



OFFICE OF ENERGY INFRASTRUCTURE SAFETY

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Caroline Thomas Jacobs, Director

January 30, 2024

To: 2023-2025 Wildfire Mitigation Plans docket (#2023-2025-WMPs)
Subject: Proposed Final 2025 WMP Update Guidelines

Enclosed is the Office of Energy Infrastructure Safety's (Energy Safety's) proposed final 2023-2025 Wildfire Mitigation Plan (WMP) Update Guidelines. Included are a clean version and a redlined version that show changes from the October 30, 2023, draft.

Energy Safety made changes to the October 30, 2023, draft document in response to stakeholder comments, including, written public comments, verbal comments received during the public workshop held on November 15, 2023, and informal feedback.

The proposed final 2025 WMP Update Guidelines is part of a suite of documents being considered for adoption at Energy Safety's WMP Guidelines Adoption Meeting on January 31, 2024.¹

Sincerely,

Suzie Rose
Program Manager, Electric Safety Policy Division
Office of Energy Infrastructure Safety

¹ Public Adoption Meeting for 2025 WMP Update Guidelines: <https://energysafety.ca.gov/events-and-meetings/events/virtual-public-adoption-meeting-for-2025-wildfire-mitigation-plan-update-guidelines/> (accessed January 30, 2024)



OFFICE OF ENERGY INFRASTRUCTURE SAFETY
2025 WILDFIRE MITIGATION PLAN
UPDATE GUIDELINES

PROPOSED FINAL (CLEAN)

January 2024

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Introduction to the Guidelines

This document is the Office of Energy Infrastructure Safety's (Energy Safety's) 2025 Wildfire Mitigation Plan Update Guidelines (2025 WMP Update Guidelines) for an electrical corporation's annual update to its approved 2023–2025 comprehensive WMP (2023-2025 Base WMP).

Authority

California Government Code section 15475.6 grants Energy Safety authority to “. . . adopt guidelines setting forth the requirements, format, timing, and any other matters required to exercise its powers, perform its duties, and meet its responsibilities described in sections 326, 326.1, and 326.2 and Chapter 6 (commencing with section 8385) of Division 4.1 of the Public Utilities Code”

Pursuant to California Public Utilities Code section 8386(b), electrical corporations must annually prepare and submit a WMP to Energy Safety for review and approval. Furthermore, Energy Safety may allow the annual submissions to be updates to the last approved comprehensive wildfire mitigation plan.

Purpose and Scope

In 2023, each electrical corporation submitted its 2023-2025 Base WMP to Energy Safety. In 2024, each electrical corporation must provide an update (2025 WMP Update) to its approved 2023-2025 Base WMP. The 2025 WMP Update Guidelines set forth requirements and reportable updates for the 2025 WMP Update submission.

The 2025 WMP Update Guidelines apply to electrical corporations in the state of California. At present, there are nine electrical corporations in California:

1. Pacific Gas and Electric Company (PG&E)
2. Southern California Edison Company (SCE)
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5. Liberty Utilities (CalPeco Electric), LLC (Liberty)
6. Bear Valley Electrical Service, Inc. (BVES)
7. Trans Bay Cable, LLC (TBC)
8. Horizon West Transmission, LLC (HWT)
9. LS Power Grid California, LLC (LS Power)

The electrical corporation must reference the documents listed below for other requirements on technical details, processes, maturity survey, and data.

- 2023-2025 WMP Technical Guidelines
- 2023-2025 WMP Process and Evaluation Guidelines (WMP Process Guidelines)
- 2023-2025 Wildfire Mitigation Maturity Model
- Energy Safety Data Guidelines

General Instructions

This section provides general instructions for the electrical corporation to prepare its 2025 WMP Update to its approved 2023-2025 Base WMP. Specific requirements of reportable updates are set forth in Sections 1 through 5.

Reportable Updates

Reportable updates are updates to an electrical corporation's 2023-2025 Base WMP that it must include in its 2025 Update. An electrical corporation must provide a 2025 WMP Update reporting on the five categories of reportable updates listed below and defined in these 2025 WMP Update Guidelines. The electrical corporation may not include any changes outside these reportable updates in its 2025 WMP Update.

There are five categories of reportable updates.

1. Updates to Risk Models
2. Changes to Approved Targets, Objectives, and Expenditures
3. Quarterly Inspection Targets for 2025
4. New or Discontinued Programs
5. Progress on Areas for Continued Improvement

If an electrical corporation has no reportable updates that fall within one of the five categories listed above, it must affirmatively provide in its 2025 WMP Update that it has no reportable updates for 2025 and that the information provided in its 2023-2025 Base WMP covering the year is current and accurate.

Required Components of 2025 WMP Update

The following documents are required components of the electrical corporation's 2025 WMP Update submission:

1. 2025 WMP Update: A standalone 2025 WMP Update document that describes the electrical corporation's proposed updates, or confirmation of no updates to the approved 2023-2025 Base WMP in accordance with Energy Safety's 2025 WMP Update Guidelines.

2. Redlined 2023-2025 Base WMP: A redlined version of the electrical corporation's 2023-2025 Base WMP showing proposed updates to the approved 2023-2025 Base WMP. Significant updates to risk models must also be captured in Appendix B of the 2023-2025 Base WMP in redline.
3. Clean Updated 2023-2025 Base WMP: A clean, updated copy of the 2023-2025 Base WMP (i.e., without any updates marked in redline).

An electrical corporation without reportable updates for 2025 does not need to submit a redlined or clean version of its 2023-2025 Base WMP.

Energy Safety may require an electrical corporation to revise or provide an errata submission to an incomplete 2025 WMP Update.¹

Detailed instructions for naming conventions can be found in the 2023-2025 Wildfire Mitigation Plan Process and Evaluation Guidelines, Section 10.6: Naming Conventions.

Quantitative and Tabulated Responses

The electrical corporation must provide quantitative data to support narratives and qualitative descriptions. The electrical corporation must use the example tables as templates for reporting requested information according to the instructions provided in the respective sections. Any populated cells in the example tables are examples provided by Energy Safety for reference only.

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If any portion of the 2025 WMP Update Guidelines requires data (qualitative or quantitative) that the electrical corporation cannot collect, the electrical corporation is required to work with stakeholders, including federal, state, and local agencies and other partners, to obtain the necessary data. When data required by the 2025 WMP Update Guidelines is not collected by the electrical corporation or any stakeholder, the electrical corporation must identify these circumstances and provide a description of an alternative source of data or identify a proxy for that data that most closely fits the original requirement. The electrical corporation's 2025 WMP Update must clearly cite the source of the data used in lieu of the required data.

¹ See 2023-2025 WMP Process Guidelines, Section 4.3: Errata and Section 4.4: Revision Notice.

Relevant Regulations, Codes, and Standards

The electrical corporation must cite relevant regulations, codes, and standards (both external and internal standards) throughout its 2025 WMP Update. The electrical corporation must provide the title or tracking number of the regulation, code, or standard in parentheses next to the relevant text, or in the appropriate column if noted in a table. The electrical corporation must provide citations in footnotes.

PROPOSED FINAL

1. Updates to Risk Models

The electrical corporation must report on updates to its risk models. The collective updates to risk models are categorized as either “significant” or “non-significant.” The electrical corporation must categorize the collective changes to its risk models as either significant updates or non-significant updates, not both. The proceeding subsections outline the thresholds to determine if updates to risk models are “significant” or “non-significant.”

When determining if updates to risk models are “significant” (Section 1.1.1) or “non-significant” (Section 1.1.2), the electrical corporation’s analysis must be independent of risk reduction resulting from deployed mitigations described in the approved 2023-2025 Base WMP. For example, if a circuit was undergrounded in late 2023, the analysis would not take that risk reduction into account and would evaluate the risk for that circuit consistent with the point in time represented by WMP Table 6-5² in the approved 2023-2025 Base WMP.

An electrical corporation must analyze its top 5 percent of highest risk circuits, segments, or spans³ to determine whether updates to its risk models are significant. An electrical corporation’s top ignition risk circuits, segments, or spans are the top 5 percent of highest ignition risk circuits, segments, or spans when the circuits, segments or spans are ranked individually from highest to lowest circuit-mile-weighted ignition risk. An electrical corporation’s top Public Safety Power Shutoff (PSPS) risk circuits, segments or spans are the top 5 percent of highest PSPS risk circuits, segments, or spans when the circuits, segments or spans are ranked individually from highest to lowest circuit-mile-weighted PSPS risk.⁴

² In accordance with the 2023-2025 WMP Technical Guidelines, Table 6-5 “Summary of Top-Risk Circuits, Segments, or Spans.”

³ Electrical corporations must use the granularity – circuit, segment, or span – it used to report its “Top Risk-Contribution Circuits/Segments/Spans” in accordance with the 2023-2025 WMP Technical Guidelines, Section 6.4.2.

⁴ “Ignition risk” and “PSPS risk” are defined in the 2023-2025 WMP Technical Guidelines, Appendix A.

1.1 Significant Updates

If an electrical corporation's updates to its risk models are significant, it must:

- Discuss its updated methodology and models (e.g., using a new machine learning algorithm, changing how wildfire consequences are calculated, or changes to assumptions);
- Provide justification for the updates;
- Show how risk has shifted as a result of the updates; and
- Report any resulting changes to prioritization of mitigation initiatives and scheduling and workplans for the implementation of mitigation initiatives resulting from these updates.

The electrical corporation must use the format established by Tables 1-1 and 1-2 of these 2025 WMP Update Guidelines to summarize the updated top 5 percent of highest-risk circuits, segments, or spans.⁵ If one or both tables are more than 20 lines, then an electrical corporation may submit a spreadsheet as an attachment to the 2025 WMP Update rather than a table to provide the information. Discussions of significant updates to risk models must be limited to 20 pages total. Figures and tables are excluded from the 20-page limit.

1.1.1 Top Risk-Contributing Circuit, Segments, or Spans

Significant updates to risk models are defined as:

- Any change or combination of changes to a risk model that moves 10 percent or more of ignition risk into or out of the top ignition risk circuits, segments, or spans,⁶ and/or
- Any change or combination of changes to a risk model that moves 10 percent or more of PSPS risk into or out of the top PSPS risk circuits, segments, or spans.⁷

⁵ The updated list must be independent of risk reduction resulting from deployed mitigations described in the approved 2023-2025 Base WMP. For an updated list that is inclusive of all deployed mitigation, refer to electrical corporation submissions pursuant to Energy Safety's Data Guidelines, Section 4.3.15.

⁶ Electrical corporations must use the granularity – circuit, segment, or span – it used to report its “Top Risk-Contribution Circuits/Segments/Spans” in accordance with the 2023-2025 WMP Technical Guidelines, Section 6.4.2.

⁷ Electrical corporations must use the granularity – circuit, segment, or span – it used to report its “Top Risk-Contribution Circuits/Segments/Spans” in accordance with the 2023-2025 WMP Technical Guidelines, Section 6.4.2.

The electrical corporation must use the format established by Tables 1-1 and 1-2 of these 2025 WMP Update Guidelines to summarize the updated top 5 percent of highest risk circuits, segments, or spans. If one or both tables are more than 20 lines, then an electrical corporation may submit a spreadsheet as an attachment to the 2025 WMP Update rather than a table to provide the information. Discussions of significant updates to risk models must be limited to 20 pages. Figures and tables are excluded from the 20-page limit.

Example 1

Assume there are 300 circuits in an electric corporation's high-fire risk area, which means that 15 circuits are in the top 5 percent when all circuits are ranked from highest to lowest by circuit-mile-weighted ignition risk score. If a circuit or combination of circuits that have a total of 10 percent or more of the ignition risk scores in the top 5 percent of circuits fall out of or move into the top 5 percent of circuits, compared to the point in time represented by WMP Table 6-5, the update is considered a significant update under this requirement. Movement of a circuit or combination of circuits that have a total of 10 percent or more of the total ignition risk scores within that top 5 percent list (e.g., moving from a lower position to a higher position) is not relevant toward the 10 percent threshold.

Then the electrical corporation would conduct a similar analysis as the example above ranking circuits from highest to lowest by circuit-mile-weighted PSPS risk score to determine if updates to its risk model are significant under this requirement.

Example 2

Consider Table 1-1, below. If the Modoc circuit, with 12 percent of the total ignition risk score in top 5 percent of circuits, were to move out of the top 5 percent, this would be "significant." Similarly, if the Alpine and Kings circuits (circuits not previously in the top 5 percent) moved into the updated top 5 percent of circuits with a combined 10 percent of the total ignition risk scores, this would be "significant." The same considerations could be applied to Table 1-2.

Table 1-1. Example of Top 5% Ignition Risk Circuits/Segments/Spans

Risk Rank	Circuit Name	Circuit-Mile-Weighted Ignition Risk Score	% of Total Ignition Risk in Top 5%
1	Modoc	118	12%
2	Trinity	85	9%
3	Sierra	86	9%
4	Inyo	87	9%
5	Lassen	80	8%
6	Mariposa	75	8%
7	Tehama	67	7%
8	Siskiyou	58	6%
9	Glenn	55	6%
10	Calaveras	49	5%
11	Plumas	46	5%
12	Colusa	46	5%
13	Imperial	42	4%
14	Riverside	41	4%
15	Kern	40	4%
	Total	975	100%

Table 1-2. Example of Top 5% PSPS Risk Circuits/Segments/Spans

Risk Rank	Circuit Name	Circuit-Mile-Weighted PSPS Risk Score	% of Total PSPS Risk in Top 5%
1	Lassen	4	16%
2	Trinity	3	12%
3	Sierra	2	8%
4	Glenn	2	8%
5	Plumas	2	8%
6	Imperial	2	8%
7	Kern	2	8%
8	Inyo	1	4%
9	Mariposa	1	4%
10	Siskiyou	1	4%
11	Calaveras	1	4%
12	Colusa	1	4%
13	Riverside	1	4%
14	Modoc	1	4%
15	Tehama	1	4%
	Total	25	100%

1.1.2 Qualitative Updates

Updates to risk models are also considered significant if any of the following qualitative updates are made:

- Introduction of a new model.
- Discontinuation of an existing model.
- Any change in existing model application or use-case. For example, newly applying an existing vegetation risk model to PSPS decision-making.
- Introduction of new data types. For example, incorporating additional risk drivers into newer versions of a model.
- Changes to data sources. For example, using a new source of data to measure vegetation moisture content.
- Changes to third-party vendors for risk modeling or inputs to risk modeling.

Examples of qualitative updates that are not considered significant updates to risk models include, but are not limited to, the following:

- Updating an existing dataset (e.g., augmenting ignition and outage datasets with 2023 data).
- Fixing code errors.
- Cleaning input data.

1.2 Non-Significant Updates

If an electrical corporation's updates to its risk models do not meet the "significant" criteria of Section 1.1.1, the electrical corporation must provide a tabulated summary of changes in risk ranking of the top 5 percent ignition risk and PSPS risk circuits, segments, or spans.

The electrical corporation must use the format established by Tables 1-1 and 1-2 of these 2025 WMP Update Guidelines to summarize the updated top 5 percent of highest risk circuits, segments, or spans.⁸ If one or both tables are more than 20 lines, then an electrical

⁸ The updated list must be independent of risk reduction resulting from deployed mitigations described in the approved 2023-2025 Base WMP. For an updated list that is inclusive of all deployed mitigation, refer to electrical corporation submissions pursuant to Energy Safety's Data Guidelines, Section 4.3.15.

corporation may submit a spreadsheet as an attachment to the 2025 WMP Update rather than a table to provide the information.

Energy Safety defines a non-significant update as:

- Any change or combination of changes to the risk model that moves less than 10 percent of ignition risk into or out of the top ignition risk circuits, segments, or spans and less than 10 percent PSPS risk into or out of the top PSPS risk circuits, segments, or spans; or
- Any change that only moves ignition and PSPS risk within the top risk segments.

PROPOSED FINAL

2. Changes to Approved Targets, Objectives, and Expenditures

The electrical corporation must report qualifying changes to targets, objectives, and expenditures from its approved 2023-2025 Base WMP. Each change must be justified by lessons learned,⁹ internal policy changes, new laws or regulations, corrective actions resulting from Energy Safety's compliance process,¹⁰ or other explanations for the change. Thresholds for qualifying changes to targets, objectives, and expenditures are set forth below.

2.1 2025 Targets or Target Completion Dates

For large volume work (equal to or greater than 100 units), the electrical corporation must report changes of 10 percent or greater to a 2025 target from the electrical corporation's approved 2023-2025 Base WMP.

For small volume work (less than 100 units), the electrical corporation must report changes of 20 percent or greater to a 2025 target from the electrical corporation's approved 2023-2025 Base WMP.

2.2 Initiative Objectives

The electrical corporation must report any changes to forecasted initiative objective completion dates in its approved 2023-2025 Base WMP that shift an objective's completion to a different compliance period.¹¹

⁹ "Lessons learned" should be interpreted broadly and is not limited by any definitions, categorizations, or examples presented in the 2023-2025 WMP Technical Guidelines, Section 10: Lessons Learned.

¹⁰ Including, but not limited to, any compliance assessment, audit, determination, evaluation, investigation, notice, or report pursuant to Government Code sections 15475.1 et seq., Public Utilities Code section 8386.3, or other applicable law, regulation, or guidelines.

¹¹ "Compliance period" is defined as January 1 to December 31 of each calendar year. Office of Energy Infrastructure Safety Compliance Guidelines, page 3 (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55586&shareable=true>, accessed September 28, 2023).

The electrical corporation may not add or delete 3- and 10-year objectives set forth in its approved 2023-2025 Base WMPs.

2.3 Expenditure Changes

The electrical corporation must report any changes to 2025 projected expenditures in its approved 2023-2025 Base WMP that result in an increase or decrease of more than \$10 million or constitute a greater than 20 percent change in an initiative's planned total expenditure in the 2025 compliance period.

PROPOSED FINAL

3. Quarterly Inspection Targets for 2025

The electrical corporation must define quarterly targets (end of Q2 and end of Q3) for 2025 asset and vegetation inspection targets established as end-of-year targets in its approved 2023-2025 Base WMP. The electrical corporation must use the format established by Table 3-1 to report these quarterly targets. Changes to end-of-year 2025 targets must be reported and explained pursuant to Section 2: Changes to Targets, Objectives, and Expenditures, above.

For its redlined and clean 2023-2025 Base WMP, the electrical corporation must add columns for end of Q2 2025 and end of Q3 2025 targets to its asset inspection and vegetation inspection target tables.¹²

Table 3-1. Example of Asset Inspections and Vegetation Management Targets for 2025

Initiative Activity	Tracking ID	Target End of Q2 2025 & Unit	Target End of Q3 2025 & Unit	End of Year Target 2025 & Unit	x% Risk Impact 2025
Discretionary patrols in High Fire Threat District	AI-02	300 circuit miles	500 circuit miles	700 circuit miles	3%
Hazard tree inspections	VM-04	100 circuit miles inspected	130 circuit miles inspected	200 circuit miles inspected	3%

¹² The tables populated in accordance with the 2023-2025 WMP Technical Guidelines, Tables 8-4 and 8-15.

4. New or Discontinued Programs

The electrical corporation must report on the creation of a new program or the discontinuance of a program described in its approved 2023-2025 Base WMP. Each change must be justified by lessons learned,¹³ internal policy changes, new laws or regulations, corrective actions resulting from Energy Safety's compliance process,¹⁴ or other explanations for the change.

An electrical corporation's discussion on new or discontinued programs must be limited to 20 pages total. Figures and tables are excluded from the 20-page limit.

¹³ "Lessons learned" should be interpreted broadly and is not limited by any definitions, categorizations, or examples presented in the 2023-2025 WMP Technical Guidelines, Section 10: Lessons Learned.

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5. Progress on Areas for Continued Improvement

The electrical corporation must report on progress required by the areas for continued improvement identified in Energy Safety's Decision on the electrical corporation's 2023-2025 WMP.¹⁵ The electrical corporation must provide narrative responses to each required progress that specified reporting in the 2025 WMP Update. This narrative response must include:

- Code and title of the area for continued improvement,
- Description of the area for continued improvement,
- Required progress, and
- The electrical corporation's response to the required progress.

The electrical corporation may refer to other sections of its 2025 WMP Update when reporting on areas for continued improvement if there is a duplication of reporting.

¹⁵ See 2023 – 2025 Wildfire Mitigation Plan Process and Evaluation Guidelines, Section 4.7: Decision.

DATA DRIVEN FORWARD-THINKING INNOVATIVE SAFETY FOCUSED

PROPOSED FINAL



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An electrical corporation must analyze its top 5 percent of highest risk circuits, segments, or spans³ to determine whether updates to its risk models are significant. An electrical corporation’s top ignition risk circuits, segments, or spans are the top 5 percent of highest ignition risk circuits, segments, or spans when the circuits, segments or spans are ranked individually from highest to lowest circuit-mile-weighted ignition risk. An electrical corporation’s top Public Safety Power Shutoff (PSPS) risk circuits, segments or spans are the top 5 percent of highest PSPS risk circuits, segments, or spans when the circuits, segments or spans are ranked individually from highest to lowest circuit-mile-weighted PSPS risk.⁴

² In accordance with the 2023-2025 WMP Technical Guidelines, Table 6-5 “Summary of Top-Risk Circuits, Segments, or Spans.”

³ Electrical corporations must use the granularity – circuit, segment, or span – it used to report its “Top Risk-Contribution Circuits/Segments/Spans” in accordance with [Section 6.4.2](#) of the 2023-2025 WMP Technical Guidelines, [Section 6.4.2](#).

⁴ “Ignition risk” and “PSPS risk” are defined in the 2023-2025 WMP Technical Guidelines, Appendix A.

1.1 Significant Updates

If an electrical corporation's updates to its risk models are significant, it must:

- Discuss its updated methodology and models; (e.g., using a new machine learning algorithm, changing how wildfire consequences are calculated, or changes to assumptions);
- Provide justification for the updates;
- Show how risk has shifted as a result of the updates; and
- Report any resulting changes to prioritization of mitigation initiatives and scheduling and workplans for the implementation of mitigation initiatives resulting from these updates.

The electrical corporation must use the format established by Tables 1-1 and 1-2 of these 2025 WMP Update Guidelines to summarize the updated top 5 percent of highest-risk circuits, segments, or spans.⁵ If one or both tables are more than 20 lines, then an electrical corporation may submit a spreadsheet as an attachment to the 2025 WMP Update rather than a table to provide the information. Discussions of significant updates to risk models must be limited to 20 pages total. Figures and tables are excluded from the 20-page limit.

1.1.1 Top Risk-Contributing Circuit, Segments, or Spans

Significant updates to risk models are defined as:

- Any change or combination of changes to a risk model that moves 10 percent or more of ignition risk into or out of the top ignition risk circuits, segments, or spans,⁶ and/or
- Any change or combination of changes to a risk model that moves 10 percent or more of PSPS risk into or out of the top PSPS risk circuits, segments, or spans.⁷

⁵ The updated list must be independent of risk reduction resulting from deployed mitigations described in the approved 2023-2025 Base WMP. For an updated list that is inclusive of all deployed mitigation, refer to electrical corporation submissions pursuant to Energy Safety's Data Guidelines, Section 4.3.15.

⁶ Electrical corporations must use the granularity – circuit, segment, or span – it used to report its “Top Risk-Contribution Circuits/Segments/Spans” in accordance with Section 6.4.2 of the 2023-2025 WMP Technical Guidelines, Section 6.4.2.

⁷ Electrical corporations must use the granularity – circuit, segment, or span – it used to report its “Top Risk-Contribution Circuits/Segments/Spans” in accordance with Section 6.4.2 of the 2023-2025 WMP Technical Guidelines, Section 6.4.2.

The electrical corporation must use the format established by Tables 1-1 and 1-2 of these 2025 WMP Update Guidelines to summarize the updated top 5 percent of highest risk circuits, segments, or spans. If one or both tables are more than 20 lines, then an electrical corporation may submit a spreadsheet as an attachment to the 2025 WMP Update rather than a table to provide the information. Discussions of significant updates to risk models must be limited to 20 pages. Figures and tables are excluded from the 20-page limit.

Example 1

Assume there are 300 circuits in an electric corporation's high-fire risk area, which means that 15 circuits are in the top 5 percent when all circuits are ranked from highest to lowest by circuit-mile-weighted ignition risk score. If a circuit or combination of circuits that have a total of 10 percent or more of the ignition risk scores in the top 5 percent of circuits fall out of or move into the top 5 percent of circuits, compared to the point in time represented by WMP Table 6-5, the update is considered a significant update under this requirement. Movement of a circuit or combination of circuits that have a total of 10 percent or more of the total ignition risk scores within that top 5 percent list (e.g., moving from a lower position to a higher position) is not relevant toward the 10 percent threshold.

Then the electrical corporation would conduct a similar analysis as the example above ranking circuits from highest to lowest by circuit-mile-weighted PSPS risk score to determine if updates to its risk model are significant under this requirement.

Example 2

Consider Table 1-1, below. If the Modoc circuit, with 12 percent of the total ignition risk score in top 5 percent of circuits, were to move out of the top 5 percent, this would be "significant." Similarly, if the Alpine and Kings circuits (circuits not previously in the top 5 percent) moved into the updated top 5 percent of circuits with a combined 10 percent of the total ignition risk scores, this would be "significant." The same considerations could be applied to Table 1-2.

Table 1-1. Example of Top 5% Ignition Risk Circuits/Segments/Spans

Risk Rank	Circuit Name	Circuit-Mile-Weighted Ignition Risk Score	% of Total Ignition Risk in Top 5%
1	Modoc	118	12%
2	Trinity	85	9%
3	Sierra	86	9%
4	Inyo	87	9%
5	Lassen	80	8%
6	Mariposa	75	8%
7	Tehama	67	7%
8	Siskiyou	58	6%
9	Glenn	55	6%
10	Calaveras	49	5%
11	Plumas	46	5%
12	Colusa	46	5%
13	Imperial	42	4%
14	Riverside	41	4%
15	Kern	40	4%
	Total	975	100%

Table 1-2. Example of Top 5% PSPS Risk Circuits/Segments/Spans

Risk Rank	Circuit Name	Circuit-Mile-Weighted PSPS Risk Score	% of Total PSPS Risk in Top 5%
1	Lassen	4	16%
2	Trinity	3	12%
3	Sierra	2	8%
4	Glenn	2	8%
5	Plumas	2	8%
6	Imperial	2	8%
7	Kern	2	8%
8	Inyo	1	4%
9	Mariposa	1	4%
10	Siskiyou	1	4%
11	Calaveras	1	4%
12	Colusa	1	4%
13	Riverside	1	4%
14	Modoc	1	4%
15	Tehama	1	4%
	Total	25	100%

1.1.2 Qualitative Updates

Updates to risk models are also considered significant if any of the following qualitative updates are made:

- Introduction of a new model.
- Discontinuation of an existing model.
- Any change in existing model application or use-case. For example, newly applying an existing vegetation risk model to PSPS decision-making.
- Introduction of new data types. For example, incorporating additional risk drivers into newer versions of a model.
- Changes to data sources. For example, using a new source of data to measure vegetation moisture content.
- Changes to third-party vendors for risk modeling or inputs to risk modeling.

Examples of qualitative updates that are not considered significant updates to risk models include, but are not limited to, the following:

- Updating an existing dataset (e.g., augmenting ignition and outage datasets with 2023 data).
- Fixing code errors.
- Cleaning input data.

1.2 Non-Significant Updates

If an electrical corporation's updates to its risk models ~~are non-~~do not meet the "significant" criteria of Section 1.1.1, the electrical corporation must provide a tabulated summary of changes in risk ranking of the top 5 percent ignition risk and PSPS risk circuits, segments, or spans.

The electrical corporation must use the format established by Tables 1-1 and 1-2 of these 2025 WMP Update Guidelines to summarize the updated top 5 percent of highest risk circuits, segments, or spans.⁸ If one or both tables are more than 20 lines, then an electrical

⁸ The updated list must be independent of risk reduction resulting from deployed mitigations described in the approved 2023-2025 Base WMP. For an updated list that is inclusive of all deployed mitigation, refer to electrical corporation submissions pursuant to Energy Safety's Data Guidelines, Section 4.3.15.

corporation may submit a spreadsheet as an attachment to the 2025 WMP Update rather than a table to provide the information.

Energy Safety defines a non-significant update as:

- Any change or combination of changes to the risk model that moves less than 10 percent of ignition risk into or out of the top ignition risk circuits, segments, or spans and less than 10 percent PSPS risk into or out of the top PSPS risk circuits, segments, or spans; or
- Any change that only moves ignition and PSPS risk within the top risk segments.

PROPOSED FINAL

2. Changes to Approved Targets, Objectives, and Expenditures

The electrical corporation must report qualifying changes to targets, objectives, and expenditures from its approved 2023-2025 Base WMP. Each change must be justified by **a** lessons learned,⁹ internal policy changes, new laws or regulations, **corrective actions resulting from Energy Safety's compliance process,**¹⁰ or other explanations for the change. Thresholds for qualifying changes to targets, objectives, and expenditures are set forth below.

2.1 2025 Targets or Target Completion Dates

For large volume work (equal to or greater than 100 units), the electrical corporation must report changes of 10 percent or greater to a 2025 target from the electrical corporation's approved 2023-2025 Base WMP.

For small volume work (less than 100 units), the electrical corporation must report changes of 20 percent or greater to a 2025 target from the electrical corporation's approved 2023-2025 Base WMP.

2.2 Initiative Objectives

The electrical corporation must report any changes to forecasted initiative objective completion dates in its approved 2023-2025 Base WMP that shift an objective's completion to a different compliance period.¹¹

⁹ "Lessons learned" should be interpreted broadly and is not limited by any definitions, categorizations, or examples presented in the 2023-2025 WMP Technical Guidelines, Section 10: Lessons Learned.

¹⁰ **Including, but not limited to, any compliance assessment, audit, determination, evaluation, investigation, notice, or report pursuant to Government Code sections 15475.1 et seq., Public Utilities Code section 8386.3, or other applicable law, regulation, or guidelines.**

¹¹ "Compliance period" is defined as January 1 to December 31 of each calendar year. Office of Energy Infrastructure Safety Compliance Guidelines, page 3 (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55586&shareable=true>, accessed September 28, 2023).

The electrical corporation may not add or delete 3- and 10-year objectives set forth in its approved 2023-2025 Base WMPs.

2.3 Expenditure Changes

The electrical corporation must report any changes to 2025 projected expenditures in its approved 2023-2025 Base WMP that result in an increase or decrease of more than \$10 million or constitute a greater than 20 percent change in an initiative's planned total expenditure in [the 2025](#) compliance period.

PROPOSED FINAL

3. Quarterly Inspection Targets for 2025

The electrical corporation must define quarterly targets (end of Q2 and end of Q3) for 2025 asset and vegetation inspection targets established as end-of-year targets in its approved 2023-2025 Base WMP. The electrical corporation must use the format established by Table 3-1 to report these quarterly targets. Changes to end-of-year 2025 targets must be reported and explained pursuant to Section 2: Changes to Targets, Objectives, and Expenditures, above.

For its redlined and clean 2023-2025 Base WMP, the electrical corporation must add columns for end of Q2 2025 and end of Q3 2025 targets to its asset inspection and vegetation inspection target tables.¹²

Table 3-1. Example of Asset Inspections and Vegetation Management Targets for 2025

Initiative Activity	Tracking ID	Target End of Q2 2025 & Unit	Target End of Q3 2025 & Unit	End of Year Target 2025 & Unit	x% Risk Impact 2025
Discretionary patrols in High Fire Threat District	AI-02	300 circuit miles	500 circuit miles	700 circuit miles	3%
Hazard tree inspections	VM-04	100 circuit miles inspected	130 circuit miles inspected	200 circuit miles inspected	3%

¹² The tables populated in accordance with the 2023-2025 WMP Technical Guidelines, Tables 8-4 and 8-15.

4. New or Discontinued Programs

The electrical corporation must report on the creation of a new program or the discontinuance of a program described in its approved 2023-2025 Base WMP. Each change must be justified by ~~a~~ lessons learned,¹³ internal policy changes, new laws or regulations, corrective actions resulting from Energy Safety's compliance process,¹⁴ or other explanations for the change.

An electrical corporation's discussion on new or discontinued programs must be limited to 20 pages total. Figures and tables are excluded from the 20-page limit.

¹³ "Lessons learned" should be interpreted broadly and is not limited by any definitions, categorizations, or examples presented in the 2023-2025 WMP Technical Guidelines, Section 10: Lessons Learned.

¹⁴ Including, but not limited to, any compliance assessment, audit, determination, evaluation, investigation, notice, or report pursuant to Government Code sections 15475.1 et seq., Public Utilities Code section 8386.3, or other applicable law, regulation, or guidelines.

5. Progress on Areas for Continued Improvement

The electrical corporation must report on progress required by the areas for continued improvement ~~from~~ identified in Energy Safety's Decision on the electrical corporation's 2023-2025 WMP.¹⁵ The electrical corporation must provide narrative responses to each required progress that specified reporting in the 2025 WMP Update. This narrative response must include:

- Code and title of the area for continued improvement,
- Description of the area for continued improvement,
- Required progress, and
- The electrical corporation's response to the required progress.

The electrical corporation may refer to other sections of its 2025 WMP Update when reporting on areas for continued improvement if there is a duplication of reporting.

¹⁵ See WMP2023 – 2025 Wildfire Mitigation Plan Process and Evaluation Guidelines, Section 4.7: Decision ~~of the~~ 2023-2025.

DATA DRIVEN FORWARD-THINKING INNOVATIVE SAFETY FOCUSED

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