



OFFICE OF ENERGY INFRASTRUCTURE SAFETY

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Caroline Thomas Jacobs, Director

November 4, 2025

To: Wildfire Mitigation Plans Guidelines (WMP Guidelines) Docket
Subject: Second Draft Wildfire Mitigation Plan Update Requirements Chapter

Dear Wildfire Mitigation Plan Stakeholders:

Pursuant to Government Code section 15475.6, the Office of Energy Infrastructure Safety (Energy Safety) releases for public comment the Second Draft Wildfire Mitigation Plan (WMP) Update Requirements Chapter (“Second Draft”) associated with the electrical corporations’ WMP Update submittals. The existing WMP Guidelines¹ will be updated to a new version to incorporate these WMP Update guidelines, after their adoption, in a new Chapter VI.

This Second Draft includes changes made in redline to the public version released on August 19, 2025² reflecting public comments received and further Energy Safety deliberation. A summary of changes made includes:

- Clarified that electrical corporations must also submit updated data files and geospatial maps corresponding to their reportable updates, per Chapter II of the WMP Guidelines (Sections 2.1.2 and 2.2);
- Clarified that New and Discontinued program updates are reportable even if not focused on the update year;
- Modified the page limit for progress on reportable areas for continued improvement from 20 to 30 pages;
- Modified the page limit for New and Discontinued programs from 15 to 20 pages;
- Required that electrical corporations with an approved Electric Undergrounding Plan must disaggregate information related to that plan from other undergrounding initiatives/activities;
- Modified reporting for updates to the top 20 percent highest risk circuits, including changes to the required Table 2-1;

¹[Wildfire Mitigation Plan Guidelines](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58026&shareable=true), Published February 24, 2025,
URL: (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58026&shareable=true>).

² [Draft Wildfire Mitigation Plan Update Requirements Chapter](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=59222&shareable=true), Published August 19, 2025,
URL: (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=59222&shareable=true>).

- Clarified that updates to approved targets must be provided in the same format as relevant target tables in the approved Base WMP;
- Clarified that updates to qualitative targets (formerly objectives) are reportable only if the completion of a target moves from the update year to a subsequent year;
- Clarified that inadvertent incorrect numbers in tables or figures are reportable if they would materially affect Energy Safety’s evaluation;
- Specified that a clean Base WMP including all updates approved by Energy Safety must be submitted to Energy Safety within 10 business days of the published Energy Safety WMP Update Decision; and
- Made a variety of changes clarifying the requirements for a WMP Update without materially changing the requirements from the August 19, 2025 draft.

Public Comment

This Second Draft WMP Update Requirements Chapter of the WMP Guidelines is released for public review and comment. Comments will be accepted through November 21, 2025, 5:00p.m. Pacific Time. Comments will only be accepted on the redlined changes. Energy Safety will not consider reply comments nor comments on portions of the Second Draft that are not redlined.

Comments must be submitted to the WMP Guidelines Docket³ and titled: “[Commenter Name] Comments on the Second Draft Wildfire Mitigation Plans Update Guidelines [Attachment #].”

To receive notifications of the comments on these documents, subscribe to Energy Safety’s WMPs service list by following the instructions at: <https://energysafety.ca.gov/events-and-meetings/how-to-participate-in-public-events/>.

Next Steps

Energy Safety will hold a public meeting to receive public and stakeholder comments on the Second Draft WMP Update Requirements Chapter of the WMP Guidelines prior to adoption. Energy Safety will provide notice of the meeting at least 10 days in advance.

³ [WMP Guidelines Docket](https://efiling.energysafety.ca.gov/EFiling/DocketInformation.aspx?docketnumber=WMP-Guidelines), accessed October 9, 2025. URL: (https://efiling.energysafety.ca.gov/EFiling/DocketInformation.aspx?docketnumber=WMP-Guidelines).

If there are no further substantive revisions, Energy Safety expects to adopt WMP Guidelines that include the WMP Update requirements as Chapter VI. The adopted Guidelines will be published to the docket.⁴

Sincerely,

/s/ Tony Marino

Tony Marino
Deputy Director | Electrical Infrastructure Directorate
Office of Energy Infrastructure Safety

⁴ 2025 California Legislative Service Chapter 119 (Senate Bill 254, Becker) (“SB 254”), which became law on September 19, 2025, amended section 15475.6 and changed the guidelines adoption process.



OFFICE OF ENERGY INFRASTRUCTURE SAFETY SECOND DRAFT CHAPTER VI: WMP UPDATE REQUIREMENTS

November 2025

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VI. WMP UPDATE REQUIREMENTS

This ~~chapter~~Chapter sets forth requirements and reportable updates for the electrical ~~corporation~~corporation's WMP Update submissions.

The electrical corporation must refer to the other ~~chapters~~Chapters of the WMP Guidelines, the Energy Safety Policy Division Process Guidelines, the Electrical Corporation Wildfire Mitigation Maturity Model and Survey Guidelines, the Energy Safety Data Guidelines and any other supporting documents for additional applicable requirements on technical details, processes, maturity survey, and data.

1. General Instructions

This section provides general instructions for the electrical corporation to prepare its WMP Update. See Chapter II (Process and Evaluation), Section 2 for instructions that apply to both Base WMP and WMP Update submissions. SpecificThe electrical corporation must also provide updated data files and geospatial maps, corresponding to its reportable updates, according to requirements set forth in Chapter II, Sections 2.1.2 and 2.2.

Within this Chapter, specific requirements for reportable updates are set forth within ~~this chapter in Sections 1~~Section 2 and 2.Aa description of the Energy Safety evaluation process for WMP Updates is found in Section 3~~of the chapter~~.

1.1 Required Components of a WMP Update

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

1. WMP Update: A standalone document that describes the electrical corporation's proposed reportable updates within the below required categories for the update year¹ of the current WMP cycle or provides confirmation of no such reportable updates to the approved Base WMP in accordance with this WMP Update Requirements Chapter.
 - a. Required Categories (if it has no updates in any of the categorybelow categories, the electrical corporation must state "no updates"");" for that category):
 - i. Areas for Continued Improvement
 - ii. Risk Models
 - iii. New and Discontinued Programs
 - iv. Approved Targets
 - v. Projected Expenditures
 - vi. Administrative Information
 - b. Any reportable update may have downstream impacts. -The electrical corporation must include and describe any downstream impacts of the reportable updates. This includesDownstream impacts might include impacts in other required categories from an update in any one category and/or impacts in the remaining years of a WMP cycle following the update year.

¹ The "update year" is the year following the filingsubmission of the WMP ~~update~~Update, i.e., the year when the mitigation work will be performed.

- c. As an appendix to the WMP Update, the electrical corporation must provide a table summarizing of its proposed reportable updates that matches the Redlined Base WMP. The table must list the sections and pages in the Redlined Base WMP where there is redlined material with the associated reportable update from the WMP Update. This table must reference specific subsections (e.g., “6.2.2” rather than just “6.2”) and page numbers ~~to link each change reflected in the WMP Update with the associated Redlined Base WMP.~~
 - d. ~~Redlined Base WMP:~~As required in Chapter II, Section 2.1.1 of the WMP Guidelines, an excel file containing the data reported in the tables required in the WMP Update and in any updated tables in the Redlined Base WMP.
2. Redlined Base WMP:² A redlined version of the electrical corporation's Base WMP showing proposed reportable updates to the approved Base WMP. ~~Redlines must be text-inserted~~Information and data being added or changed must follow the format and requirements outlined in the corresponding section within Chapter III (Base WMP Technical Requirements). Redlines must display text edits in tracked changes form. For example, when changes are made in a Microsoft Word document with the “Track Changes” feature on:
 - a. Deleted text is shown in ~~strikeout~~ and may be a different color from the original text.
 - b. New text is shown in a different color from the original text and underlined.

If the electrical corporation does not have any reportable updates ~~for the update year~~, the electrical corporation does not need to submit a Redlined Base WMP but must still provide a WMP Update, the content of which is specified in Section 1.2 of this Chapter.

All changes due to reportable updates that impact information in Appendix B: Supporting Documentation for Risk Methodology and Assessment must also be captured, as required above (in redline), in Appendix B of the Redlined Base WMP.

All updates reported in the WMP Update must be consistently reflected in the Redlined Base WMP and vice versa. That is, every redline change in the Redlined Base WMP must be associated with a proposed reportable update described in the WMP Update document, and every proposed update in the WMP Update must have an associated redline.

² Note that a clean Base WMP is not required as part of the WMP Update submission. The electrical corporation must submit a clean WMP only at the end of the WMP Update evaluation, after Energy Safety issues its Decision. See Section 3 of this Chapter for more information.

1.2 Reportable Updates

“Reportable updates” are specific changes ~~for the update year~~ to the electrical corporation’s wildfire mitigation initiatives and activities in its approved Base WMP. Reportable updates include:

- Required information for each of the WMP Update ~~Required Categories~~required categories listed in Section 1.1(1)(a) (~~see details~~Section 2 of this Chapter lists the requirements for each category ~~in Section 2~~).
- As applicable, the downstream impacts of the reportable update, including impacts within or following the update year of a WMP cycle. For example, if the electrical corporation implements a new program, it must explain what is changing in the update year ~~impacts of a reportable new program are, including reference to any associated updates to approved targets reported,~~ and any related impacts to ~~the final~~any year of a WMP cycle: after the update year (e.g., new targets).

The electrical corporation must describe each requested ~~update~~reportable update, including the reason for the update and downstream impacts to its mitigation activities and overall strategy, in its WMP Update and reflect the updated information in ~~the~~its Redlined Base WMP.

For example, any new mitigation initiatives or activities planned for the update year that were not included in its approved Base WMP must be included in the “New or Discontinued Programs” section of the WMP Update and must be reflected ~~as required~~ in the appropriate section of the Redlined Base WMP. Similarly, any updated targets that are reportable per Section 2.4 of this Chapter must be ~~described~~explained in the WMP Update and be reflected in the Redlined Base WMP.

~~Specific~~Some reportable updates may need to be reflected in more than one section: ~~of the WMP Update~~. For example, if a risk model update results in the creation of a new program, the risk model update would be documented in Section 2.2, the new program would be described in Section 2.3, and new targets associated with the new program discussed in Section 2.4 of the WMP Update. The WMP Update would reference all sections in the Redlined Base WMP that include associated redlined changes (e.g., Section X, Lessons Learned, Section X [mitigation category describing new program], Table X with new targets, etc.).

If the electrical corporation has no reportable updates that fall within the six categories listed in Section 1.1, it must affirmatively state in its WMP Update that it has no reportable updates for the update year, and that the information provided in its approved Base WMP covering the update year is current and accurate.

1.3 Non-reportable Updates

The following are non-reportable updates and must not be included in the WMP Update or the Redlined Base WMP:

- Updates outside the reportable update categories described in Section 1.1 of this Chapter.
- Updates in the categories that solely affect the year prior to or after the update year, ***with the exception of:***
 - Updates outside the reportable update categories described in these Guidelines:
 - New and discontinued programs (discussed in Section 2.3 of this Chapter);
 - Electric Undergrounding Plan (EUP) disaggregation (discussed in Section 2.4 of this Chapter); and
 - Reportable target impacts after the update year (downstream impacts)

That is, the electrical corporation should include updates to its approved Base WMP, regardless of what year of the cycle it impacts, **only** if it is reporting a new or discontinued program or is disaggregating its undergrounding activities and targets per a recent³ EUP approval from Energy Safety or providing input on downstream impacts outside of the update year. Energy Safety will not consider any other updates outside of the update year as a reportable update.

Non-reportable updates will not be evaluated by Energy Safety.

³ “Recent” means that an electrical corporation has received an approved EUP from Energy Safety after its prior WMP submission but before this Update submission.

2. Reportable Update Categories

2.1 Areas for Continued Improvement

The electrical corporation must report its progress on areas for continued improvement **only** for those areas where progress is required in the update year.⁴ For these areas for continued improvement, the electrical corporation must detail its progress and provide narrative responses that include:

- Code and title of the area for continued improvement,
- Description of the area for continued improvement,
- Required progress as described in the area for continued improvement, and
- A detailed narrative response to the required progress for the update year.

The electrical corporation must refer to other sections of its WMP Update or Redlined Base WMP when reporting on areas for continued improvement if there is a duplication of reporting. The electrical corporation must not simply refer to the Redlined Base WMP without the narrative response described above in the WMP Update.

Reporting on progress in the areas for continued improvement must be limited to 2030 pages total. Figures and tables are excluded from the 2030-page limit.

2.2 Risk Models

The electrical corporation must report ~~its~~ updates to its risk models when the updated models, including data and scenarios, are associated with, or result in ~~the creation of a~~ reportable ~~updates~~update to ~~either~~:

- Areas of Continued Improvement (Section 2.1),
- New or discontinued programs (Section 2.3), or
- Approved targets (Section 2.4).

~~That is~~For example, if the electrical corporation is required to report on risk models as a result of an area for continued improvement, or if it adjusts its risk models in a way that results in a reportable update ~~under to its targets (per requirements in~~ Section 2.3 ~~or 2.4;~~), the electrical corporation must explain the adjustment and include it as a reportable update to its risk models. These updates must be discussed in Section 2.2 of its WMP Update, as well as

⁴ See Chapter II, Process and Evaluation ~~Chapter~~, Section 4.1.4: Decision.

other relevant sections (e.g., Section 2.4 for targets, Section 2.3 for new or discontinued programs), as well as reflected accordingly in the Redlined Base WMP.

Reportable updates to risk models **do not** include:

- Changes to risk modeling that are not expected to be implemented by the time of the update year.
- Changes to risk modeling that solely derive from already deployed mitigations described in the approved Base WMP – initiatives or activities that have been or are fully expected to be accomplished prior to the update year. For example, if a circuit was undergrounded prior to the update year, it is not expected to cause a reportable update to risk modeling in the WMP Update.⁵

For each reportable update to risk models, the electrical corporation must:

- Discuss in detail its updated methodology and models (e.g., using a new algorithm, changing how wildfire consequences are calculated, or changes to assumptions);
- Provide the reasons for the updates, including supporting analysis and documentation detailing what circumstances, insights, or requirements, etc., ~~that~~ necessitated the updates, and describe how the risk modeling improved from the update;
- Show how risk scores and associated prioritization have shifted;
- Describe, including supporting analysis and documentation, any changes to prioritization of mitigation initiatives or activities, and to scheduling and workplans for the implementation of mitigation initiatives or activities resulting from these updates. This reporting may refer to other sections of the WMP Update that discuss the resulting updates to targets or initiatives /or activities;
- Summarize changes to the top risk-contributing circuits, segments, or spans, as described in Section 2.2.1 below; and
- Provide consistent changes in the Redlined Base WMP, including updates as needed to Tables ~~5-5~~, ~~6-1~~, and ~~6-4~~.⁶

Discussions of updates to risk models must be limited to 20 pages total. Figures and tables are excluded from the 20-page limit.

⁵ This type of deployed mitigation may however affect reportable updates to targets, which would then be described in ~~the~~Section 2.4, Approved Targets ~~Section~~.

⁶ Electrical corporations may include optional new tables, in the WMP Updates **only** and not in the Redlined WMP, to help document their risk model updates.

2.2.1 Reanalysis of High Risk Circuits

When there is a reportable risk model update, the electrical corporation must reanalyze the ~~top 20 percent of its highest risk circuits, segments, or spans⁷ and provide a summary description of circuits, segments, or spans⁸ that contribute the most overall utility risk⁹ and collectively represent 20 percent of the total summed overall utility risk value (hereinafter referred to as the Top 20 Percent Circuits). The electrical corporation must describe~~ the resulting changes in its WMP Update or indicate there are no such changes.

In particular, the electrical corporation must reflect any changes to the ~~top~~ Top 20 percent of the highest risk circuits ~~Percent Circuits¹⁰~~ resulting from a reportable risk model update in Table 32-1 of ~~the~~ its WMP Update,¹¹ with the following:

- Circuit names and/or IDs,
- Updates in risk scores (previous risk scores in parentheses),
- Contribution to the top 20 percent of risk, and
- Any updates to associated risk drivers for these circuits.

Table 2-1 in the WMP Update requires a quantitative summary of changes to the ~~top 20 percent highest risk circuits~~ Top 20 Percent Circuits in the WMP Update, compared to the electrical corporation's previous list of circuits in the approved Base WMP. Table 2-1 in the WMP Update may be a shortened list of the first 20 rows of the table; however, a full and complete table must be provided in the associated Excel spreadsheet file as required by Chapter II, Section 2.1.1 of the WMP Guidelines.

The electrical corporation must also provide a short description of the changes to risk circuits listed in Table 2-1, at a minimum describing:

1. How and why the circuit(s) changed in overall, wildfire, or outage program risk, delineating between changes in wildfire risk and outage program risk,
- 1-2. What risk model change led to the circuit(s) risk change, and

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 WMP Guidelines, Section 5.5.2.~~

⁸ ~~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 WMP Guidelines, Section 5.5.2.~~

⁹ ~~Overall utility risk is defined as the comprehensive risk due to both wildfire risk and reliability risk across its service territory in accordance with the WMP Guidelines, Section 5.2.1.~~

¹⁰ ~~Note that hereinafter the word “circuits” is used to represent the granularity of “circuits, segments, or spans”)~~

¹¹ ~~Note that hereinafter the word “circuits” is used to represent the granularity of “circuits, segments, or spans”)~~

~~2.3.~~ Whether any associated risk drivers changed and why.

The sample ~~table~~Table 2-1 below shows examples of four circuits or circuit changes that must (if applicable) be included in the submitted ~~table:~~Table 2-1.

1. **Example Circuit 1:** If an update does not change the risk scores or percentage contributions of a circuit that remains in the ~~top~~Top 20 ~~percent~~Percent Circuits compared to the Base WMP analysis;
2. **Example Circuit 2:** If an update changes the risk scores or percentage contributions of a circuit ~~that~~ and that circuit remains in the ~~top~~Top 20 ~~percent~~Percent Circuits compared to the Base WMP analysis;
3. **Example Circuit 3:** If an update results in a circuit being included in the ~~top~~Top 20 ~~percent~~Percent Circuits when that circuit was not previously included in the Base WMP analysis. In this case, the electrical corporation must show that circuit in Table ~~32~~-1 in bold font and must also include the new percentage of risk-contribution ~~to the top 20 percent~~ in the ~~100~~20 percent summation at the bottom of the table (column 7 in the example).
4. **Example Circuit 4:** If an update results in a circuit falling out of the ~~top 20 percent of the highest-risk circuits~~Top 20 Percent Circuits compared to the Base WMP analysis. In this case the electrical corporation must show that circuit at the bottom of the table in ~~strikeout~~ font and must not include the circuit's percentage of risk contribution in the ~~100~~20 percent summation at the bottom of the table (column 7).

~~Table 2-1 in the WMP Update may be a shortened list of the top 20 lines; however, a full and complete table must be provided in the associated Excel spreadsheet file as required by Section 2.1.1 of the Process and Evaluation Chapter.~~

~~The~~If there are no changes to the Top 20 Percent Circuits (only Example Circuit 1 rows exist)
~~the~~electrical corporation must is not required to provide a short description of the changes to risk circuits listed in Table 2-1 in the WMP Update.

Table 2-1. Example Showing Changes to Top 20% ~~Risk~~ Circuits/~~Segments~~/~~Spans~~

Risk Ranking	Circuit, Segment, or Span ID	Length (miles)	Revised Overall Utility Risk Score (Previous Score)	Wildfire Risk	Outage Program Risk	Percent of Overall Utility Risk Within Top 20% Percent	Associated Risk Drivers
1	Example Circuit 1	33.22	99.7 (99.7)	92.6 (include previous score)	7.1 (include previous score)	0.5 1.55%	
2	Example Circuit 2	15.55	95. 22 (90)	92.11 (88.11)	3.11 (1.89)	0.5 1.49%	
23	Example Circuit 3	7.45	91.52 (13)	91.51	0.01	0.46 1.22% (New in top Top 20 Percent Circuits ; included in total below)	
34	Etc.						
45	Etc.						
NA	Example Circuit 4		5 (87)			No longer in top Top 20 percent Percent Circuits . Not included in total below	
			975			100 20%	

2.3 New or Discontinued Programs

The electrical corporation must report on the creation of ~~new programs impacting the update year~~ any new or the discontinuance of any existing programs ~~described compared to those programs set forth in it~~ the approved Base WMP.¹² New and discontinued programs with impacts outside of the update year must also be reported on. Any alteration of the name, purpose, or scope of an existing program must ~~also be reported~~ included in this section. ~~Each~~

The WMP Update must summarize the new or discontinued programs as described below. The associated changes in the Redlined Base WMP must follow and include the same information as required by the applicable sections of Chapter III (Base WMP Technical Requirements).

For discontinued programs, the electrical corporation must include in the summary what new or existing activities that mitigate risk will replace the discontinued program.

For new or discontinued programs that will impact the update year, the summary for each program creation or discontinuance must include a justification an explanation of the reason for the creation or the discontinuance, which may include one or more of the following:

- Lessons learned,¹³
- Internal policy changes,
- New laws, regulations, executive orders, or
- Corrective actions resulting from Energy Safety's compliance process.¹⁴

~~If a~~ For new or discontinued ~~program does~~ programs that do not impact or affect work in the update year, the electrical corporation must state the nature of the program change, explain why there is no impact in the update year ~~(e.g. impacts preceding or following the update year),~~ and show the changes within the Redlined Base WMP.

The electrical corporation's discussion on new or discontinued programs must be limited to 15-20 pages total. Figures and tables are excluded from the 1520-page limit.

¹² Discontinued programs do not include programs or initiatives that the electrical corporation has completed.

¹³ "Lessons learned" should be interpreted broadly and is not limited by any definitions, categorizations, or examples presented in the WMP Guidelines, Chapter III, Section 13: 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.

2.4 Approved Targets

The electrical corporation must provide reportable updates to its quantitative and qualitative targets for the following mitigation categories and initiatives:

- Grid design, grid operations, or grid management (such as asset inspections, grid hardening installations, etc.);
- Vegetation management (preparation and prevention, wood management, restoration, collaboration/defensible space, etc.);
- Situational awareness (monitoring, forecasting, detection, etc.); and
- Emergency preparation, community engagement, and collaboration; and
- Enterprise systems.

In its WMP Update, the electrical corporation must ~~justify~~explain the reason for each reportable target update ~~with an explanation~~, which may be based on one or more of the following:¹⁵

- Lessons learned,¹⁶
- Internal policy changes,
- New laws, regulations, executive orders,
- Corrective actions resulting from Energy Safety's compliance process,
- A new or discontinued program described in Section 2.3, or
- Other rationale for the update.¹⁷

When reporting ~~qualifying~~ target updates, the electrical corporation must also describe any downstream impacts of these updates. For example, if a ~~qualifying~~reportable target update impacts subsequent target(s) in the WMP cycle, the electrical corporation must include these updates to its future targets, in addition to those in the update year.

Updates to approved targets must be provided in the same format as the corresponding target tables within the approved Base WMP. Updates to targets (status, numbers, etc.) must

¹⁵ Note that Section 2.4.3 covering reportable target decreases contains restrictions on the rationale that can result in a reportable update.

¹⁶ "Lessons learned" should be interpreted broadly and is not limited by any definitions, categorizations, or examples presented in the WMP Guidelines, Chapter III, Section 13: Lessons Learned.

¹⁷ Including, but not limited to, California Public Utilities Commission (CPUC) General Rate Case proceeding or CPUC SB 884 program, or 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.

be reflected in the Redlined Base WMP and must be explained in the WMP Update as described above.

The electrical corporation must not add or remove 3-year targets set forth in its approved Base WMP, except when clearly related to and justified by a risk model update described in Section 2.2, or a new or discontinued program described in Section 2.3.

The following sub-sections outline reportable and non-reportable updates to qualitative and quantitative targets. Section 2.4.4 describes required reportable updates for electrical corporations that recently received an EUP Decision from Energy Safety.

2.4.1 Reportable Qualitative Target Updates

Updates to qualitative targets are reportable when status updates occur within the completion of the target moves from the update year and when these to a subsequent year. Qualitative target updates that impact the status of the target in future years **only** the first year of the WMP cycle are not reportable.

2.4.2 Reportable Quantitative Target Increases

For a quantitative target increase to qualify as reportable, the target must increase by 15 percent or greater in the update year.

2.4.3 Reportable Quantitative Target Decreases

The electrical corporation must not make, and thus should not report reductions in update year, any quantitative targets target reductions unless:

- The electrical corporation exceeded the approved target in the year prior to the update year, so that lowering the update year target does not reduce the cumulative 3-year target from the approved Base WMP and does not impact the expected risk reduction.¹⁸ The electrical corporation must provide a description of the exceedance, including the previously approved target for the year prior, the amount by which the electrical corporation exceeded that target, and the requested reduction for the

¹⁸ For example, if the electrical corporation has modified a mitigation initiative/activity so that the expected risk reduction is maintained or increased while the 3-year target for an initiative/activity has decreased (e.g.—due to switching to a different mitigation activity to maintain risk reduction), the electrical corporation must explain why risk reduction is maintained or enhanced with reduced 3-year targets for an initiative/activity.

update year. The electrical corporation must explain how such target reduction in the update year would maintain or increase the expected risk reduction.¹⁹

- The electrical corporation cannot meet the prior target due to a CPUC General Rate Case (GRC) ~~Decision~~ decision or CPUC decision as related to Phase 2 of CPUC’s SB 884 program. For these reportable updates, the electrical corporation must provide information in its WMP Update according to in accordance with the requirements set forth in the Petition to Amend chapter of these Guidelines Chapter (Chapter IV).²⁰
- The target reduction is directly a result of a reportable risk model change or new or discontinued program.
- The target reduction reduces rather than increases risk, such as with the following mitigation initiatives ~~/or~~ activities:
 - PSPS ~~/or~~ outage target reductions (number of outages, customers impacted, etc. ~~/~~).
 - Fast-trip settings target reductions (number of outages, customers impacted, etc. ~~/~~), or
 - Past due mitigation inspection report target reductions (e.g. ~~—~~, reducing the maximum limit on such past-due actions).

The electrical corporation must **not** ~~include update year report~~ target reductions ~~in its WMP Update~~ for any other reasons. If the electrical corporation is expecting to not meet one or more of its approved targets for the update year, it ~~should~~ may raise the issue during Energy Safety’s ~~compliance performance oversight~~ process.

2.4.4 EUP Target Disaggregation

If the electrical corporation has received an approved EUP from Energy Safety after the prior WMP submission but before this Update submission, it must disaggregate its undergrounding activities into the following: those it plans to perform under its EUP, and other undergrounding work it expects to complete outside of its EUP. The figures provided for work under the EUP must be consistent with what the electrical corporation provided in its EUP to Energy Safety’s Electrical Undergrounding and Culture Division.

¹⁹ For example, if the electrical corporation has modified a mitigation initiative/activity so that the expected risk reduction is maintained or increased while the 3-year target for an initiative/activity has decreased (e.g. due to switching to a different mitigation activity to maintain risk reduction), the electrical corporation must explain why risk reduction is maintained or enhanced with the reduced 3-year targets for an initiative/activity.

²⁰ See Chapter IV “Petition to Amend” for instructions on aligning the WMP with a California Public Utilities Commission decision in a GRC proceeding.

Specifically, in the electrical corporation's WMP Update and Redlined Base WMP, it must provide:

1. Two separate undergrounding activities -- one titled and described as EUP activities and the other as non-EUP activities.
2. Two separate and distinct tracking IDs and targets for each activity.
3. Separate and distinct rows for each activity in tabular data.
4. In its Redlined Base WMP, the electrical corporation must update Tables 6-2, 6-3, 6-4, and 8-1.

Note that the criteria for reportable target updates, as described in Section 2.4 of this Chapter, do not apply to the disaggregation of undergrounding activities. The electrical corporation must also integrate the updated activities and IDs throughout the Base WMP as appropriate (e.g., Tables [input], subsequent QDRs, etc.).

If an electrical corporation wants to *change* its approved undergrounding targets and not just disaggregate pursuant to an Energy Safety-approved EUP, it must submit under and meet requirements of Section 2.4 of this Chapter.

Discussions of updates to approved targets must be limited to 20 pages total. Figures and tables are excluded from the 20-page limit.

2.5 Projected Expenditures

The electrical corporation must report updates to its projected expenditures in the update year **only** at the category level and **only** if the projected expenditure updates occur due to another reportable update, such as a reported change to a target or a new or discontinued program.

The electrical corporation may report its category-level projected expenditure updates in a table format. Table 2-2 ~~provides~~ is a template ~~that electrical corporations may be used~~ use for this table.

~~Table 2-2.~~ Table 2-2. Reportable Projected Expenditure Updates for [Update Year], per Category

Mitigation Category	Approved in Base WMP	Proposed Update	Difference
Category Title 1	\$191 million	\$251 million	\$60 million
Category Title 2	\$208 million	\$158 million	-\$50 million
Etc.			
Etc.			

Discussions of updates to projected ~~expenditures~~expenditure must be limited to 5 pages total. Figures and tables are excluded from the 5-page limit.

2.6 Administrative Information

The electrical corporation ~~may~~must report limited administrative updates to its Base WMP. Administrative information that has changed from the Base WMP are reportable updates only if those updates are required to evaluate the WMP, communicate with the electrical corporation, or to avoid confusion. For example, an administrative update is reportable if:

5. A responsible person for a WMP section changes (e.g., a listed responsible person is reassigned or leaves the company);
6. The phone number or contact information changes for a responsible person;
7. A company reorganization changes which division or person is responsible for a WMP section; or
8. There is a typo in the Base WMP that substantively changes the meaning of a sentence, table, or figure, or otherwise materially affects Energy Safety's evaluation.

Examples include:

- a. The ~~inadvertent~~ inclusion of the word “not” in a sentence suggesting inaccurately that the electrical corporation is not pursuing an action; or
- b. The ~~mistaken~~ inclusion of something like “to be completed” when the measure has already been completed.
- c. Other typosAn incorrect number in a table or figure that don't would materially affect Energy Safety's evaluation.²¹

Typos that **do not** substantively change the meaning but of a sentence and are ~~mere~~immaterial corrections of words or grammar, or numbers are not reportable.

Discussions of updated administrative information in this section must be limited to 5 pages total. Figures and tables are excluded from the 5-page limit.

²¹ Note that if the numbers in a table or represented in a figure change where that is not a typo, such as because a target is increased then the change is reportable under the requirements of the Approved Targets section if it meets the threshold to be reportable.

3. WMP Update Evaluation Process

Energy Safety will not accept pre-submissions of the WMP Update or Redlined Base WMP.

Energy Safety will use the Evaluation Process and Criteria set forth in Chapter II (Process and Evaluation), Section 4 of these [WMP](#) Guidelines when evaluating the electrical corporation's WMP Update submissions.

Energy Safety may reject in whole or in part a WMP Update submission that contains non-reportable updates without further evaluation. During its review, Energy Safety determines whether the electrical corporation's WMP Update will be approved or denied in whole or in part.

If any part of the WMP Update is rejected or denied by Energy Safety, Energy Safety may direct the electrical corporation to resubmit its WMP Update.²² Energy Safety may direct the electrical corporation, for those portions of the WMP Update rejected or denied, to keep in place the corresponding previously approved Base WMP portions for the WMP cycle, as with any previously approved Base WMP portions for which there are no WMP Updates.

Energy Safety's statutory evaluation period commences upon the submission or resubmission of the WMP Update, whichever is later.²³

After Energy Safety publishes a WMP Update Decision, the electrical corporation must submit a clean Base WMP that includes all updates approved by Energy Safety within ten business days.

²² Pub. Util. Code, § 8386.3(a).

²³ See Energy Safety Policy Division Process Guidelines for additional information regarding submission schedules.

DATA DRIVEN FORWARD-THINKING INNOVATIVE SAFETY FOCUSED



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