

**BEFORE THE OFFICE OF ENERGY INFRASTRUCTURE SAFETY
OF THE STATE OF CALIFORNIA**

Office of Energy Infrastructure Safety
Natural Resources Agency

**COMMENTS OF THE GREEN POWER INSTITUTE ON THE
2025 WILDFIRE MITIGATION PLAN UPDATE GUIDELINES**

August 18, 2023

Gregory Morris, Director
Zoe Harrold, Scientist
The Green Power Institute
a program of the Pacific Institute
2039 Shattuck Ave., Suite 402
Berkeley, CA 94704
ph: (510) 644-2700
fax: (510) 644-1117
gmorris@emf.net

COMMENTS OF THE GREEN POWER INSTITUTE ON THE 2025 WILDFIRE MITIGATION PLAN UPDATE GUIDELINES

The Green Power Institute (GPI), the renewable energy program of the Pacific Institute for Studies in Development, Environment, and Security, provides these *Comments of the Green Power Institute on the 2025 Wildfire Mitigation Plan Update Guidelines*.

Introduction

The updated WMP filing guidelines reestablished the Base plan as a 3-year scope of work and set a year-ahead reporting schedule for the following WMP Update plans. This approach will substantially improve the ability for OEIS and stakeholder reviews to affect WMP methods prior to their full or partial implementation during the plan filing year. The ensuing challenge is distilling down interim, annual WMP Updates in a way that enables annual plan maturation and external review while reducing regulatory burden. GPI appreciates the efforts by OEIS to develop a WMP Update format that manages plan length and review time by focusing on material changes to wildfire mitigation approaches. We provide comments on the proposed WMP Update schedule, filing format, and definitions of reportable changes as well as content limits.

2025 WMP Update filing and review schedule

The OEIS proposes a 2025 WMP Update filing and review schedule beginning in April 2024 for the IOUs and June 2024 for the SMJUs and ITOs. GPI supports staggering the IOU and SMJUs WMP Update plan filing deadline and generally supports the proposed schedule. The proposed 2-month stagger between IOU and SMJU plans will necessarily include the pre-submission review period (est. + 2 weeks) followed by an additional 2 weeks for the Utilities to address any OEIS directives. The pre-submission check would therefore constitute WMP activities for nearly the entirety of April, with a complete public 2025 WMP Update submission deadline at the end of April. Providing a minimum of 4 weeks for OEIS/stakeholder plan review is relatively reasonable assuming the 2025 Update plans are substantially shorter (e.g. 100-200

pages per Update plan), and/or the review process is streamlined. This timeline establishes a stakeholder comment deadline at the end of May. The overlap between the IOU WMP review process and the SMJU processes is therefore constrained to IOU WMP Update Reply Comments (est. + 2 weeks), OEIS Draft Decision filing (est. + 4 weeks), stakeholder Decision review, and subsequent comment cycles (est. + 2 weeks) before issuing a Final Decision, which we estimate puts the IOU WMP Update cycle completion at the end of July.

Despite anticipating that SMJU WMP Updates will be shorter compared to the IOU filings, GPI suggests providing an equivalent minimum of 4 weeks for OEIS/stakeholders to review the SMJU WMP Updates since the schedule will include overlap with the OEIS IOU Draft Decisions and stakeholder comment periods. GPI also respectfully notes that as stakeholders on multiple CPUC proceedings we are frequently engaging in other CPUC issued stakeholder comment periods throughout the year, such that longer review/comment periods help us balance our engagement as stakeholders/intervenors in cross-cutting proceedings (e.g. Climate Adaptation, RPS-BioMAT).

With respect to establishing a schedule, GPI respectfully requests that OEIS take into consideration the anticipated page count of the final filing requirement (i.e. a WMP Update plus Redlined/Clean Base WMP). We anticipate that the review process will benefit from comparing the proposed content in standalone WMP Updates against the more comprehensive Redlined Base plan or against the original WMP if a Redlined Base WMP version is not provided. We also suspect that it will be inherently challenging to predict and define a clear distinction between “significant” and “non-significant” plan changes ahead of receiving the WMP Update Plans, especially where the definition is more qualitative. Given the difficulty of this task, it would be prudent to review a Redlined Base WMP filing in order to assess whether the WMP Update captures all “significant” updates and to assess whether multiple “non-significant” changes could have a material impact on WMP outputs and outcomes. We therefore suggest that the WMP Update stakeholder review period should be no less than 4 weeks and preferably extend out to 6-8 weeks depending on the final WMP Update filing requirements.

WMP Pre-Submission Process

The WMP Pre-submission process was introduced to ensure that the WMPs initially comply with the statutory and OEIS guideline reporting requirements. This was introduced when WMP revisions were mandated based on missing information identified after stakeholder review had taken place. GPI notes that stakeholder reviews also identify missing WMP plan content – a standard review element in any plan review process.

GPI supports using a draft WMP review process prior to issuing an OEIS Decision, but recommends changing the objective and implementation method. The Pre-submission WMP completeness check and revision opportunity consumes valuable time for the OEIS, stakeholders, and the utilities. The combination of a Pre-submission completeness-check-based WMP update and a WMP revision notice-based update equates to two WMP plan updates per review cycle. We assume that the OEIS must review the plans for completeness at the time of the Pre-submission completeness check as well as in the first iteration of public plan updates, after the completeness revisions are filed. Utilities are potentially subject to two separate WMP update rounds during each annual review cycle.

Stakeholders must specially request Pre-submission plans, may be asked to sign NDAs to access the Pre-submission plans, must wait for the Pre-submission phase to close, and/or may need to compare plan differences between the Pre-submission draft and public filing. Furthermore, WMP completeness is a core requirement for plan approval and should not be evaluated separately from a holistic plan evaluation process. It is on the onus of the utility to provide a complete WMP submission per the OEIS guidelines. Incomplete or missing plan content can be requested by OEIS and stakeholders via Data Request during a longer review phase. We therefore suggest eliminating the Pre-submission completeness check and distilling the annual cycle into one comprehensive Draft WMP review that provides utilities with one opportunity to update their WMP prior to issuing an OEIS Decision.

2025 WMP Update Filing Format

The 2025 WMP Update filing requirements proposed by OEIS include four elements: (1) Pre-submission process; (2) 2025 WMP Update stand-alone document; (3) Redline 2023-2025

WMP; and (4) Clean, updated 2023-2025 WMP. We understand that the 2025 WMP Update stand-alone document is envisioned to include specific reporting requirements and page limits delineated based on “significant” and “non-significant” plan changes. The Redlined Base 2023-2025 WMP is then intended to be a single source of truth. The updated Base WMP would presumably form the basis for evaluating whether the utilities adequately achieve their proposed outputs (e.g. targets) and outcomes (e.g. performance metrics). GPI understands and values the intention of both deliverables. However, we are concerned that the proposed filing approach might increase or at best maintain the regulatory burden that the annual WMP Updates are intended to mitigate during interim Base WMP years.

Updating content across 1,000-2,000-page Base WMPs to generate a redlined version will constitute substantive work on the part of the utilities. This in and of itself is not an argument against requiring a Redlined Base WMP filing. Rather a combined redline base plan plus developing a comprehensive summary of the Redlined Base WMP “significant” and “non-significant” edits compiled into a WMP Update will expand the workload and therefore the regulatory burden. This extends to the OEIS and stakeholders who will necessarily need to review both components per our comments above. The WMP Update will also require the utilities to summarize any contextual information required to frame the update. For example, an adjustment to risk modeling input data will require a functional summary of the risk model in order to contextualize the change.

Our biggest concern with a dual Redlined/Clean Base WMP and WMP Update filing is that the Base WMP resubmission requirement, intended as a single source of truth, will require the IOUs to make comprehensive edits to the Base WMP regardless of the WMP Update content requirements. Failure to make comprehensive major *and minor* changes to a re-filed 2023-2025 Base WMP could create a utility liability risk. Outdated content cannot carry over into a refiled Base WMP plan, such that the utilities should not, and likely will not, *partially* update and refile a Base WMP. Any and all outdated utility method/target/proposal/etc. that was reported on in the previous Base WMP filings must be updated in a new Redlined+Clean Base WMP filing. We therefore anticipate the dual filing requirement will require a comprehensive Base WMP update that is subsequently summarized in a WMP Update filing and that the WMP Update filing will include substantial redundant information to the re-filed Redlined WMP.

GPI suggests three alternate options: (1) Require only a Redlined+Clean Base WMP filing; (2) Require only a WMP Update filing; (3) Require a Redlined+Clean Base WMP filing with a WMP Update document that identifies locations in the *Redlined* Base WMP that classify as “significant,” and that provide a page-limited justification for the update.

1. Redline+Clean Base WMP filing only – Redlined plans offer obvious, yet substantial, review value in that reviewers do not have to physically access the previous plan version in order to determine what was changed. This format also eliminates the need to summarize contextual information. For example, changing the input data for a model that remains constant does not require a complete methodological summary that would otherwise be required to put the update into context. While the Base WMPs are, relatively speaking, very extensive utility plans, OEIS and stakeholders become accustomed to the format, including where to find specific information. This continuity facilitates the review process. A Redline + Clean Base WMP filing requirement approach also maintains the objective of establishing a single source of truth. Drawbacks include a review process that will require sifting through the substantive Base WMPs and many potentially minor and non-material plan adjustments in order to identify material or “significant” changes to the plan.
2. WMP Update filing only – This approach would center on reducing regulatory burden in the interim years between WMP Base Plans. GPI appreciates the intention of a WMP Update filing requirement to extract and highlight the significant or material changes to the WMP, map to the Base WMP, and ultimately streamline the reporting and review process. As noted above, our primary concern is that it will be inherently challenging to predict, and therefore define, a clear distinction between “significant” and “non-significant” plan changes ahead of receiving the WMP Update Plans, especially in cases where the definition is more qualitative. Only filing a more narrowly defined WMP Update intended to target significant changes could lead to information gaps and/or Base WMP comparison challenges that an updated Redlined+Clean Base WMP filing could fill.
3. Redline+Clean Base WMP filing plus alternate WMP Update (Preferred) – GPI poses this third alternate option. This option would entail filing an updated Redlined and Clean Base

WMP as well as a WMP Update that identifies the Redlined document locations that map to OEIS guidelines for “significant” plan changes and provides a short justification (e.g. maximum 3 pages) for each significant change. Benefits of this approach include retaining all the value identified in (1) above associated with a Redlined and Clean Base WMP filing and establishing a single source of truth. Redefining the WMP Update document to a paired (not standalone) submission would remove the anticipated redundancy and drawbacks identified in (2) above, while still streamlining the Redlined Base WMP review process by directly identifying the plan elements and locations where changes are classified as “significant.” Adding a “significant” change justification statement would provide additional supporting information that otherwise might not be included in the plan. For example, if a change is made to model input data that results in a “significant” impact to circuit/segment risk ranking this would be updated in the Redlined Base WMP in the inputs and results sections. The WMP Update would list this change (e.g. 2025WMP-PGE-C01 Input dataset *x* was exchanged for an updated dataset *y*. *Redlined 2023-2025 Base WMP p. 456, 567*) and provide a justification summary (e.g. Input dataset *x* has lower granularity (km) and is outdated relative to dataset *y* (sub-km), which was made publicly available in 2023...). Utilities would not be required to identify “non-significant” changes in the paired WMP Update filing as these would be reflected throughout the Redlined Base WMP and available for review as deemed necessary by reviewers.

GPI also recommends requiring Utilities to provide an updated Appendix B with their Redlined+Clean Base WMP. Changes to risk modeling methods should be updated in version-controlled Appendix B technical documentation. This documentation should not fall out-of-date compared to the WMP Update or refiled Base WMP and OEIS, and stakeholders should also not be required to request this core filing requirement via a separate Data Request.

WMP Update – Criteria Defining Reportable Updates

OEIS proposes four subject-based criteria for reportable revisions:

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

GPI generally supports the intention of the subject-based reportable revision definition. We suggest clarifying that the subject-based criteria define reportable “significant” changes for the purpose of preparing a WMP Update document, whether standalone or paired with a Redlined+Clean Base WMP filing. If utilities are required to file a Redlined+Clean Base WMP they should be permitted to make any updates required to bring the plan into alignment with both “significant” and “non-significant” methodological/plan changes. We generally support “significant” change criteria 1, 3, and 4.

Our primary concern is with Criteria 2 – Shifts in Strategic Direction from Lessons Learned. Criteria 2: Lessons Learned, functions as a catch all for “significant” plan updates that are not quantitative (Criteria 1 and 4) or required by an ACI (Criteria 3). It’s unlikely that WMP “Lessons Learned” narrations and tables comprehensively capture the range of possible WMP “significant” update topics. We are also concerned that mapping WMP Updates to Base WMP Lessons Learned does not take into account the likelihood for new lessons learned since filing the Base WMP R0. The WMPs are a snapshot in time summarizing utility wildfire mitigation plans/approaches/strategy. Plan maturation is achieved through ongoing developments, including those gleaned between the time of the Base WMP filing (version R0) and the next WMP filing (WMP Update R0 and Redlined Base WMP). Reviewers should expect that plan updates based on both existing Lessons Learned and new developments are under consideration as soon as the Base WMP R0 version drops.

GPI supports including reported Lessons Learned as a criterion for “significant” updates with two caveats:

- (1) Lessons Learned should not be a static Base Plan reporting element. Utilities should be required to report on any new Lessons Learned and identify where resulting changes, if any, were made in the WMP Update.
- (2) Lessons Learned should not be construed as a topical catchall for qualitative “significant” updates. We reiterate that it is inherently challenging to predict, and therefore define, a clear distinction between “significant” and “non-significant” plan changes ahead of

receiving the WMP Update Plans, especially in cases where the definition is more qualitative. Put another way, “significant” updates include “unknown unknowns” from a reviewer perspective until an Update plan is filed. Requiring a comprehensive Redlined Base WMP filing as the WMP Update can mitigate this gap, while a paired WMP Update report can facilitate review by highlighting anticipated “significant” updates based on the four proposed criteria (Option 3 above).

GPI suggests including a reportable update criterion that includes WMP plan changes which advance WMP maturation according to the Maturity Survey. The WMP Maturity Survey is used to establish current best practices and benchmark plan maturation by tracking measurable milestones across all plan elements. WMP Updates that qualify a utility to update a maturity survey response should be considered a reportable update, and more than likely are “significant” updates or are updates that achieve a measurable progress threshold as defined by the survey.

Definition of “Significant” Reportable Changes

Definitions of “significant” reportable changes are proposed each of the four proposed reportable update criteria. We provide the following suggestions:

Page Limits – We appreciate the effort to manage WMP Update plan length with page limits. In our experience with both proposal writing and extensive utility compliance plan review (e.g. CPUC ordered RPS, IRP, WMP, and DRP plans), page limits can help increase the content richness of the narration provided, though overly-restrictive limits may limit plan details that would be useful to have. Page limits on plan summaries or broad contextual information (e.g. service territory characteristics) are likely to be less consequential for the value of the content provided. It’s not readily apparent if or how the proposed page limits in the proposed standalone WMP Update filing will affect utility narration quality and level of detail, and therefore the review process. As discussed above, the additional page-limited update document will also include information that is both redundant and potentially abridged relative to the proposed Redlined Base WMP filing requirement. To remedy this uncertainty, GPI suggests adopting option 3 above or extending the page-length limits.

Proposed Changes to Risk Models – GPI generally supports the proposed threshold for “significant” changes. However, reviewers should be provided sufficient information to determine whether other “non-significant” updates warrant comment. This can be achieved via a Redlined Base WMP and Appendix B filing.

Changes to WMP Target and other quantitative metrics – It appears that “significant” change thresholds for plan targets are included in both Criteria 2: Lessons Learned and Criteria 4: Forecasted Targets, Performance Metrics, and Expenditures. Both also specify 2025 target changes. “Significant” thresholds for targets should be consolidated into one criterion. Lessons Learned do not have targets or performance metrics. They generally outline qualitative goal/objective statements. It may be more functional for utilities to map WMP changes to Lessons Learned, rather than identify Lessons Learned as an update criterion. See additional discussion on Lessons Learned above.

“Significant” changes should include changes to targets for any and all planning years in the WMPs. This will capture annual changes to near-, mid-, and long-term strategic planning.

GPI generally supports defining the “significant” change threshold as 10 percent. However, a 10 percent expenditure change on a low-cost initiative, such as weather station installations, pales in comparison to the investment decision associated with a 10 percent change to an undergrounding initiative. This same relativity principle applies to initiative targets. For example, canceling 1 of 10 planned weather station installations is relatively insignificant, especially in comparison to canceling 20 of 200 planned system hardening (e.g. covered conductor or undergrounding) line miles. It may be prudent to establish more conservative “significant” percentage thresholds for critical risk mitigation initiatives or quantitative caps. For example, a 10 percent, or \geq \$1M change in initiative expenditure.

Conclusion

We respectfully submit these comments on the 2025 WMP Update guidelines. In the past the WMP mid-period Updates have been virtually as long and detailed as the original period documents, and we appreciate the efforts of the OEIS to place reasonable limits on the Updates. In these comments we propose various streamlines and other mechanisms to further tighten the

guidelines and distinguish between the full WMPs, which are due on a three-year cycle, and the mid-period Updates.

For the reasons stated above, we urge the OEIS to adopt our recommendations herein.

Dated August 18, 2023.

Respectfully Submitted,

A handwritten signature in blue ink that reads "Gregory Morris". The signature is written in a cursive style and is positioned above a horizontal line.

Gregory Morris, Director
The Green Power Institute
a program of the Pacific Institute
2039 Shattuck Ave., Suite 402
Berkeley, CA 94704
ph: (510) 644-2700
e-mail: gmorris@emf.net