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BY ENERGY SAFETY E-FILING

Tony Marino
Acting Deputy Director, Electric Infrastructure Directorate
Office of Energy Infrastructure Safety
California Natural Resources Agency
715 P Street, 20th Floor
Sacramento, CA 95814

Re: **Pacific Gas and Electric Company’s Comments on the Draft WMP Guidelines – Package 1**
Docket: #WMP-Guidelines

Dear Deputy Director Marino:

Pacific Gas and Electric Company (“PG&E”) submits the following comments on the Draft 2026-2028 Wildfire Mitigation Plan (“WMP”) Guidelines – Package 1 (“Draft Guidelines”), issued by the Office of Energy Infrastructure Safety (“Energy Safety”) on November 12, 2024.

I. PROCEDURAL AND TIMING ISSUES

A. The Utilities Need a Process that Provides Timely Feedback on the Compliance Impacts of Changes to the WMPs

In Chapter IV of the Draft Guidelines, Energy Safety proposes a petition to amend process that only allows the modification of WMP targets due to a General Rate Case decision.¹ The petition to amend process would not give the utilities a timely way of understanding whether a proposed change was acceptable or whether Energy Safety would consider it to be a compliance violation. It is PG&E’s understanding that this petition to amend process would fully replace the change order process and would be the sole mechanism to request and receive approval from Energy Safety on changes to targets in a submitted WMP. The proposed process for capturing changes to WMP initiatives in the Draft Guidelines does not include sufficient time for the utilities to implement Energy Safety’s feedback. In addition, under the proposed process, the utilities are put in a position where they would have no understanding of whether Energy Safety considers a change to a WMP initiative to be a compliance violation for at least 21

¹ Draft Guidelines at 158-159.

months, potentially causing a compliance violation, and potential regulatory enforcement, to continue for multiple years.²

To make changes to WMP initiatives, based on the discussion that occurred at Energy Safety’s Draft Guidelines Workshop, PG&E understands that Energy Safety intends for each utility to explain changes to in-year targets in its Annual Report on Compliance (“ARC”).³ Energy Safety will then convey its findings as to whether this change has merit—or represents a compliance violation—to the utility in the annual Energy Safety ARC. However, given that there is a minimum 21-month gap between completion of a compliance year and issuance of the final ARC, the utility will be unable to receive feedback from Energy Safety in a timely way. Under this proposed process, the utilities will be required to wait at least 21 months—but potentially much longer depending on when the change was proposed to Energy Safety—to understand if Energy Safety finds the utility’s change to be acceptable or a compliance violation.⁴ By the time feedback is received, new programs will be significantly embedded in the operations of the utility and potential compliance violations will have been continuing for multiple years. Thus, PG&E asks Energy Safety to reinstate a process similar to the current change order process whereby a utility may request changes to targets—including an increase, decrease, or program termination—and receive timely feedback to enable the utility to integrate that feedback into the next plan year.

The inability for a utility to ask for and receive approval for changes in a timely manner could also have an unintended chilling effect on WMP targets. PG&E’s focus remains on its stand that catastrophic wildfires shall stop, and it needs some flexibility to learn from its programs, adapt to changes, and continue to improve.

Conditions that precipitate wildfires are becoming more severe, and PG&E is constantly learning and evolving its wildfire mitigation process to respond to changing conditions and reflect its best understanding of risk and appropriate risk responses. For example, in response to increased ignitions during R3+ conditions in the summer of 2024, PG&E rapidly deployed resources to understand the root cause of the increased ignitions. The in-year adjustments to the elevated climate-driven ignition risk resulted in changes to PG&E’s mitigation strategy (and in some cases, targets) during the current wildfire season yielding meaningful ignition reductions.

B. In the Future, the WMP Filing Schedule Should Be Released Simultaneously with the Draft WMP Guidelines

² Energy Safety’s Annual Reports on Compliance for the utilities are issued within 21 months of the end of the compliance year at issue. Therefore, the 2024 Energy Safety Annual Reports on Compliance will be issued by the end of September 2026, 21 months from when the work in question was completed.

³ The Energy Safety Draft Guidelines Workshop was held on November 26, 2024. A recording of the Workshop is available at the following link: <https://www.youtube.com/watch?v=ASDogFVZH2U>.

⁴ As an example, if a change is proposed by the utility in November 2025 to begin in January 2026, the utility will have no feedback from Energy Safety on whether this change was appropriate or a compliance violation until September 2028 when Energy Safety releases its 2026 ARC for the utility. This means the potential compliance violation would unnecessarily continue for 34 months before receiving feedback from Energy Safety.

To date, Energy Safety has not released a filing schedule for the 2026-2028 WMP process. It is necessary to understand when WMP-related filings are due to fully comment on the Draft Guidelines. For example, PG&E cannot comment on the appropriateness of the many changes to the WMP requirements without knowing how much time PG&E will have from the issuance of the Final Guidelines to the date the WMP or pre-submission is due.⁵ Issuing the WMP schedule at the same time as the Draft Guidelines allows the parties to offer more informed comments on the Draft Guidelines.

C. If Pre-Submission Is Required, the Same Amount of Time Should Be Provided to Prepare the WMPs as When No Pre-Submission Is Required

PG&E supports the pre-submission process but urges Energy Safety to adopt a filing schedule that provides an equal, or greater, amount of time to prepare a base year WMP (including the earlier pre-submission deadline) as is provided for a WMP update. The base WMPs are significantly longer and more complex than the WMP Update filings and require a significantly greater amount of preparation, strategy, and drafting time. A minimum of four months is needed between issuance of the Final Guidelines and submission of base WMPs. Four months is not an unreasonable amount of time to prepare these complex and lengthy documents, particularly given that each of the large utilities' most recent base WMPs were each over 900 pages. This will ensure a high quality, responsive WMP that minimizes both minor errata and substantial revisions. Since the Utilities are not allowed to alter or change their WMPs once they are pre-submitted, this four-month preparation period needs to occur before the pre-submission deadline since the pre-submission WMP is essentially identical to the final WMP.⁶ Providing the Final WMP Guidelines so as to allow sufficient WMP preparation time (from the publication of the Final WMP guidelines to the date of the pre-submission) will result in the submission of higher quality WMPs and reduce the burden on Energy Safety to identify and correct errors.

D. Discovery Should Not Be Permitted During the Pre-Submission Process

Allowing discovery on substantive WMP content during the pre-submission process (other than by Energy Safety) defeats the purpose of this process and effectively begins the WMP evaluation period months earlier. Thus, (1) the pre-submission WMP should not be discoverable; and (2) the WMP discovery period should not begin until the submission of the final WMP. As stated in the Draft Guidelines, the pre-submission process "is not a substantive review of WMP content" but instead an opportunity for Energy Safety to "first assess each electrical corporation's WMP for satisfaction of the statutory and guidelines requirements."⁷ Given that it is not a substantive review of content, which only "occurs during the WMP evaluation process," discovery should not be permitted until the evaluation process begins with

⁵ Draft Guidelines at 7-8.

⁶ The only exception to this prohibition on changing the pre-submission WMP would be if Energy Safety determines a utility's pre-submission is incomplete. An incomplete submission allows the utility to add only the missing information but would not permit any other changes to the pre-submission WMP. *See* Draft Guidelines at 7-8.

⁷ Draft Guidelines at 7.

the final submission of each Utility's WMP.⁸ The purpose of discovery is to allow for substantive evaluation of a Utility's WMP. Allowing discovery during the pre-submission process defeats this purpose and results in an evaluation process significantly greater than the three months contemplated in the statute.⁹

If Energy Safety wishes to propound discovery related to a utilities' pre-submission WMP, Energy Safety has the statutory ability to do so, as well as to set whatever response timeline it determines is appropriate. However, allowing all parties to submit substantive discovery on a utility's pre-submission WMP would create an additional evaluation period that lasts multiple months and should not be allowed.

II. ITEMS FOR CLARIFICATION

A. Clarification as to the Definitions for Initiative vs Activity vs Program vs Target

The Draft Guidelines introduce ambiguities in the definitions and use of critical terms, specifically "initiatives," "initiative activities," and "programs." These inconsistencies create challenges in ensuring alignment between our reporting structure and the Draft Guidelines.

The Draft Guidelines define "Activity" as "A specific measure, done within an initiative, designed to reduce the consequences and/or probability of wildfire or PSPS,"¹⁰ and "Initiative" as a "Measure, either proposed or in process, designed to reduce the consequences and/or probability of wildfire or PSPS."¹¹ However, the term "initiative activities" is used extensively throughout the document without definition, creating ambiguity. For example, in Section 8.2, the Draft Guidelines refer to items such as "Covered conductor installation" and "Undergrounding of electric lines and/or equipment" as "initiative activities."¹² Appendix C of the newly released Draft Data Guidelines, however, classifies these same items under the header "WMP Initiatives."¹³ This inconsistent terminology makes it unclear whether the terms "initiative activities" and "initiatives" are synonymous or represent distinct hierarchical levels. Additionally, Section 3.3 of the Draft Guidelines requires that electrical corporations use "Utility Initiative Tracking IDs" to tie together targets, narratives, initiatives, and activities.¹⁴ This implies a hierarchical relationship between initiatives and activities, not a one-to-one relationship. Clear definitions are needed to ensure that we are assigning Tracking IDs appropriately and maintaining consistency across reports.

⁸ *Id.*

⁹ Pub. Util. Code § 8386.3(a).

¹⁰ Draft Guidelines at A-1.

¹¹ *Id.* at A-8.

¹² *Id.* at 78.

¹³ Energy Safety Draft Data Guidelines v4.0 (Nov. 19, 2024) at 177.

¹⁴ Draft Guidelines at 14.

When examining the Draft Guidelines, it becomes evident that certain sections introduce additional hierarchical layers that are absent in others. For instance, in the Grid Design, Operations, and Maintenance section, there is a subsection titled “Grid Design and System Hardening,” which could be considered an initiative.¹⁵ Within this subsection, specific items such as “Covered conductor installation” are categorized as “initiative activities.”¹⁶ However, in the Vegetation Management and Inspections section, the Draft Guidelines seem to jump directly to what would be considered “initiative activities,” such as “Pole Clearing” or “Wood and Slash Management,” without an intermediary initiative-level categorization.¹⁷ This inconsistency complicates the alignment of hierarchical structures and raises questions about whether all sections should follow a uniform framework or allow for variations. In the previous WMP cycle, the QDR template included a column for “initiative activities” that aligned with the examples in Appendix C of the new Draft Data Guidelines. In the current cycle, this reference has been removed, and these items are referred to as “initiatives.” This change further blurs the distinction between “initiatives” and “activities.”

As a separate but related issue, the term “programs” appears in sections such as 9.2 (Vegetation Management Inspections) but is not defined in the glossary.¹⁸ For example, the Draft Guidelines reference “inspection programs” and require details such as program names and frequencies. It is unclear if “programs” are a subset of “initiatives,” of “activities,” or a separate categorization altogether.

To resolve this confusion, we propose the following hierarchical framework, assuming “initiative activities” are synonymous with “activities.”

Level	Definition	Examples	Example IDs
Category		Grid Design, Operations, and Maintenance; Vegetation Management and Inspection	8, 9
Initiative	Measure, either proposed or in process, designed to reduce the consequences and/or probability of wildfire or PSPS.	Grid Design and System Hardening	8.2, * there is no initiative-level within the VM section *

¹⁵ *Id.* at 78.

¹⁶ *Id.*

¹⁷ *Id.* at 97-113.

¹⁸ *Id.* at 100.

Level	Definition	Examples	Example IDs
Activity	A specific measure, done within an initiative, designed to reduce the consequences and/or probability of wildfire or PSPS.	Covered Conductor Installation; Pole Clearing	8.2.1, 9.4
Target		System Hardening - Distribution; Pole Clearing Program	GH-04, VM-02

B. Clarification as to Targets to Be Included in the Quarterly and Annual Reporting

PG&E requests clarification as to which sections contain target requirements that must be tracked in the Quarterly Notification (“QN”), Quarterly Data Report (“QDR”), and Annual Report on Compliance (“ARC”). As an example, Section 8.1 specifically requires Quality Assurance (“QA”) and Quality Control (“QC”) initiative targets associated with Section 8.5, while Section 9.1 does not similarly specify QA and QC Vegetation Management Targets associated with Section 9.10.¹⁹ Further adding to the confusion, similar to Table 8-4 in Section 8.5.1, Table 9-5 in Section 9.10.1 requires Vegetation Management (“VM”) QA and QC Program Targets.²⁰ Thus, PG&E would appreciate clarification as to the following:

- Whether Section 9.1 requires targets for VM QA/QC similar to the QA/QC targets required by Section 8.1 even though these targets are not specified.²¹ As Section 9.1 of the Draft Guidelines is currently written, PG&E would not be providing targets for VM QA/QC.²²
- Whether the QA/QC pass rate targets contained in Table 9-5 are meant to also be reflected in Table 9-1 of Section 9.1.²³ As the Draft Guidelines are currently written, the QA/QC pass rates in Table 9-5 would not be included in Table 9-1.
- Whether there are any other sections—aside from 8.1, 9.1, 10.1, 11.1, and 12.1—that contain targets that will also be required to be reported in the QDR, QN or ARC. As the Draft Guidelines are currently written, it does not appear that the utilities need to report targets in the QDR, QN or ARC for sections other than those identified above.

C. Clarification as to Vegetation Management Planned Improvements

¹⁹ *Id.* at 75 and 97-98.

²⁰ *Id.* at 89 and 108.

²¹ *See id.* at 75-77 for Section 8.1

²² *See id.* at 97-98 for Section 9.1.

²³ *See id.* at 99 for Table 9-1 and at 108 for Table 9-5.

PG&E notes several items that appear to be typographical errors and requests clarification as to the following:

- Section 9.5.4 is related to wood and slash management, but the last sentence of this section instructs the utilities to: “Discuss any planned improvements or updates to pole clearing and the timeline for implementation.”²⁴ PG&E requests clarification as to whether this should instead refer to wood and slash management.
- Section 9.7.4 is related to Integrated Vegetation Management (“IVM”) but the last sentence of this section instructs the utilities to: “Discuss any planned improvements or updates to pole clearing and the timeline for implementation.”²⁵ PG&E requests clarification as to whether this should instead refer to IVM.
- Section 9.8.4 is related to activities based on weather conditions, but the last sentence of this section instructs the Utilities to: “Discuss any planned improvements or updates to pole clearing and the timeline for implementation.”²⁶ PG&E requests clarification as to whether this should instead refer to activities based on weather conditions.
- Section 9.9.4 is related to post-fire service restoration, but the last sentence of this section instructs the Utilities to: “Discuss any planned improvements or updates to pole clearing and the timeline for implementation.”²⁷ PG&E requests clarification as to whether this should instead refer to post-fire service restoration.

D. Clarification as to Climatological Wildfire Risks and the Granularity of Risk Drivers

In Section 3.4 of the Draft Guidelines, entitled a ‘Prioritized List of Wildfire Risks and Risk Drivers,’ electrical corporations are required to provide topographical and climatological risk factors associated with each risk and risk driver.²⁸ PG&E seeks clarity on whether climatological risk factors are limited to current climatological conditions or if PG&E must evaluate future conditions as examined in the Climate Adaptation and Vulnerability Assessment (“CAVA”). As it is currently written, PG&E interprets this section to include only current topographical and climatological risk factors. PG&E notes that in its past WMP submittals, PG&E included forward-looking views of projected wildfire ignition risk (from all sources) as influenced by climate change. The best available climate projections for wildfire risks for California validate the geographic scope of current wildfire mitigation activities, as wildfire risk is projected to intensify in currently designated High Fire Threat District (“HFTD”) zones and spread around the margins of current HFTD zones.

PG&E further notes that risk drivers vary depending on location in PG&E’s service territory and that system-wide risk drivers may not provide meaningful information. PG&E requests further clarity on whether Energy Safety prefers that utilities present prioritized lists of

²⁴ *Id.* at 103.

²⁵ *Id.* at 104.

²⁶ *Id.* at 105.

²⁷ *Id.* at 106.

²⁸ *Id.* at 14-19.

drivers at a more granular level to reflect the diversity of their service territory (e.g. at the regional or circuit protection zone level).

E. Clarification as to What Should be Included in Initiative Activity Scheduling

PG&E seeks to confirm its understanding of Section 6.1.3.3, entitled ‘Initiative Activity Scheduling,’ as only applying to initiatives in which: (1) a single project takes multiple years to implement; and (2) PG&E determines that interim mitigation measures are necessary.²⁹ PG&E’s understanding is that this would not apply to initiatives where targets are staggered across multiple years, but where work is completed in a given year. For example, installation of covered conductor will occur across multiple years, but execution of a specific project can occur within a one-year time frame.

F. Clarification as to the Risk Reduction for Enterprise Systems

PG&E seeks clarification as to Section 12.1.2, entitled ‘Quantitative Targets,’ where Energy Safety requires Utilities to provide the expected percentage of risk reduction for the enterprise system over each year of the three-year WMP.³⁰ Enterprise systems enable the risk reducing mitigations they support but in and of themselves do not directly reduce risk. PG&E seeks guidance on how Energy Safety envisions utilities might measure and report on risk reduction from enterprise systems. As the Draft Guidelines are currently written, PG&E interprets only qualitative targets being required for enterprise systems and that the “expected % risk reduction” fields in Table 12-1 would be marked “not applicable” to enterprise systems.

G. Undergrounding Requirements in the WMP Should Not Overlap or Be Inconsistent with Those of the Electric Undergrounding Plan

PG&E notes that there are requirements related to undergrounding in the Draft Guidelines that will likely overlap with the requirements currently being created in Energy Safety’s Electric Undergrounding Plan (“EUP”).³¹ PG&E urges Energy Safety to coordinate the requirements and clarify that the requirements in the WMP not contradict, overlap or become inconsistent with those of the EUP. Ensuring there are no conflicts between the two sets of requirements will further a clear understanding of the plans and prevent potential confusion and additional work.

PG&E also notes that there are some items related to undergrounding in the WMP—such as the requested trend analysis showing how implementation of mitigation activities reduce risk over time in Section 8.2—that PG&E is not currently capable of performing but will be capable of performing in the future as part of the EUP.³² PG&E urges Energy Safety to clarify that this

²⁹ *Id.* at 64-65.

³⁰ *Id.* at 150-151.

³¹ For example, *see id.* at 24, 62, 66, 70, 72, and 78-80.

³² *Id.* at 79.

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information may be submitted in the future as part of the EUP if it is not available when the WMP is filed.

CONCLUSION

We appreciate Energy Safety's continuous efforts to refine and improve the WMP process and we look forward to continuing to work with Energy Safety and other stakeholders to promote wildfire safety.

Should you have any questions, please do not hesitate to contact the undersigned at.

Very truly yours,

/s/ Jay Leyno

Jay Leyno