



January 31, 2023

Via Electronic Filing

Caroline Thomas Jacobs, Director
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Subject: Public Advocates Office Request for Data Request Stakeholder Designation

Docket: 2023-2025-WMPs

Dear Director Thomas Jacobs,

The Public Advocates Office at the California Public Utilities Commission (Cal Advocates) respectfully requests Data Request Stakeholder Designation for the 2023 to 2025 Wildfire Mitigation Plan (WMP) docket (#2023-2025-WMPs), for data requests to all electrical corporations within the jurisdiction of the California Public Utilities Commission (CPUC).¹ Cal Advocates has a statutory duty to represent and advocate on behalf of the interests of public utility customers within the jurisdiction of the CPUC, with the goal “to obtain the lowest possible rate for service consistent with reliable and safe service levels.”²

The Office of Energy Infrastructure Safety’s (Energy Safety) review of each electrical corporation’s WMP, and its subsequent recommendation to the CPUC on whether to approve or deny an electrical corporation’s WMP, have a direct and immediate impact on the rates and availability of safe and reliable electric utility service for California public utility customers.³ Cal Advocates frequently requires information from electrical corporations regarding their

¹ *2023-2025 Wildfire Mitigation Plan Process and Evaluation Guidelines*, December 6, 2022, Section 8.1.

² Public Utilities (Pub. Util.) Code section 309.5(a).

³ Pursuant to Pub. Util. section 8386, enacted as part of SB 901, all California electric utilities must “prepare and submit wildfire mitigation plans that describe the utilities’ plans to prevent, combat and respond to wildfires affecting their service territories.” R.18-10-007, *Order Instituting Rulemaking*, October 25, 2018, p. 2; *see* P.U. Code sections 8386(a), (b). The CPUC has a statutory responsibility to ratify the decisions of Energy Safety on utility WMPs. Pub. Util. Code section 8386.3(a). The Pub. Util. Code requires that utility recovery of costs related to wildfire mitigation plans be addressed in general rate case applications. Pub. Util. Code section 8386.4.

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WMPs, so that it can provide comments in the WMP review process as part of its statutory duty to represent and advocate for the interests of customers served by electrical corporations in California.

Please designate Carolyn Chen, with the mailing address, email address, and telephone number below, as a representative of Cal Advocates.

Sincerely,

/s/ ***Carolyn Chen***

Carolyn Chen
Attorney

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