



OFFICE OF ENERGY INFRASTRUCTURE SAFETY

715 P Street, 15th Floor | Sacramento, CA 95814
916.902.6000 | www.energysafety.ca.gov

Caroline Thomas Jacobs, Director

December 12, 2025

To: Wildfire Mitigation Plans (WMP) Guidelines and 2026-2028 Base WMP Dockets

Subject: Revised Discussion Topics for December 17, 2025, Public Workshop

Wildfire Mitigation Plan Stakeholders:

Changes have been made to the previously published Energy Safety Discussion Questions for the public workshop to be held on December 17, 2025.¹

Specifically, these changes are:

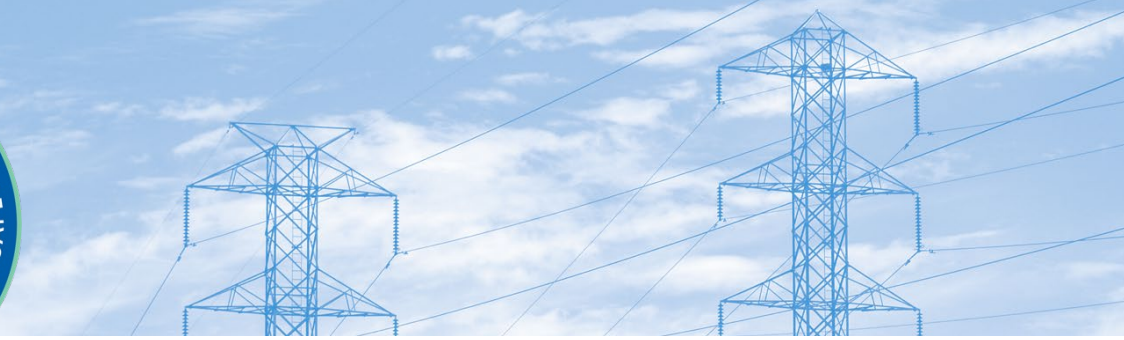
- The submission docket for written responses and comments has been updated to the WMP Guidelines docket.
- Written questions and comments are now due to the WMP Guidelines docket by January 19, 2026.
- Question #2 has been updated to the following:
 - How do you account for location-specific risk reduction benefits when calculating the cost efficiency of a project, especially when the cost estimate for the project is averaged over multiple circuit segments?
 - For example: If you're using an average cost per mile based on multiple circuit segments of undergrounding to calculate cost efficiency, could the cost efficiency of an individual circuit segment within the project be obscured by using that average? Why or why not?

Sincerely,

Nicole Dunlap
Program Manager | Electrical Safety Policy Division
Office of Energy Infrastructure Safety

¹ [Discussion Topics – WMP SB 254 Implementation](#), published December 8, 2025.

URL: (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=59846&shareable=true>)



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 WMP Guidelines² Docket by January 19, 2026.

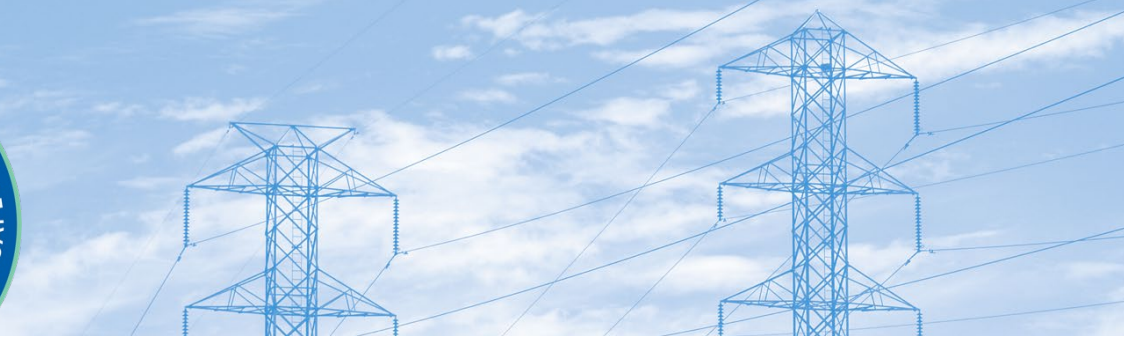
The discussion and question responses will aid Energy Safety in developing guidelines for electrical corporations to submit 4-year WMPs in accordance with Public Utilities Code section 8386, as amended by Senate Bill 254.

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

² [WMP-Guidelines Docket](#)



1. Describe how you attribute costs to wildfire activities.
 - 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. How do you account for location-specific risk reduction benefits when calculating the cost efficiency of a project, especially when the cost estimate for the project is averaged over multiple circuit segments?
 - a. For example: If you're using an average cost per mile based on multiple circuit segments of undergrounding to calculate cost efficiency, could the cost efficiency of an individual circuit segment within the project be obscured by using that average? Why or why not?
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?