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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 Pacific Gas and Electric Company's 2026-2028 Base Wildfire Mitigation Plan¹ which authorizes public comment on the Draft Decision by December 17, 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.

MGRA provides the following comments timely and requests that Energy Safety give them serious consideration.

¹Office of Energy Infrastructure Safety's Draft Decision for Pacific Gas and Electric Company's 2026-2028 Base Wildfire Mitigation Plan; November 26, 2025. (DD or Draft Decision)

Respectfully submitted this 17th day of December, 2025,

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On behalf of the Mussey Grade Road Alliance.

1. INTRODUCTION AND SUMMARY

These comments are provided as comments in response to Energy Safety's Draft Decision on the PG&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 Methodology and Assessment

2.1.1. Ingress/Egress and Suppression

MGRA supports Energy Safety's findings on Wildfire Consequence Scaling factors and Issue PGE-26B-02. In particular, MGRA has obtained additional information regarding PG&E's suppression scaling factor as part of the GRC proceeding that has strengthened the findings MGRA presented in its comments on PG&E's WMP and Revision Notice. MGRA maintains that PG&E's calculation is demonstrably faulty, and is intending to litigate this point in PG&E's 2027 rate case.

Suppression is a very difficult issue because it depends on human factors as well as environmental conditions, and so it is difficult to make accurate predictions. One approach to the problem MGRA has suggested is to break the suppression problem into individual pieces that may be more quantifiably addressed:

- Initial attack success – the likelihood that a wildfire does not become large or destructive due to initial deployment of resources and favorable local and environmental conditions.
- Perimeter control – the ability of firefighting resources to influence spread of the wildfire, causing it to be less than that which would be predicted by an unimpeded wildfire simulation.
- Structure protection – the increase in structure survival rate due to the availability of firefighting resources to protect structures in wildland urban interface areas.

MGRA hopes to be able to contribute to the development of a common utility approach to suppression modeling through the Risk Mitigation Working Group process.

2.2. Wildfire Mitigation Strategy Development

2.2.1. Net Benefit and Risk Scaling

MGRA supports Energy Safety's position on Net Benefit and Risk Scaling (Risk Attitude Function), however additional clarification may be helpful in producing OEIS's desired result.

The Draft Decision states that:

“When evaluating risk, PG&E employs a risk-averse Risk Attitude Function to weight low frequency, high consequence events. These risk scaling functions may have significant impacts on quantified benefits of mitigations...”

If PG&E continues to use multiple economic analyses and risk-averse scaling, it must understand those analyses without the influence of risk-averse scaling, and it must demonstrate the overall impact of applying risk scaling functions on its decision-making...

PG&E must collaborate with other electrical corporations to establish what attributes are appropriate to apply scaling functions and to complete a sensitivity analysis to determine how risk-averse approaches affect mitigation selection. Requirements are set forth in Section 5.4, PGE-26B-06 “Sensitivity Analysis for Risk Averse Scaling or Approach.”²

Energy Safety's proposed solution could be further strengthened by requiring PG&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 PGE-26B-06 states that:

“PG&E employs a risk-averse scaling function to modify wildfire and PSPS consequence risk scores. PG&E accounts for tail risk by employing a risk-adverse Risk Attitude Function to weight low-frequency, high consequence events.”³

² DD; p. 20.

³ Draft Decision; p. 24.

As MGRA has previously maintained, if proper predictive models incorporating truncated power law distributions and 24-hour wildfire spread modeling are used for determining risk, “extreme” events should already be incorporated into the model.⁴ Thus, risk aversion is not strictly necessary to account for low-frequency, high consequence events. However, many justifications for risk aversion have been given, 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.

2.2.1.1. Recommended Changes

p. 20 –

Original:

When evaluating risk, PG&E employs a risk-averse Risk Attitude Function to weight low frequency, high consequence events.

Red-lined:

When evaluating risk, PG&E employs a risk-averse Risk Attitude Function to weight ~~low~~ frequency, high consequence events.

⁴ MGRA PG&E WMP Comments; p. 17.

Final:

When evaluating risk, PG&E employs a risk-averse Risk Attitude Function to weight high consequence events.

Original:

PG&E must collaborate with other electrical corporations to establish what attributes are appropriate to apply scaling functions and to complete a sensitivity analysis to determine how risk-averse approaches affect mitigation selection.

Red-lined:

PG&E must collaborate with other electrical corporations to:

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

Final:

PG&E must collaborate with other electrical corporations to:

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

p. 25 - 6.3.3 PGE-26B-06. Sensitivity Analysis for Risk Averse Scaling or Approach**Red-lined:**

PG&E accounts for tail risk by employing a risk-averse Risk Attitude Function to weight low frequency, high consequence events.

Red-lined:

PG&E accounts for tail risk by employing a risk-averse Risk Attitude Function to weight ~~low frequency~~, high consequence events.

Final:

PG&E accounts for tail risk by employing a risk-averse Risk Attitude Function to weight high consequence events.

p. 25 - 6.3.3 PGE-26B-06. Sensitivity Analysis for Risk Averse Scaling or Approach

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:

PG&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:

PG&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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