Workshop Slides and Recording

Workshop on the Implementation of Cost-per-Avoided Ignition and Wildfire Mitigation Plan (WMP) Schedule Pursuant to Senate Bill 254 Requirements

The Office of Energy Infrastructure Safety (Energy Safety) held a workshop to gather feedback and information to aid in the implementation of Senate Bill 254 requirements as they relate to WMP submission on December 17, 2025. A recording of the workshop can be found on Energy Safety's YouTube channel: https://www.youtube.com/watch?v=39HsFngmdss. The slides shown during the workshop presentations are attached to this document.

ENERGY SAFETY PUBLIC WORKSHOP

Implementation of cost-per-avoided ignition and Wildfire Mitigation Plan schedule pursuant to Senate Bill 254 requirements.

December 17, 2025

SAFETY MESSAGE

- Be aware of your surroundings
- Know your emergency exits and evacuation route
- Take regular breaks; get up and stretch
- Keep emergency contact information readily available

AGENDA

- Workshop Background & Purpose
- Questions & Discussion
  - Cost per avoided ignition
  - WMP submission schedule
- Submitting Written Comments

WORKSHOP BACKGROUND & PURPOSE

Senate Bill (SB) 254, effective Sept 19, 2025, enacted several changes to Wildfire Mitigation Plan (WMP) submissions and evaluations.

Today's workshop discussion topics are:

- New requirement for an estimate of cost per avoided ignition per risk
- Changes to WMP submission schedules

Discussion and question responses will aid Energy Safety in developing guidelines and implementing changes under SB 254.

WORKSHOP TIME ALLOTMENTS

2:15 – 2:35 PM	Question 1: Attributing costs to wildfire activities
2:35 – 2:50 PM	Question 2: Risk reduction calculation
2:50 – 3:10 PM	Question 3: Risk driver mitigations
3:10 – 3:30 PM	Question 4: Establishing avoided ignitions
3:30 – 3:45 PM	*Break*
3:45 – 4:00 PM	Question 5: Risk reduction, mitigations & weather impacts
4:00 – 4:20 PM	Question 6: Transition to align schedule w/ GRC cycle
4:20 – 4:40 PM	Question 7: Changes & updates to WMPs
4:40 – 5:00 PM	Question 8: Additional elements in a 4-year WMP

Energy Safety staff will provide time checks & 2-minute warnings.

HOW TO PARTICIPATE

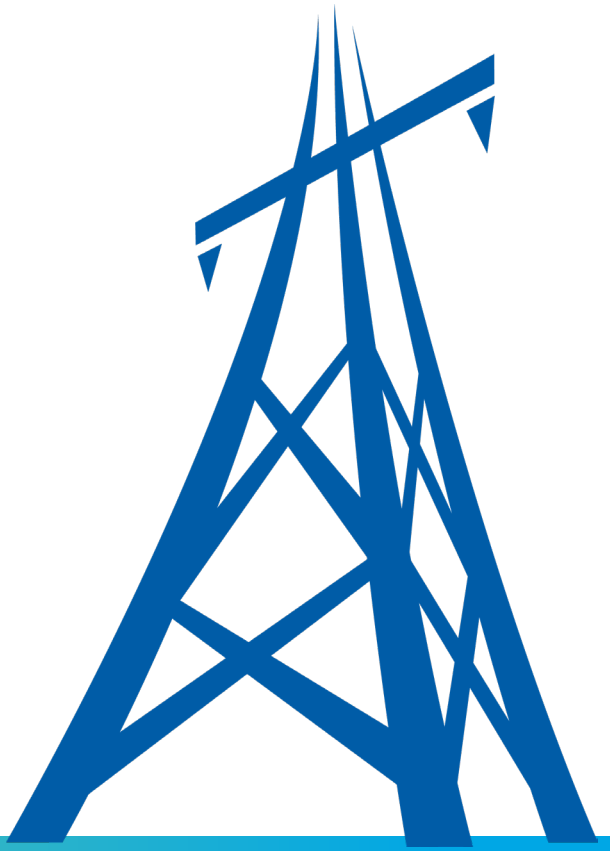
If You Wish to Speak:

- Press the **“Raise Hand”** button in Teams; participants will be unmuted in the order hands are raised.
- For dial-in users via telephone, press **#5** to raise or lower your hand.
- Use the **chat** feature to submit a question at any time.


QUESTIONS
&
DISCUSSION

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. Describe how you attribute costs to wildfire activities.

1a. How do you differentiate costs to perform routine work from costs to perform wildfire mitigation activities?

1b. 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?

2a. 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).

3a. For mitigations that address multiple risk drivers, how do you apportion the reduction for each risk?

3b. 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?

4a. How do you use proxies, such as outages and wire-down events, to correlate wildfire risk and avoided ignitions?

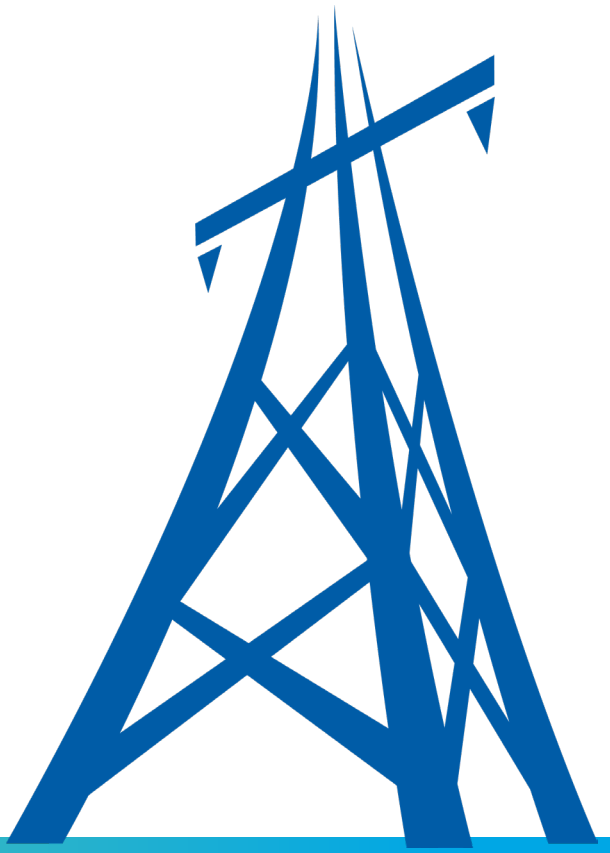
4b. Which risk drivers are challenging to estimate avoided ignitions for?


15
MINUTE
BREAK

5. How do your risk reduction values for mitigation initiatives account for risk reduced due to weather and environmental conditions?

WMP SUBMISSION SCHEDULE

Government Code section 8386(d)(c)(1) requires the electrical corporation to submit a WMP at least once every four years and one year ahead of GRC application or concurrent with RAMP application.



6. What logistical challenges do you foresee in transitioning to and implementing the new WMP submission cadence, and what are your proposed solutions?

6a. 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?

7a. What would create the need for these changes?

7b. How often do these changes occur?

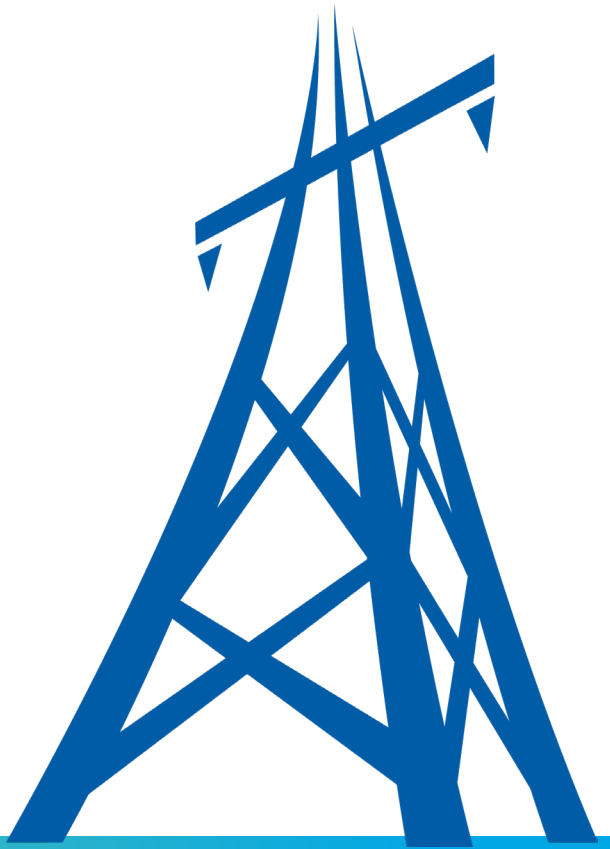
8. What additional elements should be included in a 4-year WMP?

Providing Written Comments

SUBMITTING WRITTEN COMMENTS

Stakeholders may provide written responses to these questions, or comments about the discussion, via e-filing in the WMP Guidelines Docket by **January 19, 2026**.

Stakeholders may also provide suggestions for SB 254 related topics they would like to see covered at a future workshop.



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