly integrated into Commission GRCs. One aspect of this integration should be to ensure that WMP approval is recognized by Commission resolution or decision in order to facilitate the participation of intervenors in the review process, increasing the transparency and thoroughness of review.

Respectfully submitted this 13th day of August, 2026,

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⁴ MGRA Ignition Comments; p. 8.