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**BY ENERGY SAFETY E-FILING**

Melissa Semcer  
Deputy Director, Electric Infrastructure Directorate  
Office of Energy Infrastructure Safety  
California Natural Resources Agency  
715 P Street, 20<sup>th</sup> Floor  
Sacramento, CA 95814

Re: **Pacific Gas and Electric Company's Comments on the Office of Energy Infrastructure Safety's Draft 2023-2025 Wildfire Mitigation Plan Schedule**

Dear Deputy Director Semcer:

Pursuant to the instructions in the Office of Energy Infrastructure Safety's ("Energy Safety") October 14, 2022 letter, Pacific Gas and Electric Company ("PG&E") submits the following comment on the Draft 2023-2025 Wildfire Mitigation Plan Schedule ("WMP Plan Schedule").

**THE MATURITY SURVEY RESPONSE DEADLINE SHOULD BE EXTENDED**

The 2023-2025 WMP Guidelines incorporate "significant changes to the detailed requirements for the electrical corporations' WMP submittals."<sup>1</sup> The changes will require "electrical corporations to submit more detailed information that was not required in past submittals."<sup>2</sup> Responding to these requests for more detailed information will take a significant amount of time.

The 2023-2025 Electrical Corporation Wildfire Mitigation Maturity Survey ("Maturity Survey") is emblematic of the significant changes that have been made to the WMP requirements. The 2022 WMP Maturity Survey scored each utility against a total of 52 capabilities, organized in ten categories. The utilities were required to respond to approximately 250 questions. In the 2023-2025 WMP Maturity Survey, seven categories of the maturity model are composed of multiple capabilities which, in turn, are composed of multiple scoring philosophies. For each scoring philosophy, a series of questions is asked to ascertain the electrical corporation's maturity in that aspect of the capability.<sup>3</sup> The result is that the utilities

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<sup>1</sup> WMP Plan Schedule, p. 1.

<sup>2</sup> WMP Plan Schedule, p. 1.

<sup>3</sup> 2023-2025 WMP Maturity Survey, p 1.

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must respond to approximately 1,165 questions—nearly five times the number of questions included in the 2022 WMP Maturity Survey. In addition, the questions are not yet in final form.

Assuming the 2023-2025 Maturity Survey questions are finalized on December 16, 2022, the utilities will only have a month and a half to complete the survey by January 30, 2023. Even if it only takes one hour to respond to each survey question, on average, the utilities will spend over 1000 hours on the survey while simultaneously drafting the 2023-2025 WMP. For this reason, the WMP Plan Schedule does not include enough time for the utilities to meaningfully respond to the Maturity Survey.

PG&E respectfully requests that Energy Safety extend the deadline to respond to the Maturity Survey to March 27, 2023. This is the date that the large utilities are required to submit their final WMPs to Energy Safety. By that time, the utilities will have a more complete understanding of their 2023 wildfire mitigation maturity, and this will allow for more meaningful engagement with the Maturity Survey.

## **CONCLUSION**

PG&E appreciates Energy Safety's efforts to outline the 2023-2025 WMP process and schedule. We respectfully submit these comments and look forward to continuing to work with Energy Safety and other stakeholders to promote wildfire safety.

Should you have any questions, please do not hesitate to contact the undersigned at [jay.leyno@pge.com](mailto:jay.leyno@pge.com).

Very truly yours,

*/s/ Jay Leyno*

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