



Jay Leyno
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VIA ELECTRONIC FILING

Docket: WMP-Guidelines

January 19, 2026

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

RE: Bear Valley Electric Service, Inc., Liberty Utilities, Pacific Gas and Electric, PacifiCorp, San Diego Gas & Electric and Southern California Edison Company's Comments on the Public Workshop on WMP SB 254 Implementation

Dear Deputy Director Marino:

Bear Valley Electric Service, Inc., Liberty Utilities (CalPeco Electric) LLC, Pacific Gas and Electric Company, PacifiCorp, San Diego Gas & Electric, and Southern California Edison, (collectively, "the Joint Utilities") hereby provide comments addressing the Public Workshop on Wildfire Mitigation Plan (WMP) SB 254 Implementation held by the Office of Energy Infrastructure Safety ("Energy Safety") on December 17, 2025 ("Public Workshop Notice for WMP SB 254 Implementation") related to Electrical Corporations' implementation of their WMP. The Joint Utilities have limited the comments below to the most salient issues.

I. COMMENTS

A. Cost Per Avoided Ignition

Each utility provided input on the cost per avoided ignition during the public workshop on December 17, 2025. For continued discussion of this topic, the Joint Utilities recommend utilizing the Risk Model Working Group or another forum established by Energy Safety to further explore and develop this topic.

B. WMP Schedule

WMP Submission:

Because WMPs will be filed on a staggered schedule going forward, each utility will be in a different phase of their Risk Assessment and Mitigation Phase (RAMP) and

General Rate Case (GRC) cycles when the relevant statute in SB 254 is triggered on January 1, 2027.¹ Some may not have any issue filing their next Base Plan concurrently with the next RAMP and one year before the next GRC, but this timeline may not be possible for others, potentially leaving gaps of several years before a utility could abide by SB 254 to the letter. Due to this, the Joint Utilities urge flexibility on the part of Energy Safety by either allowing for an “off schedule” submission of the next Base Plan or additional annual WMP updates until a utility can file a base plan as prescribed.

SCE’s next RAMP application will be filed in March 2026, and SCE’s 2029-2032 GRC will be filed in May 2027. Because the trigger date for submission of a preliminary WMP is January 2027, and one year before the filing of SCE’s next GRC application is May 2026—i.e., before the January 2027 trigger date—SCE’s first opportunity to file a four-year preliminary WMP that covers that same period as its GRC would be in advance of the 2033-2036 GRC. Thus, SCE recommends filing the 2029-2032 WMP in March of 2028, maintaining the year-ahead cadence that utilities are currently on, but allowing for a transition to a four-year Base Plan that aligns with the 2029-2032 GRC. Alternatively, SCE recommends annual WMP Updates (similar to the forthcoming 2027 WMP Update) for 2029, 2030, 2031, and 2032, until SCE can file a preliminary 2033-2036 WMP that covers the same period as the 2033-2036 GRC.

PG&E’s next RAMP application will be filed in May 2028, and the 2031–2034 GRC will be filed in May 2029. In an effort to adhere to the implementation of SB 254 in January 2027, PG&E recommends filing a three-year WMP covering 2028–2030 in 2027, followed by the 2031–2034 WMP in 2028. When PG&E files the three-year WMP covering 2028-2030, it may mean that PG&E provides an update for 2028 from the 2026-2028 WMP filing and establish a new plan for 2029 and 2030. This approach maintains the year-ahead cadence currently observed by IOUs while supporting the transition to a four-year Base Plan aligned with the next GRC cycle.

SDG&E will be filing a GRC in May of 2026 which will include the years 2028-2031. SDG&E’s next RAMP application will be filed in May 2029 and the 2032-2035 GRC will be filed in May 2030. In order to comply with the implementation of SB 254 in January of 2027, SDG&E recommends a bridge process where the Spring of 2026 would be an update filing for 2027. In order to bridge to the next GRC cycle, SDG&E recommends a

¹ Public Utilities Code § 8386(c)(1) provides “Beginning January 1, 2027, each electrical corporation shall submit a preliminary wildfire mitigation plan to the office at the earliest date of one year before the filing of its general rate case application or concurrent with the filing of its Risk Assessment Mitigation Phase application with the commission. The wildfire mitigation plan shall cover the same period as the general rate case period.”

four-year WMP to be filed in 2027, covering 2028-2031. SDG&E would then be able to officially comply with SB 254 by filing the RAMP and WMP in 2029, covering the years 2032-2035. This approach maintains the year-ahead cadence currently observed by IOUs while supporting the transition to a four-year Base Plan aligned with the next GRC cycle.

Updates to WMPs:

SB 254 requires the utilities to submit targets much further into the future, which introduces significant uncertainty. Current Energy Safety processes limit the ability of the utility to update targets; remedying uncertainty is not a currently allowable reason for a target change. However, for many of the reasons listed below, the utilities need a mechanism to refine targets based on up-to-date information. Absent a process to update targets, utilities face risks to WMP compliance and safety certification implementation.²

To address these concerns, we recommend that Energy Safety: (a) enable comprehensive target updates; and/or (b) adopt cumulative targets/risk calculations over the four-year period. These approaches provide the utility sufficient operational flexibility to integrate new learnings and updated information and to ensure that WMP targets are set to most effectively address known risk during the plan period.

Regarding making updates to an approved WMP outside of GRC-related changes, there are several reasons why this may be necessary. Below are some examples:

- When major fires occur globally, utilities often analyze causes and mitigation strategies. Incorporating lessons learned from ignition events or catastrophic wildfires worldwide in the mid-WMP cycle helps improve safety and reduce wildfire risk.
- New technologies and emerging tools for monitoring, detection, or prevention can significantly enhance wildfire mitigation. Updating the WMP ensures these technologies are integrated into planning and operations.
- Advancements in processes, such as inspection methods from ground to aerial inspections, to promote efficiency and effectiveness. Adjusting the WMP to reflect new best practices ensures that the utilities are most effectively addressing risk.
- Risk planning models need to evolve to reflect new data, methodologies, and insights. Holding risk models stagnant for four to six years can lead to inaccurate

² See Pub. Util Code. § 8389(f)7.



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risk scores, planning gaps, or even “null” values” that disrupt work prioritization and mitigation strategies.

- As research improves, so does the understanding of which mitigations work best, and utilities can make more cost-effective decisions. Updating the WMP ensures alignment with the latest evidence-based practices.
- Some programs may become obsolete or less effective. Utilities may discontinue these programs and introduce new initiatives, requiring WMP updates to reflect these changes.
- Updates to asset registries, changes in High Fire Risk Areas (HFRA), or new operational data may necessitate adjusting annual goals for inspections, hardening or vegetation management.
- Other regulatory filings and decisions such as the Electric Undergrounding Plan (EUP) and Climate Adaptation Vulnerability Assessment (CAVA) may require additional adjustments to the WMP. When regulators approve or modify EUPs, utilities need to align their WMP with those decisions to maintain compliance and consistency. New CAVAs are updated every four years or when major methodological changes occur. If new climate data or modeling significantly alters risk projections, the WMP must be revised accordingly.

These considerations underscore the need for flexibility in WMP updates.

II. Conclusion

The Joint Utilities appreciate the opportunity to provide these comments.

If you have any questions or require additional information, please contact me at jay.leyno@pge.com, David LeBlond (SCE) at david.leblond@sce.com, Kari Kloberdanz (SDG&E) at kkloberdanz@sdge.com, Paul Marconi (BVES) at Paul.Marconi@bvesinc.com, Melissa Swenson (PacifiCorp) at Melissa.Swenson@pacificorp.com, or Jordan Parrillo (Liberty Utilities) at jordan.parrillo@libertyutilities.com.

Sincerely,

/s/ Jay Leyno