Pacific Gas and Electric Company

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VIA ELECTRONIC FILING **Docket: WMP-Guidelines**

April 27, 2026

Tony Marino
Acting 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 a Cost Per Avoided Ignition (CPAI) metric.

I. COMMENTS

The Joint Utilities agree that transparency regarding the relationship between wildfire mitigation investments and ignition events is an important long-term objective. However, careful consideration is required to ensure that any adopted cost-per-avoided-ignition (CPAI) metric is methodologically sound and appropriately reflective of the limitations of currently available ignition data.

Observed ignition counts naturally fluctuate from year to year because they are influenced by factors such as weather, vegetation conditions, and minimum reporting thresholds, many of which are exogenous factors beyond utility control. Ignitions are recorded only when specific criteria are met,[1] meaning small differences in conditions

[1] For purposes of CPUC wildfire reporting and utility Wildfire Mitigation Plans, an "ignition" is defined as a "CPUC-Reportable Event," meaning any event where utility facilities are associated with: (a) a

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can determine whether an event is counted or not. As overall ignition frequency declines due to mitigation investments and/or due to proactive Public Safety Power Shutoffs (PSPS), subsequent ignition counts become less reliable as a standalone measure of performance.

In addition, it is important to note that avoided ignition counts alone will not capture differences in the potential consequences associated with each avoided ignition. Instead, avoided ignition should be interpreted in the context of prevailing fire-weather outcomes and associated consequences avoided as a result. An avoided ignition which would have occurred during fire weather conditions in a CPUC designated High Fire Threat District (HFTD) in proximity to population centers, for instance, would have potentially posed orders of magnitude greater risk than an ignition occurring under benign conditions outside of the fire season in a remote, unpopulated location. Accordingly, there may need to be some future consideration to appropriately weight avoided ignitions based only on their potential consequences.

For these reasons, the Joint Utilities caution that while a CPAI metric may be informative, it should not be viewed in isolation and must be interpreted within a broader context. With this context in mind, the following section describes a practical framework for estimating cost per avoided ignition, while recognizing the limits of available data.

Conceptual Cost per Avoided Ignition (CPAI) Framework

Conceptually, the creation of a CPAI metric would entail estimating the number of ignitions that would have occurred absent incremental mitigation investments, then comparing those counterfactual outcomes to observed ignition trends following mitigation deployment to estimate an annualized count of avoided ignitions. The development of this type of counterfactual analysis typically involves three primary steps: (1) the development of a baseline counterfactual ignition trend, (2) an estimate of the number of avoided ignitions attributable to mitigation deployment, and (3) the allocation of mitigation costs across ignition drivers or sub-drivers in a manner that avoids double counting, while also preserving the observed pattern of both historical

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self-propagating fire of material other than electrical or communication facilities; (b) the resulting fire travels more than one linear meter from the ignition point; and (c) the utility has knowledge that the fire occurred. The ignition point is the location, excluding utility facilities, where a rapid, exothermic reaction was initiated that propagated and caused the material involved to undergo temperature changes substantially above ambient conditions. *See* CPUC Decision 14-02-015 (R.08-11-005), Decision Adopting Regulations to Reduce the Fire Hazards Associated with Overhead Electric Utility Facilities and Aerial Communications Facilities, Appendix C

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and present day ignition trends. While this framework provides a clear way to think about cost per avoided ignition, applying it in practice would require utilities to overcome a number of significant implementation challenges that must be carefully considered, as explained below.

Key Implementation Challenges

As discussed above, whether an electrical fault results in an ignition is strongly influenced by weather, fuel conditions, and other external factors that can vary significantly from year to year. As a result, changes in annual ignition counts may reflect these external conditions rather than the effects of mitigation investments, making multi-year trend analysis essential for any CPAI counterfactual. This challenge is compounded by limited historical data on asset condition, vegetation, and high-resolution weather, as well as the fact that mitigation has been deployed gradually and alongside evolving operational practices. Moreover, wildfire mitigations work as an integrated portfolio, with many measures affecting multiple ignition causes at once. While mitigation costs can be estimated at the program level, allocating those costs to specific ignition drivers requires modeling assumptions and cannot be directly observed. Accordingly, the Joint Utilities recommend that initial CPAI estimates focus on system-level outcomes, rather than at the driver or sub-driver-level.

Recommended Interim CPAI Approach

Given the limitations described above, the Joint Utilities recommend that, while stakeholders continue to refine the CPAI framework, Energy Safety adopt an Interim CPAI approach which focuses on existing reported system-level ignition and mitigation metrics that are already well understood. These existing metrics include historical ignition counts and ignition rates over time, which could, in turn, be normalized by asset population and/or mileage and fire-weather conditions, then compared to mitigation deployment and portfolio level costs. We believe this approach meets Energy Safety's objectives to provide meaningful insight into long-term ignition trends without implying a level of causal precision that cannot currently be supported.

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

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Sincerely,

/s/ Jay Leyno