Pacific Gas and Electric Company

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

Re: Reply 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:

On December 17th and 18th, 2025, two stakeholders submitted comments on the Office of Energy Infrastructure Safety's (Energy Safety) Draft Decision for Pacific Gas and Electric Company's (PG&E's) 2026-2028 Base Wildfire Mitigation Plan. PG&E submits these reply comments addressing specific issues raised by The Utility Reform Network (TURN) and Mussey Grade Road Alliance (MGRA). Please note that, given the amount of time for replying to comments, we are not able to address every single issue raised in the opening comments. However, we welcome the opportunity to meet with Energy Safety or the commenting parties to discuss any issues raised in the opening or reply comments.

Energy Safety should finalize the Decision as drafted. The comments submitted by TURN and MGRA criticizing PG&E's risk modeling, scaling, and System Hardening mitigation selection processes largely repeat earlier positions and are already addressed in the new Areas for Continued Improvement (ACI) identified by Energy Safety in the draft Decision. The draft Decision appropriately balances approval of PG&E's WMP with requirements for continued work, studies, and refinements through ACIs to address concerns raised by stakeholders and Energy Safety.

I. RISK METHODOLOGY AND ASSESSMENT

A. Wildfire Suppression

We agree with MGRA that suppression modeling is challenging due to human factors. MGRA argues that suppression may be better addressed by separating it into the following individual elements: initial attack success, perimeter control, and structure protection.[1] PG&E points out that MGRA's recommendation is unnecessary because our existing model already incorporates these elements. Our suppression model is trained on observed fire outcomes that by

[1] MGRA Opening Comments, pp. 3-4.

definition reflect all components of the suppression effort expended on each fire. These fire outcomes are not disaggregated into the individual elements MGRA identifies. As a result, there is no model training data available to separately model the elements MGRA has delineated.

We also assert the robustness of the first iteration of our wildfire suppression model addresses these concerns. A key input to the suppression model is Technosylva's Terrain Difficulty Index (TDI) which was developed by Technosylva to address suppression difficulty related to both initial and extended attack as well as the ability for firefighting resources to create a fireline perimeter to control the spread of the fire. We will continue refining and advancing our wildfire consequence modeling capabilities, including representing suppression and egress outcomes in model predictions.

B. Risk Scaling

MGRA argues that our risk scaling function may be better understood if we clarify our motivation on our mitigation strategy.[2] As previously stated in our 2024 Risk Assessment and Mitigation Phase (RAMP) filing cited in the WMP, PG&E applies the risk scaling function to reflect risk preferences, specifically societal risk aversion using a market-based approach. This is consistent with the Risk-based Decision-Making Framework (RDF)[3], which states that "(t)he Risk Scaling Function is an adjustment made in the risk model due to different magnitude of Outcomes, which can capture aversion or indifference towards those Outcomes".[4] In the Safety Policy Division's (SPD) Evaluation Report on PG&E 2024 RAMP, "SPD evaluated [PG&E's Risk-Averse Risk Scaling Function] approach and concluded that it is valid."[5] As MGRA suggests, our risk scaling function accounts for "high consequence events"; however, it is not limited to low frequency risk events only. We will continue to be receptive to other utilities and experts for knowledge sharing and industry benchmarking related to its risk scaling methodology.

II. SYSTEM HARDENING DECISION-MAKING PROCESS

Energy Safety should not adopt TURN's recommendations to require immediate, significant changes to our System Hardening decision-making process. System Hardening projects follow long, multi-year planning and execution cycles, and abrupt changes to project selection criteria mid-cycle would result in substantial rework, sunk costs, and avoidable program delays. Starting and stopping capital projects in this manner undermines efficiency and timely risk mitigation for our customers.

The draft Decision takes the appropriate and measured approach by directing us to develop an improvement plan and to participate in continuing and new joint analyses and studies to identify and implement enhancements to the mitigation selection process for future work in the planning stage. Importantly, these improvements would apply prospectively and not to

[2] MGRA Opening Comments, pp. 4-5.
[3] D.24-05-064 Appendix A, Step 1A, Row 7 at A-8.
[4] PG&E 2024 Risk Assessment Mitigation Phase Exhibit (PG&E-1) p. 1-7, Exhibit (PG&E-2) pp. 2-2 – 2-3, 2-19 – 2-27.
[5] Safety Policy Division Evaluation Report on PG&E 2024 RAMP Application (A.)24-05-008, November 8, 2024, p. 3.

projects that have already been planned and prioritized using the existing decision trees. This approach promotes continuous improvement while preserving project stability, risk mitigation, and execution certainty.

The draft Decision also already includes requirements that render TURN's proposed changes unnecessary. While TURN's criticisms of our tree strike and ingress/egress risk assessment reflect a continued misunderstanding of those steps,[6] the draft Decision already requires us to address how those risks are incorporated into our models. Specifically, ACI PGE-26B-07 requires PG&E to include in the 2027 WMP update an Improvement Plan to incorporate tree strike and ingress/egress risk factors into our modeling. Likewise, TURN's recommendations related to scaling are already reflected in ACI PGE-26B-06 requiring utilities to evaluate the impact of attribute function scaling on efficacy calculations and mitigation planning. Energy Safety should allow these ACIs to proceed and should not order any immediate changes to mitigation selection because of the significant negative program impacts mentioned above.

While we disagree with TURN's sweeping characterization of our decision-making as biased and opaque,[7] we recognize parties' interest in how we select mitigations, and we understand the concerns raised by Energy Safety in the draft Decision regarding a 50% BCR threshold and use of net benefits. As we prepare for an EUP, we are orienting our system hardening decision-making approach to be responsive to those concerns. The draft Decision references Energy Safety's intent to review our decision-making approach within the EUP[8] – we look forward to that opportunity. We expect our EUP-based decision-tree, our mitigation selection process, and the work required by WMP ACIs on risk scaling and modeling, will address Energy Safety's concerns on these points.

Finally, we agree with TURN on the benefits of regulatory alignment across related filings and support efforts by Energy Safety and the CPUC to align on regulatory requirements and reporting.

III. CONCLUSION

We appreciate this opportunity to provide reply 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

[6] See PG&E's explanation in PG&E's WMP 2026-2028 Response to Revision Notice, July 28, 2025, pp. 12-16.
[7] TURN Opening Comments, pp. 2, 4.
[8] Draft Decision on PG&E's 2026-2028 WMP, p. 19.