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Via Electronic Filing

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**Subject: Public Advocates Office's Comments on the Draft 2028-2031
Wildfire Mitigation Plan Guidelines**

Docket: WMP-Guidelines

Dear Director Kaser,

The Public Advocates Office at the California Public Utilities Commission (Cal Advocates) respectfully submits the following comments regarding the Draft 2028-2031 Wildfire Mitigation Plan Guidelines, which the Office of Energy Infrastructure Safety issued on September 1, 2026. Please contact Nathaniel Skinner (Nathaniel.Skinner@cpuc.ca.gov) or Iain Fisher (Arthur.Fisher@cpuc.ca.gov) with any questions relating to these comments.

We respectfully urge the Office of Energy Infrastructure Safety to adopt the recommendations discussed herein.

Sincerely,

/s/ **Joshua Tey**

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I. INTRODUCTION

On September 1, 2026, the Office of Energy Infrastructure Safety (Energy Safety) issued the draft guidelines for the 2028-2031 wildfire mitigation plans (WMPs).¹ On September 24, 2026, Energy Safety hosted a workshop regarding the Draft WMP Guidelines. Public comments were invited to be submitted by October 8, 2026.

Cal Advocates timely submits these comments pursuant to the cover letter of the Draft 2028-2031 WMP Guidelines. The recommendations herein aim to improve the clarity, transparency, and overall effectiveness of the Draft WMP Guidelines and data reporting standards, and ensure that they serve the needs of all stakeholders.

II. PROCEDURAL AND SCHEDULING ISSUES

A. Energy Safety Should Ensure WMP Workshops Allow Sufficient Time For Meaningful Intervenor Participation

The current guidelines require that each Investor-Owned Utility (IOU) host their own WMP workshops.² These guidelines state, “The workshop must be held at least 10 and no more than 20 calendar days after its WMP submission date.”³ Furthermore, these guidelines require that “The workshop must allow the public to submit questions and topics to the electrical corporation, ahead of and during the workshop, for the electrical corporation to respond to” and “the workshop must be publicly noticed.”⁴

However, the current guidelines suffer from two shortcomings. First, the current guidelines do not state how far in advance each IOU must give prior notice prior to holding their workshop.⁵ As written, it appears that an IOU could issue notice on the 9th day after its WMP submission and then hold the workshop on the 10th day. To prevent this situation from occurring, Energy Safety should lengthen the period given to the IOUs, and require the IOUs to issue notice of a workshop within two weeks of the WMP submission, and Cal Advocates proposes a timeline below.

¹ Office of Energy Infrastructure Safety, *Draft Wildfire Mitigation Plan Guidelines*, September 1, 2026, docket WMP-Guidelines. (Draft WMP Guidelines)

² Draft WMP Guidelines at Chapter II, Section 5.4 at II-15 to II-16.

³ Draft WMP Guidelines, Chapter II, Section 5.4 at II-15 to II-16.

⁴ Draft WMP Guidelines, Chapter II, Section 5.4 at II-15 to II-16.

⁵ Draft WMP Guidelines, Chapter II, Section 5.4 at II-15 to II-16.

Second, the current guidelines do not allow sufficient time for interested parties and stakeholders to review the WMP prior to the workshop. The WMPs have historically been complex and voluminous documents with attachments that contain a high volume of data that need to be reviewed, analyzed and interpreted. It is reasonable to expect that the IOU would request stakeholders submit questions several days in advance of the workshop. If an IOU hosts its workshop 10 days after WMP submission, as currently permitted, that wouldn't give the public a reasonable amount of time to review the WMP and identify meaningful questions.

To best serve stakeholders, the WMP workshop should clarify topics and programs such as risk modeling, asset inspections, system hardening, and more; the workshop should not simply explain what is already covered in the WMP. This process should be similar to the current process utilized for the Draft WMP Guidelines. Energy Safety published the draft guidelines on September 1, 2026,⁶ and requested stakeholders submit questions two weeks later, by September 15, 2026.⁷ Energy Safety hosted a workshop nine days later, on September 24, and used the workshop as a forum to answer submitted questions.

The current guidelines are 378 pages long, including appendices. In contrast, PG&E's 2026-2028 WMP was two volumes that totaled over 1,000 pages. Under the process currently outlined in the current guidelines, the public would be given substantially less time to review the WMP and develop questions than they were given to review the current guidelines, despite the increased length and complexity of the WMPs.

To improve opportunities for meaningful stakeholder involvement, Cal Advocates recommends Energy Safety require the IOUs to issue notice of a workshop within two weeks of the WMP submission. The workshop itself should be held no sooner than two weeks after such notice. Furthermore, to ensure stakeholders can incorporate information from the workshop into their opening comments, the workshop should take place no later than two weeks prior to the due date of opening comments. Consistent with this approach, Energy Safety should revise Chapter II Section 5.4 of the current guidelines to include the following:

- “The electrical corporation must issue public notice of a workshop within two weeks of its WMP submission date.”

⁶ Draft WMP Guidelines cover letter.

⁷ Public Meeting Announcement: Workshop on Draft Wildfire Mitigation Plan Guidelines, September 1, 2026.

- “The workshop shall be held no sooner than two weeks after such public notice, and no later than two weeks prior to the due date of opening comments.”
- “The workshop must allow the public to submit questions and topics to the electrical corporation ahead of and during the workshop, and the electrical corporation should make a good faith effort to respond to all such questions in its workshop.”

B. Energy Safety Should Require Utilities To File A Notice Of Material Change Between WMP Submission Years

Prior WMP Guidelines required electrical corporations to submit WMP Updates in the second and third year of an approved three-year Base WMP, to address five defined reportable categories: risk model changes, expenditure shifts, quarterly inspection targets, new or discontinued programs, and ACI progress.⁸ Cal Advocates requests clarification on whether Energy Safety intends to carry these categories forward, or establish a comparable self-report obligation, in the current guidelines. As drafted, Chapter VI of the current guidelines does not require electrical corporations to submit a WMP Update. Section 1 states only that Energy Safety "may require a WMP Update from an electrical corporation for any reason," and Section 2 provides that Energy Safety will give the electrical corporation notice if it does so.² The draft imposes no corresponding duty on the electrical corporation to flag a material change on its own initiative.

This shift matters more now than it would have under the prior structure, because WMP periods are no longer a consistent three-year period. Under the new WMP-GRC alignment schedule and rules, there are electrical corporations who will not file another full WMP until 2029 or 2030.¹⁰ If the utility is not required to flag a material change, there is no guarantee that in a multi-year period stakeholders would be aware or learn of any potential material change. The current guidelines effectively convert a known obligation of the utility to self-report change into an uncertainty and places the burden solely on Energy Safety.

⁸ Energy Safety, 2025 Wildfire Mitigation Plan Update Guidelines, October 2023, at 3 (listing the five categories of reportable updates: Updates to Risk Models; Changes to Approved Targets, Objectives, and Expenditures; Quarterly Inspection Targets; New or Discontinued Programs; and Progress on Areas for Continued Improvement).

² Draft WMP Guidelines, Chapter VI, Sections 1–2 at VI-1 to VI-2.

¹⁰ Energy Safety, *Revised Wildfire Mitigation Plan Submission Schedules*, April 9, 2026.

Cal Advocates recognizes that the discretionary framework may be intended to reduce the review burden of a mandatory biennial Update imposed on both utilities and Energy Safety. To preserve this reduced burden while closing the transparency gap, Energy Safety should require a short, standardized “Notice of Material Change” filing whenever an objective, defined threshold is crossed. For example, a cumulative expenditure deviation from the approved WMP exceeding 15 percent for any program, the adoption of a new or materially revised risk model version, or the discontinuation of an approved program. The risk model changes are addressed in more detail in Section III.C below. This “Notice of Material Change” filing would not require the full narrative and redline burden of a WMP Update; it would simply place the fact of the change and a brief explanation on the docket, preserving Energy Safety's discretion over whether to require a full Update in response.

Energy Safety should revise the current guidelines to include the following:

- Reinstatement of a defined set of objective thresholds (expenditure deviation, risk model version change, program addition/discontinuation) that trigger a mandatory Notice of Material Change;
- Specify and ensure that this Notice is filed to the WMP docket and does not itself require Energy Safety action, preserving Energy Safety's sole discretion over whether a full WMP Update is warranted; and
- Include language to clarify that the elimination of the prior mandatory WMP Update framework does not relieve electrical corporations of an independent duty to disclose material changes as they occur.

C. Energy Safety Should Institute Clear Standards For Evaluating Cost-Effectiveness And Employment Of Resources

The current guidelines state that Energy Safety will consider, when evaluating whether a proposed mitigation activity is effective at reducing risk, “at minimum, cost, time and complexity of implementation, risk drivers mitigated, and risk remaining.”¹¹ The current guidelines also state that the electric corporation’s “proposed mitigation activities focus on achieving the greatest risk reduction while utilizing the most efficient allocation of resources (e.g., expenditures, time, staff, material).”¹² Finally, electric corporations must demonstrate that

¹¹ Draft WMP Guidelines, Chapter II, Section 7.2 at II-21.

¹² Draft WMP Guidelines, Chapter II, Section 7.2 at II-21.

they use “risk analysis to select and prioritize mitigation activities that maximize risk reduction.”¹³

By itself, requiring that an electric corporation merely consider these objectives does not create a clear standard for evaluating whether a selected mitigation activity is a reasonable and cost-benefit effective deployment of resources. There is a clear separation between demonstrating that an electric corporation considered cost and showing that its selected mitigation activity is cost-effective when compared with other reasonable alternatives.

Suppose an electric corporation selects a very costly mitigation activity which significantly reduces wildfire risk even though another reasonable alternative could provide similar risk reduction at a much lower cost. In that situation, simply stating that the electric corporation considered cost would provide little information about whether the selected mitigation is the most efficient use of resources. A more expensive mitigation may be reasonable if it provides greater risk reduction, reduces more remaining risk, lasts longer, or provides other benefits. The electric corporation should show why the additional cost is justified by additional benefits or risk reduction.

The current guidelines already contain information needed to show why the additional cost is justified by additional benefits or risk reduction. Chapter III, Section 8.1.3 requires electrical corporations to “provide a narrative of how it calculates the benefit cost ratio (BCR) of its mitigation activities, and it must describe how a project-specific BCR is calculated”,¹⁴ and “calculate an estimate of the cost per avoided ignition for each mitigation activity planned for the WMP period.”¹⁵ Section 8.1.4 also requires electric corporations to “[e]xplain how the electrical corporation considers at least two reasonable mitigation activity alternatives for a given identified wildfire risk in its activity selection process.”¹⁶ Energy Safety should require the electric corporation to link this information together and demonstrate why its selected mitigation activity represents a reasonable deployment of resources in comparison to the feasible alternatives considered, and implement the following revisions to address this concern.

¹³ Draft WMP Guidelines, Chapter II, Section 7.2 at II-21.

¹⁴ Draft WMP Guidelines, Chapter III, Section 8.1.3 at III-65.

¹⁵ Pub. Util. Code Section 8386(d)(12)(D).

¹⁶ Pub. Util. Code Section 8386(d)(14).

1. Energy Safety should require utilities to demonstrate reasonable incremental risk reduction and to compare all reasonable alternatives

Electric corporations should show the forecasted risk reduction from a selected mitigation activity and explain how that risk reduction compares with the resources required. Where detailed information is available, the electric corporation should provide that information rather than relying mainly on a narrative explanation.

When reasonable alternatives are available, electric corporations should compare its selected mitigation with those alternatives using available information such as estimated cost, expected risk reduction, BCR, cost per avoided ignition, implementation time, useful life, and remaining risk. If the selected mitigation is less cost-effective than an alternative, the electric corporation should explain what additional risk reduction or other benefits warrant the additional cost.

2. Energy Safety should establish clear and measurable criteria to evaluate mitigation selection

Requiring electric corporations to provide this information would make Sections 7.2 and 8.1.4 work together more effectively. Section 7.2 would establish the goal of maximizing risk reduction through efficient resource use, while Section 8.1.4 would provide the information needed to determine whether the electric corporation actually met that goal.

Adopting this methodology would move the analysis from evaluating the electric corporation's consideration of cost and alternatives to determining if the evidence shows why the selected mitigation provides a reasonable level of risk reduction for the resources being spent compared with reasonable alternatives. Moreover, this would provide Energy Safety and stakeholders with a clearer foundation for reviewing mitigation decisions and would increase transparency concerning how ratepayer resources are being used.

III. TECHNICAL ISSUES

A. Energy Safety Should Require Utilities To Verify Forecasted Risk Reduction Against Actual Outcomes

Chapter III, Section 8.1.2 of the current guidelines requires each electrical corporation to provide the expected or forecasted risk reduction effectiveness for every mitigation activity, including the general formulas and calculations used, adjustment factors applied, inputs relying

on subject-matter-expert judgment, and the uncertainties in those calculations.¹⁷ Chapter III does not require the electrical corporation to revisit that forecast once the mitigation is complete and deployed, to confirm the real-world risk reduction matched what was projected.¹⁸ As a result, Energy Safety and stakeholders have no consistent way to tell whether a mitigation delivered the risk reduction used to justify its selection and cost, and a mitigation that falls short of its forecast can be carried into the next WMP on the strength of the original projection.

The Commission has often required utilities to report on the actual risk reduction achieved compared to its forecast. For example, in PG&E's 2023 General Rate Case, the Commission found it "prudent to require heightened tracking and reporting of costs and work to ensure accountability," and ordered PG&E to file an annual System Hardening Accountability Report.¹⁹ That report requires a "baseline" sheet reflecting the risk reduction approved in the GRC and a "completed" sheet reflecting actual results, with risk reduction "measured by comparing the 'completed' to 'baseline' sheet."²⁰

To ensure that utilities are funding effective and reasonable wildfire mitigation programs, Energy Safety should revise the current guidelines to:

- Require electrical corporations to report, for each completed mitigation activity, observed risk reduction compared to its Chapter III, Section 8.1.2 forecast, using a baseline-versus-completed comparison modeled on the System Hardening Accountability Report already required of PG&E;
- Adopt objective interim risk-reduction thresholds comparable to those the Commission set for PG&E's system hardening program, and require a corrective filing - explaining specifically how the electrical corporation will adjust its approach - whenever actual results fall materially short of those thresholds; and

¹⁷ Draft WMP Guidelines, Chapter III, Section 8.1.2, Mitigation Effectiveness, pp. III-56–57.

¹⁸ The closest existing mechanism, Section 5.4, Performance Metrics, requires only a narrative "lesson learned" from at least one self-selected metric per WMP, a qualitative exercise, not a systematic, quantitative comparison of forecasted versus observed outcomes. Draft WMP Guidelines, Chapter III, Section 5.4, Performance Metrics, p. III-11.

¹⁹ Decision 23-11-069 (Application 21-06-021), Decision Adopting Pacific Gas and Electric Company's 2023 General Rate Case, issued November 17, 2023, Section 4.3.7, Accountability, at 279-280 (finding it "prudent to require heightened tracking and reporting of costs and work to ensure accountability" and ordering PG&E to file an annual System Hardening Accountability Report- SHAR Advice Letter with the Commission's Safety Policy Division).

²⁰ Id. at 281 (requiring a "baseline" sheet reflecting GRC-approved projected risk reduction and a "completed" sheet reflecting actual results for completed projects, with risk reduction "measured by comparing the 'completed' to 'baseline' sheet").

- Coordinate with the Commission to ensure that a mitigation's documented WMP performance record is a required input to the Commission's review of continued or increased funding for that mitigation in the applicable General Rate Case.

B. Energy Safety Should Not Allow A Utility To “Opt Out” Of Providing Required Risk Analysis

Chapter III, Section 7, of the current guidelines, instructs electric corporations to “provide a description of its methodology for how it assesses its risk, including key data inputs, assumptions, risk analysis, and risk presentation (i.e., the results of its assessment).”²¹ The current guidelines also state that this information is, “necessary to understand the foundation of the electrical corporation’s wildfire mitigation strategy.”²²

Section 7, however, also states that an electric corporation “is not required to perform each calculation and analysis specified in this section.”²³ If an electric corporation does not perform “a particular calculation or analysis, it must explain why it does not do so, describe its current alternative to that calculation or analysis (if applicable), and outline any plans to incorporate those calculations or analyses into its risk methodology and assessment in the future.”²⁴ Without minimum required analyses, Energy Safety may not be able to consistently determine whether each electric corporation has adequately assessed wildfire risk.

A measure of flexibility is reasonable because electric corporations have different service territories, equipment, wildfire risks, data, and modeling systems. Accordingly, a calculation or methodology that is fit for purpose for one electric corporation may not always be appropriate for another. The current guidelines should allow different methodological differences when they are technically justified.

However, Section 7 currently allows too much flexibility. The current guidelines create ambiguity about which components of a Section 7 analyses are mandatory, which are optional, and what type of alternative analysis is acceptable. This uncertainty is especially important because later parts of Section 7 explicitly identify items as minimum requirements. For example, section 7.2 requires electric corporations to evaluate factors such as equipment, weather,

²¹ Draft WMP Guidelines, Chapter III, Section 7 at III-26.

²² Draft WMP Guidelines, Chapter III, Section 7 at III-26.

²³ Draft WMP Guidelines, Chapter III, Section 7 at III-26.

²⁴ Draft WMP Guidelines, Chapter III, Section 7 at III-26.

vegetation, and climate change.²⁵ Section 7.2.1 also requires that, “at a minimum, the electrical corporation must calculate its overall utility risk as the comprehensive risk from both wildfire risk and outage program risk across its service territory.”²⁶ This ambiguity can result in conflicting risk assessments amongst electric corporations, reducing Energy Safety’s ability to compare WMPs and determine whether mitigation decisions adequately address risk.

Permitting electric corporations to leave out core risk analyses also undermines comparability. Energy Safety and stakeholders need a common analytical foundation to assess risk results across electric corporations and over time. Without that foundation they may be unable to determine whether differences in reported risk reflect actual system conditions or from a variation in methodological strategies.

Energy Safety should clarify how these minimum requirements work within the broader proposal that electric corporations do not have to perform every calculation or analysis. Without this clarification, neither Energy Safety nor stakeholders have clear criteria to determine when an excluded analysis is reasonable and when the exclusion leaves a key gap in the electric corporation's risk assessment.

A comprehensive risk analysis is the starting point for many WMP decisions. As the current guidelines recognize, the required risk analysis components are “necessary to understand the foundation of the electrical corporation’s wildfire mitigation strategy.”²⁷ Electric corporations use risk analysis to identify areas of heightened risk, develop and compare mitigation activities, and forecast risk reduction. If important analyses are excluded, the results may influence which projects receive priority, and the amount of risk reduction the electric corporation predicted those projects will deliver.

Stakeholders should have adequate information to determine how the electric corporation achieved its results. If an electric corporation's risk analysis is used to justify a major mitigation program investment, Energy Safety and stakeholders should be able to trace that investment back to a sound risk analysis. An explanation that a calculation or other analysis was not performed may identify the absence, but it does not provide sufficient information to test the alternative method or determine how the omission affected the final risk forecast. Because opting out of

²⁵ Draft WMP Guidelines, Chapter III, Section 7.2 at III-27.

²⁶ Draft WMP Guidelines, Chapter III, Section 7.2.1 at III-28.

²⁷ Draft WMP Guidelines, Chapter III, Section 7 at III-26.

fundamental risk analysis adversely affects analysis reproducibility, Energy Safety should implement the following revisions.

1. Energy safety should identify the core mandatory risk analyses

The current guidelines should clearly identify which calculations, risk components, and analyses make up the minimum analytical foundation for every electric corporation. This would limit and reduce uncertainty created by the generic statement that electric corporations are not required to perform every calculation or analysis.

For example, Energy Safety should require appropriate validation of the risk calculations and results used to support an electric corporation's WMP. Section 7.5.1 requires an electric corporation to explain how it validates calculations and results for each risk component, including the data and sources used for validation.²⁸

Similarly, Energy Safety should require sensitivity analysis where material uncertainty in model inputs or assumptions could affect risk results. Section 7.5.1 requires an electric corporation to identify sources of uncertainty, explain how uncertainty is handled, "identify the needs for sensitivity analysis," and provide the results of any sensitivity analysis completed.²⁹ The current guidelines do not clearly establish when sensitivity analysis itself must be performed. Where changes to a material assumption or input could meaningfully change modeled risk, risk rankings, or predicted mitigation benefits, sensitivity analysis should be a required component of the risk assessment rather than an analysis the electric corporation may elect not to perform.

2. Energy safety should require the utility to provide justification when an analysis cannot be performed

When an electric corporation cannot perform an important calculation or analysis, it should provide:

- a specific explanation of why the analysis cannot reasonably be performed;
- the methods or approaches it considered;
- a technically supported alternative method, where available;

²⁸ Draft WMP Guidelines, Chapter III, Section 7.5.2 at III-51.

²⁹ Draft WMP Guidelines, Chapter III, Section 7.5.2 at III-51.

- a reasonable estimate or range where a complete calculation is not possible;
- an explanation of the uncertainty created by the missing analysis; and
- data to support each of the points above.

This would give Energy Safety and stakeholders enough information to evaluate whether the omission is reasonable and how it affects the electric corporation's actual and predicted risk results.

These changes would preserve needed flexibility while creating clearer minimum standards. Electric corporations would not be required to use identical models or methods, but they would be required to provide a complete enough risk analysis for Energy Safety and stakeholders to understand and evaluate their wildfire mitigation decisions.

C. Energy Safety Should Require Notice And Review Of Any Material Risk Model Changes

The current guidelines require utilities to explain how they implement model control strategies to manage versions and compare the results of a new model, or major revisions, with the prior version.³⁰ The evaluation must tackle variances in model outputs, changes to the highest risk circuit segments, changes in model accuracy, and the effects of adding or removing model components.³¹ The current guidelines also require electric corporations to discuss uncertainty and sensitivity in their risk models.³² During the reviews of the electric corporations' wildfire mitigation plans, these requirements provide useful information for reviewing changes to risk models. The current guidelines explain what an electric corporation must report when its model changes, but they do not clearly state when a major model change should require notice or review before the electric corporation uses the new results to change its wildfire mitigation plans.

This distinction matters because a material model change can alter how an electric corporation prioritizes wildfire risk and mitigation. A new or significantly modified model could change which circuit segments are considered the highest risk. Those changes could then affect

³⁰ Draft WMP Guidelines, Chapter III, Section 7.5.1 at III-50.

³¹ Draft WMP Guidelines, Chapter III, Section 7.5.1 at III-50 – III-51.

³² Draft WMP Guidelines, Chapter III, Section 7.5.1 at III-51.

whether the electric corporation chooses undergrounding, covered conductor, vegetation management, or another mitigation in a particular area.

Not every model change should require additional regulatory review. Electric corporations regularly improve data, correct errors, update assumptions, and make other routine changes. Requiring review of every small adjustment would create unnecessary work without improving WMP oversight. However, some model changes may be large enough to affect the basis of an approved WMP. A change should receive greater scrutiny when it materially changes results such as risk rankings, circuit or asset priorities, mitigation selection, or expected risk reduction. In those cases, simply explaining the change in a later filing may not provide sufficient oversight.

The current guidelines already recognize the importance of comparing model versions. Electric corporations must explain differences between the old and new model outputs and identify how the highest risk circuits changed and why.³³ The same information could be used to assess whether a model change is significant enough to require a notice to Energy Safety.

1. Energy Safety should require Utilities to provide notice when a risk models change

A material change could include a change that significantly affects risk rankings, circuit or asset prioritization, mitigation selection, expected risk reduction, or resource allocation. The notice should explain what changed in the model and why. It should also compare the results of the old and new versions so that Energy Safety can see whether the change has a meaningful effect on the WMP. This would build on the model version comparison that the current guidelines already require rather than creating an entirely separate analysis.

The electric corporation should also explain how the new results affect its existing mitigation plans. If a new model moves a group of circuit segments from a lower risk category to a higher risk category, the electric corporation should explain whether that change affects planned projects, project timing, mitigation types, or expected expenditures. If there is no meaningful effect on the approved WMP, the electric corporation should be able to say so and explain why.

³³ Draft WMP Guidelines, Chapter III, Section 7.5.1 at III-51.

To limit the burden on Energy Safety and the utilities, Energy Safety should direct utilities to file an information-only Notice of Risk Model Change whenever any changes are made to its risk model. The report should state plainly whether the change results in meaningful change to:

- risk rankings or identification of the highest risk circuits
- the location or priority of mitigation work
- the type of mitigation selected
- expected risk reduction
- planned allocation of resources.

Energy Safety would review the Notice of Risk Model Change and determine whether the provided documentation is sufficient, or whether the change is significant enough to be addressed through the WMP Update process.

This would not require Energy Safety to approve every technical change to an electric corporation's risk model. Rather, it would focus regulatory review on the impact of the change. A model update that produces similar risk rankings and mitigation priorities would likely require little additional review, whereas a model update that significantly changes where the electric corporation identifies risk or where it plans to spend wildfire mitigation funds would get more scrutiny.

The current guidelines already require electric corporations to document and compare changes to their risk models. Adding a clear notice requirement for material changes would close the gap between documenting a model change and reviewing what that change means to an approved WMP.

IV. CONCLUSION

Cal Advocates respectfully requests that Energy Safety adopt the recommendations discussed in these comments.

Respectfully submitted,

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