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BY ENERGY SAFETY E-FILING

Tony Marino
Deputy Director, Electrical Infrastructure Directorate
Office of Energy Infrastructure Safety
California Natural Resources Agency
715 P Street, 20th Floor
Sacramento, CA 95814

Re: Pacific Gas and Electric Company's Comments on the Office of Energy Infrastructure Safety's Draft Wildfire Mitigation Plan Guidelines
Docket: *#WMP-Guidelines*

Dear Deputy Director Marino:

Pacific Gas and Electric Company (PG&E) submits the following comments on the Draft Wildfire Mitigation Plan (WMP) Guidelines (Draft Guidelines), issued by the Office of Energy Infrastructure Safety (Energy Safety) on September 1, 2026. We appreciate Energy Safety's continued efforts to refine the WMP framework and develop guidelines that support effective wildfire mitigation planning and reporting.

We have identified several areas where we respectfully request Energy Safety to clarify or modify the Draft Guidelines. Specifically, PG&E recommends modifications to the WMP Update framework, establishment of a dedicated section for wildfire risk reduction partnerships, supplemental guidance regarding the reporting of additional benefits associated with mitigation activities, greater consistency in target table requirements, and clarification of certain risk modeling and documentation requirements. We address these issues below and look forward to collaborating with Energy Safety and other stakeholders in our collective effort to reduce wildfire risk and support the continued refinement of the WMP process.

We would also like to make Energy Safety aware that PG&E is currently preparing comments in response to the Commission's Order Instituting Rulemaking on the Rate Case Plan [R.26-09-003], which asks several questions about the Wildfire Mitigation Plan and how it relates to the Risk Assessment and Mitigation Phase (RAMP) and General Rate Case (GRC). Because those questions bear directly on the proposed WMP Guidelines, PG&E respectfully brings that proceeding to Energy Safety's attention and encourages coordination between the two efforts. PG&E will share its comments with Energy Safety once they are filed.

I. WMP UPDATES FOR EXTERNAL FACTORS AND DEPENDENCIES

A. In-Year Compliance Review for Unforeseen External Factors

The proposed framework does not appear to include a mechanism to address unforeseen circumstances outside of utility control that materially affect annual target attainment. Without an

established process to account for these circumstances in year, public reporting may indicate an off-track or red status that does not accurately reflect utility performance.

For example, following the February 2026 hydro penstock failure, the Colgate Powerhouse was deenergized and the Colgate Switching Station was removed from service, preventing inspections from occurring until the facilities return to operation. Although we have completed 100 percent of the available inspection scope, we will fall short of our annual target of 55 inspections and complete 53 of 55 inspections. In this circumstance, the reported target shortfall is driven by factors outside of our control rather than a failure to execute planned work.

Our 2026-2028 WMP recognizes that target attainment may be affected by external factors. Specifically, the WMP states that “All targets throughout this WMP are subject to External Factors. External Factors in this context are reasonable circumstances that may impact execution against targets including, but not limited to, physical conditions, environmental delays, landowner or customer refusals or non-contacts, permitting delays/restrictions, weather conditions, removed or destroyed assets, wildfires, exceptions or exemptions to regulatory/statutory requirements, and other safety considerations.”¹

Without a process to review and evaluate these circumstances during the reporting year, supporting documentation cannot be assessed in real time and compliance determinations may not appropriately distinguish between execution challenges and external factors beyond a utility's control. As a result, compliance reporting may not fully reflect utility performance under circumstances where approved work could not be completed for reasons outside of the utility's control. In addition, this leads to public perception that we are not fulfilling a WMP commitment. An in-year review process would also improve transparency by providing a mechanism to evaluate and document these circumstances as they occur.

Recommendation: Energy Safety should add an in-year compliance review component as suggested in the proposed three-pronged framework under Ministerial Changes in the comments submitted by the Joint Utilities on May 14, 2026². This process would allow utilities to work with Energy Safety's Compliance team to address circumstances outside of utility control that materially affect annual target attainment.

B. Annual Target Updates for Activities with Significant External Dependencies

The Draft Guidelines for WMP Updates³ does not clearly provide a mechanism for electrical corporations to update targets when new information becomes available after WMP approval. As we previously noted in comments on the Draft WMP Submission Schedules⁴, the inability to update targets may result in approved targets that no longer reflect anticipated risk reduction, changing circumstances, or expected deployment outcomes.

¹ PG&E's 2026-2028 WMP Vol 1 R2, p. 306.

² The Joint Utilities' Comments on the Public Workshop on Public Utilities Code Section 8386.4(b)(3) and WMP Updates, p. 3.

³ Draft Guidelines, p. VI-1.

⁴ PG&E's Comments on the Office of Energy Infrastructure Safety's Draft Wildfire Mitigation Plan Submission Schedules, p. 2.

This issue is particularly relevant for mitigation activities with a low volume of work that are difficult to forecast multiple years in advance, such as microgrids and remote grids. For such activities, we may not have sufficient certainty to set meaningful targets beyond the first year of the WMP, due to indeterminate timelines related to customer agreements, discretionary permits, or other external factors for outer-year projects. As a result, we may need to set outer-year targets at zero, even when work is planned.

This challenge will become even more pronounced as WMP planning horizons extend further into the future. In 2028, we will be required to establish annual targets for the 2031-2034 WMP period, requiring targets to be set three to six years before the associated work is expected to occur. For mitigation activities with these types of dependencies, that timeframe may be too far in advance to establish meaningful annual targets for any year of the WMP period, including the first year of implementation. Without a mechanism to update targets as we clear external dependencies and reduce project schedule uncertainty, the approved WMP may not reflect the most current understanding of expected deployment and risk reduction outcomes.

Recommendation: Energy Safety should establish a mechanism for updating approved targets annually for mitigation activities, such as microgrids and remote grids, that are known to be subject to significant external dependencies and for which long-term forecasting is inherently unreliable. Such updates could be submitted through the WMP Update process.

In addition, Energy Safety should consider allowing cumulative multi-year targets for this limited category of mitigation activities. Cumulative multi-year targets are appropriate for mitigation activities for which long-term forecasting is unreliable and would incentivize utilities to complete these projects as quickly as possible once external dependencies are cleared, resulting in earlier completion of permanent risk reduction work and lower residual risk in subsequent years. Such targets would preserve accountability for achieving the activity's overall unit and risk reduction objectives.

II. ITEMS FOR CLARIFICATION

A. Scope of Wildfire Risk Reduction Partnerships

Section 11.8, *Vegetation Management Partnerships*⁵, defines partnerships as efforts to accomplish wildfire risk-reduction objectives through vegetation management and identifies examples such as Regional Forest and Fire Capacity Program grantees, funding partners, and local forest collaboratives. However, it is unclear how other non-vegetation-management activities such as collaborative planning and coordination activities that support wildfire risk-reduction objectives are intended to be reflected in the WMP. Current examples include joint planning with CAL FIRE Units, coordination with Caltrans, and participation in Regional Forest and Fire Capacity Program Regional Priority Plans. These efforts have supported prescribed burning, expanded fuels reduction projects, and other wildfire resilience activities performed by partner organizations beyond utility compliance obligations.

Additional partnership activities support wildfire response and resilience through shared resources and operational coordination. One example is our County Aviation program, which

⁵ Draft Guidelines, pp. III-162 – III-163.

sponsors firefighting helicopter resources in high-risk areas through partnerships with local agencies. In Contra Costa County, Copter 1 supported suppression efforts that helped contain a 2026 fire to 50.8 acres in the same location where the 2013 Morgan Fire burned approximately 3,111 acres. During the response, Copter 1 conducted 53 drops and delivered 19,875 gallons of water. Another example is partnerships supporting the placement of dip tanks, which augment and maximize the effectiveness of helicopter resources by providing strategically located water sources. These partnerships reduce refill travel times and enable more rapid and sustained aerial firefighting operations.

Other partnership actions are expected to continue developing through the California Wildfire & Forest Resilience Task Force. While partnerships are also discussed in Section 12.2.1, *Emergency Response Preparedness*⁶, the current draft guidelines do not provide a clear location for electrical corporations to describe the broader range of partnership activities that support wildfire risk-reduction objectives outside of vegetation management and emergency response preparedness. As a result, many collaborative planning, coordination, and Task Force-related activities are not clearly reflected in the current WMP reporting structure.

Recommendation: Energy Safety should create a separate section dedicated to describing the broad range of partnership activities that support wildfire risk-reduction objectives. Such a section would provide electrical corporations an opportunity to describe the diverse partnerships, collaborative efforts, and coordination activities that meaningfully contribute to wildfire mitigation but are not otherwise captured in the current WMP structure.

B. Clarification of Additional Benefits

Sections 9.6, *Additional Benefits of Grid Design and Operations*⁷, and 10.7, *Additional Benefits of Asset Management Activities*⁸, require electrical corporations to describe benefits beyond wildfire risk and outage program risk that are “outside of the risk components that the electrical corporation analyzed specifically for wildfire mitigation but may influence the electrical corporation’s decision-making” and tie those benefits to specific mitigation activities. However, the guidelines do not provide sufficient direction regarding the types of benefits that should be included, how those benefits should be assessed and described, or the level of detail expected. For example, we may identify benefits such as enhanced visibility and improved system mapping or phase balancing from AMI 2.0 deployments for these sections, but the guidelines do not clarify whether these types of operational and planning benefits are intended to be reported. This lack of specificity may lead to inconsistent reporting across electrical corporations and uncertainty regarding Energy Safety’s expectations.

Recommendation: Energy Safety should provide additional guidance on the intended scope of Sections 9.6 and 10.7, including the categories of benefits that should be discussed, the level of detail expected, and how those benefits should be tied to mitigation activities. Clearer direction would support more consistent and comparable reporting across electrical corporations and reduce uncertainty regarding what information should be included.

⁶ Draft Guidelines, p. III-180.

⁷ Draft Guidelines, pp. III-115 – III-116.

⁸ Draft Guidelines, p. III-141.

C. Target Table Field Consistency

There appears to be instances where target tables request the same or similar information but use different field names and terminology.⁹ For example, Tables 9-1 and 10-1 use different field names when requesting information regarding the percentage of an activity planned in HFTDs and HFRAs, and Tables 9-1 and 11-1 use different terminology when requesting expected risk reduction values. These examples are provided in more detail in Appendix A.

Where the intent is to collect the same information across mitigation activity categories, these differences in terminology may create uncertainty regarding whether the fields are intended to capture equivalent information or reflect different reporting expectations. Inconsistent naming conventions can also make it more difficult for electrical corporations to interpret requirements consistently and compare information across target tables.

Recommendation: Energy Safety should standardize field names, terminology, and definitions across target tables for data elements that are intended to capture the same information. Consistent naming conventions would improve clarity, reduce potential confusion, and support more consistent reporting across mitigation activities.

D. Model Calibration Documentation

Section 14.2.3, *Detailed Modeling Documentation*¹⁰, requires utilities to provide detailed documentation for models that use "real-time calibration," including calibration data sources, parameter adjustments, uncertainty comparisons, and model improvement pathways. However, the guidelines do not define what constitutes "real-time calibration" or provide examples of activities that would qualify. While the section describes calibration generally as modifying model inputs and parameters to improve accuracy, it is unclear how Energy Safety distinguishes real-time calibration from other model update or validation activities.

Recommendation: Energy Safety should define "real-time calibration" and provide an example demonstrating how the concept is intended to be applied.

E. Model Cross-Comparison Documentation

The model cross-comparison requirements under Section 14.2.3¹¹ require utilities to test and compare at least three models, including at least one open-source and peer-reviewed model, using historical utility-caused wildfires and benchmarking fire behavior results against observed fire perimeters. However, it is unclear whether this requirement is intended to apply only to wildfire-spread simulation models or more broadly to all wildfire risk models. In addition, the guidelines do not identify an acceptable open-source, peer-reviewed model that utilities may use for this comparison.

Recommendation: Energy Safety should clarify whether the model cross-comparison requirement applies only to wildfire-spread simulation models. Energy Safety should also

⁹ Draft Guidelines, Table 9-1, p. III-93; Table 10-1, p. III-120; Table 11-1, p. III-144.

¹⁰ Draft Guidelines, p. III-204.

¹¹ Draft Guidelines, p. III-205.

identify any particular open-source, peer-reviewed model(s) it considers appropriate for this cross-comparison in the guidelines.

III. CONCLUSION

We appreciate this opportunity to provide comments on the Draft WMP Guidelines and look forward to continuing to work with Energy Safety and interested parties to reduce wildfire risk throughout California. Should you have any questions, or need any additional information, please do not hesitate to reach out.

Very truly yours,

/s/ Jay Leyno

Appendix A – Examples of Target Table Field Naming Inconsistencies

Topic / Data Element	Table / Field Name	Comparable Table / Field Name	Draft Guideline Reference(s)
Percentage of activity planned in High Fire Threat Districts (HFTD) and High Fire Risk Areas (HFRA)	Table 9-1: "% Planned in HFTD & HFRA for [Year]"	Table 10-1: "% Planned in HFTD [Year]"	Draft Guidelines, pp. III-93, III-120
Expected wildfire risk reduction associated with a mitigation activity	Table 9-1: "Expected Risk Reduction for [Year] (k\$)"	Table 11-1: "% Risk Reduction Value (k\$) [Year]"	Draft Guidelines, pp. III-93, III-144