



Jay Leyno
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VIA ELECTRONIC FILING

Docket: WMP-Guidelines

May 14, 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 Public Utilities Code section 8386.4(b)(3) and Wildfire Mitigation Plan Updates.

Dear Mr. Marino:

Bear Valley Electric Service, Inc.; Liberty Utilities (CalPeco Electric) LLC; Pacific Gas and Electric Company; PacifiCorp d/b/a Pacific Power; San Diego Gas & Electric; and Southern California Edison (collectively "the Joint Utilities") hereby provide comments addressing the Office of Energy Infrastructure Safety's ("Energy Safety") May 7, 2026 Public Workshop discussion questions related to Senate Bill 254 (SB 254) and Electrical Corporations' implementation of their Wildfire Mitigation Plans (WMPs). The Joint Utilities have limited the comments below to the topic of Public Utilities Code section 8386.4(b)(3) and WMP Updates.

I. Follow-up request at the workshop:

- a. What are the appropriate criteria for submitting a WMP Update?
- b. What is the appropriate timing for submitting a WMP Update?

In response to the follow up questions posed at Energy Safety's May 7, 2026 workshop, the Joint Utilities propose a three-pronged approach for making changes to approved Base WMPs based on identified criteria and describe when those changes should be made. First, the Petition to Amend process will be used for changes resulting from approved General Rate Case (GRC) or Electrical Undergrounding Plan (EUP) decisions. Second, the WMP Update process will be used for significant changes as described below and submitted at the discretion of the utility. Third, the Joint Utilities propose a ministerial process to address minor or administrative changes that fall outside of the Petition to Amend or proposed WMP Update process, following the approval of a WMP.

1) Petition to Amend

A Petition to Amend will be submitted if an Electrical Corporation has significant shifts in purpose, scope or strategy triggered by GRC or EUP decisions which materially alter authorized funding or activities.

Petitions to Amend will be submitted no later than 45 days after the issuance of a GRC decision or EUP approval from the California Public Utilities Commission. Consistent with Public Utilities Code section 8386.4(b), the Joint Utilities request Energy Safety approve Petitions to Amend within two months of the submission. Once approved by Energy Safety, the Electrical Corporation shall file the revised wildfire mitigation plan as an information-only submittal to the CPUC.

2) WMP Updates

A WMP Update is appropriate for substantial changes to an electric corporation's wildfire mitigation plan that remain within its GRC spend boundaries. This pathway recognizes the dynamic nature of wildfire mitigation and allows utilities to adapt to new information, evolving risk conditions, and operational constraints without a full amendment. Changes could be driven by updated risk models, improved data, new learnings, or implementation challenges such as permitting delays, supply chain constraints, or other delays outside the control of the electrical corporation. This pathway would also be appropriate for the addition or discontinuation of programs, or material adjustments to targets, timelines, or expenditures (provided they remain within GRC-authorized funding levels). WMP Update criteria include:

- Any target changes with more than +/-25 percent for 100 or more units, +/-20 percent for less than 100 units and over 10 units, and more than +/- 2 units for less than 10 units.
- Expenditure changes of more than \$25 million or more than 20 percent of an initiative's planned total expenditure within the performance period.
- Significant changes to risk model.
- Changes resulting from new learnings (e.g. continuous monitoring, equipment fuses).
- New or discontinued programs.
- Significant legislative or regulatory changes.

WMP Updates should be submitted at the discretion of the utility and should include advance notice to Energy Safety of approximately three months. Updates will be

submitted a year ahead (e.g. if making changes for 2031+, submission would occur in 2030) and consistent with Public Utilities Code section 8386.3(a)(1)(A), the Joint Utilities request Energy Safety approval within 9 months. However, Updates should not be submitted prior to the issuance of a relevant GRC decision.

3) Ministerial Changes

Ministerial changes are appropriate for routine or more minor adjustments following the approval of an Electrical Corporation's WMP, that would not materially affect risk reduction outcomes, program scope, intent, or overall wildfire mitigation strategy over the course of the approved Base WMP.

These changes should be submitted directly to Performance Assurance Division with supporting documentation and could include changes to targets as a result of updates to asset registries or High Fire Threat Area boundaries, as well as timing modifications necessary to meet approved targets within a different performance period of a Base WMP. Proposed criteria for submitting ministerial changes are:

- Targets not met in the performance year but will be met over the course of the three-or four-year WMP period. These requests could be submitted with updated Annual WMP Tabular Data. Examples of triggering events could include permitting delays, easement constraints, change in vendor, etc.
- Any target changes must be no more than +/-25 percent for 100 or more units, +/-20 percent for less than 100 units and over 10 units, and no more than +/- 2 units for less than 10 units.
- Expenditure changes of less than \$25 million or less than 20 percent of an initiative's planned total expenditure within the performance period.

The Joint Utilities propose that ministerial requests can be made either prior or during an applicable compliance year. Given the limited scope of these changes, the joint utilities recommend a more expedited review and approval process of approximately 45 days from submission via letter and posted on the docket.

II. GRC Crosswalk Template

As discussed during the May 7 workshop, crosswalking revenue authorization from an electrical corporation's GRC decision to its WMP creates significant practical challenges. GRC proceedings generally address expenditures at a categorical level, such as distribution capital or operations and maintenance and may be comprised of multiple programs and initiatives. As a result, GRC determinations may not address

discrete WMP initiatives or programs. Instead, they are likely to reflect adjustments to overall proposed expenditures, and the electrical corporation determines what programs will be impacted by the disallowance.

Additionally, it may not be feasible for an electrical corporation to rebalance its wildfire mitigation portfolio in a way that significantly closes the gap in risk reduction between the WMP that received preliminary approval from Energy Safety and the adjusted plan following the issuance of a GRC decision. For example, where capital investments are the greatest driver of risk reduction activities, reductions in authorized capital investments in a GRC decision cannot necessarily be offset through additional operations and maintenance activities. As a result, there may be inherent limitations on an electrical corporation's ability to maintain the same level of risk reduction in its previously submitted WMP.

The Joint Utilities will respond with additional comments on Energy Safety's proposed GRC Crosswalk Template on May 21, 2026.

III. Additional Topics

Below, the Joint Utilities also provide brief comments on the five additional items from the May 7, 2026 Workshop.

1. Cumulative WMP Targets

Given that WMPs will now cover a three- or four-year period and will be submitted for a period far in the future, uncertainty is significant. To address this uncertainty, the Joint Utilities propose that cumulative targets across a Base WMP period be allowed for all targets.

2. Running Year-to-Date Quarterly Data Reporting (QDR) with Yearly Update Annual Implementation Report

Currently, when utilities identify an error in a QDR submission, some utilities submit a revision to prior quarterly reports. The Joint Utilities propose establishing a uniform process that incorporates a running year-to-date QDR. This will eliminate the need for separate revision filings. Any revisions made would instead be documented in the cover letter, consistent with the existing QDR revision process. Annual data true-up would be done via the Annual Implementation Report (AIR), instead of quarterly revisions.

3. Recommend Not Requiring a Redline of the Base Plan as Part of the WMP Update Process

Currently, when Electrical Corporations submit revised WMPs, they are required to provide a redline to the base WMP showing all revisions. The Joint Utilities

recommend eliminating this process for WMP Update submissions, particularly as these documents grow in size and complexity. The redlined submittals provide yet another opportunity for error and confusion rather than clean copy with all revisions submitted once.

4. Maintaining Consistent Risk Modeling Methodology

The Joint Utilities request that risk model requirements remain consistent across the three or four year WMP cycle period to maintain consistency with the approved GRC.

5. Areas for Continued Improvement

Currently, Energy Safety issues ACIs that are due in the WMP Update as well as the next base WMP. Also, Energy Safety issues ACIs that must be addressed by the utilities jointly. The Joint Utilities request that any ACIs be due only in the next base WMP consistent with the proposal that WMP Updates are filed at the discretion of the utility. In addition, due to the staggered WMP submission schedule, the Joint Utilities recommend that ACIs be limited to individual utilities.

IV. Conclusion

The Joint Utilities appreciate the opportunity to provide these comments. The Joint Utilities respectfully request that the final WMP Guidelines implementing the changes set forth in SB 254 be provided at no less than 6 months before the first electrical corporation's WMP submission deadline, to allow sufficient time to implement these significant process changes.

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