

Diane Conklin  
Spokesperson  
Mussey Grade Road Alliance  
PO Box 683  
Ramona, CA 92065

January 22, 2024

VIA ELECTRONIC FILING

Shannon O'Rourke  
Deputy Director  
Electrical Infrastructure Directorate  
Office of Energy Infrastructure Safety

**RE: MUSSEY GRADE ROAD ALLIANCE COMMENTS ON DRAFT REVISIONS TO  
WMP DOCUMENTS RELATED TO THE 2025 WMP UPDATE**

The Mussey Grade Road Alliance (MGRA or Alliance) files these comments pursuant to the Cover letter announcing the Draft Revisions to WMP Documents Related to the 2025 WMP Update, sent December 22, 2023,<sup>1</sup> and setting a due date of January 22, 2024 for public comment.

The Alliance reply comments are authored by the Alliance expert, Joseph W. Mitchell, Ph.D.

Respectfully submitted this 22<sup>nd</sup> day of January, 2024,

By: /s/ **Diane Conklin**

Diane Conklin  
Spokesperson  
Mussey Grade Road Alliance  
P.O. Box 683  
Ramona, CA 92065  
(760) 787 – 0794 T  
[dj0conklin@earthlink.net](mailto:dj0conklin@earthlink.net)

---

<sup>1</sup> 2023-2025-WMPs; Office of Energy Infrastructure Safety; Draft Revisions to WMP Documents Related to the 2025 WMP Update; December 22, 2023; TN13492\_20231222T121146. (Draft Revisions)

**COMMENTS ON DRAFT REVISIONS TO WMP  
DOCUMENTS RELATED TO THE 2025 WMP UPDATE**

**COMMENTS**

MGRA appreciates the effort that the Office of Energy Infrastructure staff put into the annual cycle of Wildfire Mitigation Plan review, and supports its efforts to make this an efficient process. MGRA understands that the current Draft Revision is specifically aimed at the 2025 WMP update, which is intended to be more streamlined restricted than the 2023-2025 Base WMPs, which provided thousands of pages of filings, supporting files, and data request responses. Given Energy Safety's goal, it is understandable that it would want to limit the scope of public comment as well as utility filings. However, the 15 page limit set on all public comment<sup>2</sup> is inappropriate for the WMP filings, since these documents, supporting data, and data request record could still be extensive.

MGRA therefore urges Energy Safety to remove the revision that would set a 15 page limit on all opening documents, and return to the original version that only set this limit on opening comments for Draft Decisions. A 15 page limit on WMP Opening Comments would restrict the information made available to Energy Safety and potentially dissuade public input, particularly if producing meaningful input requires the amount of effort required to digest the full record of the WMPs and supporting data. Additionally, MGRA notes that in its past comments, it has merged its comments on the three major utilities into one document for the sake of efficiency. A page limit will encourage commenters to submit one filing per utility WMP instead, increasing duplication and creating unnecessary work.

Regarding the 5 page limit on WMP Reply Comments, this would negatively impact utilities, since utility WMP Reply Comments are usually responsive to multiple public comments. Restricting utility comment in this way might compromise the record by not providing due process rights, giving parties an opening to appeal at the time of Commission ratification or afterwards.

MGRA therefore urges removal of page limits on WMP Opening and Reply Comments. Alternatively, if Energy Safety wishes to set a limit on public comment, it should provide

---

<sup>2</sup> Draft Revision; 2023-2025 WMP Process and Evaluation Guidelines; p. 10.

significantly larger limit than the draconian 15 page limit it would set on Opening Comments and the 5 page limit on Reply Comments.

Respectfully submitted this 22<sup>nd</sup> day of January, 2024,

By: /S/ **Joseph W. Mitchell, Ph.D.**

Joseph W. Mitchell  
M-bar Technologies and Consulting, LLC  
19412 Kimball Valley Rd.  
Ramona, CA 92065  
(858) 228-0089  
[jwmitchell@mbartek.com](mailto:jwmitchell@mbartek.com)  
on behalf of the Mussey Grade Road Alliance