



Jay Leyno
Senior Director
Wildfire Mitigation PMO

Mailing Address: 300 Lakeside Drive
Oakland, CA 94612
Telephone: (925) 239-3126
Email: Jay.Leyno@pge.com

VIA ELECTRONIC FILING

Docket: WMP-Guidelines

April 1, 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 Mr. 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 ("the Joint Utilities") hereby provide comments addressing the Public Workshop on Wildfire Mitigation Plan (WMP) Senate Bill (SB) 254 Implementation held by the Office of Energy Infrastructure Safety ("Energy Safety") on March 23, 2026 ("Public Workshop Notice for WMP SB 254 Implementation") related to Electrical Corporations' implementation of their WMPs. The Joint Utilities have limited the comments below to the topic of reporting the cost per avoided ignition.

I. COMMENTS

The Joint Utilities respectfully request additional opportunities to engage with Energy Safety on this topic. While SB 254 requires utilities to report the cost per avoided ignition, the value of the metric is dependent upon its design.

For example, there may be some academic merit in comparing the effectiveness of reducing utility involved ignitions as compared to non-utility ignitions from a state-wide perspective, but this type of metric will potentially have limited use in utility decision making unless it is paired with ignition consequence values in some form. Additionally, prescribing too much granularity in measuring potential ignitions may mean that asset or segment level views have a near-zero ignition rate, giving the impression of a substantially inflated cost per avoided ignition.



Jay Leyno
Senior Director
Wildfire Mitigation PMO

Mailing Address: 300 Lakeside Drive
Oakland, CA 94612
Telephone: (925) 239-3126
Email: Jay.Leyno@pge.com

The Joint Utilities recommend an iterative and collaborative process for development of the cost per avoided ignition metric. To provide meaningful input, the Joint Utilities respectfully request that Energy Safety provide guidance on the goals and use cases for the metric via a working group in early to mid-April. The Joint Utilities are unable to provide substantive comments by April 1, 2026 but respectfully request an extension to submit comments by April 27, 2026. We look forward to the opportunity to further engage on development of the cost per avoided ignition metric. With respect to the remaining discussion questions from the virtual workshop (questions 5, 6, and 7), the Joint Utilities have no additional comments at this time.

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