



## **Workshop Slides and Recording**

### **Workshop on the Second Draft Wildfire Mitigation Plan Update Requirements Chapter (WMP Update Guidelines)**

The Office of Energy Infrastructure Safety (Energy Safety) held a workshop on the Second Draft Wildfire Mitigation Plan Update Requirements Chapter (WMP Update Guidelines) on November 17, 2025. A recording of the workshop can be found on Energy Safety's YouTube channel: [Workshop for the Second Draft of the WMP Update Requirements Chapter - 11/17/25](#). The slides shown during the workshop presentations are attached to this document.

# **PUBLIC WORKSHOP ON THE SECOND DRAFT WILDFIRE MITIGATION PLAN (WMP) UPDATE REQUIREMENTS CHAPTER OF THE WMP GUIDELINES**



**November 17, 2025**





## **SAFETY MESSAGE**

- Be aware of your surroundings
- Know your emergency exits and evacuation route
- Take regular breaks; get up and stretch
- Keep emergency contact information readily available

# AGENDA

Time	Topics
9:30 – 9:45 am	Intro, Purpose, Background, and Objectives
9:45 – 10:15 am	Second Draft Wildfire Mitigation Plan Update Requirements Chapter Changes <ul style="list-style-type: none"><li>• Refresher on Required Components, Reportable Update Categories, and WMP Update Evaluation Process</li><li>• Substantive Changes From First Draft (September 4 Workshop)</li></ul>
10:15 – 10:45 am	Discussion & Q&A
10:45 – 11:00 am	Next Steps & Closeout





## Purpose of Today's Workshop:

- Present the Second Draft WMP Update Requirements Chapter (Chapter VI) of the WMP Guidelines, **highlighting notable changes** from the First Draft that was published on August 18<sup>th</sup> 2025, and presented at the September 4<sup>th</sup> 2025, workshop.
- Provide an opportunity for stakeholder questions and feedback on the changes highlighted in the Second Draft WMP Update Requirements Chapter.
- Provide an opportunity to inform stakeholders' written comments – due by 5 PM on November 21<sup>st</sup> 2025.



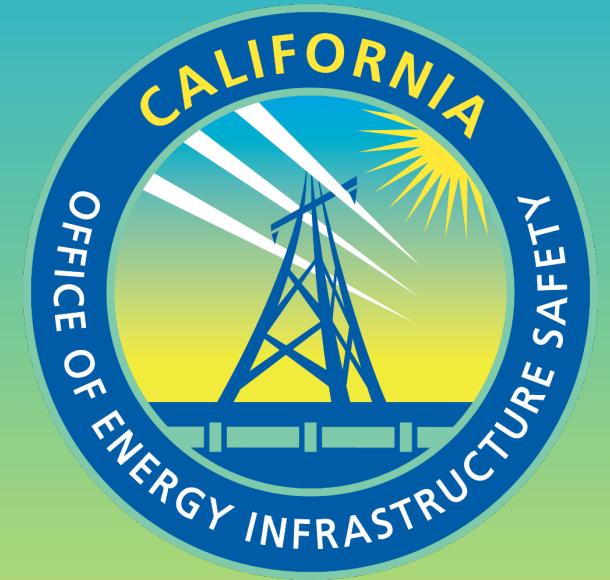
## Where We Are in the Guidelines Process:

- In February 2025, Energy Safety adopted the WMP Guidelines, which contained the Process and Evaluation, Base WMP Technical Requirements, Petition to Amend, and ITO Modified Requirements Chapters.
- Since then, Energy Safety has been working on the WMP Update Requirements Chapter that we are discussing today.
- Energy Safety is soliciting comments on this current draft and expects to adopt this WMP Update Requirements Chapter and merge into the existing WMP Guidelines (as Chapter VI).

# WMP GUIDELINES OVERVIEW

## WMP Guidelines Document

- ❖ Chapter I – Introduction
- ❖ Chapter II – Process and Evaluation
- ❖ Chapter III – Base WMP Technical Requirements
- ❖ Chapter IV – Petition to Amend
- ❖ Chapter V – ITO Modified Requirements
- ❖ **Draft Chapter VI – WMP Update Requirements**
- ❖ Attachment 1 – Data Request Log Template
- ❖ Appendix A – Definitions
- ❖ Appendix B – Supporting Documentation for Risk Methodology and Assessment
- ❖ Appendix C – Additional Maps
- ❖ Appendix D – Areas for Continued Improvement
- ❖ Appendix E – Referenced Regulations, Codes, and Standards




# DRAFT WMP UPDATE REQUIREMENTS CHAPTER



**Since the September 4<sup>th</sup>, 2025, Workshop, Energy Safety has made changes to the Draft WMP Update Requirements Chapter resulting from:**

- Comments received from the Joint Utilities (BVES, Liberty Utilities, PG&E, PacifiCorp, SDG&E, and SCE).
- Discussion in the first workshop about the Draft WMP Update Technical Requirements Chapter and pre-submitted questions.
- Further Energy Safety consideration of and clarification to the wording of the Draft WMP Updates Technical Requirements Chapter.
- Additional information required by Energy Safety pursuant to electrical undergrounding regulations.





# Refresher On Energy Safety's First Draft Chapter VI: WMP Update Requirements



## Objectives for the WMP Update Submissions:

- Enable each electrical corporation to provide **new and updated information** regarding its WMP in a focused, streamlined way for the applicable *update year*.
- Allow Energy Safety to evaluate any **significant updates** and provide direction to the electrical corporations' *mid-WMP cycle*.



## Required Components of a WMP Update:

### The WMP Update – a standalone document containing:

- The Reportable Updates organized by the six required categories.
- A description of the downstream impacts of Reportable Updates.
- An appendix listing the changes made to the Redlined Base WMP and tying them to the associated Reportable Updates.

### Redlined Base WMP:

- Text must be inserted/deleted in “Track Changes” format.
- A Redlined Base WMP is not needed if there are no Reportable Updates.

*Note: A clean Base WMP is **not** required upon initial submission **but is** following an Energy Safety Decision.*



## Reportable Updates:

**Definition:** “Reportable Updates” are specific changes, focused on the **update year (with some exceptions)**, that meet the requirements described in the Update Requirements Chapter.

**For each Reportable Update, the electrical corporation must:**

- **Include the required information** for each category.
- **Include any related impacts** of the Reportable Updates in other categories and any downstream impacts for the final year of a WMP cycle.
- **Reflect the Reportable Update** in corresponding changes in the Redlined Base WMP.






## Non-Reportable Updates:

**Definition: “Non-Reportable Updates” are:**

- Changes that only affect the year(s) prior to or after the update year **(with some exceptions)**.
- Changes outside the required six Reportable Update categories.
- Changes within those categories that do not meet the specific requirements outlined in the Update Requirements Chapter.

*Note: Energy Safety will not evaluate Non-Reportable Updates submitted in a WMP Update.*



# Substantive Changes In Second Draft Chapter VI: WMP Update Requirements



## **Substantive Clarification 1:** updated data and geospatial files

- *“The 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.” (Section 1, page 2 of redline document).*
- In response to electrical corporation comments, Energy Safety is clarifying that the updated data and geospatial files that have previously been required in WMP submittals are also required for the WMP Update.
- These data and geospatial files must be updated to match reportable updates in the WMP Update itself and submitted to the expected portals.





**Substantive Clarification 2:** In response to electrical corporation comments, Energy Safety is clarifying that while generally non-update year impacts are not considered reportable, there are exceptions for new and discontinued programs and the new EUP disaggregation requirement (as well as downstream impacts in subsequent years). The exceptions are --

- *New and discontinued programs (discussed in Section 2.3);*
  - *Electric Undergrounding Plan (EUP) disaggregation (discussed in Section 2.4); and*
  - *Reportable target impacts after the update year (downstream impacts)*
- (Section 1.3, Page 5 of redline document and in relevant parts of Section 2).**
- New and existing program changes are to be reported for all years of the WMP cycle.





## **Substantive Modification 3:** areas for continued improvement page limits

- *“Reporting on progress in the areas for continued improvement must be limited to **30 pages total.**” (Section 2.1, Page 6 of redline document).*
- Electrical corporations’ comment requested a page limit per area of continued improvement rather than a 20-page limit for the entire section.
- Energy Safety recognized the request for additional pages by increasing the overall section page limit to 30 pages.
- Energy Safety believes this provides greater flexibility in reporting individual areas of continued improvement.



## **Substantive Modification 4:** Clarified meaning of “Top 20% Circuits” reporting

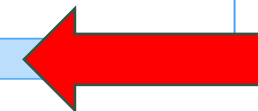
- “... *the electrical corporation must reanalyze the top 20 percent of its highest risk circuits, segments, or spans and provide a summary description of circuits, segments, or spans that contribute the most overall utility risk and **collectively represent 20 percent of the total summed overall utility risk value** (hereinafter referred to as the Top 20 Percent Circuits).*” (Section 2.2.1, pages 8-10 of Redline document).
- Energy Safety clarified the Top 20 Percent Circuit requirements by using consistent terminology for the concept and revising how the risk percentages are to be included in Table 2-1. (Revised table on next slide).
- Reanalysis of Top 20 Percent Circuits only reportable if there is a reportable risk-model update.

# DRAFT WMP UPDATE REQUIREMENTS CHAPTER



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	Associated Risk Drivers
1	Example Circuit 1	33.22	99.7 (99.7)	92.6 (include previous score)	7.1 (include previous score)	1.55%	
2	Example Circuit 2	15.55	95.22 (90)	92.11 (88.11)	3.11 (1.89)	1.49%	
3	<b>Example Circuit 3</b>	<b>7.45</b>	<b>91.52 (13)</b>	<b>91.51</b>	<b>0.01</b>	<b>1.22% (New in Top 20 Percent Circuits; included in total below)</b>	
4	Etc.						
5	Etc.						
NA	Example Circuit 4		5 (87)			No longer in Top 20 Percent Circuits. Not included in total below	
			<b>975</b>			<b>20%</b>	





## **Substantive Modification 5:** changed new and Discontinued program page limit

- *“The electrical corporation’s discussion on new or discontinued programs must be limited to **20** pages total.” (Section 2.3, Page 11 of redline document).*
- Electrical corporations’ comment requested a page limit per new and discontinued program rather than an overall 15-page limit for the entire section.
- Energy Safety recognized the request for additional pages by increasing the overall section page limit to 20 pages.
- Energy Safety believes this provides greater flexibility in reporting individual new and discontinued program information.



## **Substantive Clarification 6:** allowing reportable target updates for the Enterprise Systems section

- “ ...
  - *Emergency preparation, community engagement, and collaboration; and*
  - **Enterprise systems.**” (Section 2.4, page 12 of redline document).
- 
- Electrical corporations’ comment requested that Enterprise Systems be included in the list of reportable target information.
  - Energy Safety agrees that this is reasonable and added the category to the list of reportable targets.



## **Substantive Clarification 7:** clarifying format for updated target tables

- *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 be reflected in the Redlined Base WMP and must be explained in the WMP Update as described above. (Section 2.4, page 12 of redline document).*
- Electrical corporations requested clarification about the format of tables to be reported in the approved targets section.
- Energy Safety is clarifying that the format for the included tables should be in the same format as the corresponding target tables in the previously approved Base WMP.



## **Substantive Clarification 8:** reduced need to report qualitative targets

- *Updates to qualitative targets are reportable when the completion of the target **moves from the update year to a subsequent year**. Qualitative target updates that impact **only** the first year of the WMP cycle are not reportable. (Section 2.4.1, Page 13 of redline document)*
- Energy Safety decided to alter what is required as a reportable qualitative target.
- Now qualitative targets must only be reported when the completion date of the target moves from the update year to a subsequent year.
- Changes to qualitative target completion dates fully occurring prior to or subsequent to the update year are not reportable.



## **Substantive Modification 9:** adding Electrical Undergrounding Plan (EUP) information

- *“If the electrical corporation has received an approved EUP 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.”*  
**(New Section 2.4.4, page 14 of redline document).**
- Adding this information provides Energy Safety with clarification of an electrical corporation undergrounding activities that will be performed under a 10-year undergrounding plan.






**Substantive Clarification 10:** allowing substantive typos in tables to be reportable

- “... 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.” **(Section 2.6, Page 16 of redline document).**
- Electrical corporations requested clarification of whether reportable administrative updates included information in tables and figures.
- Energy Safety clarifies that these elements are reportable, when there is a typo in a table or figure that materially affects evaluation.



## **Substantive Clarification 11:** clarifying need for clean WMP submittal

- *“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.” (Section 3, page 17 of redline document).*
- In response to electrical corporations’ comments, Energy Safety is clarifying that a clean Base WMP (no redline) must be submitted, but only at the end of the process, once Energy Safety publishes a WMP Update Decision.
- The clean Base WMP must include all updates approved by Energy Safety in its Decision and must not include changes that are not approved.



# DISCUSSION AND Q&A

# HOW TO PARTICIPATE

## If You Wish to Speak:

- Press the “**Raise Hand**” button in Teams; participants will be unmuted in the order hands are raised.
- For dial-in users via telephone, press **#5** to raise or lower your hand.
- Use the **chat** feature to submit a question at any time.





# NEXT STEPS & CLOSE OUT



## Written Comments

- Comments must pertain only to the **Redline Changes** in the Second Draft WMP Update Requirements Chapter.
- Written comments must **not exceed 10 pages**. Supporting documents may be included as appendices or attachments and are excluded from the 10-page limit.
- Written comments are due by 5 pm on **November 21<sup>st</sup> 2025**, and must be filed in the WMP-Guidelines Docket ([Docket #WMP-Guidelines](#)).



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