



OFFICE OF ENERGY INFRASTRUCTURE SAFETY

2023-2025 WILDFIRE MITIGATION PLAN

PROCESS AND EVALUATION GUIDELINES

December 6, 2022

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1 Introduction

This document establishes guidelines¹ outlining the process for disposition of Wildfire Mitigation Plans (WMPs) and details the public participation process and submission requirements. These guidelines will remain in effect for the 2023-2025 WMP three-year cycle. Energy Safety will release an updated schedule each year and may amend these guidelines as necessary according to the procedures in Government Code section 15475.6. These guidelines do not address the substantive content of the WMPs. For substantive content requirements, refer to the 2023-2025 WMP Technical Guidelines.²

2 The Three-Year WMP Process

Each electrical corporation is required to annually prepare and submit a WMP to Energy Safety for review and approval. The plan must cover at least a three-year period.³ Energy Safety has discretion to establish a submission schedule. It may also elect to allow annual submissions to be updates to the last approved comprehensive WMP provided that a comprehensive WMP is submitted once every three years.^{4,5} In 2023, Energy Safety is requiring each electrical corporation to submit a comprehensive WMP covering 2023-2025. This will be known as the “Base WMP.” Non-Base submissions will be known as “WMP Updates.”

2.1 Base WMP

For the Base WMP, electrical corporations must submit comprehensive WMPs covering the 2023-2025 plan period pursuant to the 2023-2025 WMP Technical Guidelines.

¹ Gov. Code, § 15475.6.

² 2023-2025 WMP Technical Guidelines, adopted December 6, 2022.

³ Pub. Util. Code, § 8386(b).

⁴ *Id.*

⁵ Energy Safety intends for Electric Corporations’ Base WMPs to cover a three-year period and subsequent filings within the three-year plan cycle be WMP Updates. The 2023 schedule reflects this intention; however, Energy Safety reserves the right to require Base WMP submissions in any year.

2.2 WMP Updates

If Energy Safety determines that the electrical corporation need only file an Update to its Base WMP, the electrical corporation must submit information pursuant to future WMP Update Guidelines, to be published in 2023. Updates are intended to report progress and changes to the Base WMP. Updates are not intended to include major changes to strategic direction unless based on a new understanding of risk. Energy Safety may, at its discretion, require electrical corporations to provide updates on specific initiatives or topic areas in WMP Updates. See Section 13 for more information on WMP Updates.

2.3 The Year-Ahead Process

To date, electrical corporations have submitted WMPs in the year in which mitigations occur. For example, electrical corporations submitted the 2020 WMP in February 2020 with final dispositions in May of that year.

Moving forward, electrical corporations must submit plans for the subsequent year(s). For example, in 2024, electrical corporations will submit a WMP Update for 2025. To facilitate this shift, in 2023, electrical corporations must submit a Base WMP that covers 2023-2025, including detailed targets, projections, etc. for all three years. As part of its 2023 evaluation, Energy Safety will evaluate and approve or deny the electrical corporations' plans for both 2023 and 2024. In 2024, the electrical corporations must submit its WMP Updates for 2025. A timeline is provided below in Table 1.

Table 1: Timeline for the Year-Ahead Process

Year Submitted	Filing
2023	2023-2025 WMP Base Plan
2024	2025 WMP Update

3 Maturity Survey

As part of the WMP evaluation process, Energy Safety develops a Maturity Model to measure each electrical corporation's current and projected maturity over the three-year plan period. To measure maturity, Energy Safety (or its contractor) will issue an electronic Maturity Survey to each electrical corporation along with instructions on how to complete the Maturity

Survey. Each electrical corporation must submit a complete set of survey responses by the designated deadline.⁶

3.1 Extension Requests

If an electrical corporation seeks a longer response period to complete the Maturity Survey than the response period provided by Energy Safety, the electrical corporation must request an extension by sending an extension request to safetypolicy@energysafety.ca.gov.

- a. An extension request must include:
 - i. A strong showing of the specific reason for the delay; and
 - ii. A proposed date of response in lieu of the original deadline.
- b. Any extension request must be received by Energy Safety by 5:00 p.m. Pacific time two business days prior to the date the Maturity Survey response is due.
- c. Upon receipt of an extension request, Energy Safety will evaluate the request and issue a determination.

4 Energy Safety Evaluation Process

This section sets forth the steps to the WMP evaluation process.

4.1 Completeness Check/Pre-Submission

Energy Safety will first assess each electrical corporation's WMP for completeness based on the statutory requirements and adherence to the relevant year WMP Guidelines. The completeness check occurs through a pre-submission process and is a precursor to and separate from the statutory WMP review process.⁷

WMP approval is contingent upon complete and adequate filings. The objective of the completeness check is to ensure that electrical corporations' WMP submissions are complete prior to commencing evaluation. The completeness check is not a substantive review of WMP content; a substantive review occurs during the WMP evaluation process. For an efficient and streamlined WMP review process, WMP submissions at a minimum must satisfy Public

⁶ See Section 11 for additional information regarding the WMP submission schedule.

⁷ See Pub. Util. Code, § 8389.3(a)

Utilities Code section 8386(c) statutory requirements and demonstrate this via the requisite checklist in the 2023-2025 WMP Technical Guidelines.⁸

4.1.1 Completeness Check Process

The completeness check consists of five steps:

1. Energy Safety uses the Statutory Checklist in the WMP Technical Guidelines to confirm that information is reported for each Public Utilities Code section 8386(c) requirement and appropriately cross-references the relevant section(s)/sub-section(s) of the WMP. If information is not reported for a requirement, Energy Safety marks this element incomplete.
2. Energy Safety confirms the electrical corporation has provided a narrative for each section and sub-section in the WMP. If the WMP contains a blank section, an inapplicable cross reference, or insufficient detail, Energy Safety marks this element incomplete.
3. Energy Safety confirms narrative tables are filled out in the WMP. Narrative tables are the required tables found within the body of the WMP as required by the WMP Technical Guidelines. If any fields are blank, Energy Safety marks this element incomplete.
4. Energy Safety confirms completeness of each electrical corporation's spatial and non-spatial data, submitted separately from its WMP and according to the Energy Safety Data Guidelines. If an electrical corporation's spatial submission contains any blank fields or layers, Energy Safety notes the deficiencies and marks this element incomplete.
5. Energy Safety makes a determination and informs the electrical corporation of its findings.
 - a. If an electrical corporation's WMP satisfies the initial completeness check, Energy Safety will instruct the electrical corporation to submit its WMP as-is with no changes for its WMP Submission (see Section 4.2).
 - b. If an electrical corporation's WMP does not satisfy the initial completeness check, Energy Safety will notify the electrical corporation as to the missing or incomplete information (i.e., incomplete, not fully referenced, or unsubstantiated statutory compliance checklist). For its WMP Submission, the electrical corporation must add the missing information to its WMP as directed by Energy Safety, with no additional changes.

⁸ 2023-2025 WMP Technical Guidelines, adopted December 6, 2022.

Energy Safety will not accept public comments on the completeness check determination.

4.2 WMP Submissions

Following completeness checks/pre-submissions, electrical corporations must submit WMPs according to the schedule set forth by Energy Safety.⁹ The statutory evaluation period commences upon submission of the WMP.¹⁰

4.2.1 Incomplete WMPs

If an electrical corporation submits an incomplete WMP, Energy Safety in its sole discretion may direct an electrical corporation to remedy its incomplete WMP through an errata submission or Energy Safety may deny the electrical corporation's WMP without further notice.

4.3 Errata

An Erratum is a correction of published text and does not include revisions required by Energy Safety as part of the Revision Notice process (see Section 4.4).

Electrical corporations may submit errata as follows:

1. After the submission deadline, **substantive errata** for WMPs will only be accepted within 10 business days after the submission deadline unless permission is granted through written request to the Deputy Director.
 - **Substantive errata** are corrections to targets, calculations, initiatives, etc., that materially impact Energy Safety's evaluation of the WMP.
2. **Nonsubstantive errata** for WMPs will only be accepted within 30 business days after the submission deadline.
 - **Nonsubstantive errata** are minor corrections to fix typographical errors or to improve clarity.

Classification of errata as substantive or nonsubstantive is solely within the discretion of Energy Safety.

Energy Safety may request an electrical corporation submit errata based upon information learned through the data request process at any point during the evaluation process.

⁹ See Section 11 for additional information regarding the WMP submission schedule.

¹⁰ *Id.*

If an electrical corporation submits errata to its WMP and Energy Safety approves the WMP, the electrical corporation must submit a final version of its WMP to the docket that includes all previously submitted errata within 10 days of Energy Safety's Final Decision approving the WMP. This final version must include changes resulting from a Revision Notice, as further discussed below, but not include any other changes.

4.4 Revision Notice

Public Utilities Code section 8386.3(a) states, “[b]efore approval, the division may require modifications of the plan.” Energy Safety effectuates this provision by issuing a Revision Notice. The purpose of a Revision Notice is to ensure the electrical corporation addresses critical issues prior to completion of Energy Safety's evaluation.

4.4.1 Examples Warranting a Revision Notice

Examples of when Energy Safety may choose to issue a Revision Notice include, but are not limited to, the following and shall be designated as critical issues:

- The electrical corporation failed to address the Areas for Continued Improvement detailed in the prior year's decision,
- The electrical corporation did not provide sufficient¹¹ information for evaluation,
- The electrical corporation made a significant shift in its wildfire mitigation strategy without sufficient substantiation,
- The electrical corporation's submission does not meet evaluation criteria listed in Section 5.1, including ineffective or infeasible mitigations, and
- The electrical corporation did not provide sufficient information for an element of the WMP that is critical to life-safety or property.

4.4.2 Revision Notice Process

The Revision Notice process is set forth as follows:

1. Energy Safety determines an electrical corporation's WMP contains critical issue(s) that warrant a Revision Notice.
2. Energy Safety issues a Revision Notice to the electrical corporation. The Revision Notice will contain a list of critical issues the electrical corporation must address in its Revision Notice Response and the due date(s) by which the electrical corporation

¹¹ Different from the completeness check, in the case of revision notices, information is present but lacks sufficient detail or information for Energy Safety to conduct its evaluation.

must respond. In the Revision Notice, Energy Safety may revise any prior WMP schedule or set forth additional WMP schedules for the electrical corporation's response(s), public comments, and the issuance of a decision.

3. By the provided due date(s), the electrical corporation must resubmit its entire WMP or sections therein, as directed within the Revision Notice, as well as provide written responses to each issue delineated in the Revision Notice (Revision Notice Response). Energy Safety will not accept any updates or errata to the Revision Notice Response after the due date(s).
4. Once an electrical corporation has resubmitted its WMP or sections thereof and provided its Revision Notice Response, Energy Safety will consider the electrical corporation's Revision Notice Response, revised WMP, public comments, responses to data requests, and the totality of the information before it to-date and issue a determination on the electrical corporation's WMP.
5. If Energy Safety approves the electrical corporation's WMP after issuing a Revision Notice, the electrical corporation must submit a final version of its WMP to the docket that includes changes resulting from the Revision Notice within 10 days of Energy Safety's Final Decision approving the WMP. This final version must also include previously submitted errata, as discussed above, but should not include any other changes.

If, by the date specified in the Revision Notice, an electrical corporation fails to provide a Revision Notice Response or resubmit its WMP or sections as required in the Revision Notice, Energy Safety may deny the electrical corporation's WMP without further notice.

4.5 Workshops

Energy Safety in its sole discretion may hold one or more public workshops to discuss part or all of an electrical corporation's WMP or Revision Notice Response. Energy Safety will issue notice of workshops according to the process set forth in Section 6.4.

4.6 Comments On WMP and Revision Notices

Once an electrical corporation has submitted its WMP, it is available for public comment. Opening Comments (initial public comments) must be filed according to the schedule set forth by Energy Safety and according to the process set forth in Section 6. Opening Comments must focus on information contained in the WMP or Revision Notice Response.

Electrical corporations as well as members of the public may file Reply Comments to Opening Comments on WMPs. Reply Comments will be accepted according to the schedule set forth by Energy Safety. The subject of Reply Comments is limited to issues raised in Opening Comments. While Energy Safety will not respond to public comments (Opening and Reply Comments) directly, it will consider those comments during its evaluation of the WMPs.

When a public comment is received, it becomes public record and will be made available to the public on the Energy Safety docket. Energy Safety will post the public comments as received without redaction of personal information.

4.7 Draft Decision and Public Comment

Upon completion of its review, Energy Safety determines whether each electrical corporation's WMP should be:

- Approved (approval may include a requirement that the electrical corporation demonstrate continued growth in its subsequent WMP, known as an Area for Continued Improvement), or
- Denied (the electrical corporation does not have an approved WMP and must reapply for approval in the subsequent year).

To reach its decision, Energy Safety assesses each element of the WMP against statutory requirements and guidelines and may seek additional information through meetings with electrical corporations and data requests.¹² After this assessment and consideration of comments on the posted WMP, Energy Safety determines if each element of the WMP has been satisfactorily addressed according to the evaluation criteria set forth in Section 5.

Energy Safety's approval of a WMP does not mean that the electrical corporation has reached the highest levels of maturity or has reduced its ignition risk to zero. Rather, approval means the electrical corporation has satisfied the evaluation criteria and substantiated its mitigation strategy such that implementation of the plan is appropriate.

When Energy Safety approves a Base WMP or WMP Update, it does so with an aim of continued improvement. Therefore, in its final decision, Energy Safety may list Areas for Continued Improvement, which are areas where the electrical corporation must continue to mature in its capabilities. Areas for Continued Improvement identified during an evaluation **must** be addressed in the next WMP. Failure to show maturation in these areas may result in a Revision Notice or denial. Areas for Continued Improvement that require more than one year to complete will have a custom deadline identified by Energy Safety.

Energy Safety's draft decision on a submitted WMP will be posted on Energy Safety's docket for public comment.

Electrical corporations and members of the public may submit Opening Comments on a draft decision within 20 days of a draft decision being posted to the docket according to the

¹² See Sections 7 and 8.

process set forth in Section 6. Reply Comments are limited to issues brought up in Opening Comments. Reply Comments will be accepted for 10 days after the close of the Opening Comment period. While Energy Safety will not respond to public comments directly, it will consider those comments before issuing a final decision. When a comment is received, it becomes public record and will be made available to the public on the Energy Safety docket. Energy Safety will post the comments as received without redaction of personal information.

4.8 Final Decision

Upon completion of its review of public comments, Energy Safety will issue a final decision. Energy Safety submits final decisions for each electrical corporation to the California Public Utilities Commission for ratification pursuant to Public Utilities Code section 8386.3(a).

5 WMP Evaluation Criteria

5.1 Evaluation Criteria

Energy Safety evaluates WMPs according to the following criteria:

- **Completeness:** The electrical corporation comprehensively responds to the statutory requirements contained in Public Utilities Code section 8386(c) and Energy Safety's Guidelines.
- **Technical and programmatic feasibility and effectiveness:** The proposed initiatives are technically feasible and effective in addressing the risks that exist in the electrical corporation's service territory. The proposed initiatives are programmatically feasible for the specific electrical corporation given its maturity and progress to date.
- **Resource use efficiency:** The proposed initiatives are an efficient use of electrical corporation resources and focus on achieving the greatest risk reduction with the most efficient use of funds and workforce resources.
- **Demonstrated year-over-year progress:** The electrical corporation demonstrates sufficient progress on the objectives and targets reported in its previous plan.
- **Forward-looking growth:** The electrical corporation demonstrates a clear action plan to continue reducing utility-related ignitions and the scale, scope, and frequency of Public Safety Power Shutoff (PSPS) events. In addition, the electrical corporation focuses sufficiently on long-term strategies to build the overall maturity of its wildfire mitigation capabilities while reducing reliance on shorter-term strategies such as PSPS and enhanced vegetation management.
- **Performance metrics:** The electrical corporation uses performance metrics to indicate the extent to which its WMP is driving performance outcomes in its service territory in terms of both leading and lagging indicators of wildfire risk, PSPS risk, and

other direct and indirect consequences of wildfire and PSPS, including the potential unintended consequences of wildfire mitigation work.

- **Targets:** The electrical corporation uses quantitative targets to set commitments for specific initiatives in its WMP. The electrical corporation reports progress towards completing the targets in its approved WMP through its quarterly reporting. Targets track the electrical corporation's pace of activity completion as laid out in the WMP but do not track the efficacy of its activities. The primary use of these targets is to track the electrical corporation's completion of the initiatives in its approved WMP.

5.2 Evaluation Inputs

To assess a WMP, Energy Safety may rely upon the following:

- An electrical corporation's WMP submissions, including errata,
- Input from the California Department of Forestry and Fire Protection (CAL FIRE),
- Public and stakeholder comments,
- An electrical corporation's response to the Utility Wildfire Mitigation Maturity Survey (Maturity Survey),
- An electrical corporation's data submissions,
- An electrical corporation's responses to data requests, and
- Any other information Energy Safety may require for the evaluation of an electrical corporation's WMP submissions.

5.3 Approval or Denial of a WMP

Energy Safety may issue a draft decision denying the WMP if the WMP is not satisfactory or includes insufficient detail within a section or sub-section of the WMP. A WMP is considered "satisfactory" if the WMP meets statutory and guideline requirements, including the evaluation criteria set forth in Section 5.1, with sufficient substantiation and shows an acceptable level of continued improvement over the prior WMP.

6 Public Participation/Feedback on WMPs

6.1 Docket Access

Unless otherwise specified herein, Energy Safety posts all documents received and issued to the docket. Persons who are not already subscribed to Energy Safety's WMP service list and wish to receive service of the WMPs and comments on the WMPs may enroll by visiting

https://listservice.cnra.ca.gov/scripts/wa.exe?A0=OEIS_WMPS&X=P274FFFAAFB0F2A86FA. Additional information on Energy Safety’s service lists and detailed instructions for signing up can be found at <https://energysafety.ca.gov/events-and-meetings/how-to-participate-in-public-events/>.

6.2 Public Comments

Any person or entity may submit opening and reply comments on WMPs and draft decisions in accordance with the schedule issued by Energy Safety. Opening comments must focus on information contained in the WMP, Revision Notice Response, or Draft Decision. The subject of reply comments is limited to issues raised in opening comments.

6.3 Submitting Comments

Public comments must conform to the following requirements:

- Whenever possible, comments must be submitted to the proper docket on Energy Safety’s e-filing system.¹³ For WMP related matters, comments must be submitted to the appropriate year’s WMP docket (e.g., #2023-2025-WMPs).
- Comments on an electrical corporation’s WMP shall be named according to the naming convention set forth in Section 10.6. However, comments shall include the organization or person’s name followed by “Opening Comments” or “Reply Comments” and then the relevant abbreviations set forth in Table 2 in Section 10.6. For example:
 - Comments on Pacific Gas and Electric Company’s (PG&E) 2023_2025 WMP Submission:
“2023_04_10_ORGNAME¹⁴_OpeningComments_PGE_2023_2025WMP_R0,” which refers to an organization’s comments submitted on April 10, 2023, on PG&E’s 2023-2025 Base Year WMP, first version.
- Opening Comments must focus on the content of the WMP, Revision Notice Response, or draft decision. Opening Comments on draft decisions shall be limited to 15 pages.

¹³ Members of the public and other interested parties are also encouraged to utilize the e-filing system. Energy Safety will accept mailed or in person submissions at, 715 P Street, 20th Floor, Sacramento, California 95814.

¹⁴ For comments submitted by an individual, please use the individual’s last name in place of the organization name.

- Reply Comments are limited to issues raised in Opening Comments. New information not directly related to issues presented in Opening Comments will not be considered. Reply Comments shall be limited to five pages.
- Comments must be accessible. It is the policy of the State of California that electronic information be accessible to people with disabilities. Each person who submits information through the Office's e-filing system must ensure that the information complies with the accessibility requirements set forth in Government Code section 7405. Energy Safety may reject any information submitted through the e-filing system that does not comply with these requirements.
- The submission process for confidential information is set forth in section 29200 of Title 14 of the California Code of Regulations.

6.4 Notice of Workshops

Energy Safety may at its discretion hold one or more public workshops during the WMP evaluation phase to discuss all or part of an electrical corporation's WMP submission. Notice of workshops will be posted to the relevant year's WMP docket and on Energy Safety's website, www.energysafety.ca.gov. Energy Safety will issue written notice of the workshop at least 10 days prior to the workshop. Workshop notices will include information on the workshop topic, date, location, format, etc.

7 Data Requests from Energy Safety

Energy Safety may obtain any document, data, or information from any electrical corporation that is relevant to any docket matter via a data request.

The following applies to data requests:

1. Data requests from Energy Safety staff to the electrical corporations may come from safetypolicy@energysafety.ca.gov or from individual Energy Safety staff e-mail addresses. All responses to Energy Safety data requests must be submitted to the 2023-2025 WMP Data Requests docket (#2023-2025-WMP-DRs).
2. For data requests submitted by 5:00 p.m. on a business day, the date of submission is Day 0. For data requests submitted after 5:00 p.m. or on a Saturday, Sunday, or holiday as defined in Government Code section 6700, the next business day is Day 0.
3. Unless a different response period is provided by Energy Safety, electrical corporations must respond to all data requests by 5:00 p.m. on Day 3, with each business day counted as one day. For example, in a week with no holidays, if a data request is submitted at 2:00 pm on a Monday, the data request response would be due by 5:00 pm on Thursday of that same week.

- a. Energy Safety will endeavor to limit the three-business-day response requirement to the WMP review period unless an expedited response time is otherwise required by Energy Safety.
 - b. The WMP review period for Energy Safety begins on the date an electrical corporation submits its WMP for the completeness check (pre-submission) and runs throughout the entire WMP evaluation period until issuance of a final decision for each electrical corporation.
4. Energy Safety-issued WMP-related data requests occurring outside of the WMP review period shall be subject to a 10-business day response period unless a different response period is provided by Energy Safety.
5. Extension Requests
- a. If an electrical corporation seeks a longer response period than as provided in this section or as provided by Energy Safety, the electrical corporations must request an extension by sending an extension request to safetypolicy@energysafety.ca.gov.
 - b. An extension request must include:
 - i. The data request or portion of the data request requiring an extension;
 - ii. A strong showing of the specific reason for the delay; and
 - iii. A proposed date of response in lieu of the original deadline.
 - c. Any extension request must be received by Energy Safety by 5:00 p.m. Pacific time one business day prior to the original data request response due date.
 - d. Upon receipt of an extension request, Energy Safety will evaluate the request and issue a determination.

8 Data Requests from Stakeholders

A Data Request Stakeholder, as defined in Section 8.1 and for the purpose of submission of data requests pursuant to this Section, may obtain through a data request to electrical corporations, documents, data, or other information as related to any WMP docket matter that seeks public comments.

Prior to issuing a data request, a person or entity must seek and obtain designation as a Data Request Stakeholder pursuant to Section 8.1. A person or entity may submit public comments without designation as a Data Request Stakeholder.

8.1 Data Request Stakeholder Designation

Any person or entity must submit a request for and receive designation as a Data Request Stakeholder to send data requests to electrical corporations regarding the WMP submissions of electrical corporations. An initial request for designation as a Data Request Stakeholder can be submitted any time prior to the WMP submission but must be submitted to the relevant year's WMP docket no later than five business days following submission of an electrical corporation's WMP.

A request for designation as a Data Request Stakeholder must include:

1. The docket matter (Docket #) the person or entity intends to participate in (e.g., #2023-2025-WMPs),
2. The position and interest of the person in the WMP docket matter,
3. Disclosure of the persons or entities on whose behalf the person may be seeking the designation, if any,
4. The electrical corporations for which the person or entity seeks stakeholder status. This may include a request for all electrical corporations,
5. The name, mailing address, e-mail address, and telephone number of the person or entity designee.

A request for designation as a Data Request Stakeholder will be considered approved five business days after submission without any further correspondence from Energy Safety unless the person or entity seeking the designation is otherwise notified by Energy Safety during that time. Once granted designation as a Data Request Stakeholder, a person or entity shall retain that designation for subsequent WMP evaluation years unless that stakeholder fails to submit comments or otherwise actively participate in the WMP evaluation process for two years. After two years of non-participation, the Data Request Stakeholder designation is automatically withdrawn, and the person or entity must resubmit for status as a Data Request Stakeholder in future WMP years.

Energy Safety may grant late requests for designation as a Data Request Stakeholder only on a showing of good cause by the interested person or entity.

8.2 Data Request Process for Data Request Stakeholders

The following applies to data requests from Data Request Stakeholders:

1. Electrical corporations must respond to all data requests within three business days of the request (as described in Section 7), unless a different response period is mutually agreed upon by the stakeholder making the data request and the electrical corporation.

- a. The three-business-day response requirement is only in effect during the WMP review period.
 - b. The WMP review period begins for Data Request Stakeholders on the date of submission of an electrical corporation's WMP (not its pre-submission) and runs throughout the entire WMP evaluation period until issuance of a Final Decision for each electrical corporation.
2. WMP-related data requests occurring outside of the WMP review period shall be subject to a 10-business day response period, unless a different response period is mutually agreed upon by the stakeholder making the data request and the electrical corporation.
3. Extension Requests
- a. Prior to seeking an extension from Energy Safety to respond to a data request, an electrical corporation must first make a good-faith effort to ask the stakeholder making the request to agree to the extension.
 - b. If an electrical corporation cannot reach an agreement with the stakeholder making the request, the electrical corporation must request an extension by sending an extension request to safetypolicy@energysafety.ca.gov.
 - c. An extension request must include:
 - i. A showing of a good-faith effort by the electrical corporation to ask the stakeholder to agree to the extension and the result of such effort,
 - ii. The data request or portion of the data request requiring an extension,
 - iii. A strong showing of the specific reason for the delay, and
 - iv. A proposed date of response in lieu of the original deadline.
 - d. Any extension request must be received by Energy Safety by 5:00 p.m. one business day prior to the date the data request response(s) is due.
 - e. Upon receipt of an extension request, Energy Safety will evaluate the request and issue a determination.

8.3 Minimum Data Requests Criteria for Data Request Stakeholders

Data requests from Data Request Stakeholders must adhere to the following:

1. Data requests must seek documents, data, or information relevant to the pending docket matter and be designed to facilitate the stakeholder's ability to make an informed public comment,
2. Stakeholders submitting data requests must consider the volume and nature of the data being requested when negotiating response deadlines outside of those set forth in Section 8.2,

3. Stakeholders must avoid extensive and comprehensive data requests in the six weeks before the electrical corporation must submit its WMP if the data could reasonably be requested outside of that timeframe.
4. Stakeholders submitting data requests must not submit requests where such information is otherwise available, namely:
 - a. Contained in the electrical corporations' WMP submissions,
 - b. Previously requested by Energy Safety, or
 - c. Previously requested by other Data Request Stakeholders.

Stakeholders may view prior data requests and responses in each electrical corporation's Data Request Log, available on an electrical corporation's website. See Section 9.2.

8.4 Request to Compel or Limit Stakeholder Data Requests

Data Request Stakeholders and electrical corporations must endeavor to resolve all data request disputes amongst themselves. For data request disputes that cannot be resolved, parties to the dispute may seek relief in accordance with the process below:

1. Prior to filing a request to compel or limit data requests, the parties to the dispute must have previously met and conferred in a good faith effort to informally resolve the dispute.
2. The party seeking to compel or to limit data requests bears the burden of proving the reasons why Energy Safety should compel or limit the data request.
3. A request to compel or limit a data request must include:
 - a. Facts showing a good-faith attempt at an informal resolution of the data request dispute presented by the request,
 - b. The data request or portion of the data request at issue,
 - c. Basis to compel or limit the data request, and
 - d. A proposed determination that clearly indicates the relief requested.
4. A response from a stakeholder or electrical corporation must be submitted within three business days of the date that the request was submitted to Energy Safety. If no response is submitted to request to compel or limit a data request, then the request will be deemed granted. Energy Safety will take requests to compel or limit a data request under consideration and will issue a determination on a request to compel or limit a data request after the request and response(s) have been submitted. Energy Safety may request clarification or additional information from the parties to the dispute prior to issuing a determination. Responses to such requests for clarification or additional information must be submitted within three business days of the date of the request.

All filings for a request to compel or limit data requests must be submitted to Energy Safety at safetypolicy@energysafety.ca.gov and served to all parties to the dispute.

9 Document Maintenance

9.1 Document Postings

Each electrical corporation must post its WMP and all documents referenced in its WMP on a WMP-specific website in an easy-to-follow format. This will be in addition to the posting of WMPs on Energy Safety's docket and website. Electrical corporations must include the website address in a cover letter to their WMP submission.

9.2 Data Request Log

Each electrical corporation must post a WMP Data Request Log according to the guidance set forth below. The WMP Data Request Log must be posted and maintained beginning with pre-submission of the WMP and ending upon issuance of a draft decision.

1. Each electrical corporation must update its WMP Data Request Log and post all data requests and responses issued to-date weekly each Thursday at 5:00 p.m. Pacific time.
2. The website or portion of webpage pertaining to data requests must be titled "YEAR Wildfire Mitigation Plan Data Requests."
3. The Data Request Log must be in the form of a searchable online table that contains all data requests, responses for each data request received, and links to relevant documents.
4. The Data Request Log must indicate:
 - a. The attachment number of any additional attachments related to the data request,
 - b. The relevant sections of the WMP, and
 - c. A thematic category and subcategory of the data request.

See Appendix A for the Data Request Log template.

10 Electrical Corporation WMP Submission Information

Following the completeness check/pre-submission, each electrical corporation must submit its WMP and all supporting documents to the appropriate year's WMP docket. In addition, each electrical corporation must mail 5 hard copies, including appendices, of the WMP to:

Office of Energy Infrastructure Safety

Attn: Deputy Director

715 P Street, 20th Floor

Sacramento, CA 95814

10.1 Confidentiality

The submission process for confidential information is set forth in section 29200 of Title 14 of the California Code of Regulations.

10.2 Single Point of Contact

Each electrical corporation must send to safetypolicy@energysafety.ca.gov the name of its single point of contact for all data requests and WMP matters for Energy Safety staff use no later than the date of its pre-submission.

10.3 Format

Every document submitted to Energy Safety must comply with the formatting requirements below.

1. Electronically filed documents shall be word searchable and accessible as prescribed in Section 10.4.
2. Paper documents shall be:
 - a. Typewritten or otherwise mechanically printed;
 - b. On paper 11 inches long and 8 ½ inches wide;
 - c. Printed on both sides of the page if feasible; and
 - d. Bound securely.
3. Both electronic and paper documents shall;
 - a. Be in a clear, easily readable font of at least 11 points;
 - b. Have consecutively numbered pages; and
 - c. Included the following information on the first page:
 - i. Name of the docket;
 - ii. Number of the docket; and
 - iii. Title of the document.

4. For electronic documents, signatures may be electronic.¹⁵

10.4 Accessibility

It is the policy of the State of California that electronic information be accessible to people with disabilities. Each person who submits information through the Office’s e-filing system must ensure that the information complies with the accessibility requirements set forth in Government Code section 7405. The Office will not accept any information submitted through the e-filing system that does not comply with these requirements.¹⁶

10.5 Pre-submissions

Each electrical corporation must submit a WMP pre-submission according to the schedule set forth by Energy Safety. Pre-submissions are to be complete WMPs submitted to Energy Safety for a completeness check as set forth in Section 4.1.

Each electrical corporation must submit its WMP pre-submission to its Energy Safety SharePoint drop folder. The electrical corporation must email safetypolicy@energysafety.ca.gov and confirm that the pre-submission has been successfully uploaded to the drop folder.

10.6 Naming Convention

Electronic file names for the WMPs and associated document/data submissions must follow the standardized electronic naming convention illustrated in Table 2 below. The electronic file name(s) must include, in order, the naming convention identified in each column (without quotation marks), with an underscore between the character string of each column. See examples below.

Examples:

- First Version of a WMP Submission: “2023-02-05_PGE_2023_WMP_R0”, which refers to the PG&E 2023 WMP submitted on Feb 05, 2023, first version

¹⁵ Gov. Code, § 16.5.

¹⁶ References to laws and regulations related to digital accessibility are available are available at <https://dor.ca.gov/Home/DisabilityLawsandRegulations>. Resources on constructing accessible electronic contents are available at <https://dor.ca.gov/Home/ConstructingAccessibleElectronicContent>.

- Updated submission in response to Energy Safety Revision Notices: “2023-06-05_HW_23_RNR_R1”, which refers to the Horizon West Revision Notice Response submitted on June 5, 2023, revision 1
- Maturity Model submission: “2023-04-05_TBC_2023_Survey_R0”, which refers to the Trans Bay Cable 2023 Maturity Model Survey submitted on April 5, 2023, first version

Table 2: Electronic File Naming Convention with Examples

Date Submitted (Year-Month-Day)	Electrical Corporation Abbreviated Name	Document Year	Document Type	Revision Number
“2023-02-05”	<ul style="list-style-type: none"> • “PGE” (Pacific Gas and Electric Company) • “SDGE” (San Diego Gas and Electric) • “SCE” (Southern California Edison) • “BVES” (Bear Valley Electrical Services) • “LU” (Liberty Utilities) • “PC” (PacifiCorp) • “HWT” (Horizon West Transmission) • “TBC” (Trans Bay Cable) • “LSPGC” (LS Power Grid California) 	“2023”	<ul style="list-style-type: none"> • “WMP-Pre (Wildfire Mitigation Plan Pre-Submission for Completeness Check) • “WMP” (Wildfire Mitigation Plan) • “WMP-Update” (Wildfire Mitigation Plan Update) • “Survey” (Maturity Model Survey) • “Metrics” (Performance Metrics Data) • “RNR” (Revision Notice Response) • “DSSR” (Data Schema Status Report) • “COR” (Change Order Report) • “PR” (Progress Report) 	<ul style="list-style-type: none"> • R0 (First Version) • R1 (Revision 1) • R2 (Revision 2)

Date Submitted (Year-Month-Day)	Electrical Corporation Abbreviated Name	Document Year	Document Type	Revision Number
			• “QDR” (Quarterly Data Report)	

10.7 Service and Publications of WMPs

The electrical corporations must submit their 2023-2025 Base WMPs to the 2023-2025 Wildfire Mitigation Plan docket (#2023-2025-WMPs). Energy Safety will publish all WMPs on its website as required by Public Utilities Code section 8386(d). The electrical corporations must concurrently serve WMPs on the Department of Forestry and Fire Protection at CALFIREUtilityFireMitigationUnit@fire.ca.gov.

10.8 WMP Data Submissions

Data previously submitted with the WMP, excluding WMP targets as set forth in 2023-2025 WMP Technical Guidelines,¹⁷ will now be collected via Quarterly Data Reports (QDR). No separate data will be submitted along with the WMPs. Evaluation of an electrical corporation’s WMP¹⁸ and its compliance with the WMP¹⁹ will include QDR submissions. Energy Safety will rely upon the most recently submitted QDR when evaluating a WMP.

Requirements for QDR submissions will be available in the Energy Safety Data Guidelines.

11 Schedule

Pursuant to Public Utilities Code section 8385.3(a), Energy Safety “shall approve or deny each wildfire mitigation plan and update...within three months of its submission, unless the

¹⁷ 2023-2025 WMP Technical Guidelines, adopted December 6, 2022.

¹⁸ See Pub. Util. Code, § 8386.3(a).

¹⁹ See Pub. Util. Code, §§ 8386.3(c) & 8389(g); see also Gov. Code, §§ 15475.1 & 15475.2.

division makes a written determination, which shall include reasons supporting the determination, that the three-month deadline cannot be met.”

Energy Safety will release a schedule each year prior to the pre-submission deadline. Energy Safety may update the schedule as needed during the evaluation process via written notice to the docket. Should Energy Safety exercise its right to extend the three-month deadline, Energy Safety will issue notice and rationale for its extension, concurrent with issuance of a determination or included in notice of a schedule or schedule update.

Any deadline that falls on a Saturday, Sunday, or holiday as defined in Government Code section 6700 shall be moved to the following business day. A document will be accepted by Energy Safety as of the date of the document’s receipt. Documents submitted after 5:00 p.m. on a business day, or at any time on a Saturday, Sunday, or holiday shall be deemed filed the next business day.

12 Change Order Requests

After approval of an electrical corporation’s WMP, the electrical corporation may seek to change approved mitigation initiatives as it gains experience and assesses outcomes. The following section outlines the process for an electrical corporation to request Energy Safety’s approval of significant changes related to its WMP mitigation initiatives.

Electrical corporations are required to request approval of changes to their mitigation initiatives if the changes substantially alter the course of their WMP or potentially reduce asset or community protections from wildfire or Public Safety Power Shutoff (PSPS) risk. Specific criteria for Change Order Requests are described in Section 12.

12.1 Purpose of a Change Order Request

The purpose of a change order request is to allow electrical corporations to request approval for a change or update to mitigation initiatives from its approved WMP prior to submission of a subsequent WMP or Update based on an updated understanding of risk.

Energy Safety evaluates change order requests to ensure that electrical corporations continue to follow a risk-based approach to mitigation of wildfire and PSPS risk. Energy Safety will issue a decision on each change order request as set forth in Section 12.5.

12.2 Criteria for a Change Order Request

An electrical corporation must request approval from Energy Safety if it is making any significant change to a mitigation initiative described in its WMP or WMP Update as soon as practicable after the WMP or WMP Update is approved and the electrical corporation determines a change is warranted. To be considered “significant” the change must meet the criteria set out in both A **and** B below.

A. Type of Initiative

The proposed change is to a mitigation initiative in one or more of the following categories:

1. Risk methodology and assessment
2. Grid design, operation, and maintenance, including asset inspections and maintenance
3. Vegetation management and inspections
4. Public Safety Power Shutoff (PSPS)

B. Change in Risk

The change results in either of the following:

1. An increase or decrease of more than 25% of an initiative's risk reduction value based on an updated understanding of risk.
2. The change represents a significant shift in either the strategic direction or purpose of an initiative (e.g., introducing a novel risk model that may alter the risk profile of the electrical corporation's circuits).

If an electrical corporation is unsure whether a proposed change meets these criteria, it is encouraged to submit an advance inquiry to Energy Safety on the matter via email at safetypolicy@energysafety.ca.gov.

Electrical corporations should not request approval for changes in the following cases:

- Changes to approach or targets exclusively because full implementation may not be feasible.
- Changes to approach or targets exclusively because the electrical corporation expects to exceed or fail to meet its targets. Energy Safety will evaluate an electrical corporation's variance from the targets approved in its WMP or WMP Update as part of Energy Safety's compliance program. Electrical corporations should include details about their progress against their targets in their Quarterly Data Reports.

Electrical corporations should also not request approval for a fundamental change in strategy, as such a change may be too substantive for the change order process.

12.3 Additional Change Order Requests in 2023

Change order requests that electrical corporations submit in 2023 may include the following, even if the above change in risk criteria are not met:

- Updates to the electrical corporation’s 2024 quarterly initiative targets. This specific exception is allowable in 2023 to assist the electrical corporations in adjusting to the year-ahead approach described in Section 2.3.
- Updates to projections for any performance metrics defined by Energy Safety²⁰ and newly required or amended in 2023. This specific exception is allowable in 2023 to enable the electrical corporations to collect data on these performance metrics and update projections as needed. The new and amended performance metrics in 2023 are shown in Table 3.

Table 3: New and Amended Performance Metrics

Performance Metric number	Name of performance metric	Newly required or amended in 2023
1.e.	Risk Events – number of outage events on circuits with adjusted settings for protective devices enabled	New
2.	Time between vegetation inspection finding and resulting trimming activity	New
3.-5.	Time between level 1, 2 and 3 asset inspection finding and resulting maintenance activity	New
6.	Number of open and past due vegetation management work orders	New

²⁰ As listed in the electrical corporation’s QDR

7.	Number of asset management open and past due work orders	New
8.	Response time to locked open circuit breaker	New
14.	Grid condition findings from inspection	Amended
15.	Grid condition fixes in response to inspection findings	New
16.	Vegetation clearance findings from inspection	Amended

If an electrical corporation requests changes to any of its 2024 quarterly initiative targets and/or any performance metric projections, these changes must be submitted concurrently in one change order request.

If an electrical corporation is unsure whether a proposed change meets these criteria, it is encouraged to submit an advance inquiry to Energy Safety on the matter via email at safetypolicy@energysafety.ca.gov.

12.4 Submission of Change Order Requests & Stakeholder Comments

Electrical corporations should endeavor to submit change order requests as soon as practicable after they determine a change is warranted. Multiple submissions are permissible, however all requests involving changes to 2024 quarterly initiative targets and/or performance metric projections must be submitted in one change order request. Electrical corporations must submit change order requests related to their approved WMP or WMP Update no later than 5:00 p.m. on November 1 of the year prior to which the changes are

being requested, or within 10 days of Energy Safety’s approval of their WMP or Update for that year, if the approval is issued after November 1.²¹

Change order requests must be submitted to Energy Safety’s e-filing system in the associated year’s docket. Electrical corporations must concurrently send all change order requests to the Department of Forestry and Fire Protection at CALFIREUtilityFireMitigationUnit@fire.ca.gov. Change order requests should be titled following the naming conventions set forth in Section 10.6.

12.4.1 Requirements for Change Order Request Submissions

Requests for changes that meet the criteria described in Section 12.2 must include the following:

- A. A brief description of the proposed change including:
 1. The title of the initiative for which the proposed change request is being submitted
 2. The page number(s) in the WMP or WMP Update where that initiative is described
 3. Whether the proposed change is a change to an approach, a target, or both
- B. The planned expenditure for that initiative according to the WMP or WMP Update including:
 1. The percent of planned expenditure already spent
 2. The planned expenditure for the remainder of the current WMP cycle
 3. If the expenditure amount is being redeployed, the amount being redeployed:
 - a. From what budget
 - b. To what budget
- C. The type of change proposed. Changes may include:
 1. Increase in scale
 2. Decrease in scale

²¹ Energy Safety may update this deadline as needed via written notice to the docket. For changes to the 2023 and 2024 portions of electrical corporations’ WMPs, the deadline is November 1, 2023. For changes to the 2025 portion of the electrical corporations’ WMPs, the deadline is November 1, 2024.

3. Change in prioritization
 4. Change in timing
 5. Change in the nature of the work.
- D. Description of the expected outcome from the change within the current WMP cycle, including any reduction to:
1. Wildfire risk (including ignition and consequence risk)
 2. PSPS risk

12.4.2 Stakeholder Comments

Stakeholders, including members of the public, may comment on any change order request within 20 days of the date of submission by the electrical corporation to Energy Safety’s WMP docket. For more information, see Section 6.2. The three-day deadline for discovery that applies to Energy Safety and stakeholder data requests during the WMP or WMP Update review period also applies to stakeholder data requests during this 20-day stakeholder change order request comment period.

If submitting comments, electrical corporations and stakeholders must submit comments to the appropriate WMP docket and use the file naming conventions set forth in Section 10.66.

12.5 Change Order Request Evaluation

Energy Safety will evaluate change order requests and approve or deny the request based on the criteria in Table 3 below.

Table 3: Criteria for Approval and Denial of Change Order Requests

Decision	Rationale	Impact
Approved	Proposed change responds to an updated understanding of risk and is likely to reduce wildfire or PSPS risk.	Electrical corporation must reflect the change in all subsequent reports or WMP/Update submissions to Energy Safety.
Rejected	Proposed change is not likely to reduce wildfire or PSPS risk over the	Targets/approaches remain the same as proposed in the approved WMP/Update.

	<p>existing approved mitigation initiative;</p> <p>OR</p> <p>Proposed change does not respond to an updated risk assessment and/or only responds to underperformance or overperformance for reasons unrelated to the risk assessment;</p> <p>OR</p> <p>Proposed change is too substantive for the change order process.</p>	
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Electrical corporations must not include changed targets or approaches in any submission to Energy Safety, including Quarterly Data Reports, until the change is approved. Upon approval, the electrical corporation must, as directed by Energy Safety, amend any previous submissions via an amended submission to the relevant docket.

13 WMP Updates

Energy Safety will issue separate guidelines for WMP Updates. The anticipated allowable revisions for WMP Updates may include:²²

1. Progress on Areas for Continued Improvement from previous decisions(s),
2. Updates resulting from approved Change Order Requests,
3. Mid-year and end-of-year targets for the year covered in the WMP Update (i.e., in 2024, electrical corporations will provide/update applicable mid-year and end-of-year targets for 2025),
4. Updates based on lessons learned during the previous year, and

Updates based on significant changes to risk models.

²² A final list will be issued in forthcoming WMP Update Guidelines.

DATA DRIVEN FORWARD-THINKING INNOVATIVE SAFETY FOCUSED



OFFICE OF ENERGY INFRASTRUCTURE SAFETY
A California Natural Resources Agency
www.energysafety.ca.gov

715 P Street, 20th Floor
Sacramento, CA 95814
916.902.6000



