



Energy Safety Public Workshop

Discussion Questions

Implementation of Cost-per-Avoided Ignition and Wildfire Mitigation Plan (WMP) Schedule Pursuant to Senate Bill 254 Requirements

This notice contains the discussion topics for the virtual public workshop to be held on December 17, 2025, from 2 p.m. to 5 p.m.¹

Discussion topics for this public workshop are centered around the new requirement for WMPs to include an estimated cost-per-avoided ignition for each risk. Questions are generally directed toward electrical corporations; however, Energy Safety welcomes responses and input from stakeholders or the public during the workshop or in writing. Discussions during the workshop will be limited to 20 minutes per question.

Stakeholders may provide written responses or comments to these questions via e-filing in the 2026-2028 Base WMP Docket by January 17, 2026.

The discussion and question responses will aid Energy Safety in developing guidelines for electrical corporations to submit 4-year WMPs in accordance with Public Utilities Code section 8386, as amended by Senate Bill 254.

Cost Per Avoided Ignition

Government Code section 8386(d)(12)(D) requires the electrical corporation, in its WMP, to provide “[a]n estimate of cost-per-avoided ignition for each risk, or an explanation on why such a value could not be assigned to a particular risk.”

1. Describe how you attribute costs to wildfire activities.

¹ [Public Meeting Notice – WMP SB 254 Implementation](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=59822&shareable=true), published December 5, 2025.
URL:(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=59822&shareable=true>).



- a. How do you differentiate costs to perform routine work from costs to perform wildfire mitigation activities?
 - b. How do you track costs for initiatives that are performed in-house and by contractors? (e.g., accounting for in-house labor and overhead, vs contractor's unit costs for the same initiative)
2. When calculating risk reduction, how do your costs account for variation in ignition risk across a mitigation activity?
 - a. For example: If you're using an average cost per mile for an undergrounding project to calculate risk reduction and cost efficiency, how does the average cost account for the reality that each circuit segment of the project has a different ignition risk?
3. Describe how you determine which ignition risk driver(s) are mitigated by which mitigation initiative(s).
 - a. For mitigations that address multiple risk drivers, how do you apportion the reduction for each risk?
 - b. If an ignition risk can be mitigated by multiple initiatives (e.g., covered conductor and PEDS on the same span both mitigate the risk of conductor-to-conductor contact), describe your process for determining how much of that risk each separate mitigation initiative reduced.
4. What baselines or counterfactuals have you considered when establishing "avoided" ignitions?
 - a. How do you use proxies, such as outages and wire-down events, to correlate wildfire risk and avoided ignitions?
 - b. Which risk drivers are challenging to estimate avoided ignitions for?
5. How do your risk reduction values for mitigation initiatives account for risk reduced due to weather and environmental conditions?

WMP Schedule



The electrical corporations are required to submit their WMP one year ahead of GRC application. (Government Code section 8386(c)(1).)

6. What logistical challenges do you foresee in transitioning to and implementing the new WMP submission cadence, and what are your proposed solutions?
 - a. When should the 4-year cadence begin for you, at the earliest, and why?
7. Outside of GRC-related changes, for what reason(s) would you want to make changes to your approved WMP?
 - a. What would create the need for these changes?
 - b. How often do these changes occur?
8. What additional elements should be included in a 4-year WMP?