



Meeting Slides and Recording

Workshop on Development of 2025 Wildfire Mitigation Plan Update Guidelines

On July 19, 2023, the Office of Energy Infrastructure Safety held a public workshop on the development of the 2025 Wildfire Mitigation Plan Update Guidelines. A recording of the meeting can be found on Energy Safety's YouTube channel at <https://youtu.be/hhE2EoHEBHY>.

The slides presented during the meeting are attached to this document.

PUBLIC WORKSHOP ON THE DEVELOPMENT OF THE 2025 WILDFIRE MITIGATION PLAN UPDATE GUIDELINES



July 19, 2023





Welcome to Energy Safety's Workshop on the Development of the 2025 Update Guidelines

- Be aware of your surroundings
- Know your emergency exits and evacuation route
- Take regular breaks; get up and stretch
- Keep emergency contact information readily available

AGENDA

Topic

Introduction and Safety Message

Purpose, background, and context

Objectives for the 2025 Wildfire Mitigation Plan (WMP) Update Guidelines

Energy Safety's Initial Proposals:

- Structure of the 2025 WMP Updates
- Initial proposals for reportable updates:
 1. Proposed changes to risk models and subsequent workplans
 2. Shifts in strategic direction from Lessons Learned
 3. Progress on Areas for Continued Improvement
 4. Forecasted targets, performance metrics, and expenditure
- Submission Schedule

Discussion and Q&A (taking each proposal in turn)

Next steps and close out





Purpose of today's workshop:

- Provide context and background on the development of the 2025 WMP Update Guidelines
- Discuss Energy Safety's objectives for the 2025 WMP Update Guidelines
- Provide an opportunity for stakeholder feedback on Energy Safety's initial proposals
- Identify issues that need further consideration
- Clarify next steps



Background:

Public Utilities Code Section 8386(b)

*“may allow the annual submissions to be **updates** to the last approved comprehensive wildfire mitigation plan; provided, that each electrical corporation shall submit a comprehensive wildfire mitigation plan at least once every three years”*



Where we are in the WMP Cycle:

- In 2023, Energy Safety is evaluating and approving or denying the electrical corporations' comprehensive or "Base" 2023-2025 Wildfire Mitigation Plans
- In 2024, electrical corporations will be submitting a 2025 Wildfire Mitigation Plan that is an **update** to their 2023-2025 Base Plan that was submitted this year
- Henceforth, WMPs will be submitted and approved/denied before the plan year begins



Objectives for the 2025 WMP Update Guidelines:


- Meet the WMP statutory requirements in PUC 8386(c)
- Focus on “*significant*” updates between the 2023-2025 Base WMP and the 2025 Update
- Enable each electrical corporation to provide new and updated information regarding its WMP in a streamlined way
- Allow Energy Safety and stakeholders to evaluate any significant updates and provide direction to the electrical corporations mid WMP cycle



Preliminary ideas for the 2025 WMP Update Guidelines were presented at the public workshop in April 2022. This culminated in the following text included within Section 13 of the WMP Process and Evaluation Guidelines:

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

1. Progress on Areas for Continued Improvement
2. Updates resulting from approved Change Order Requests
3. Mid-year and end-of-year targets for the year covered in the WMP Update
4. Updates based on lessons learned during the previous year
5. Updates based on significant changes to risk models”



Energy Safety's Initial Proposals for the 2025 WMP Update Guidelines



Structure of the 2025 WMP Updates:

1. **2025 WMP Update:** This would be a stand-alone document that describes the proposed updates to the Base 2023-2025 WMP (2023-2025 WMP) in accordance with Energy Safety's 2025 Update Guidelines.
2. **Redline 2023-2025 WMP:** The proposed updates described in the 2025 WMP Update (i.e. the document above) would be included within each electrical corporation's 2023-2025 WMP in redline.
3. **Clean, updated 2023-2025 WMP:** Proposed updates from the 2025 WMP Update would be incorporated into each electrical corporation's 2023-2025 WMP in a clean document (i.e., without any updates marked in redline).



Submission Schedule:

Energy Safety proposes that the electrical corporations that intend on requesting a Safety Certification would submit their 2025 WMP Updates in April 2024, with the remaining electrical corporations to follow in June 2024.

Energy Safety additionally proposes a pre-submission process to ensure completeness of 2025 WMP Updates.



Energy Safety's Initial Proposals for Reportable Updates for the 2025 WMP Update:

1. Proposed changes to risk models that would significantly alter the top 20% risk profile, and subsequent workplan
2. Shifts in Strategic Direction from Lessons Learned
3. Progress on Areas for Continued Improvement
4. Forecasted Targets, Performance Metrics, and Expenditure



1. PROPOSED CHANGES TO RISK MODELS AND WORKPLANS



Previous Proposal

Context – Discussed at the Guidelines workshop in April 2022:

- Freeze risk model(s) over three-year WMP cycle
- Allow changes in inputs and re-running the existing model
- Avoids large changes in plan

Stakeholder Feedback

- **SCE:** “. . . a freeze could impede a utility’s ability to make appropriate and timely changes to its risk models and prevent the utility from using the updated risk models to target mitigations to the highest risk areas.”
Echoed by other utilities
- **Cal Advocates:** “. . . freezing models could promote continuity in each utility’s selection and prioritization of mitigation efforts.. may also allow intervenors to conduct more thorough analyses of the utility’s mitigation efforts”



Proposed changes to risk models that would significantly alter the top 20% risk profile, and subsequent workplans

Objective: Provide a process by which electrical corporations can report on continued refinement of planning and operational risk models in the electrical corporations' 2025 WMP Update.

The collective refinements and updates to risk models will either be categorized as “**significant**” or “**non-significant**” (not both).



- Energy Safety defines a “**significant**” update as any change or combination of changes to the risk model that moves 10% or more of the Ignition Risk and/or PSPS Risk in or out of the top 20% of highest risk circuits/segments/spans when all circuits/segments/spans are ranked individually from highest to lowest risk.
- This definition excludes shifts in risk resulting from the implementation of mitigation measures since the filing of the Base WMP, allowing for “apples to apples” comparison.
- If updates are “significant,” the electrical corporation must discuss its updated methodology, provide justification for the updates, and show how risk has shifted as a result of the updates. It must also report any resulting changes to prioritization of mitigation initiatives and scheduling/workplans for the implementation of mitigation initiatives.
- This entire discussion would be limited to 15 pages.



- Energy Safety defines a “**non-significant**” update as any change or combination of changes to the risk model that moves less than 10% of the Ignition Risk and/or PSPS Risk in or out of the top 20% of highest risk circuits/segments/spans when all circuits/segments/spans are ranked individually from highest to lowest, or any changes that moves risk order within the top 20%.
- If updates are “non-significant” the electrical corporation must provide a summary of the changes and refinements to its risk model since the last WMP.
- The summary of non-significant changes and refinements would be limited to three pages.

DEVELOPMENT OF THE 2025 WMP UPDATE GUIDELINES



Example of Top 20% Risk Circuits by Rank

Risk Rank	Circuit Name	Overall Utility Risk	% of Total OUR ¹ in Top 20%	Ignition Risk	% of Total Ignition in Top 20%	PSPS Risk	% of Total PSPS in Top 20%
1	Modoc	118.47	12%	118.47	12%	0.00	0%
2	Trinity	91.28	9%	85.79	9%	5.49	30%
3	Sierra	88.61	9%	86.04	9%	2.57	14%
4	Inyo	88.41	9%	87.67	9%	0.73	4%
5	Lassen	85.60	9%	80.74	8%	4.86	27%
6	Marposa	75.58	8%	75.42	8%	0.16	1%
7	Tehama	67.22	7%	67.22	7%	0.00	0%
8	Siskiyou	58.82	6%	58.30	6%	0.52	3%
9	Glenn	57.11	6%	55.76	6%	1.35	7%
10	Calaveras	50.10	5%	49.53	5%	0.57	3%
11	Plumas	47.28	5%	46.82	5%	0.47	3%
12	Colusa	46.88	5%	46.43	5%	0.45	2%
13	Imperial	43.06	4%	42.09	4%	0.97	5%
14	Riverside	42.19	4%	42.18	4%	0.01	0%
15	Kern	41.10	4%	40.94	4%	0.16	1%
	Total	1001.69	100%	983.39	100%	18.31	100%

A landscape photograph showing a steep, rocky hillside covered with evergreen trees. The sky is filled with dramatic, grey and white clouds. The foreground shows a mix of green foliage and large, light-colored rocks.

2. SHIFTS IN STRATEGIC DIRECTION FROM LESSONS LEARNED



Objective: Provide a process by which electrical corporations can propose key strategic changes mid-cycle that are not directly related to changes in risk modeling.

Each update must be tied to a key Lesson Learned. The electrical corporation must detail Lessons Learned (in the same or similar way it did in its 2023-2025 WMP, Section 10) and the associated updates. These updates must represent a “**significant**” shift in strategic direction for 2025.

Energy Safety defines “**significant**” shifts as:

1. Change to a 2025 target, that was initially reported in the Base WMP, of greater than or equal to 10%.
2. Change to the forecasted completion of an initiative objective or target to a future compliance year (e.g., if the completion date for an objective in the Base WMP was in 2025 but must be pushed to 2026, this would be “significant”).
3. Change in expenditure for an initiative activity of greater than or equal to 10%.
4. Creation of a new initiative activity/deletion of an existing initiative activity



3. PROGRESS ON AREAS FOR CONTINUED IMPROVEMENT



Objective: Provides a process by which electrical corporations can provide required updates on progress to address Areas for Continued Improvement identified in the 2023 WMP evaluation.

Electrical corporations must report progress associated with Areas for Continued Improvement, where requested by Energy Safety in a previous WMP decision. This would be in the same or similar format to Appendix D of the 2023-2025 WMP Technical Guidelines.

Energy Safety will denote Areas for Continued Improvement requiring reporting in the 2025 Updates in the upcoming Base Year Decisions.



4. FORECASTED TARGETS, PERFORMANCE METRICS, AND EXPENDITURE



Objective: Provide a process by which electrical corporations can propose any “**significant**” changes to forecasted targets, performance metrics, and expenditure for 2025.

In this case, Energy Safety defines “**significant**” changes to mean a change greater than or equal to 10%. Each significant change requires justification.

Non-significant changes would still be reflected in the electrical corporation's quarterly data submission and documented according to requirements laid out in the Data Guidelines.

These updates would be separate from updates to the risk model, lessons learned, and progress on Areas for Continued Improvement.



10 MINUTE BREAK



DISCUSSION

HOW TO PARTICIPATE

If you wish to make a comment:

- Press the “raise hand” button on Zoom, participants will be unmuted in order of hands raised
- Dial-in participants need to press #2 to raise hand
- Use Zoom’s Q&A feature to write a question. Questions will be read by the moderator.





NEXT STEPS AND CLOSE OUT



Written Public Comments:

- Comments must focus on proposals outlined in today's presentation but may include additional proposals. Where a stakeholder disagrees with an Energy Safety proposal, please provide a clear alternative proposal.
- Written comments must be no longer than 25 pages. Supporting documents may be included as appendices or attachments and are excluded from the 25- page limit.
- Written comments are due August 18, 2023, and must be filed in Docket 2023-2025-WMPs with the following naming convention:
“2023_08_18_ORGNAME_Comments_2025WMPGuidelines”



Tentative Schedule

Milestone	Date
Workshop	July 19th
Comments on Workshop	August 18th
Draft Publication	November 2023
Workshop on Draft	+15 days after publication of draft Guidelines
Comments on Draft	+30 days after publication of draft Guidelines
Adoption Meeting / Final	January 2024
WMP Submission (Safety Certification requested)	April 2024
WMP Submission (Safety Certification not requested)	June 2024



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