



Gary Chen  
Director  
Safety & Infrastructure Policy

**Docket# 2023-2025-WMPs**

December 6, 2023

Lucy Morgans  
Program Manager, Electric Safety Policy Division  
Office of Energy Infrastructure Safety  
715 P Street, 20th Floor  
Sacramento, CA 95814

**SUBJECT:** Comments Regarding Draft 2025 Wildfire Mitigation Plan Update Guidelines

Dear Program Manager Morgans:

Southern California Edison Company, San Diego Gas & Electric Company, and Pacific Gas and Electric Company (the "Joint Utilities") appreciate the opportunity to submit comments following the issuance of Draft 2025 Wildfire Mitigation Plan ("WMP") Update Guidelines on October 30, 2023 and the subsequent workshop on November 15, 2023.

The Joint Utilities reiterate their support of Energy Safety's intention to focus the 2025 WMP Update on meaningful changes relative to the base 2023-2025 WMP. The Joint Utilities have organized comments below based on the sequence and categories of topics reviewed at the workshop.

**Completeness Check Process**

Given the narrow scope of the 2025 WMP Update relative to the base 2023-2025 WMP, the Joint Utilities support elimination of the completeness check process. A single submission date for the 2025 WMP Update is intuitive and allows simultaneous evaluation by Energy Safety and all other parties, consistent with the timeframe provided by Public Utilities Code Section 8386.3(a). This streamlines the process, improves clarity for all parties by avoiding multiple versions of the WMP, and reduces administrative burdens.

**Changes to Approved Targets, Objectives, and Expenditures**

The Joint Utilities reiterate that due to constraints that materialize with little or no notice, in addition to the timing of annual budgeting and operational planning cycles, 2025 program targets cannot be forecasted with sufficient confidence in April 2024 to establish a reasonable compliance expectation for 2025. This is especially important given the compliance-focused nature of the WMP targets, in which a utility's record in meeting targets informs overall WMP compliance. In other words, the expectations for utility compliance with WMP targets should be matched with a corresponding ability for the utility to submit informed and meaningful

targets. By preventing utilities from being able to update targets closer to the date of the actual work, when there is a better understanding of the work that will be performed, the draft guidelines may inadvertently incentivize an overly conservative approach when establishing targets.

While utility planning processes look several years ahead, specific annual goals and targets (including those used for executive compensation purposes) are developed late in the year during the annual budgeting and corporate goal setting process. This allows for timely and accurate information on financial resources, operational needs, recent regulatory outcomes, permitting issues, supply chain considerations, and the other elements that are essential to the ability to establish a target with meaningful confidence.

The utilities agree with the desire stated by Energy Safety at the workshop to shift toward a year-ahead planning cycle. But all parties also benefit from WMP targets that are informed, timely, and meaningful, and which can be used for both WMP evaluation and WMP compliance. Allowing for target adjustments prior to the year in question is reasonable and appropriate, and can be accommodated without compromising the shift to the year-ahead schedule.

To address this concern, the Joint Utilities suggest two options, which can be taken individually or as a combined approach:

First, Energy Safety could allow a process in late 2024 for utilities to update 2025 targets within limits set by Energy Safety. For example, updates could be limited to non-significant changes, which would allow refinement of targets based on final budgeting and planning decisions, or the availability of information that was not available at the time of submission. Significant changes could have a higher threshold for why a target adjustment is needed (i.e., the change in risk criteria already in place). This could be combined with guidance in the 2025 WMP Update that a utility must strive to indicate any targets that it anticipates will need refinement in late 2024.

Second, Energy Safety could expand the change order criteria for changes submitted in 2025 to include factors such as updated operational plans or CPUC cost recovery decisions.

These changes would allow Energy Safety and other parties to gain a meaningful understanding of 2025 targets when the 2025 WMP Updates are submitted, and to allow for refinement of 2025 targets without creating an open-ended process that undermines the April submission. This approach would reduce the potential for a large amount of changes orders in 2025, as well as avoiding utilities from being in a position in which numerous caveats might be needed on 2025 targets if they must be set in April 2024 with little recourse for change.

#### **Additional Update Category to Reflect OEIS Findings**

The Joint Utilities also request a “Corrective Actions” category for allowable updates to reflect corrective actions in other Energy Safety regulatory proceedings, such as the Substantial Vegetation Management Audit.

### **Coordination Amongst Proceedings**

During the WMP process it has become increasingly evident that there are significant areas of overlap among ongoing regulatory proceedings including the WMP, the General Rate Case (GRC), the Risk and Mitigation Analysis Proceeding (RAMP), and upcoming Senate Bill 884 proceedings. We respectfully encourage Energy Safety and the CPUC to continue to engage with one another to ensure consistency among the various filings. Where possible, consistency in terminology, requirements, presentation of data, and other areas will help to reduce confusion and administrative burden for all stakeholders and ultimately lead to better and more useful wildfire mitigation information.

### **Maturity Model Submission**

Given the subject matter and administrative expertise needed to update the maturity model, the Joint Utilities would appreciate receiving guidance on this submission as soon as possible.

### **Conclusion**

The Joint Utilities appreciate the opportunity to provide feedback during the process of developing guidelines for the 2025 WMP Update, and again reiterate their support for Energy Safety's effort to focus on significant changes relative to the base WMP.

If you have questions for SCE, please contact me at [gary.chen@sce.com](mailto:gary.chen@sce.com). If you have questions for SDG&E, please contact Kari Kloberdanz at [kkloberdanz@sdge.com](mailto:kkloberdanz@sdge.com), and for PG&E, please contact Wade Greenacre at [wade.greenacre@pge.com](mailto:wade.greenacre@pge.com).

Sincerely,

//s//

Gary Chen

Director, Safety & Infrastructure Policy