Pacific Gas and Electric Company

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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 Revised 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 Revised Draft Wildfire Mitigation Plan (WMP) Guidelines (Draft Guidelines), issued by the Office of Energy Infrastructure Safety (Energy Safety) on November 6, 2026. We appreciate Energy Safety's continued efforts to refine the WMP framework and develop guidelines that support effective wildfire mitigation planning and reporting.

PG&E offers the following comment and recommendation for Energy Safety's consideration.

I. COMMENTS

A. Risk Reduction Baseline for PEDS and Permanent Mitigations

The *Risk of Impact of Activities* under Section 8.1.4 defines PV Baseline Risk as the modeled risk without mitigation activities being applied. However, the Revised Draft Guidelines further state that when calculating the risk reduction of a system hardening mitigation on a circuit where PEDS mitigations have already been implemented, the Baseline Risk must include the risk reduction attributable to the previously implemented PEDS mitigations. This approach represents a departure from prior WMP risk-reduction reporting and understates the long-term value of permanent wildfire mitigations because it compares permanent infrastructure investments against a temporary operational mitigation that is not intended to be relied upon in perpetuity. Incorporating PEDS risk reduction into the baseline lowers the starting risk against which permanent mitigations, such as system hardening, are evaluated and obscures the individual and cumulative risk-reduction benefits of these mitigations.

Recommendation: Energy Safety should revise Section 8.1.4 to allow for permanent wildfire mitigations to be measured against a wildfire risk baseline that reflects conditions prior to operational mitigations.

II. CONCLUSION

We appreciate this opportunity to provide comments on the Revised 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