



OFFICE OF ENERGY INFRASTRUCTURE SAFETY

2023-2025 WILDFIRE MITIGATION PLAN PROCESS AND EVALUATION GUIDELINES

REVISED

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1 Introduction

This document establishes guidelines¹ outlining the process for disposition of Wildfire Mitigation Plans (WMPs) and details the public participation process and submission requirements.² These guidelines will remain in effect for the 2023-2025 WMP three-year cycle. Energy Safety will release an updated schedule each year and may amend these guidelines as necessary according to the procedures in Government Code section 15475.6. These guidelines do not address the substantive content of the WMPs. For substantive content requirements, refer to the 2023-2025 WMP Technical Guidelines.³ For reportable update requirements, refer to the 2025 WMP Update Guidelines.

2 The Three-Year WMP Process

Each electrical corporation is required to annually prepare and submit a WMP to Energy Safety for review and approval. The plan must cover at least a three-year period.⁴ Energy Safety has discretion to establish a submission schedule. It may also elect to allow annual submissions to be updates to the last approved comprehensive WMP, provided that a comprehensive WMP is submitted once every three years.^{5,6} In 2023, Energy Safety required each electrical corporation to submit a comprehensive WMP covering 2023-2025. This is the “Base WMP.” Non-Base submissions will be known as “WMP Updates.”

2.1 Base WMP

For the Base WMP, each electrical corporation submitted a comprehensive WMP covering the 2023-2025 plan period pursuant to the 2023-2025 WMP Technical Guidelines.

¹ Gov. Code, § 15475.6.

² Unless otherwise specified, these guidelines apply to Base WMPs and WMP Updates.

³ 2023-2025 WMP Technical Guidelines, adopted December 6, 2022.

⁴ Pub. Util. Code, § 8386(b).

⁵ *Id.*

⁶ Energy Safety intends for electric corporations’ Base WMPs to cover a three-year period and subsequent filings within the three-year plan cycle be WMP Updates. The 2023 schedule reflects this intention; however, Energy Safety reserves the right to require Base WMP submissions in any year.

2.2 WMP Updates

The electrical corporation must submit information pursuant to the 2025 Update Guidelines for the 2025 WMP Update. Updates are intended to report progress and changes to the Base WMP.

2.3 The Year-Ahead Process

An electrical corporation must submit a plan for the subsequent years. In 2023, each electrical corporation submitted a Base WMP that covered 2023-2025, including detailed targets, projections, etc. for all three years. As part of its 2023 evaluation, Energy Safety evaluated and approved electrical corporation plans for both 2023 and 2024. In 2024, each electrical corporation must submit its WMP Update for 2025. A timeline is provided below in Table 1.

Table 1: Timeline for the Year-Ahead Process

Year Submitted	Filing
2023	2023-2025 WMP Base Plan
2024	2025 WMP Update

3 Maturity Survey

For WMP evaluations, Energy Safety developed a Maturity Model to measure each electrical corporation's current and projected maturity over the three-year plan period. To measure maturity, Energy Safety (or its contractor) will issue an electronic Maturity Survey to each electrical corporation along with instructions on how to complete the Maturity Survey. Each electrical corporation must submit a complete set of survey responses by the designated deadline.⁷

An electrical corporation must request permission through written request to the Deputy Director prior to filing any amendments to its previously submitted survey responses. A request to amend previously submitted survey responses must include:

- Each survey response to be amended; and
- Good cause for each requested amendment.

⁷ See Section 11 for additional information regarding the WMP submission schedule.

3.1 Extension Requests

If an electrical corporation seeks a longer response period to complete the Maturity Survey than the response period provided by Energy Safety, the electrical corporation must request an extension by sending an extension request to safetypolicy@energysafety.ca.gov. An extension request must include:

- Good cause for the delay; and
- A proposed date of response in lieu of the original deadline.

Any extension request must be received by Energy Safety by 5:00 p.m. Pacific time two business days prior to the date the Maturity Survey response is due.

4 Energy Safety Evaluation Process

This section sets forth the steps to the WMP evaluation process.

4.1 Pre-Submission Check

Energy Safety will first assess each electrical corporation's WMP for completeness based on the statutory requirements and adherence to the relevant year WMP Guidelines. WMP pre-submissions must, at a minimum, demonstrate satisfaction of the statutory requirements in the Public Utilities Code section 8386(c) via the requisite checklist in the 2023-2025 WMP Technical Guidelines.⁸ The pre-submission check is a precursor to, and separate from, the statutory WMP review process.⁹

The pre-submission check is not a substantive review of WMP content; a substantive review occurs during the WMP evaluation process.

Energy Safety will not conduct a pre-submission process pursuant to this Section for the 2025 WMP Updates.

⁸ 2023-2025 WMP Technical Guidelines, adopted December 6, 2022.

⁹ See Pub. Util. Code, § 8389.3(a)

4.1.1 Pre-Submission Check Process

The pre-submission check consists of five steps:

1. Energy Safety uses the Statutory Checklist in the WMP Technical Guidelines to confirm that information is reported for each Public Utilities Code section 8386(c) requirement and appropriately cross-references the relevant section or sub-section of the WMP. If information is not reported for a requirement, Energy Safety marks this element incomplete.
2. Energy Safety confirms the electrical corporation has provided a narrative for each section and sub-section in the WMP. If the WMP contains a blank section, an inapplicable cross reference, or insufficient detail, Energy Safety marks this element incomplete.
3. Energy Safety confirms narrative tables are filled out in the WMP. Narrative tables are the required tables found within the body of the WMP as required by the WMP Technical Guidelines. If any fields are blank, Energy Safety marks this element incomplete.
4. Energy Safety confirms completeness of each electrical corporation's spatial and non-spatial data, submitted separately from its WMP and according to the Energy Safety Data Guidelines. If an electrical corporation's spatial submission contains any blank fields or layers, Energy Safety notes the deficiencies and marks this element incomplete.
5. Energy Safety informs the electrical corporation of its findings.
 - a. If an electrical corporation's WMP satisfies the pre-submission check, Energy Safety will instruct the electrical corporation to submit its WMP as-is, with no changes for its WMP Submission (see Section 4.2).
 - b. If an electrical corporation's WMP does not satisfy the pre-submission check, Energy Safety will notify the electrical corporation as to the missing or incomplete information (i.e., incomplete, not fully referenced, or unsubstantiated statutory compliance checklist). At the time of the WMP submission, the electrical corporation must add the missing information to its WMP as directed by Energy Safety, with no additional changes.

Energy Safety will not accept public comments on the pre-submission check determination.

4.2 WMP Submissions

An electrical corporation must submit its WMP according to the schedules set forth by Energy Safety.¹⁰ The statutory evaluation period commences upon submission of the WMP.¹¹

An electrical corporation may seek an extension to the deadlines established in a schedule for its submission by emailing a request to the Deputy Director. The request must include:

- Original deadline,
- Type of submission,
- Good cause for the extension request, and
- Proposed revised deadline.

Extension requests must be received by Energy Safety by 5:00 p.m. Pacific time at least two business days prior to the original due date.

For any technical issues encountered that may affect the timeliness of its submission, an electrical corporation must immediately contact efiling@energysafety.ca.gov, safetypolicy@energysafety.ca.gov, and the assigned Energy Safety staff lead for the electrical corporation's WMP evaluation.

WMPs are posted on the appropriate year's WMP docket for public comment. Refer to Section 6.2: Public Comments for more information.

4.2.1 Incomplete WMPs

If an electrical corporation submits an incomplete WMP, Energy Safety may direct an electrical corporation to remedy its incomplete WMP submission through an errata submission or a Revision Notice.

4.3 Errata

An erratum is a correction of published text and does not include revisions required by Energy Safety as part of the Revision Notice process (see Section 4.4).

An electrical corporation may submit errata as follows:

1. After the submission deadline, an electrical corporation may submit to the appropriate year's WMP docket **substantive errata** for WMPs within 10 business days after the submission deadline. After 10 business days, an electrical corporation must

¹⁰ See Section 11 for additional information regarding the WMP submission schedule.

¹¹ *Id.*

request permission through written request to the Deputy Director prior to filing any substantive errata.

- **Substantive errata** are corrections to targets, calculations, initiatives, etc., that materially impact Energy Safety’s evaluation of the WMP.
2. An electrical corporation may submit **nonsubstantive errata** for a WMP within 30 business days after the submission deadline.
 - **Nonsubstantive errata** are minor corrections to fix typographical errors or to improve clarity.

When submitting errata or a request to submit errata to the Deputy Director, an electrical corporation must include the following:

1. A cover letter with a summary of the corrections, including,
 - a. Whether the errata submission is substantive or nonsubstantive,
 - b. The WMP page number, section number, and table or figure number (if applicable) of the corrections,
 - c. A description of the corrections, and
 - d. Reason for the corrections; and
2. A redline of the page or pages of the WMP showing the corrections.

Classification of errata as substantive or nonsubstantive is solely within the discretion of Energy Safety.

Energy Safety may request that an electrical corporation submit errata at any point during the evaluation process.

If an electrical corporation submits errata to its WMP and Energy Safety approves the WMP, the electrical corporation must submit a final version of its WMP to the docket that includes all previously submitted errata within 10 days of Energy Safety’s Decision approving the WMP. This final version must also include changes resulting from a Revision Notice, as further discussed below. An electrical corporation must not include any other changes in its final version of its WMP, unless otherwise directed by Energy Safety.

4.4 Revision Notice

Public Utilities Code section 8386.3(a) states, “[b]efore approval, the division may require modifications of the plan.” Energy Safety effectuates this provision by issuing a Revision Notice. The purpose of a Revision Notice is to ensure the electrical corporation addresses critical issues prior to completion of Energy Safety’s evaluation.

4.4.1 Examples Warranting a Revision Notice

Examples of when Energy Safety may choose to issue a Revision Notice include, but are not limited to, the following and shall be designated as critical issues:

- The electrical corporation failed to address the areas for continued improvement detailed in the prior year's decision,
- The electrical corporation did not provide sufficient¹² information for evaluation,
- The electrical corporation made a significant shift in its wildfire mitigation strategy without sufficient substantiation,
- The electrical corporation's submission does not meet evaluation criteria listed in Section 5.1, including ineffective or infeasible mitigations, and
- The electrical corporation did not provide sufficient information for an element of the WMP that is critical to life, safety or property.

4.4.2 Revision Notice Process

The Revision Notice process is set forth as follows:

1. Energy Safety determines an electrical corporation's WMP contains one or more critical issues that warrant a Revision Notice.
2. Energy Safety issues a Revision Notice to the electrical corporation. The Revision Notice will contain a list of critical issues the electrical corporation must address in its Revision Notice Response and due dates by which the electrical corporation must respond. In the Revision Notice, Energy Safety may revise any prior WMP schedule or set forth additional WMP schedules.
3. By the provided due dates, the electrical corporation must resubmit its entire WMP or sections therein (in a redline copy and a clean copy), as directed within the Revision Notice, as well as provide written responses to each issue delineated in the Revision Notice (Revision Notice Response).
4. Once an electrical corporation has resubmitted its WMP or sections thereof and provided its Revision Notice Response, Energy Safety will consider the electrical corporation's Revision Notice Response, revised WMP, errata, public comments, responses to data requests and the totality of the information before it to-date, and issue a determination on the electrical corporation's WMP.
5. If Energy Safety approves the electrical corporation's WMP after issuing a Revision Notice, the electrical corporation must submit a final version of its WMP to the docket

¹² Different from the completeness check, in the case of revision notices, information is present but lacks sufficient detail or information for Energy Safety to conduct its evaluation.

that includes changes resulting from the Revision Notice within 10 days of Energy Safety's Decision approving the WMP. This final version must also include previously submitted errata, as discussed above, but must not include any other changes, unless otherwise directed by Energy Safety.

If, by the date specified in the Revision Notice, an electrical corporation fails to provide a Revision Notice Response or resubmit its WMP or sections as required in the Revision Notice, Energy Safety may deny the electrical corporation's WMP without further notice.

Revision Notice Responses are posted on the appropriate year's WMP docket for public comment. Refer to Section 6.2: Public Comments for more information.

4.5 Workshops

Energy Safety in its sole discretion may hold one or more public workshops to discuss part or all of an electrical corporation's WMP or Revision Notice Response. Energy Safety will issue notice of workshops according to the process set forth in Section 6.4.

4.6 Draft Decision

Upon completion of its review, Energy Safety determines whether each electrical corporation's WMP should be:

- Approved (approval may include a requirement that the electrical corporation demonstrate continued growth in its subsequent WMP, known as an area for continued improvement), or
- Denied (the electrical corporation does not have an approved WMP).

Energy Safety may issue a draft decision approving a WMP if the WMP meets statutory and guideline requirements, including the evaluation criteria set forth in Section 5.1. Energy Safety may issue a draft decision denying the WMP if the WMP does not meet the statutory and guidelines requirements, including the evaluation criteria set forth in Section 5.1.

Energy Safety's draft decision will be posted on the appropriate year's WMP docket for public comment. Refer to Section 6.2: Public Comments for more information.

4.7 Decision

Upon completion of its review of public comments, Energy Safety will issue a decision. Energy Safety submits its decisions for each electrical corporation to the California Public Utilities Commission for ratification pursuant to Public Utilities Code section 8386.3(a).

In its decision, Energy Safety may list areas for continued improvement, which are areas where the electrical corporation must continue to mature in its capabilities. Areas for

continued improvement identified during an evaluation **must** be addressed in the next WMP, or on the timeline directed by Energy Safety in the decision. Failure to show maturation in these areas may result in a Revision Notice or denial.

5 WMP Evaluation Criteria

5.1 Evaluation Criteria

Energy Safety evaluates WMPs according to the following criteria:

- **Completeness:** The electrical corporation comprehensively responds to the statutory requirements contained in Public Utilities Code section 8386(c) and Energy Safety's Guidelines.
- **Technical and programmatic feasibility and effectiveness:** The proposed initiatives are technically feasible and effective in addressing the risks that exist in the electrical corporation's service territory. The proposed initiatives are programmatically feasible for the specific electrical corporation given its maturity and progress to date.
- **Resource use efficiency:** The proposed initiatives are an efficient use of electrical corporation resources and focus on achieving the greatest risk reduction with the most efficient use of funds and workforce resources.
- **Demonstrated year-over-year progress:** The electrical corporation demonstrates sufficient progress on the objectives and targets reported in its previous plan.
- **Forward-looking growth:** The electrical corporation demonstrates a clear action plan to continue reducing utility-related ignitions and the scale, scope, and frequency of Public Safety Power Shutoff (PSPS) events. In addition, the electrical corporation focuses on long-term strategies to build the overall maturity of its wildfire mitigation capabilities while reducing reliance on shorter-term strategies such as PSPS and enhanced vegetation management.
- **Performance metrics:** The electrical corporation uses performance metrics to indicate the extent to which its WMP is driving performance outcomes in its service territory in terms of both leading and lagging indicators of wildfire risk, PSPS risk, and other direct and indirect consequences of wildfire and PSPS, including the potential unintended consequences of wildfire mitigation work.
- **Targets:** The electrical corporation uses quantitative targets to set commitments for specific initiatives in its WMP. The electrical corporation reports progress towards completing the targets in its approved WMP through its quarterly reporting. Targets track the electrical corporation's pace of activity completion as laid out in the WMP but do not track the efficacy of its activities. The primary use of these targets is to track the electrical corporation's completion of the initiatives in its approved WMP.

5.2 Evaluation Inputs

To assess a WMP, Energy Safety may rely upon the following:

- An electrical corporation's WMP submissions, including errata and Revision Notice Response,
- Input from the California Department of Forestry and Fire Protection (CAL FIRE),
- Public and stakeholder comments,
- An electrical corporation's response to the Utility Wildfire Mitigation Maturity Survey (Maturity Survey),
- An electrical corporation's data submissions,
- An electrical corporation's responses to data requests, and
- Any other information Energy Safety may require for the evaluation of an electrical corporation's WMP submissions.

6 Public Participation/Feedback on WMPs

6.1 Docket Access

Persons who wish to receive service of the WMPs, comments on the WMPs, and WMP decisions may enroll by visiting:

https://public.govdelivery.com/accounts/CNRA/subscriber/new?topic_id=CNRA_416.

Additional information on Energy Safety's service lists and detailed instructions for signing up can be found at <https://energysafety.ca.gov/events-and-meetings/how-to-participate-in-public-events/>.

6.2 Public Comments

Any person or entity may submit opening and reply comments on WMPs, Revision Notice Responses, and draft decisions. Such comments must be submitted in accordance with schedules issued by Energy Safety. The scope of opening comments must focus on information contained in the document subject to the comment period. The scope of reply comments is limited to the issues raised in opening comments. New information not directly related to issues presented in opening comments will not be considered. Energy Safety may reject comments submitted after the due dates provided within a schedule or comments that are not within the scope as described in this section.

Opening comments on draft decisions are limited to 15 pages. Reply comments on draft decisions are limited to five pages.

Any person or entity seeking an extension to a public comment due date may email a request to Energy Safety at safetypolicy@energysafety.ca.gov. The request must include:

- Original deadline,
- Document subject to the comment period,
- Good cause for the extension, and
- Proposed new deadline in lieu of the original.

Any extension request must be received by Energy Safety by 5:00 p.m. Pacific time two business days prior to the original comment due date.

For any technical issues encountered that may affect the timeliness of a public comment submission, the person or entity submitting the comment must immediately contact efiling@energysafety.ca.gov and safetypolicy@energysafety.ca.gov.

While Energy Safety will not respond to public comments directly, it will consider those comments before issuing a decision. When a comment is received, it becomes public record and will be made available to the public on the Energy Safety docket. Energy Safety will post the comments as received without redaction of personal information.

For public comments on change orders, reference Section 12.

6.3 Submitting Comments

Public comments must conform to the following requirements:

- Whenever possible, comments must be submitted to the proper docket on Energy Safety's e-filing system.¹³ For WMP related matters, comments must be submitted to the appropriate year's WMP docket (e.g., #2023-2025-WMPs).
- Comments on an electrical corporation's WMP shall be named according to the naming convention set forth in Section 10.6. However, comments shall include the organization or person's name followed by "Opening Comments" or "Reply Comments" and then the relevant abbreviations set forth in Table 2 in Section 10.6.

For example:

- Comments on Pacific Gas and Electric Company's (PG&E) 2023_2025 WMP Submission:
"2023_04_10_ORGNAME¹⁴_OpeningComments_PGE_2023_2025WMP_R0,"

¹³ Members of the public and other interested parties are encouraged to utilize the e-filing system. Energy Safety will accept mailed or in person submissions at, 715 P Street, 20th Floor, Sacramento, California 95814.

¹⁴ For comments submitted by an individual, an individual may use their last name in place of the organization name.

which refers to an organization's comments submitted on April 10, 2023, on PG&E's 2023-2025 Base Year WMP, first version.

- Comments must be accessible. It is the policy of the State of California that electronic information be accessible to people with disabilities. Each person who submits information through the Office's e-filing system must ensure that the information complies with the accessibility requirements set forth in Government Code section 7405. Energy Safety may reject any information submitted through the e-filing system that does not comply with these requirements.
- The submission process for confidential information is set forth in section 29200 of Title 14 of the California Code of Regulations.

7 Data Requests from Energy Safety

Energy Safety may obtain any information from an electrical corporation that is relevant to a matter within the scope of its authority via a data request.

The following applies to data requests:

1. Data requests from Energy Safety staff to an electrical corporation may come from safetypolicy@energysafety.ca.gov or from individual Energy Safety staff e-mail addresses. All responses to Energy Safety data requests must be submitted to the appropriate year's WMP data request docket (e.g., #2023-2025-WMP-DRs). An electrical corporation must endeavor to submit one file per data request to the docket (as opposed to a file for every question in the data request).
2. For data requests submitted by 5:00 p.m. on a business day, the date of submission is Day 0. For data requests submitted after 5:00 p.m. or on a Saturday, or holiday (including all Sundays) as defined in Government Code section 6700, the next business day is Day 0.
3. Unless a different response period is provided by Energy Safety, an electrical corporation must respond to all data requests by 5:00 p.m., on Day 3, with each business day counted as one day. For example, in a week with no holidays, if a data request is submitted at 2:00 pm on a Monday, the data request response would be due by 5:00 pm on Thursday of that same week.
 - a. Energy Safety will endeavor to limit the three-business-day response requirement to the WMP review period unless an expedited response time is otherwise required by Energy Safety.
 - b. The WMP review period for Energy Safety begins on the date an electrical corporation submits its WMP for the completeness check (pre-submission) and

runs throughout the entire WMP evaluation period until issuance of a decision for each electrical corporation.

4. Energy Safety-issued WMP-related data requests occurring outside of the WMP review period shall be subject to a 10-business day response period unless a different response period is provided by Energy Safety.
5. Extension Requests
 - a. If an electrical corporation seeks a longer response period than as provided in this section or as provided by Energy Safety, the electrical corporation must request an extension by sending an extension request to safetypolicy@energysafety.ca.gov and to the assigned Energy Safety staff lead for the electrical corporation's WMP evaluation.
 - b. An extension request must include:
 - i. The data request or portion of the data request requiring an extension;
 - ii. Good cause for the extension; and
 - iii. A proposed date of response in lieu of the original deadline.
 - c. Any extension request must be received by Energy Safety by 5:00 p.m. Pacific time one business day prior to the original data request response due date.

8 Data Requests from Stakeholders

A Data Request Stakeholder, as defined in Section 8.1, may obtain through a data request to electrical corporations, information as related to any WMP docket matter that seeks public comments.

Prior to issuing a data request, a person or entity must seek and obtain designation as a Data Request Stakeholder pursuant to Section 8.1. A person or entity may submit public comments without designation as a Data Request Stakeholder.

8.1 Data Request Stakeholder Designation

Any person or entity must submit a request for and receive designation as a Data Request Stakeholder to send data requests to electrical corporations regarding the WMP submissions of electrical corporations. An initial request for designation as a Data Request Stakeholder can be submitted any time prior to the WMP submission but must be submitted to the relevant year's WMP docket no later than five business days following the submission deadline of an electrical corporation's WMP.

A request for designation as a Data Request Stakeholder must include:

1. The docket matter (Docket #) the person or entity intends to participate in (e.g., #2023-2025-WMPs),
2. The position and interest of the person in the WMP docket matter,
3. Disclosure of the persons or entities on whose behalf the person may be seeking the designation, if any,
4. The electrical corporations for which the person or entity seeks stakeholder status. This may include a request for all electrical corporations,
5. The name, mailing address, e-mail address, and telephone number of the person or entity designee.

A request for designation as a Data Request Stakeholder will be considered approved five business days after submission without any further correspondence from Energy Safety unless the person or entity seeking the designation is otherwise notified by Energy Safety during that time. Once granted designation as a Data Request Stakeholder, a person or entity shall retain that designation for subsequent WMP evaluation years unless that stakeholder fails to submit comments or otherwise actively participate in the WMP evaluation process for two years. After two years of non-participation, the Data Request Stakeholder designation is automatically withdrawn, and the person or entity must resubmit for status as a Data Request Stakeholder in future WMP years.

Energy Safety may grant late requests for designation as a Data Request Stakeholder only on a showing of good cause by the interested person or entity.

8.2 Data Request Process for Data Request Stakeholders

The following applies to data requests from Data Request Stakeholders:

1. An electrical corporation must respond to all data requests within three business days of the request (as described in Section 7), unless a different response period is mutually agreed upon by the stakeholder making the data request and the electrical corporation.
 - a. The three-business-day response requirement is only in effect during the WMP review period.
 - b. The WMP review period begins for Data Request Stakeholders on the date of submission of an electrical corporation's WMP (not its pre-submission) and runs throughout the entire WMP evaluation period until issuance of a Decision for each electrical corporation.
2. WMP-related data requests occurring outside of the WMP review period shall be subject to a 10-business day response period, unless a different response period is

mutually agreed upon by the stakeholder making the data request and the electrical corporation.

3. Extension Requests
 - a. Prior to seeking an extension from Energy Safety to respond to a data request, an electrical corporation must first make a good-faith effort to ask the stakeholder making the request to agree to the extension.
 - b. If an electrical corporation cannot reach an agreement with the stakeholder making the request, the electrical corporation must request an extension by sending an extension request to safetypolicy@energysafety.ca.gov.
 - c. An extension request must include:
 - i. A showing of a good-faith effort by the electrical corporation to ask the stakeholder to agree to the extension and the result of such effort,
 - ii. The data request or portion of the data request requiring an extension,
 - iii. Good cause for the extension, and
 - iv. A proposed date of response in lieu of the original deadline.
 - d. Any extension request must be received by Energy Safety by 5:00 p.m. one business day prior to the date the data request response is due.

8.3 Data Request Requirements for Data Request Stakeholders

Data requests from Data Request Stakeholders must adhere to the following:

1. Data requests must seek information relevant to the pending docket matter and be designed to facilitate the stakeholder's ability to make an informed public comment,
2. Stakeholders submitting data requests must consider the volume and nature of the data being requested when negotiating response deadlines outside of those set forth in Section 8.2,
3. Stakeholders must avoid extensive and comprehensive data requests in the six weeks before the electrical corporation must submit its WMP if the data could reasonably be requested outside of that timeframe.
4. Stakeholders submitting data requests must not submit requests where such information is otherwise available, namely:
 - a. Contained in the electrical corporations' WMP submissions,
 - b. Previously requested by Energy Safety, or
 - c. Previously requested by other Data Request Stakeholders.

Stakeholders may view prior data requests and responses in each electrical corporation's Data Request Log, available on an electrical corporation's website. See Section 9.2.

8.4 Request to Compel or Limit Stakeholder Data Requests

Data Request Stakeholders and electrical corporations must endeavor to resolve all data request disputes amongst themselves. For data request disputes that cannot be resolved, parties to the dispute may seek relief in accordance with the process below:

1. Prior to filing a request to compel or limit data requests, the parties to the dispute must have previously met and conferred in a good faith effort to informally resolve the dispute.
2. The party seeking to compel or to limit data requests bears the burden of proving the reasons why Energy Safety should compel or limit the data request.
3. A request to compel or limit a data request must include:
 - a. Facts showing a good-faith attempt at an informal resolution of the data request dispute presented by the request,
 - b. The data request or portion of the data request at issue,
 - c. Basis to compel or limit the data request, and
 - d. A proposed determination that clearly indicates the relief requested.
4. A response from a stakeholder or electrical corporation must be submitted within three business days of the date that the request was submitted to Energy Safety. If no response is submitted to request to compel or limit a data request, then the request will be deemed granted. Energy Safety will take requests to compel or limit a data request under consideration and will issue a determination on a request to compel or limit a data request after the request and response have been submitted. Energy Safety may request clarification or additional information from the parties to the dispute prior to issuing a determination. Responses to such requests for clarification or additional information must be submitted within three business days of the date of the request.

All filings for a request to compel or limit data requests must be submitted to Energy Safety at safetypolicy@energysafety.ca.gov and served to all parties to the dispute.

9 Document Maintenance

9.1 Document Postings

Each electrical corporation must post its WMP, all documents referenced in its WMP, and any subsequent versions of the WMP and documents on a WMP-specific website in an easy-to-follow format. This will be in addition to the posting of WMPs on Energy Safety's docket and

website. An electrical corporation must include the website address in a cover letter to its WMP submission.

9.2 Data Request Log

Each electrical corporation must post a WMP Data Request Log on its website. The WMP Data Request Log must be posted and maintained beginning with pre-submission of the WMP¹⁵ and ending upon issuance of the decision on the electrical corporation's WMP. Each electrical corporation must also submit to Energy Safety a Data Request Log weekly for the same time period. The requirements for each Data Request Log are set forth as follows.

1. Each electrical corporation must update its WMP Data Request Log and post all data requests and responses issued to-date weekly each Thursday by 5:00 p.m. Pacific time.
2. Each electrical corporation must submit to Energy Safety its WMP Data Request Log each Thursday by 5:00 p.m. Pacific time to the appropriate year's WMP Data Requests docket (e.g., #2023-2025-WMP-DRs).
3. The website or portion of webpage pertaining to data requests must be titled "YEAR Wildfire Mitigation Plan Data Requests."
4. The Data Request Log must be in the form of a searchable online table that contains all data requests, responses for each data request received, and links to relevant documents.
5. The Data Request Log must indicate:
 - a. The attachment number of any additional attachments related to the data request,
 - b. The relevant sections of the WMP, and
 - c. A thematic category and subcategory of the data request.

See Appendix A for the Data Request Log template.

¹⁵ Beginning with the submission of the WMP if there is no pre-submission check.

10 Electrical Corporation WMP Submission Information

Each electrical corporation must submit its WMP and all documents referenced in the WMP to the appropriate year's WMP docket in accordance with the schedule established by Energy Safety. In addition, each electrical corporation must mail 5 hard copies, including appendices, of the WMP to:

Office of Energy Infrastructure Safety

Attn: Deputy Director

715 P Street, 20th Floor

Sacramento, CA 95814

10.1 Confidentiality

The submission process for confidential information is set forth in section 29200 of Title 14 of the California Code of Regulations.

10.2 Single Point of Contact

Each electrical corporation must send to safetypolicy@energysafety.ca.gov the name of its single point of contact for all data requests and WMP matters for Energy Safety staff use no later than the date of its pre-submission.¹⁶

10.3 Format

Every document submitted to Energy Safety must comply with the formatting requirements below.

1. Electronically filed documents shall be word searchable and accessible as prescribed in Section 10.4.
2. Paper documents shall be:
 - a. Typewritten or otherwise mechanically printed;
 - b. On paper 11 inches long and 8 ½ inches wide;
 - c. Printed on both sides of the page if feasible; and

¹⁶ Beginning with the submission of the WMP if there is no pre-submission check.

- d. Bound securely.
3. Both electronic and paper documents shall;
 - a. Be in a clear, easily readable font of at least 11 points;
 - b. Have consecutively numbered pages; and
 - c. Included the following information on the first page:
 - i. Name of the docket;
 - ii. Number of the docket; and
 - iii. Title of the document.
4. For electronic documents, signatures may be electronic.¹⁷

10.4 Accessibility

It is the policy of the State of California that electronic information be accessible to people with disabilities. Each person who submits information through the Office's e-filing system must ensure that the information complies with the accessibility requirements set forth in Government Code section 7405. The Office will not accept any information submitted through the e-filing system that does not comply with these requirements.¹⁸

10.5 Pre-submissions

Each electrical corporation must submit a WMP pre-submission according to the schedule set forth by Energy Safety. Pre-submissions are to be complete WMPs submitted to Energy Safety for a completeness check as set forth in Section 4.1.

Each electrical corporation must submit its WMP pre-submission to its Energy Safety SharePoint drop folder. The electrical corporation must email safetypolicy@energysafety.ca.gov and confirm that the pre-submission has been successfully uploaded to the drop folder.

Energy Safety will not conduct a pre-submission check for the 2025 WMP Updates.

¹⁷ Gov. Code, § 16.5.

¹⁸ References to laws and regulations related to digital accessibility are available are available at <https://dor.ca.gov/Home/DisabilityLawsandRegulations>. Resources on constructing accessible electronic contents are available at <https://dor.ca.gov/Home/ConstructingAccessibleElectronicContent>.

10.6 Naming Convention

Electronic file names for the WMPs and associated document/data submissions must follow the standardized electronic naming convention illustrated in Table 2 below. The electronic file name must include, in order, the naming convention identified in each column (without quotation marks), with an underscore between the character string of each column. See examples below.

Examples:

- First Version of a WMP Submission: “2023-02-05_PGE_2023_WMP_R0”, which refers to the PG&E 2023 WMP submitted on Feb 05, 2023, first version
- Updated submission in response to Energy Safety Revision Notices: “2023-06-05_HW_23_RNR_R1”, which refers to the Horizon West Revision Notice Response submitted on June 5, 2023, revision 1
- First Version of a 2025 WMP Update Submission: “2024-02-05_PGE_2025_WMP-Update_R0”, which refers to the PG&E 2025 WMP Update submitted on Feb 05, 2024, first version
- Maturity Model submission: “2023-04-05_TBC_2023_Survey_R0”, which refers to the Trans Bay Cable 2023 Maturity Model Survey submitted on April 5, 2023, first version

Table 2: Electronic File Naming Convention with Examples

Date Submitted (Year-Month-Day)	Electrical Corporation Abbreviated Name	Document Year	Document Type	Revision Number
"2023-02-05"	<ul style="list-style-type: none"> • "PGE" (Pacific Gas and Electric Company) • "SDGE" (San Diego Gas and Electric) • "SCE" (Southern California Edison) • "BVES" (Bear Valley Electrical Services) • "LU" (Liberty Utilities) • "PC" (PacifiCorp) • "HWT" (Horizon West Transmission) • "TBC" (Trans Bay Cable) • "LSPGC" (LS Power Grid California) 	<p>"2023" for 2023-2025 Base WMP</p> <p>"2025" for 2025 WMP Update</p>	<ul style="list-style-type: none"> • "WMP-Pre (Wildfire Mitigation Plan Pre-Submission for Completeness Check) • "WMP" (Wildfire Mitigation Plan) • "WMP-Update" (Wildfire Mitigation Plan Update) • "Survey" (Maturity Model Survey) • "Metrics" (Performance Metrics Data) • "RNR" (Revision Notice Response) • "DSSR" (Data Schema Status Report) • "COR" (Change Order Report) • "PR" (Progress Report) • "QDR" (Quarterly Data Report) • "DR-Summary" (Data Request Log) 	<ul style="list-style-type: none"> • R0 (First Version) • R1 (Revision 1) • R2 (Revision 2)

10.7 WMP-Related Data Reporting

Evaluation of an electrical corporation's WMP¹⁹ and its compliance with the WMP²⁰ will include the electrical corporation's quarterly data report (QDR) submissions. Data presented and relied upon in an electrical corporation's WMP must be consistent with the electrical corporation's QDR submissions.

Requirements for QDR submissions are set forth in the Energy Safety Data Guidelines.

11 Schedule

Energy Safety will release a schedule each year prior to the pre-submission or submission²¹ deadline. Energy Safety may update the schedule as needed during the evaluation process via written notice to the docket. Should Energy Safety exercise its right to extend the three-month deadline,²² Energy Safety will issue a notice and rationale for its extension.

Any deadline that falls on a Saturday, or holiday (including all Sundays) as defined in Government Code section 6700 shall be moved to the following business day. A document will be accepted by Energy Safety as of the date of the document's receipt. Documents submitted after 5:00 p.m. on a business day, or at any time on a Saturday, or holiday (including all Sundays) shall be deemed filed the next business day.

12 Change Order Requests

After approval of an electrical corporation's WMP, the electrical corporation may seek to change approved mitigation initiatives as it gains experience and assesses outcomes. The following section outlines the process for changes related to its WMP mitigation initiatives that require Energy Safety's approval.

An electrical corporation is required to request approval of changes to its mitigation initiatives if the changes substantially alter the course of its WMP or potentially reduce asset or community protections from wildfire or Public Safety Power Shutoff (PSPS) risk. Specific criteria for Change Order Requests are described in Section 12.1 and 12.2.

¹⁹ See Pub. Util. Code, § 8386.3(a).

²⁰ See Pub. Util. Code, §§ 8386.3(c) & 8389(g); see also Gov. Code, §§ 15475.1 & 15475.2.

²¹ Prior to the submission if there is no pre-submission check.

²² See Pub. Util. Code, § 8386.3(a).

12.1 Criteria for a Change Order Request

An electrical corporation must request a change order as soon as practicable after the WMP is approved and the electrical corporation determines a change is warranted. An alteration to the WMP necessitating a change order must meet the criteria set out in both A **and** B below.

A. Type of Initiative

The proposed change is to a mitigation initiative in one or more of the following categories:

1. Risk methodology and assessment
2. Grid design, operation, and maintenance, including asset inspections and maintenance
3. Vegetation management and inspections
4. Public Safety Power Shutoff (PSPS)

B. Change in Risk

The change results in either of the following:

1. An increase or decrease of more than 25% of an initiative's risk reduction value based on an updated understanding of risk.
2. The change represents a significant shift in either the strategic direction or purpose of an initiative (e.g., introducing a novel risk model that may alter the risk profile of the electrical corporation's circuits).

Energy Safety may reject a change order request for any of the following reasons:

- Changes to approach or targets exclusively because full implementation may not be feasible.
- Changes to approach or targets exclusively because the electrical corporation expects to exceed or fail to meet its targets. Energy Safety will evaluate an electrical corporation's variance from the targets approved in its WMP as part of Energy Safety's compliance program. An electrical corporation should include details about its progress against its targets in its Quarterly Data Reports.
- A fundamental change in strategy in a change order request.

For questions regarding change order submissions pursuant to Section 12.1, the electrical corporation may contact Energy Safety via email at safetypolicy@energysafety.ca.gov.

12.2 Additional Change Order Requests for WMPs Submitted in 2023

A Change Order Request that an electrical corporation submits for a WMP submitted in 2023 may include the following, even if the Section 12.1 criteria are not met:

- Updates to the electrical corporation's end of Q2 and end of Q3 2024 initiative targets reported in accordance with Tables 8-4 and 8-15 of the 2023-2025 WMP Technical Guidelines (Asset Inspections and Vegetation Inspections, respectively). This specific exception is allowable for WMPs submitted in 2023 to assist an electrical corporation in adjusting to the year-ahead approach described in Section 2.3.
- Updates to projections for any performance metrics defined by Energy Safety²³ and newly required or amended in 2023. This specific exception is allowable for WMPs submitted in 2023 to enable an electrical corporation to collect data on these performance metrics and update projections as needed. The new and amended performance metrics in 2023 are shown in Table 3.

²³ As listed in the electrical corporation's QDR

Table 3: New and Amended Performance Metrics

Performance Metric number	Name of performance metric	Newly required or amended in 2023
1.e.	Risk Events – number of outage events on circuits with adjusted settings for protective devices enabled	New
2.	Time between vegetation inspection finding and resulting trimming activity	New
3.-5.	Time between level 1, 2 and 3 asset inspection finding and resulting maintenance activity	New
6.	Number of open and past due vegetation management work orders	New
7.	Number of asset management open and past due work orders	New
8.	Response time to locked open circuit breaker	New
14.	Grid condition findings from inspection	Amended
15.	Grid condition fixes in response to inspection findings	New
16.	Vegetation clearance findings from inspection	Amended

For questions regarding change order submissions pursuant to Section 12.2, the electrical corporation may contact Energy Safety via email at safetypolicy@energysafety.ca.gov. Section 12.2 does not apply to 2025 WMP Updates, or any subsequent WMP submissions.

12.3 Submission of Change Order Requests & Stakeholder Comments

Change order requests for a WMP pursuant to Section 12.1 or Section 12.2 may be submitted after the WMP has been approved. Energy Safety may impose a deadline for change order requests via written notice to the docket.

Change order requests pursuant to Section 12.1 may be submitted in separate submissions. However, all change order requests pursuant to Section 12.2, for changes to WMPs submitted in 2023, must be submitted in a single, one-time submission unless otherwise approved by Energy Safety.

Change order requests must be submitted to Energy Safety's e-filing system in the associated year's docket. Change order requests should be titled following the naming conventions set forth in Section 10.6.

12.3.1 Requirements for Change Order Request Submissions

Requests for changes that meet the criteria described in Section 12.11 must include the following:

- A. A brief description of the requested change including:
 1. The title of the initiative for which the requested change request is being submitted
 2. The page number in the WMP or WMP Update where that initiative is described
 3. Whether the requested change is a change to an approach, a target, or both
 4. How the change meets the change order criteria in Section 12.1
- B. The planned expenditure for that initiative according to the WMP or WMP Update including:
 1. The percent of planned expenditure already spent
 2. The planned expenditure for the remainder of the current WMP cycle
 3. If the expenditure amount is being redeployed, the amount being redeployed:
 - a. From what budget
 - b. To what budget

- C. The type of change requested. Changes may include:
 - 1. Increase in scale
 - 2. Decrease in scale
 - 3. Change in prioritization
 - 4. Change in timing
 - 5. Change in the nature of the work.
- D. Description of the expected outcome from the change within the current WMP cycle, including any reduction to:
 - 1. Wildfire risk (including ignition and consequence risk)
 - 2. PSPS risk

12.3.2 Stakeholder Comments

Stakeholders, including members of the public, may comment on any change order request within 20 days of the date of submission by the electrical corporation to Energy Safety's WMP docket. For more information, see Section 6.2. The three-day deadline for discovery that applies to Energy Safety and stakeholder data requests during the WMP or WMP Update review period also applies to stakeholder data requests during this 20-day stakeholder change order request comment period.

If submitting comments, the electrical corporation and stakeholders must submit comments to the appropriate WMP docket and use the file naming conventions set forth in Section 10.6.

12.4 Change Order Request Evaluation

Energy Safety evaluates change order requests to ensure that the electrical corporation continues to follow a risk-based approach to mitigation of wildfire and PSPS risk. Energy Safety will evaluate change order requests and approve or reject the request based on the criteria in Table 3 below.

Table 3: Criteria for Approval and Rejection of Change Order Requests

Decision	Rationale	Impact
Approved	Requested change meets the submission criteria set forth in Section 12.1 and corresponding requirements in 12.3, or the criteria in 12.2; and responds to an updated understanding of risk and is likely to reduce wildfire or PSPS risk.	Electrical corporation must reflect the change in all subsequent reports or WMP/Update submissions to Energy Safety.
Rejected	<p>Requested change is not likely to reduce wildfire or PSPS risk over the existing approved mitigation initiative;</p> <p>OR</p> <p>Requested change does not respond to an updated risk assessment and/or only responds to underperformance or overperformance for reasons unrelated to the risk assessment;</p> <p>OR</p> <p>Requested change does not meet the criteria in Section 12.1 and the requirements in 12.3, or the criteria in Section 12.2;</p> <p>OR</p> <p>Requested change is too substantive for the change order process.</p>	Targets/approaches remain the same as approved in the applicable WMP/Update.

An electrical corporation must only include changed targets or approaches in submissions to Energy Safety, including Quarterly Data Reports, after Energy Safety has approved the change. Upon approval, the electrical corporation must amend the relevant year's WMP and Q4 Quarterly Data Report (if already filed) to reflect the approved changes and file the amended documents to the relevant docket.

DATA DRIVEN FORWARD-THINKING INNOVATIVE SAFETY FOCUSED



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A California Natural Resources Agency
www.energysafety.ca.gov

715 P Street, 20th Floor
Sacramento, CA 95814
916.902.6000



