Pacific Gas and Electric Company

Jay Leyno
Senior Director
Wildfire Mitigation PMO

Mailing Address: 300 Lakeside Drive
Oakland, CA 94612
Telephone: (925) 239-3126
Email: Jay.Leyno@pge.com

December 17, 2025 **BY ENERGY SAFETY E-FILING**

Tony Morino
Deputy Director, Electrical Infrastructure Directorate
Office of Energy Infrastructure Safety
California Natural Resources Agency
715 P Street, 20th Floor
Sacramento, CA 95814

Re: Opening Comments of Pacific Gas and Electric Company to the 2026-2028 Wildfire Mitigation Plan Draft Decision Issued November 26, 2025
Docket: *#2026-2028-Base-WMPs*

Dear Deputy Director Marino:

Pacific Gas and Electric Company (PG&E) appreciates the Office of Energy Infrastructure Safety's (Energy Safety) detailed evaluation of our 2026-2028 Wildfire Mitigation Plan (WMP) in its Draft Decision issued on November 26, 2025 (Draft Decision). We strongly support Energy Safety's approval of the 2026-2028 WMP and largely agree with Energy Safety's recommendations, and we will work to implement them in the manner requested.

We have, however, identified areas that we respectfully request Energy Safety to clarify or modify in its final 2026-2028 WMP decision. Specifically: (1) PG&E requests clarification on the period covered by the next base WMP due to recent legislative directives; and (2) PG&E proposes that Energy Safety modify the requirements of ACI PGE-26B-16 and ACI PGE-26B-18. We address these issues below and look forward to collaborating with Energy Safety and other stakeholders in our collective effort to keep our customers and communities safe from wildfire.

I. ITEMS FOR CLARIFICATION

A. Upcoming Base WMP Filing Cycle

Within the requirements for Area for Continued Improvement (ACI) PGE-26B-09 Evaluation and Strategic Decision on DTS FAST Pilot, Energy Safety refers to a future WMP filing covering 2028 through 2031.[1] Senate Bill (SB) 254 amended Pub. Util. Code 8386(c)(1)to require submission of WMPs one year before a utility's general rate case application or concurrent with the filing of its Risk Assessment Mitigation Phase application (RAMP). WMPs must also cover the same period as the general rate case (GRC).[2]

[1] Draft Decision, p. 55.
[2] Stats. of 2025, Ch. 119 (September 19, 2025).

PG&E will submit our next RAMP filing in 2028 for the GRC cycle covering 2031-2034. A Base-Year WMP submission covering 2028-2031 would be duplicative of the year 2028 that is currently contained in the 2026-2028 WMP and would cross over two GRC cycles; the current 2027-2030 GRC cycle and the upcoming 2031-2034 cycle. We reviewed the draft decisions of other utilities and did not find reference to a 2028-2031 WMP submission.[3] We respectfully request that Energy Safety remove reference to the 2028-2031 WMP in ACI PGE-26B-09 and consider coordination of PG&E's WMP and GRC during the SB 254 Workshop led by Energy Safety on December 17, 2025, or any follow-on workshops or filings.

II. AREAS FOR CONTINUED IMPROVEMENT

A. ACI PGE-26B-16 - Constrained Work Order Resolution and Tracking

As related to constrained vegetation management work, PG&E currently manages constraints differently than outlined in the Draft Decision. In the Draft Decision, there are seven distinct categories of constraints defined: Environmental permitting, Encroachment Permitting, Customer Interferences, Biological, Active Wildfire, Weather Conditions, and Other.[4] In the interest of providing a response to ACI PGE-26B-16 which is aligned with PG&E's current high-level processes for managing constraints, we propose that the ACI response categorizes constraints into the following categories: Biological and Cultural, Customer, Encroachment Permitting, Environmental Permitting, and Other.

B. ACI PGE-26B-18 - Developing Tree-Specific Outage Probabilities

ACI PGE-26B-18 requires that PG&E present a plan for calculating tree species-specific probabilities of an outage occurring at the area of concern, circuit, and/or circuit protection zone level.[5] Attempting to calculate below the circuit level creates too small of a sample size and will not be useful. Additionally, our methodology is based on calculating actual outage rates rather than predicted outage probabilities.

The ACI also requires us to describe our methodology and findings from calculating tree species-specific or genus-specific outage probabilities at the eco-region scale. At a minimum, this analysis must include the 15 tree species that have the highest probability of causing an outage for each eco-region within its service territory.[6] We appreciate that Energy Safety's intent was to capture most outage risk by requiring the top 15 tree species per eco-region. However, the top 5 species would provide more meaningful information for the inspectors and will create a focus on the species that will have the most impact, especially when using this data at the circuit level.

[3] See, for example, San Diego Gas & Electric Company's Draft Decision, which only mentions the next base year submission but does not reference specific years for that submission.
[4] Draft Decision, p. 83.
[5] Draft Decision, p. 84.
[6] Draft Decision, pp. 84-85.

Finally, the ACI's requirement that the number of outages caused by each species per 1,000 trees in PG&E's records of that species is vague. We request that Energy Safety specify that we use PG&E's Strike Tree Species Model Prediction.

To address these issues, PG&E proposes the following modified requirements for ACI PGE-26B-18:

- *Present a plan for calculating tree species-specific outage rate of an outage occurring in HFTD at the eco-region, division, and/or circuit level.*
- *Describe its methodology and findings from calculating tree species-specific or genus specific outage rate at the eco-region scale. At minimum, PG&E must list the 5 tree species that have the highest rate of causing an outage for each eco region within its service territory and include the following:*
    - *The percentage each tree species represents of the recorded population.*
    - *The percentage of outages caused by each tree species.*
    - *The number of outages caused by each species per 1,000 trees in PG&E's Strike Tree Species Model Prediction.*

III. CONCLUSION

We appreciate this opportunity to provide opening comments on the Draft Decision for our 2026-2028 WMP and look forward to continuing to work with Energy Safety and interested parties to reduce wildfire risk throughout California. Should you have any questions, or need any additional information, please do not hesitate to reach out.

Very truly yours,

/s/ Jay Leyno