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VIA ELECTRONIC FILING

Tony Marino, Deputy Director
Office of Energy Infrastructure Safety
715 P Street, 20th Floor
Sacramento, CA 95814

RE: MUSSEY GRADE ROAD ALLIANCE COMMENTS

Dear Deputy Director Marino,

The Mussey Grade Road Alliance (MGRA) files these comments pursuant to the November 25, 2025, Office of Energy Infrastructure Safety Office of Energy Infrastructure Safety's Draft Decision for San Diego Gas and Electric Company's 2026-2028 Base Wildfire Mitigation Plan¹ which authorizes public comment on the Draft Decision by December 16, 2025.

MGRA finds the current Draft Decision one of the most comprehensive reviews of utility wildfire mitigation plans put out by Energy Safety to date. MGRA supports Energy Safety's actions in areas for improvement and its observations regarding all of the areas we actively studied during this WMP cycle.

MGRA suggests only minor clarification aimed at improving the next round of WMPs.

¹Office of Energy Infrastructure Safety's Draft Decision for San Diego Gas & Electric Company's 2026-2028 Base Wildfire Mitigation Plan; November 25, 2025. (DD or Draft Decision)

Respectfully submitted this 16th day of December, 2025,

By: /S/ ***Diane Conklin***

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On behalf of the Mussey Grade Road Alliance.

1. INTRODUCTION AND SUMMARY

These comments are provided in response to Energy Safety's Draft Decision on the SDG&E 2026-208 Base Wildfire Mitigation Plan. As acknowledged in the Draft Decision, MGRA participated at all phases of the WMP process. As stated in the above cover letter, MGRA supports the Draft Decision and urges adoption with few modifications. Suggestions below are intended to enhance and fortify the OEIS position.

2. ISSUES

2.1. Risk Analysis Framework

MGRA supports Energy Safety's position on SDG&E's Risk Analysis Framework. However additional clarification and detail may be helpful in producing OEIS's desired result for both SDG&E and PG&E risk scaling approaches.

The Draft Decision states that:

"SDG&E employs a risk-informed decision-making framework to evaluate the impacts of risk events and adopts a risk-averse scaling function to modify wildfire and Public Safety Power Shutoff (PSPS) consequences. SDG&E's risk-averse approach might have substantive impacts on wildfire and PSPS consequences by applying different societal costs associated with safety, reliability and affordability..."

*SDG&E's risk-averse function could amplify the calculated risk, which may skew planning towards prioritizing additional risk mitigation in the highest risk areas where a more effective solution could be to accept the residual risk from a more resource efficient mitigation and divert remaining resources to other risky areas. Thus, SDG&E must collaborate with large electrical corporations to evaluate the impact of attribute function scaling on mitigation planning. This will help determine the methodology that should be used for attribute scaling function through collaboration given the wide variance across the electrical corporations. See area for continued improvement SDGE-26B-01 Sensitivity Analysis for Risk Averse Scaling in Section 5.3."*²

² Draft Decision; p. 9.

Energy Safety’s proposed solution could be further strengthened by requiring SDG&E to clarify its motivation for risk scaling. In fact the goal and purpose of “risk-scaling” are stated differently (and sometimes interchangeably) in different places and by different stakeholders in OEIS and Commission proceedings. Area for Continued Improvement SDGE-26B-01 states that:

“SDG&E employs a risk-averse scaling function to modify wildfire and PSPS consequence risk scores. Given the significant impact such a scaling function may have on a large electrical corporation’s decision-making, large electrical corporations must collaborate to evaluate the impact of attribute function scaling on mitigation planning.”³

While the Energy Safety and the CPUC allow the utilities to use risk scaling functions, understanding whether impacts are justifiable requires that utilities also clarify their motivation them. Many justifications for risk aversion have been given by different stakeholders in different contexts, including:

- Utility preference,
- Adjusting for low-frequency, high consequence events,
- Adjusting for the uncertainty in tail risk distributions,
- Adopting best practices from other industries,
- Adjusting utility risk estimates to make them equivalent to insurance market risk premiums, and
- Accounting for public preferences for risk-aversion.

It is important to recognize that the goal of “risk-scaling” and “risk-attitude” as it they have been discussed in OEIS and CPUC processes have never been adequately defined and varied with party and context. Therefore, the Draft Decision should further specify that in addition to specifying differences in scaling practices, appropriate attributes, and sensitivity of BCR to scaling, utilities should also explicitly state the goals and purpose of adopting a risk-scaling function and whose values are being represented, and to provide support for their position.

³ DD; p. 16.

2.1.1. Recommended Changes

Page 9:

Original:

SDG&E must collaborate with large electrical corporations to evaluate the impact of attribute function scaling on mitigation planning. This will help determine the methodology that should be used for attribute scaling function through collaboration given the wide variance across the electrical corporations.

Red-lined:

SDG&E must collaborate with other electrical corporations to:

- describe appropriate methodologies for risk scaling,
- describe which utilities prefer each risk scaling method and provide justification,
- establish what attributes are appropriate to apply scaling functions,
- to complete a sensitivity analysis to determine how risk-averse approaches affect mitigation selection.

This will help determine if there are valid ~~the methodologyies~~ that should be used for attribute scaling function through collaboration given the wide variance across the electrical corporations.

Final:

SDG&E must collaborate with other electrical corporations to:

- describe appropriate methodologies for risk scaling,
- describe which utilities prefer each risk scaling method and provide justification,
- establish what attributes are appropriate to apply scaling functions,
- to complete a sensitivity analysis to determine how risk-averse approaches affect mitigation selection.

This will help determine if there are valid methodologies that should be used for attribute scaling function through collaboration given the wide variance across the electrical corporations.

p. 16 - 5.3.1 SDGE-26B-01. Sensitivity Analysis for Risk Averse Scaling

Original:

Collaborate with other large electrical corporations to establish which (if any) attributes are appropriate to apply to scaling functions and an appropriate range or magnitude for each proposed scaling function.

Red-lined:

SDG&E must collaborate with other electrical corporations to:

- describe appropriate methodologies for risk scaling,
- describe which utilities prefer each risk scaling method and provide justification,
- establish what attributes are appropriate to apply scaling functions,
- to complete a sensitivity analysis to determine how risk-averse approaches affect mitigation selection.

Final:

SDG&E must collaborate with other electrical corporations to:

- describe appropriate methodologies for risk scaling,
- describe which utilities prefer each risk scaling method and provide justification,
- establish what attributes are appropriate to apply scaling functions,
- to complete a sensitivity analysis to determine how risk-averse approaches affect mitigation selection.

3. CONCLUSION

MGRA thanks Energy Safety for the work they do on behalf of residents of high-risk areas and respectfully requests that they consider these comments on this Draft Decision.

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