

February 17, 2026

BY ENERGY SAFETY E-FILING

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: Pacific Gas and Electric Company's Comments on the Office of Energy Infrastructure Safety's Draft Wildfire Mitigation Plan Submission Schedules
Docket: #WMP-Guidelines

Dear Deputy Director Marino:

Pacific Gas and Electric Company (PG&E) submits the following comments on the January 26, 2026, letter from Office of Energy Infrastructure (Energy Safety) regarding the proposed schedule for the next two Wildfire Mitigation Plans (WMPs) as presented in Attachment 1.

I. IMPLICATIONS OF THE 2027 WMP UPDATE CANCELLATION

In its letter, Energy Safety indicates it will not be accepting 2027 WMP Updates and instead will be requiring each electrical corporation to submit a new Base WMP in 2027 covering the four-year period of 2028-2031. With the elimination of the 2027 WMP Update, PG&E requests further clarification and guidance on the following:

A. Safety Certificate Attainment

Pursuant to Pub. Util. Code Section 8389(e)(1), a utility must have an approved WMP in order to apply for safety certification. Section 8386.3(a) states that a utility's approved WMP "shall remain in effect" until Energy Safety approves that utility's subsequent plan.

On December 2, 2025, we submitted our 2025 Safety Certification Request.¹ On February 5, 2026, Energy Safety approved our 2026-2028 Base WMP. Given the absence of a 2027 WMP Update, we request that Energy Safety affirm that for subsequent safety certification requests (2026 and beyond), our 2026-2028 WMP suffices for purposes of having an approved WMP pursuant to Section 8389(e)(1).

¹ When we submitted our safety certification request, Energy Safety had not yet issued a final decision on our 2026-2028 Base WMP. Thus, the 2023-2025 Base WMP remained in effect and served as our most recently approved plan for safety certification purposes.

B. Compliance

The absence of a mechanism to make updates to our WMP initiative targets for 2027 may also lead to targets that do not fully reflect the risk to be reduced by our WMP activity. For example, we had intended to refine certain targets based on new information that would result in greater risk reduction from certain initiatives than initially anticipated. On the other hand, the inability to update targets may impact a utility's ability to achieve compliance because the utility is unable to communicate changes in circumstances. We would like to understand how Energy Safety intends to address year 2027 compliance absent a 2027 WMP Update. We request that we be permitted to submit updated information for consideration as part of the Compliance process.

C. Limited Opportunities to Improve Clarity and Processes

The lack of a 2027 WMP Update also prevents opportunities to improve clarity and enhance QA/QC review processes for vegetation management activities. For example, we are unable to include Fall-in Tree compliance criteria for QA and address incomplete Pass Rate formula for VMQC Pole Clearing for 2027. As above, we request that we be permitted to submit this information for consideration as part of the Compliance process.

II. **TIMING CONSIDERATIONS FOR UPCOMING BASE WMP CYCLES**

A. Uncertainty in Projecting Risks and Mitigations Before GRC and RAMP Filings

Our next RAMP application will be filed in May 2028, followed by the 2031–2034 GRC filing in May 2029. Developing projections by Spring 2027 for a 2028–2031 Base WMP adds considerable uncertainty because it requires forecasting 2031 risks and mitigations well before the analyses that inform our 2031-related RAMP and GRC filings are complete. Given this uncertainty, we reiterate the importance of having mechanisms to update the WMP annually and after related filings are approved to maintain consistency across our filings. We also recommend that the 2031–2034 Base WMP be submitted after the RAMP application filing in May 2028 to support better alignment between both filings.

B. Duplication of WMPs for 2031

We are concerned about inefficiencies and confusion that may result from including 2031 in two base WMPs filed just one year apart. We understand the requirement to transition to a 4-year WMP that aligns with our GRC cycle. However, we see limited value in a 4-year WMP that is not aligned with a GRC and that contains a year that will be included again in the next base WMP filed 12 months later. Per the schedule, this may be an issue not just for PG&E but also for Bear Valley, Liberty and PacificCorp. To reduce administrative waste and prevent confusion, we propose that the next base WMP be specific to 2028-2030, and that the first 4-year WMP be 2031-2034 in alignment with our 2031-2034 GRC.

C. Request for Process to Update Base WMP with New Planning Risk Models

Version 5 of the Wildfire Distribution Risk Model (WDRM) and Version 5 of the Wildfire Consequence (WFC) model, which is an input into the Wildfire Transmission Risk Model (WTRM), will not be released in time to be incorporated into the 2028-2031 Base WMP under

the proposed Spring 2027 submission timeline. We respectfully request that Energy Safety create a mechanism that would allow us to revise risk reduction targets based on the new risk models.

D. Flexibility to Update 2028 Baseline Projections

We request clarification from Energy Safety regarding whether we are required to retain the 2028 baseline projected expenditures submitted in the 2026-2028 Base WMP or if updates to the 2028 baseline may now be considered. We request that it be the latter. We also recommend that Energy Safety confirm that the 2028-2031 WMP will establish the targets and govern compliance for 2028 activities. This means that the 2028-2031 WMP decision would supersede the 2028 forecasts from the 2026-2028 WMP and no further revision would occur for the 2026-2028 WMP.

E. 2029 WMP Update

As stated in the Joint Utilities' comments on the Public Workshop on WMP SB 254 Implementation, there are many reasons utilities need mechanisms like the Annual Update to refine their targets based on up-to-date information and, without such a process, they face risks to WMP compliance and safety certification implementation.² Given that we will file the 2031–2034 Base WMP in 2028, we request confirmation that Energy Safety will allow us to submit a 2029 WMP Update for the 2028–2031 WMP cycle in 2028. We also suggest that this Update be handled as a separate filing from the 2031-2034 WMP that will be submitted in the same year.

III. DEMONSTRATING ACI PROGRESS

A. Clarification of Expectations for Progress on Joint IOU ACIs by the 2027 Base WMP

The proposed schedule states that our 2028-2031 base WMP, to be filed in Spring 2027, “must report progress on all areas for continued improvement [ACI].” The Decision on PG&E’s 2026-2028 WMP contains ACIs PGE-26B-05 and PGE-26B-11, both of which will require significant joint utility collaboration on studies and reports. The Decision specifies for ACI PGE 26B-05 that “In its next Base WMP, PG&E must collaborate with SCE, SDG&E, PacifiCorp, and Liberty...PG&E, in collaboration with SCE, SDG&E, PacifiCorp, and Liberty must complete and provide a joint study and report by March 1, 2028, to the 2026-2028 Base WMP Docket (#2026-2028-Base WMPs), and include the report in their subsequent Base WMP submission.”³ The Decision includes similar language for ACI PGE-26B-11.

We request that the final WMP Schedule confirm the schedule specified in the final Decision that the joint utility studies and reports for these ACIs are due by March 1, 2028 and are not required to be complete at the time of submission of our 2028-2031 WMP submission. As specified in the final Decision, after delivering the reports by March 1, 2028, we would include the reports in our 2031-2034 base WMP submission in Spring of 2028, per the proposed schedule. We support the Decision’s specified due date of March 1, 2028 because it provides

² 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, pp. 3-4.

³ Office of Energy Infrastructure Safety’s Decision for the Pacific Gas and Electric Company 2026-2028 Base Wildfire Mitigation Plan, p. 24.

sufficient time for the amount of work and cross-utility collaboration that is required by these ACIs. Both ACIs expand on previous ACIs and will involve more data sharing, data analysis, benchmarking and collaboration by the three electric utilities, and with PacifiCorp and Liberty for ACI PGE-26B-05. This work will be resource-intensive and cannot reasonably be completed before the March 1, 2028, date ordered in the final Decision.

In addition to confirming the March 1, 2028, date specified in the final Decision for completion of the joint studies and reports, we request that the final Schedule clarify Energy Safety's expectations for demonstration of collaborative progress on these ACIs in the 2028-2031 WMP filing. For example, we interpret that it would be acceptable for our Spring 2027 filing to include a status update report detailing the collaborative work completed and the work still in progress.

B. ACI Progress for Risk Model Updates

As stated above, the newest versions of the WDRM and the WFC model, which is an input into the WTRM, will not be released by the 2028–2031 Base WMP under the proposed submission schedule. ACIs that require a model update will not be completed by that base WMP submission. We will be able to discuss our plans for the model updates in the ACI responses for the 2028 - 2031 WMP, but we will not be able to respond completely until the 2031-2034 WMP.

IV. REGULATORY FILING ALIGNMENT

A. Triggers for Petition to Amend

As we have noted in previous comments⁴, we appreciate that the petition to amend process allows for updates to the WMP to align with GRC decisions. However, given the number of filings that will overlap with the upcoming base WMPs, Energy Safety should allow for additional triggers for Petitions to Amend to align with decisions on other filings, including but not limited to decisions arising from Energy Safety's Electric Undergrounding Proceeding (EUP), rather than limiting amendments solely to GRC alignment.

B. Request for Process to Update Targets and Forecast Upon GRC Submission

If the intention is to align WMPs to GRCs, we respectfully encourage Energy Safety to either: (a) permit utilities to update both targets and projected expenditures upon submission of their GRC application (which occurs one year after the Base WMP submission), or (b) permit utilities to supplement their WMP submissions with relevant Tables—such as Table 12 for units and Table 11 for dollars—so that the information is consistent with the GRC upon its submission.

In practical terms, this would mean submitting the 2031-2034 WMP in 2028 with targets and forecast expenditures that align to the RAMP, and then either updating or supplementing this data in 2029 upon application for the 2031-2034 GRC. This approach would enable regulators to track WMP data in relation to other proceedings and would avoid the complexity that may arise

⁴ PG&E's Reply Comments on the Draft 2026-2028 WMP Guidelines, pp. 1-2.

if utilities were required to justify variances to outdated RAMP data rather than the more current GRC cost recovery forecasts being considered by the CPUC.

V. CONCLUSION

We appreciate this opportunity to provide comments on the Draft WMP Submission Schedules 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