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**Via Electronic Filing**

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**Subject: Comments of the Public Advocates Office on Draft 2025 Wildfire Mitigation Plan Update Guidelines**

**Docket: 2023-2025-WMPs**

Dear Director Thomas Jacobs,

The Public Advocates Office at the California Public Utilities Commission (Cal Advocates) respectfully submits the following comments regarding the Public Workshop on the Draft 2025 Wildfire Mitigation Plan Update Guidelines held November 15, 2023. Please contact Nathaniel Skinner ([Nathaniel.Skinner@cpuc.ca.gov](mailto:Nathaniel.Skinner@cpuc.ca.gov)) or Henry Burton ([Henry.Burton@cpuc.ca.gov](mailto:Henry.Burton@cpuc.ca.gov)) with any questions relating to these comments.

We respectfully urge the Office of Energy Infrastructure Safety to adopt the recommendations discussed herein.

Sincerely yours,

/s/ **Joseph Lam**

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**TABLE OF CONTENTS**

	<b><u>Page</u></b>
I. INTRODUCTION .....	1
II. TABLE OF RECOMMENDATIONS .....	2
III. GUIDELINES SECTION 1: UPDATES TO RISK MODELS .....	2
A. Energy Safety should specify additional information utilities must provide for risk model updates. ....	2
B. Energy Safety should include “changes in assumptions” as meeting the criteria for a significant qualitative update to a risk model. ....	3
C. Energy Safety should include examples of criteria that represent a non-significant qualitative update to a risk model.....	3
IV. GUIDELINES SECTION 4: NEW OR DISCONTINUED PROGRAMS .....	4
A. Energy Safety should include additional language within Section 4 to improve reporting by the utilities. ....	4
V. ADDITIONAL COMMENTS .....	5
A. Energy Safety should strengthen the role of lessons learned in each type of reportable update. ....	5
VI. CONCLUSION.....	6

## I. INTRODUCTION

On June 21, 2023, the Office of Energy Infrastructure Safety (Energy Safety) issued initial proposals on guidelines for 2025 wildfire mitigation plan (WMP) updates.<sup>1</sup> Energy Safety hosted a workshop regarding these initial proposals on July 19, 2023.<sup>2</sup> The Public Advocates Office at the California Public Utilities Commission (Cal Advocates) subsequently submitted post-workshop comments on August 18, 2023.<sup>3</sup>

On October 30, 2023, Energy Safety issued Draft 2025 Wildfire Mitigation Plan Update Guidelines (Draft 2025 Update Guidelines).<sup>4</sup> On November 15, Energy Safety hosted a workshop regarding the Draft 2025 Update Guidelines. Pursuant to Energy Safety's workshop notice inviting public comments,<sup>5</sup> Cal Advocates submits these comments in response to the public workshops on the Draft 2025 Update Guidelines held on July 19 and November 15, 2023.

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<sup>1</sup> Office of Energy Infrastructure Safety, *Notice of 2025 Wildfire Mitigation Plan Update Guidelines Workshop: Pre-Workshop Material: Development of the 2025 Wildfire Mitigation Plan Update Guidelines*, June 21, 2023, Docket 2023-2025-WMPs.

<sup>2</sup> Office of Energy Infrastructure Safety, *Notice of 2025 Wildfire Mitigation Plan Update Guidelines Workshop*, June 21, 2023, Docket 2023-2025-WMPs.

<sup>3</sup> Public Advocates Office, *Comments of the Public Advocates Office on Public Advocates Office Comments Guidelines for the 2025 Wildfire Mitigation Plan Updates*, August 18, 2023 (Cal Advocates' August 2023 Comments on Guidelines).

<sup>4</sup> Office of Energy Infrastructure Safety, *Draft 2025 Wildfire Mitigation Plan Update Guidelines*, October 30, 2023, Docket #2023-2025-WMPs.

<sup>5</sup> Office of Energy Infrastructure Safety, *Notice of Public Workshop on the Draft 2025 WMP Update Guidelines* in cover letter to *Draft 2025 Wildfire Mitigation Plan Update Guidelines*, filed October 30, 2023, Docket #2023-2025-WMPs.

## II. TABLE OF RECOMMENDATIONS

<b>Draft Guidelines Section</b>	<b>Recommendation</b>	<b>Relevant Section of these Comments</b>
1.1	Energy Safety should specify additional information utilities must provide for risk model updates.	III.A.
1.1.2	Energy Safety should include “changes in assumptions” as meeting the criteria for a significant qualitative update to a risk model.	III.B.
1.2	Energy Safety should include examples of criteria that represent a non-significant qualitative update to a risk model.	III.C.
4	Energy Safety should include additional language within “Section 4. New or Discontinued Programs” of the 2025 WMP Update Guidelines to improve reporting by the utilities.	IV.A.
Additional Proposal	Energy Safety should strengthen the role of Lessons Learned in each type of reportable update.	V.A.

## III. GUIDELINES SECTION 1: UPDATES TO RISK MODELS

### A. Energy Safety should specify additional information utilities must provide for risk model updates.

In our August 2023 comments regarding WMP update guidelines, Cal Advocates recommended that Energy Safety require additional information on risk model updates.<sup>6</sup> Specifically, among other things, Energy Safety should require utilities to:

- Specify the baseline model from which changes are measured,
- Require utilities to provide full model outputs,
- Require utilities to submit internal risk model documentation as appendices, and
- Require utilities to provide updated risk scores because of the updates made to the risk models.

While Energy Safety has incorporated several proposals regarding updates to wildfire risk models, the recommendations listed above have not been addressed. Cal Advocates urges

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<sup>6</sup> Cal Advocates’ August 2023 Comments on Guidelines at 6–8.

Energy Safety to revise the Draft 2025 Update Guidelines by adding the requirements above. As we recommended in our August 2023 comments, requiring this additional information will facilitate comparisons, enable thorough and accurate analyses of risk model outputs, and provide sufficient detail for stakeholders to understand the assumptions, data, and use-cases of the risk models.<sup>7</sup> Energy Safety and stakeholders will benefit from greater transparency.

**B. Energy Safety should include “changes in assumptions” as meeting the criteria for a significant qualitative update to a risk model.**

In our August 2023 comments on the pre-workshop material, Cal Advocates recommended that utilities should report qualitative changes or updates to a risk model. We included numerous examples of possible types of qualitative updates. In the Draft 2025 Update Guidelines, Energy Safety adopted most of these examples but not “changes in assumptions”; for this type of qualitative update, an example of “change in assumptions” would be “extending the length of fire season in response to the effects of climate change.”<sup>8</sup> Climate change also drives other adjustments to business-as-usual assumptions, such as shifts in the location of wildfire risk, increased frequency of trigger events, and more frequent occurrence of black-swan or rare events. The definition of “qualitative” update should be broad enough to capture unforeseen events that a utility may encounter, and the definition should be broad enough to encourage utilities to fully consider all variables that should alter their risk models.

**C. Energy Safety should include examples of criteria that represent a non-significant qualitative update to a risk model.**

The Draft 2025 Update Guidelines include a discussion and examples of qualitative updates to risk models that are considered significant (Section 1.1). However, the Draft 2025 Update Guidelines do not include examples of qualitative updates to risk models that are identified as non-significant (under Section 1.2). Cal Advocates recommends including the following examples of non-significant updates to risk models:<sup>9</sup>

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<sup>7</sup> Cal Advocates’ August 2023 Comments on Guidelines at 7, 8.

<sup>8</sup> Cal Advocates’ August 2023 Comments on Guidelines at 6.

<sup>9</sup> Cal Advocates’ August 2023 Comments on Guidelines at 6.

- Updating but not changing input data. For example, incorporating 2023 ignition and outage data to train the model version that will be used in 2025.
- Updating asset data. For example, if a system-hardening project has been completed, or assets have otherwise been replaced or removed, the model should be updated to reflect these activities.
- Fixing code errors that do not change results and cleaning input data.

The inclusion of these examples—and other similarly appropriate examples—would encourage utilities to think more comprehensively about the ways in which changes to risk models, even insignificant ones, impact the distribution of ignition risk.

#### **IV. GUIDELINES SECTION 4: NEW OR DISCONTINUED PROGRAMS**

##### **A. Energy Safety should include additional language within Section 4 to improve reporting by the utilities.**

Under “Section 4: New or Discontinued Programs” of the Draft 2025 Update Guidelines, the utilities are required to report on the creation of a new program or the discontinuation of a program that is described in its approved 2023-2025 Base WMP.<sup>10</sup> Cal Advocates supports this reporting requirement; however, we believe the Draft 2025 Update Guidelines should be augmented to promote more thorough reporting of programmatic changes by the utilities.

Cal Advocates recommends that Section 4 be revised to include the additional wording identified below:

- “Section 4. New or Discontinued Programs and Tools”
- “The electrical corporation must report on the creation of a new program or tool, or the discontinuance of a program or tool described in its approved 2023-2025 Base WMP.”

In opening comments on San Diego Gas & Electric Company’s (SDG&E) 2023-2025 Base WMP, Cal Advocates discusses issues related to SDG&E’s failure to provide updates on enhancements and tools related to risk modeling from its 2022 Update WMP to its 2023-2025 Base WMP.<sup>11</sup> Among other things, Cal Advocates notes that SDG&E was researching the use of its Vegetation Risk Index and how it could be utilized and integrated as a predictive component

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<sup>10</sup> Office of Energy Infrastructure Safety, *Draft 2025 Wildfire Mitigation Plan Update Guidelines*, October 30, 2023 at 15.

<sup>11</sup> Cal Advocates, *Comments of the Public Advocates Office on the 2023 to 2025 Wildfire Mitigation Plans of the Large Investor-Owned Utilities*, May 26, 2023 at 66-69.

in the WiNGS-Operations model, with implementation planned near the end of 2023.<sup>12</sup> SDG&E’s Vegetation Risk Index is a situational-awareness tool, not a risk model or program.<sup>13</sup> The Draft 2025 Update Guidelines would not require utilities to report on this type of improvement, because it does not fall under the criteria for required reporting. Cal Advocates believes that the final guidelines should include “tools” (as in the proposed language above) to ensure that the utilities are accurately reporting important changes to Energy Safety.

To ensure accurate analysis of the utilities’ programs and tools, Energy Safety should include the proposed language within Section 4 of the Draft 2025 Update Guidelines. The proposed language would require reporting on key developments of programs or internal tools, thereby enabling Energy Safety and interested parties to better track the growth of utility programs and tools from one year to the next. The final 2025 WMP Update Guidelines should be strengthened with this revision.

## V. ADDITIONAL COMMENTS

### A. Energy Safety should strengthen the role of lessons learned in each type of reportable update.

Lessons learned underpin many of the reportable updates but are referenced only in the Draft 2025 Update Guidelines sections called “Changes to Approved Targets, Objectives, and Expenditures” and “New or Discontinued Programs.” Energy Safety’s Pre-Workshop Material issued in June 2023<sup>14</sup> referred to “Shifts in Strategic Direction from Lessons Learned,” and proposed that utilities should “provide Energy Safety with updates on key strategic changes mid-cycle that are not directly related to changes in risk modeling.”

Connecting lessons learned to shifts in strategic direction in the two types of updates mentioned above helps establish a useful guideline that illuminates cause and effect. However, the concept of lessons learned is largely absent from the Draft 2025 Update Guidelines. Further, neither the Pre-Workshop Material nor the Draft 2025 Update Guidelines reference lessons

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<sup>12</sup> Cal Advocates, *Comments of the Public Advocates Office on the 2023 to 2025 Wildfire Mitigation Plans of the Large Investor-Owned Utilities*, May 26, 2023 at 66-69.

<sup>13</sup> Cal Advocates, *Comments of the Public Advocates Office on the 2023 to 2025 Wildfire Mitigation Plans of the Large Investor-Owned Utilities*, May 26, 2023 at 68.

<sup>14</sup> Office of Energy Infrastructure Safety, *Notice of 2025 Wildfire Mitigation Plan Update Guidelines Workshop: Pre-Workshop Material: Development of the 2025 Wildfire Mitigation Plan Update Guidelines*, June 21, 2023, Docket 2023-2025-WMPs.

learned for the other types of reportable updates (“Updates to Risk Models,” “Quarterly Inspection Targets for 2025,” and “Progress on Areas for Continued Improvement”). Elevating “lessons learned” to its own section or reinforcing its role in all areas of reportable updates, and casting lessons learned as an integral part of strategic direction, would help focus the off-year update on its key purpose: to provide for WMP updates that meet all the requirements of California Public Utilities Code section 8386(b).

## VI. CONCLUSION

Cal Advocates respectfully requests that Energy Safety adopt the recommendations discussed in these comments.

Respectfully submitted,

/s/ **Joseph Lam**

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