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**2022-WMPs Docket**

Office of Energy Infrastructure Safety  
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**RE: CALIFORNIA ASSOCIATION OF SMALL AND MULTI-JURISDICTIONAL UTILITIES COMMENTS ON DRAFT 2022 WMP GUIDELINES**

Bear Valley Electric Service, Inc. (“BVES”), Liberty Utilities (CalPeco Electric) LLC (“Liberty”), and PacifiCorp, d.b.a. Pacific Power (“PacifiCorp”) (collectively, the California Association of Small and Multi-Jurisdictional Utilities (“CASMU”)) provide the following comments on the Draft 2022 Wildfire Mitigation Plan (“WMP”) Update Guidelines.

**I. WMP Section 3: Actuals and Planned Spending for Mitigation Plan – Utilities Should Not Provide 2023 Cost Forecasts as Part of the 2022 WMP Updates**

New draft WMP Guideline 3a requires that utilities provide “both actual and projected cost increases to ratepayers for 2017-2023.”<sup>1</sup> While CASMU appreciates the importance of providing updated cost information, CASMU has concerns about the proposed new requirement to now provide 2023 information. The three-year WMP plan period only covers 2020-2022, which means that utilities have not previously provided forecasted costs beyond the WMP plan period. CASMU believes that 2022 WMP updates should similarly provide updated information related to the WMP plan period. The Draft 2022 WMP Guidelines’ new requirement to provide

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<sup>1</sup> Draft 2022 WMP Guidelines, Attachment 1, p. 14; *see also* Attachment 2, *Table 3.2-1: WMP Electricity cost increase to ratepayers*, p. 40.

cost forecasts beyond the 2020-2022 WMP plan period will require utilities to create entirely new estimated forecasts for future WMP activities beyond the scope of the WMP plan period. While such a cost forecast can be estimated, CASMU does not believe that the 2022 WMP Update is the appropriate place for such information. Instead, as an update to the 2020 WMPs, CASMU recommends that the 2022 WMP Update continue to focus on the 2020-2022 WMP plan period.

## **II. Updating Previously Reported Information to Conform with New Definitions and/or Guidelines is Overly Burdensome and Unnecessary**

CASMU generally supports efforts to update and revise WMP guidelines to provide clarity and consistency. However, CASMU is concerned that utilities may not always be able to update previously reported information to account for certain revisions to WMP guidelines. If certain definitions or guidelines are modified in a manner that alters how previously reported information would be classified or reported, such information may not fit perfectly within updated templates or align with how utilities previously calculated or allocated costs. For example, *Table 12: Mitigation initiative financials* in Attachment 3 to the Draft 2022 WMP Guidelines would require utilities to update previously reported information going back to 2019 to conform to updated initiative categories. Reallocating or recasting prior costs or revenue requirements to align with updated guidelines or definitions is problematic as previously conducted utility wildfire mitigation efforts and the corresponding costs and allocations were based on requirements in place at the time. Updating previously reported information to align with updated definitions and templates will require utilities to make assumptions and estimates as to how prior costs fit into updated templates where there is not a clear one to one correlation between prior templates and the updated template. This will be challenging for utilities and may

not provide meaningful or accurate data. Accordingly, any new guidelines should minimize requirements to reclassify, reallocate, or revise previously reported historical information.

### **III. Conclusion**

CASMU appreciates this opportunity to provide comments and looks forward to working with the Office of Energy Infrastructure Safety and interested stakeholders to further refine the 2022 WMP Guidelines.

Respectfully Submitted,



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