



Workshop Slides and Recording

Draft Wildfire Mitigation Plan Guidelines

The Office of Energy Infrastructure Safety held a public workshop on the draft Wildfire Mitigation Plan Guidelines (published September 1, 2026) on September 24, 2026. A recording of the meeting can be found on Energy Safety's YouTube channel.

Workshop Recording: <https://www.youtube.com/watch?v=CedPaRsB7vw>

The slides presented during the meeting are attached to this document.



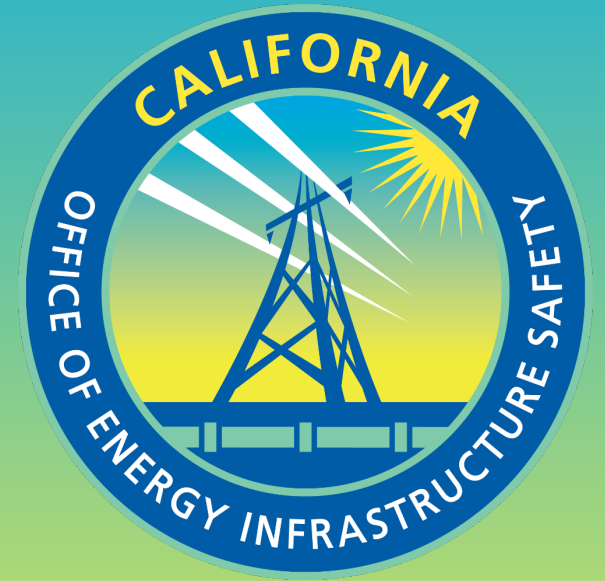
DRAFT WILDFIRE MITIGATION PLAN GUIDELINES

September 24, 2026



SAFETY MESSAGE

- Be aware of your surroundings
- Know your emergency exits and evacuation route



AGENDA

Introduction
Introduction, Process and Evaluation Chapters
WMP Requirements, ITO Requirements Chapters
<i>Break</i>
Revisions for GRC Alignment, WMP Updates Chapters
Open Comments and Questions
Closing



The WMP Guidelines

THE WMP GUIDELINES

- I. Introduction
- II. Process and Evaluation
- III. Wildfire Mitigation Plan Requirements
- IV. Independent Transmission Owner Requirements
- V. Revisions for General Rate Case Alignment
- VI. Wildfire Mitigation Plan Updates

Chapter I

Introduction



INTRODUCTION

- All electrical corporations will submit either a 2028-2030 or 2028-2031 WMP.
- Subsequent submissions timelines will align with the GRC.
- The submissions made in 2027 will be the last time all electrical corporations submit at the same time under the same guidelines.
- When updating the WMP Guidelines, Energy Safety will make clear which electrical corporations it is applicable to.



Chapter II

Process and Evaluation

PROCESS AND EVALUATION

- Includes formatting requirements, public participation, data requests, and WMP evaluation criteria.
- Energy Safety will evaluate WMPs according to:
 - Commitments
 - Continued Improvement
 - Effective at Reducing Risk
 - Long-Term Goals and Strategies
 - Progress from Previous WMP
 - Feasibility
 - Responsiveness
 - Resource-Use Efficiency
 - Risk Reduction

PROCESS AND EVALUATION

- Each electrical corporation will be required to host its own public workshop informing the public on its WMP.
- WMP dockets are reorganized.

Docket #	Name
WMP-Guidelines	Wildfire Mitigation Plans Guidelines
WMP-BVES	WMP for Bear Valley Electric Service, Inc
WMP-LU	WMP for Liberty Utilities
WMP-PC	WMP for PacifiCorp
WMP-PGE	WMP for Pacific Gas & Electric
WMP-SDGE	WMP for San Diego Gas & Electric
WMP-SCE	WMP for Southern California Edison
WMP-HWT	WMP for Horizon West Transmission, LLC
WMP-LSP	WMP for LS Power
WMP-TBC	WMP for Trans Bay Cable, LLC
Risk-Model-Group	Risk Modeling Working Group

PRE SUBMITTED QUESTIONS – PROCESS

During past WMPs, the public was allowed 7 weeks to provide comments on each WMP submission. Can the public review time be extended beyond the 20-30 days stated in the draft Guidelines? (Cal Advocates and MGRA)

PRE SUBMITTED QUESTIONS – PROCESS

Regarding the Data Request Stakeholder process, has Energy Safety considered adopting a process like the CPUC's party status process? (Cal Advocates)

PRE SUBMITTED QUESTIONS – PROCESS

Should active Data Request Stakeholders renew their status?
(MGRA)

PRE SUBMITTED QUESTIONS – PROCESS

To allow more time to develop and review responses without substantively slowing down the process, would energy Safety consider moving to a five business day response period for data requests? (SCE)

PRE SUBMITTED QUESTIONS – PROCESS

What is the reasoning for the shift to electrical corporation hosted workshops? What is the expectation for these workshops? (Cal Advocates)

PRE SUBMITTED QUESTIONS – PROCESS

Are there any other substantive changes to the manner and process by which stakeholders will provide input to the 2028-2031 WMPs? (MGRA)

PRE SUBMITTED QUESTIONS – PROCESS

The draft Guidelines state that the WMP review period lasts until Energy Safety issues its Decision on the submission. Can Energy Safety clarify whether the WMP review period extends through the date Energy Safety issues a *draft* decision, or a *final* decision? (Cal Advocates)

PRE-SUBMITTED QUESTIONS – PROCESS

If an electrical corporation becomes aware less than 45 days prior to the scheduled WMP submission date that the RAMP or GRC application date changes, how should the utility handle a situation where there isn't an opportunity to provide notice at least 45 days prior to the scheduled WMP submission date? (SDG&E)

PRE SUBMITTED QUESTIONS – PROCESS

Section 8.3.2 of Chapter II states that one of the “critical issues” that may lead to denial of a WMP is: “The electrical corporation provides a significant shift in its wildfire mitigation strategy without sufficient substantiation.” How does Energy Safety define a “significant shift” in wildfire mitigation strategy? (Cal Advocates)

PRE SUBMITTED QUESTIONS – PROCESS

Please clarify the requirement to include information from internal documents. Are all related internal documents required to be submitted as part of the WMP filing? (Liberty)

PRE SUBMITTED QUESTIONS – PROCESS

Section 3.1.1 “Utility Mitigation Tracking IDs” requires that “each mitigation activity, including those that Energy Safety defines, must have its own unique Tracking ID.” Is there a list of all mitigation activities that Energy Safety defines in the WMP Guidelines? (Liberty)



Chapter III

Wildfire Mitigation Plan Requirements

WILDFIRE MITIGATION PLAN REQUIREMENTS

- Previously the “technical requirements”.
- 14 sections, including the mitigation category sections:
 - Situational Awareness Regarding Fire Conditions and Forecasting
 - Risk Methodology and Assessment
 - Mitigation Strategy
 - Grid Design and Operations
 - Asset Management
 - Vegetation Management
 - PSPS and Wildfire Preparedness
 - Enterprise Systems

PRE SUBMITTED QUESTIONS – LESSONS LEARNED

Section 5.2 Incident Investigations: Please confirm the reporting requirements for incident investigations match the duration of the previous wildfire mitigation plan cycle. (SCE and PG&E)

PRE SUBMITTED QUESTIONS – LESSONS LEARNED

Section 5.2: Incident Investigations: What is "investigations of incidents that did not lead to catastrophic wildfire" referring to? Is this referring to CPUC reportable ignitions? Does this include all wildfire events that do not meet the definition of a catastrophic wildfire? (SDG&E and PG&E)

PRE SUBMITTED QUESTIONS – LESSONS LEARNED

For Section 5.3 - Performance Assessment, please clarify the intended scope of findings that must be addressed. (PG&E)

PRE SUBMITTED QUESTIONS – LESSONS LEARNED

For Section 5.4 - Performance Metrics, please clarify the intended purpose of this section and how the required performance metrics differ from targets and other performance reporting included elsewhere in the WMP. (PG&E)

PRE SUBMITTED QUESTIONS – LESSONS LEARNED

For Section 5.5 - Additional Lessons Learned, please clarify the applicable lookback period. Should lessons learned be limited to the current WMP cycle or extend to an earlier historical period? (PG&E)

SITUATIONAL AWARENESS REGARDING FIRE CONDITIONS AND FORECASTING

- Reorganized and placed before the Risk Methodology and Assessment section.
- Grid monitoring systems moved to the Grid Design and Operations section.
- This section is focused on forecasting and situational awareness specific to fire conditions.
 - Environmental Monitoring Systems
 - Ignition Detection Systems
 - Weather Forecasting
 - Fire Potential Index

PRE SUBMITTED QUESTIONS – SITUATIONAL AWARENESS

Section 6.2.1: Existing Systems, Technologies, and Procedures: Is Energy Safety expecting utilities to document formal quality assurance/quality control processes used to validate measurement accuracy, completeness, and reliability, or would a description of existing verification practices and operational checks be sufficient? (SDG&E)

PRE SUBMITTED QUESTIONS – SITUATIONAL AWARENESS

Section 6.3.1 Existing Ignition Detection Sensors and Systems: The draft guidelines require utilities to describe the "integration of sensor data into machine learning or AI software." Is Energy Safety requiring utilities to utilize machine learning or AI as part of their ignition detection program? (SDG&E)

PRE SUBMITTED QUESTIONS – SITUATIONAL AWARENESS

Section 6.4.5: Weather Station Maintenance and Calibration: The draft guidelines require utilities to describe "plans to overcome" maintenance and calibration limitations. Is Energy Safety expecting utilities to implement a new formal process or procedure to address these limitations, or can utilities satisfy this requirement by documenting existing operational practices? (SDG&E)

PRE SUBMITTED QUESTIONS – SITUATIONAL AWARENESS

Do the weather-forecast documentation requirements apply identically to independent transmission owners, which may lack the in-house meteorology capacity of the large investor-owned utilities? Are scaled expectations or third-party options contemplated for smaller entities? (EnXchange)

PRE SUBMITTED QUESTIONS – SITUATIONAL AWARENESS

For procedures that assign or restrict field activities based on Red Flag Warnings, Fire Potential Index levels and other weather triggers: will Energy Safety specify acceptable indices and thresholds, or expect each utility to justify its own trigger framework? How should a utility document the forecast source underlying each trigger? (EnXchange)

RISK METHODOLOGY AND ASSESSMENT

Highlights of Changes

- Reduced duplicative sections
- Brought in *List of Wildfire Risk Drivers* and added “wind dependency” column
- Incorporated RMWG feedback
 - Removed *Design Scenarios*
 - Removed *Burn Likelihood* term from the *Wildfire Likelihood* framework

Risk Modeling Documentation (Appendix B)

- *14.2.1 Summary Documentation* and *14.2.2 Example Calculations* submitted with the WMP
- *14.2.3 Detailed Modeling Documentation* prepared at time of submission, requested via DR
 - New requirements for model verification and validation, including cross comparison

PRE SUBMITTED QUESTIONS – RISK METHODOLOGY

The Risk Modeling Working Group has run for several years, and is developing a document that outlines approaches to utility risk modeling.

Will Energy Safety require or encourage utilities to adhere to the recommendations of the Risk Modeling Working Group?

(Cal Advocates)

PRE SUBMITTED QUESTIONS – RISK METHODOLOGY

Does use of an externally validated product for fire-weather forecasting change the utility's documentation burden for the products methods, validation and limitations? (EnXchange)

PRE SUBMITTED QUESTIONS – RISK METHODOLOGY

For Section 7.4.1 – Risk Model Output, please clarify whether “wildfire consequence risk” is intended to mean a monetized wildfire consequence value for each circuit segment.

MITIGATION STRATEGY

Highlights of Changes

- Decision-making Flowchart
- “Waterfall” Diagram
- New Cost-per-Avoided Ignition requirements
- Benefit Cost Ratio now required
 - Cost-per-Avoided Ignition should be used with BCR



$$\text{Cost-per-avoided Ignition} = \frac{\text{CapEx} + \text{OpEx}}{\text{Baseline Ignitions} \times (\text{POI}_{pre} - \text{POI}_{post})}$$

PRE SUBMITTED QUESTIONS – MITIGATION STRATEGY

Section 8.1.3 of Chapter III discusses benefit-cost ratios (BCRs) and references the CPUC Risk-based Decision-making Framework. At the CPUC, rulemaking R. 26-04-016 is in progress to revise the RDF. Will utilities be required to conform to decisions in this rulemaking, if they occur prior to or during the next WMP cycle? (Cal Advocates).

PRE SUBMITTED QUESTIONS – MITIGATION STRATEGY

For Section 8.1.4, Activity Selection Process, must all mitigations have two reasonable mitigation alternatives, or is it understood that some targeted mitigations address drivers and/or conditions that are not readily addressed by two or more alternatives? (SCE)

PRE SUBMITTED QUESTIONS – MITIGATION STRATEGY

For cost-per-avoided ignition, how should utilities decide how many ignitions were avoided due to weather-driven decisions (work stoppages, PSPS, rescheduling) versus physical equipment upgrades?

PRE SUBMITTED QUESTIONS – MITIGATION STRATEGY

How does Energy Safety defines a “project” in the context of developing "project-specific" mitigation effectiveness. Should a “project” be defined as a circuit segment, consistent with the EUP Guidelines, or should utilities use a different definition? (PG&E)

PRE SUBMITTED QUESTIONS – MITIGATION STRATEGY

Please clarify which mitigations are expected to be included in Table 8-2: Overall Joint Mitigation Activity Effectiveness? The example focuses on covered conductor, EPSS, and PSPS; should utilities also evaluate other combinations, such as covered conductor and pole clearing, where applicable? (PG&E)

PRE SUBMITTED QUESTIONS – MITIGATION STRATEGY

Please clarify expectations for cost-per-avoided-ignition calculations. Specifically:

Are calculations required for all mitigation activities or only major risk-reduction mitigations?

How should utilities address mitigation activities that do not have risk-reduction targets, such as situational awareness programs?

PRE SUBMITTED QUESTIONS – MITIGATION STRATEGY

Please clarify whether expenditures over a mitigation activity's useful life should be calculated using average project costs or aggregated project-level costs. (PG&E)

PRE SUBMITTED QUESTIONS – MITIGATION STRATEGY

For Section 8.2.3, please clarify how utilities are expected to identify potential sources of “unknown residual risk.” (PG&E)

GRID DESIGN AND ASSET MANAGEMENT

Organizational Changes

- *Grid Design and Operations* section focuses on system hardening and operational mitigations
- *Asset Management* now a standalone section for inspections, work orders, and equipment maintenance.

Highlights of Changes

- Undergrounding activities separate EUP from non-EUP
- More reporting on abandoned transmission line removal/mitigation
- *14.4 Additional Tabular Data* (Appendix D) set new requirements for work orders and equipment failure data

PRE SUBMITTED QUESTIONS – GRID AND ASSET

For Section 9.1.1, Quantitative Targets, please clarify what Electrical Corporations should do if they do not have a program listed in the required list on page III-90? (SCE)

Is a utility required to have quantitative target of 0 if it does not perform one of the activities listed on page III-90 or can that activity not be listed in Table 9-1? (Liberty)

PRE SUBMITTED QUESTIONS – GRID AND ASSET

If a utility is filing a 3-year WMP, can the utility remove the Year 4 columns in applicable tables (e.g., Table 6-1, Table 9-1)? (Liberty)

PRE SUBMITTED QUESTIONS – GRID AND ASSET

With the significant expansion of data required in Table 14-3 and data tables for Asset Management, please describe how Energy Safety will use this information. (SCE)

Is there overlap between the data required in Appendix D and data submissions required pursuant to Energy Safety WMP Data Guidelines? (Liberty)

PRE SUBMITTED QUESTIONS – GRID AND ASSET

Does Energy Safety consider Remote Grids a type of microgrid, or should they be treated as distinct technologies?

May pilot-stage technologies such as microgrids or Remote Grids be addressed through qualitative targets rather than quantitative deployment targets? (PG&E)

PRE SUBMITTED QUESTIONS – GRID AND ASSET

For Section 9.1.1, - Quantitative Targets, please clarify how Energy Safety would define the activity “Long Spans” listed under “Equipment Removal and/or Addition.” (PG&E)

PRE SUBMITTED QUESTIONS – GRID AND ASSET

For Sections 9.1.1 and 10.1.1, Quantitative Targets, please clarify whether removing and replacing the same piece of equipment should be reflected in one target or two separate targets, since Equipment Removal is addressed in Section 9.1.1 and Equipment Replacement is addressed in Section 10.1.1. (PG&E)

PRE SUBMITTED QUESTIONS – GRID AND ASSET

Section 9.1.1 states “The electrical corporation must provide quantitative targets for the following activities...” Can Energy Safety please clarify:

Is the requirement that an Electrical Corporation will have a target for each of the listed activities?

Or

Is the requirement that if an Electrical Corporation has a program to perform one of the listed activities, the target must be quantitative? (PG&E)

PRE SUBMITTED QUESTIONS – GRID AND ASSET

For Section 9.3.1, Equipment Settings to Reduce Wildfire Risk, please clarify whether operational performance may be demonstrated using observed damage and field data. (PG&E)

Please confirm whether the methodology used to calculate faults and ignitions avoided is expected to align with the cost-per-avoided-ignition methodology described in Section 8. (PG&E)

PRE SUBMITTED QUESTIONS – GRID AND ASSET

For Section 10.4, Equipment Maintenance and Repair Equipment Failure and Ignition Trends, in this section, how is "shortly after" defined? (SDG&E)

PRE SUBMITTED QUESTIONS – GRID AND ASSET

For Section 9.4.1, and 10.5 and 11.10.1, Quality Management System, the Guidelines state that Tracking IDs need to be an “extension” of the original activity. Does "extension" mean the QMS Tracking ID must visibly incorporate the original initiative Tracking ID? or is there flexibility to prevent modifications to existing QMS program Tracking IDs, which would support more clear data governance? (SDG&E)

PRE SUBMITTED QUESTIONS – GRID AND ASSET

For Section 10.2, Asset Inspections, please clarify the expected scope of the requirement to provide an overview of “all asset inspection activities.” (PG&E)

PRE SUBMITTED QUESTIONS – GRID AND ASSET

For Section 10.3, Work Orders, please clarify the applicable reporting date for open work order information. Should the data represent year-end status, a specific reporting date, or another point in time? (PG&E)

PRE SUBMITTED QUESTIONS – GRID AND ASSET

For Section 10.4, Equipment Maintenance and, please clarify the required scope of Equipment Failure and Ignition Trends analysis. Specifically, must all four trend analyses be completed for each of the 24 equipment types for both failures and ignitions, or only where material trends have been identified? (PG&E)

PRE SUBMITTED QUESTIONS – GRID AND ASSET

For Section 10.5.5, QA and QC Exclusions, please clarify which activities are referenced by the requirement to “describe why [the electrical corporation] does not perform QA or QC for each activity in Sections 10.2 through 0 for which it does not perform QA or QC.” (PG&E)

PRE SUBMITTED QUESTIONS – GRID AND ASSET

Would Energy Safety consider requiring electrical corporations to separately identify contracted FTEs performing WMP professional and technical services in California, in other U.S. states, and outside the United States? (Woolley)

Would Energy Safety consider requiring electrical corporations to disclose the amount or percentage of contracted professional and technical service expenditures attributable to work performed in California, elsewhere in the United States, and outside the United States? (Woolley)

PRE SUBMITTED QUESTIONS – GRID AND ASSET

Would Energy Safety consider clarifying in the Guidelines that the characterization of work as GIS, mapping, LiDAR, drone inspection, asset management, construction, or data collection, does not determine whether the activity constitutes professional land surveying, and that it depends upon the resulting professional work product? (Woolley)

Would Energy Safety consider revising the Guidelines to require an electrical corporation, for each WMP activity involving geospatial data collection, mapping, LiDAR, photogrammetry, drone-based spatial data, asset positioning, or construction-related spatial measurements, to identify whether the work includes land surveying under Business and Professions Code section 8726? (Woolley)

PRE SUBMITTED QUESTIONS – GRID AND ASSET

Where such an activity includes regulated land surveying, would Energy Safety consider requiring the WMP to identify the California-licensed professional exercising responsible charge and direct supervision, including the applicable California license number and the contractor or organizational unit performing the work? (Woolley)

VEGETATION MANAGEMENT

- The changes to the Vegetation Management Section are primarily clarifications and cleanup.
- The largest change was to Quality Management System.
 - Similar changes have been made in the Grid Design and Operations and Asset Management System sections.
 - Provides definitions for “QA audit” and “QC inspection”

PRE SUBMITTED QUESTIONS – VEGETATION MANAGEMENT

Please clarify Energy Safety's expectations regarding how electrical corporations should demonstrate that drought conditions, vegetation mortality trends, and changing growth rates influence vegetation clearance distances. Does Energy Safety expect utilities to develop a quantitative climate-adjusted clearance methodology? Does Energy Safety expect a consistent implementation across utilities? (SDG&E)

PRE SUBMITTED QUESTIONS – VEGETATION MANAGEMENT

If an IOU does not have an active Integrated Vegetation Management or Fuels Management program during the 2028-2031 WMP cycle, is the utility still expected to complete Section 11.7, or may the utility document that no such program exists and explain the basis for that determination? Specifically, how should utilities address this section if a previously reported program is no longer approved or funded? (SDG&E)

PRE SUBMITTED QUESTIONS – VEGETATION MANAGEMENT

For Section 11.1.2 - Quantitative Inspection Targets, please clarify why risk-reduction values are required for vegetation inspection activities but not for asset inspection activities.
(PG&E)

PRE SUBMITTED QUESTIONS – VEGETATION MANAGEMENT

For Section 11.5.4 - Estimated Breakdown of Additional Pole and Tower Clearing, please clarify what is meant by “estimated breakdown” and what categories or level of detail are expected. (PG&E)

PRE SUBMITTED QUESTIONS – VEGETATION MANAGEMENT

Is it the expectation that we create 4 targets for section 11.5? Or can we combine targets and create categories within targets? Do we need to split out USFS and SRA into separate targets or can we categorize and provide a breakdown of those within the distribution poles and tower targets? (PG&E)

PRE SUBMITTED QUESTIONS – VEGETATION MANAGEMENT

For Table 11-10 “Example of Vegetation Management QC Inspection Activity Commitments”, please clarify the intended reporting period for the final column, “Expected Proportion Meeting Quality Specifications.” Specifically, should this value reflect performance over the full life of the WMP, or should it be reported for a specific year? (PG&E)

PRE SUBMITTED QUESTIONS – VEGETATION MANAGEMENT

For Section 11.10 - Quality Management System, please define “Risk-Based Sample Size” and “Expected Proportion Meeting Quality Specifications,” and provide an example of how these values should be calculated and reported.

How should pass rates be calculated, and what constitutes acceptable corrective-action closure? (PG&E)

PRE SUBMITTED QUESTIONS – VEGETATION MANAGEMENT

For Section 11.10 - Quality Management System, are QA/QC programs expected for all vegetation management initiatives, including Pole Clearing, Tower Clearing, and Defensible Space programs?

What QA/QC coverage levels are expected for Pole Clearing activities, and how should Tower Clearing activities be treated?

What quality standards and reporting expectations apply to Defensible Space programs, if any? (PG&E)

PRE SUBMITTED QUESTIONS – VEGETATION MANAGEMENT

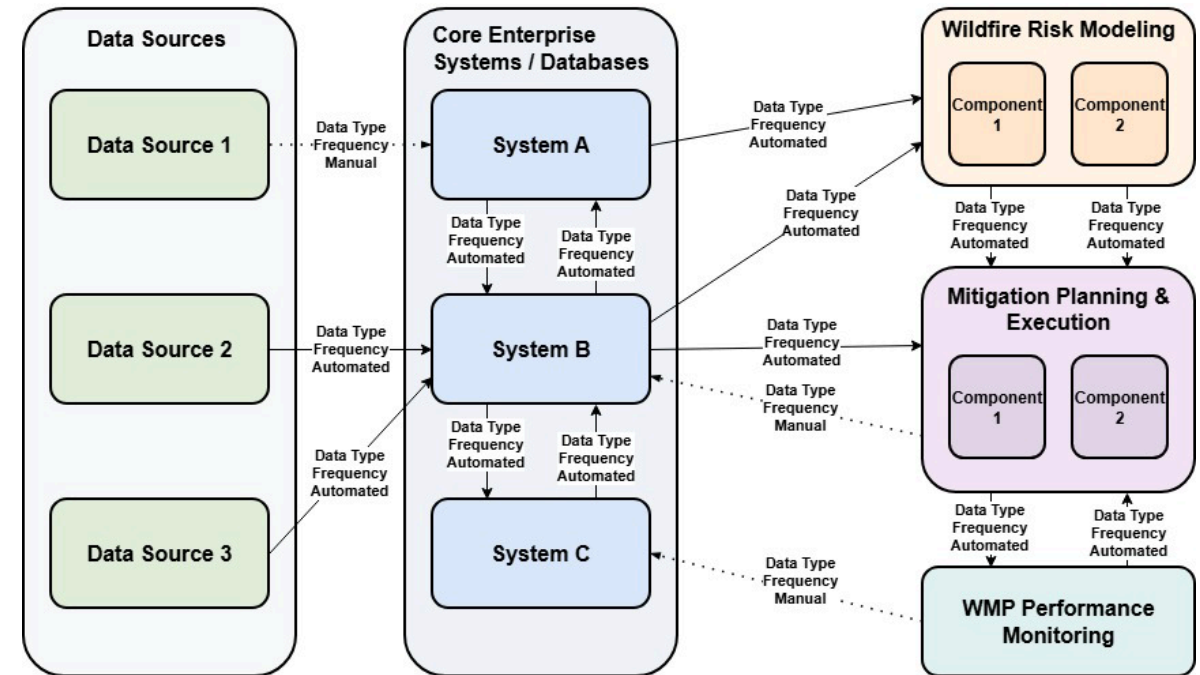
The Draft Guidelines require electrical corporations to identify the internal team or contractor performing certain inspection activities. Where contractor identity is required, would Energy Safety also consider requiring disclosure of the location or locations from which that contractor principally performs the WMP services? (Woolley)

PUBLIC SAFETY POWER SHUTOFFS AND EMERGENCY PREPAREDNESS

- The Public Safety Power Shutoffs and Emergency Preparedness, Collaboration, and Community Outreach sections have been combined to reduce duplicative reporting.

ENTERPRISE SYSTEMS

- Describe how its enterprise systems support:
 - Ignition Detection Systems
 - Weather Forecasting
 - Risk Methodology and Assessment
 - Grid Monitoring Systems
 - Asset Management
 - Vegetation Management
- Describe enterprise system architecture, including a diagram



PRE SUBMITTED QUESTIONS – ENTERPRISE SYSTEMS

For Section 13.1 - Targets, please clarify the target requirements applicable to enterprise system initiatives.

Specifically:

Are the annual targets required for enterprise system initiatives separate from the targets identified in Table 13-1?

Is a separate annual target required for each enterprise system initiative?

May those targets be qualitative, quantitative, or both? (PG&E)

PRE SUBMITTED QUESTIONS – ENTERPRISE SYSTEMS

For Section 13.3.1 - Integration with Risk Analysis and Mitigation, please provide additional clarification regarding the role of enterprise systems in mitigation decision-making.

How are enterprise systems expected to “inform” prioritization of mitigation activities?

How are enterprise systems expected to support the selection of alternative or interim mitigation activities?

How does this requirement differ from the risk model and mitigation selection discussions required in Sections 7 and 8?
(PG&E)

PRE SUBMITTED QUESTIONS – ENTERPRISE SYSTEMS

For Section 13.6 - Energy Safety Guidelines, please clarify what is meant by “procedures.” Does this refer to standard operating procedures, data governance procedures, system documentation, or another form of documented process?
(PG&E)



Chapter IV Independent Transmission Owner Requirements

ITO REQUIREMENTS

- ITO WMP requirements are fully contained within Chapter IV.
- ITOs do not need to refer to the WMP Requirements chapter.
- All other chapters apply to the ITOs.



**BREAK
RETURN AT 2:55**



Chapter V Revisions for General Rate Case Alignment

REVISIONS FOR GRC ALIGNMENT

Pub. Util. Code 8386.4

(b) For a general rate case application filed after January 1, 2027, all of the following apply:

...

(3) Within 45 days of the commission's decision rendered pursuant to paragraph (1) of subdivision (a) or any commission order modifying that decision, the electrical corporation shall submit a revised wildfire mitigation plan to the office that conforms to the commission's revenue authorization. The office shall review and either approve or request modifications to the revised wildfire mitigation plan submitted in accordance with the revenue authorized pursuant to paragraph (1) of subdivision (a). The office shall approve the revised wildfire mitigation plan within two months of submission. After approval by the office, the electrical corporation shall file the approved revised wildfire mitigation plan as an information-only submittal with the commission.

REVISIONS FOR GRC ALIGNMENT

- The electrical corporation must demonstrate to Energy Safety how the revised WMP conforms with the CPUC's authorized revenue.
- Draft Guidelines require a GRC-to-WMP crosswalk to be submitted with the revised WMP.
- For GRCs submitted prior to January 1, 2027, the previous Petition to Amend process will apply.



Chapter VI

Wildfire Mitigation Plan Updates

WMP UPDATES

- Annual WMP submissions are no longer required.
- Energy Safety may require a WMP Update on an as-needed basis.
 - A WMP Update may be required from a single electrical corporation on a single topic based on WMP evaluation findings.
 - A WMP Update may be required from all electrical corporations if new wildfire risks are causes are identified mid-WMP cycle.

PRE-SUBMITTED QUESTIONS – REVISED WMP

Will there be a public comment process on the Revised WMPs?
(Cal Advocates)

PRE-SUBMITTED QUESTIONS – REVISED WMP

The process does not appear to have an audit or verification step to ensure changes in the Revised WMP directly correlate to the revenue authorized in the GRC decision. How will Energy Safety confirm a utility hasn't used GRC alignment to make broader, non-revenue-driven changes? (Cal Advocates)

PRE-SUBMITTED QUESTIONS – REVISED WMP

If funding is not authorized in the GRC and additional funding beyond what was requested for other areas is not authorized, how can an electrical corporation address gaps without authorized funding? (SDG&E)



QUESTIONS

NEXT STEPS

- Written comments are due Thursday, October 8, 2026.
- Recommend all interested parties to familiarize themselves with the new dockets.
- Once the Guidelines are adopted, those seeking Data Request Stakeholder Designation should submit those requests.



DATA DRIVEN FORWARD-THINKING INNOVATIVE SAFETY FOCUSED

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