December 6, 2024 Via Electronic Filing

Caroline Thomas Jacobs, Director

Office of Energy Infrastructure Safety

California Natural Resources Agency

Sacramento, CA 95814

<https://efiling.energysafety.ca.gov/>

Subject: Comments of the Public Advocates Office on Draft WMP Guidelines (Package 1)

Docket: WMP-Guidelines

Dear Director Thomas Jacobs,

The Public Advocates Office at the California Public Utilities Commission (Cal Advocates) respectfully submits the following comments regarding the Draft Wildfire Mitigation Plan Guidelines (Package 1), which the Office of Energy Infrastructure Safety issued on November 12, 2024. 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,

/s/ ***Marybelle Ang***

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APPENDIX A

# INTRODUCTION

On March 4, 2024, the Office of Energy Infrastructure Safety (Energy Safety) solicited public input on the next iteration of its guidelines for 2026-2028 wildfire mitigation plans (WMPs).[[1]](#footnote-1) The Public Advocates Office at the California Public Utilities Commission (Cal Advocates) submitted comments on April 8, 2024.[[2]](#footnote-2)

On November 12, 2024, Energy Safety issued the first package of its Draft Wildfire Mitigation Plan Guidelines (Draft 2026-2028 WMP Guidelines) and invited public comments to be submitted by December 6, 2024.[[3]](#footnote-3) On November 26, 2024, Energy Safety hosted a workshop regarding the Draft 2026-2028 WMP Guidelines. Pursuant to the cover letter of the Draft 2026-2028 WMP Guidelines, Cal Advocates timely submits these comments. Our recommendations aim to improve the clarity, transparency, and overall effectiveness of the Draft 2026-2028 WMP Guidelines and data reporting standards, to ensure that they serve the needs of all stakeholders.

# Technical ISSUES

## Energy Safety should require utilities to use realistic and comparable assumptions to evaluate system hardening mitigations.

The Draft 2026-2028 WMP Guidelines require utilities to discuss 13 distinct grid design and system hardening mitigations they plan to use.[[4]](#footnote-4) For each mitigation, utilities are required to report the anticipated risk reduction and provide a detailed list of the assumptions used, along with their justifications.[[5]](#footnote-5)

However, this section does not establish a framework for how the utility should estimate risk reduction or determine appropriate assumptions. The Guidelines furthermore do not require a utility to evaluate whether initiatives are cost-effective.

### Energy Safety should set guiding principles for utility assumptions.

Cal Advocates previously showed that utilities have used inappropriate assumptions[[6]](#footnote-6) and prioritized programs with low cost-effectiveness.[[7]](#footnote-7) Energy Safety should revise the Draft 2026-2028 WMP Guidelines to establish guiding principles for utility assumptions. For example, utilities should base the estimated risk reduction for a given mitigation on actual, observed values in areas where that mitigation has been deployed; the utility should minimize its reliance on Subject Matter Expert (SME) judgement.[[8]](#footnote-8) As another example, cost estimates should be based on actual historical costs, with reasonable (and clearly identified) adjustments for inflation and other predictable trends.[[9]](#footnote-9)

### Energy Safety should require utilities to evaluate reasonable sets of mitigations.

Cal Advocates previously showed that utilities do not always evaluate reasonable and realistic combinations of mitigations.[[10]](#footnote-10) The Draft 2026-2028 WMP Guidelines state, with regard to risk reduction and implementation costs, “Where mitigations can be feasibly deployed in combination, the electrical corporation must compare these portfolios of mitigations.”[[11]](#footnote-11)

The Draft 2026-2028 WMP Guidelines list 13 distinct mitigations,[[12]](#footnote-12) but do not instruct utilities on how to evaluate feasible combinations of these or other mitigations. This omission may lead to utilities conducting poor comparisons between standalone mitigations (instead of realistic combinations of complementary mitigations). For instance, a comparison of undergrounding versus covered conductor, without considering the use of fast-trip settings, artificially reduces the perceived benefit and cost-effectiveness of the covered conductor option, thereby skewing the results.[[13]](#footnote-13)

Energy Safety should revise section 8.2 of the Draft 2026-2028 WMP Guidelines to incorporate similar language as it employs in Section 6.1.3.1, so as to specifically require utilities to evaluate the risk reduction and implementation cost of *combinations* of mitigations “where mitigations can be feasibly deployed in combination.”

## Energy Safety should require additional information on the circuits most affected by protective equipment settings.

The Draft 2026-2028 WMP Guidelines include a data table regarding the “Top Ten Impacted Circuits from Changes to Protective Equipment and Device Settings (PEDS) in the past Three Years” (Top Ten table).[[14]](#footnote-14) The Top Ten table could be improved with additional information, since it only has four columns.[[15]](#footnote-15) Table 1 below shows the columns that should be added and provides Cal Advocates’ reasoning for each addition.

|  |  |
| --- | --- |
| **Table 1: Additions to Top Ten table** | |
| **Columns to add** | **Reason for adding data** |
| Division or district | Enables analysis of regional trends. |
| Circuit name | Allows matching to other data sources. |
| Substation | Enables analysis of local trends and identifying substations where rapid earth fault current limiters (REFCL) could be applicable. |
| Customer accounts served by the circuit (3-year average)[[16]](#footnote-16) | Enables analysis of percentage customers impacted on a circuit. |
| Unique number of customer accounts impacted by outages (3-year average)[[17]](#footnote-17) | Enables comparisons of unique customer accounts compared to the cumulative number of customer accounts impacted. |
| Total circuit miles | Enables analysis of unit costs for mitigation measures and cost-effective options. |
| Percentage overhead | Enables analysis of system hardening options. |
| Percentage underground | Enables analysis of how PEDS affect overhead and underground circuits differently. |
| High Fire Threat District (HFTD) category | Enables analysis of circuits affected by changes to PEDS in HFTDs and non-HFTDs. |

## Energy Safety should specify the data quality and reporting outcomes it envisions for Quality Assurance and Quality Control (QA/QC) data.

The Draft 2026-2028 WMP Guidelines require utilities to discuss and report on their Quality Assurance and Quality Control (QA/QC) programs, procedures, and data related to asset inspections and vegetation management.**[[18]](#footnote-18),** **[[19]](#footnote-19)** Energy Safety made beneficial revisions reflected in the Draft 2026-2028 WMP Guidelines: these require the utilities to report on program objectives and sample methodology, pass rate calculations, and other metrics that evaluate the effectiveness of QA/QC by the utilities.**[[20]](#footnote-20),** **[[21]](#footnote-21)**

However, the Draft 2026-2028 WMP Guidelines do not establish the expected outcomes which Energy Safety expects the utilities to reach, in terms of the types and quality of QA/QC data that utilities will report during the upcoming 2026-2028 WMP cycle. Additionally, the Draft 2026-2028 WMP Guidelines do not address potential repercussions or remedies if utilities fail to meet the standards that Energy Safety sets forth in WMP guidelines or decisions approving WMPs. Thus, Energy Safety should improve the guidelines by setting QA/QC objectives and discussing remedies for non-compliance, as described below.

### Energy Safety should set expected objectives for utility reporting on Quality Assurance and Quality Control data for the 2026-2028 WMP cycle.

Cal Advocates has previously demonstrated utilities’ shortcomings related to QA/QC data reported within the WMPs.**[[22]](#footnote-22)** These shortcomings include the routine failure to report QA/QC data in the appropriate format or units (as required by previous WMP guidelines).**[[23]](#footnote-23)** Energy Safety should revise the Draft 2026-2028 WMP Guidelines to establish expected objectives on the reporting of QA/QC programs and procedures, and expected outcomes by the end of the 2026-2028 WMP cycle. For example, all utilities should be required to report QA/QC data in comparable units (which should be specified in the WMP guidelines) by the time they submit their next comprehensive WMPs (for 2026-2028). Utilities should also achieve any additional Energy Safety requirements by the end of the upcoming WMP cycle (2026-2028 WMP cycle).

### Energy Safety should describe consequences for any failure to accurately report QA/QC data.

The utilities’ reporting on their WMP QA/QC programs has been an ongoing issue throughout the past WMP cycles. To prevent this issue from arising in upcoming WMP cycles, Energy Safety should include language within the 2026-2028 WMP Guidelines to address what happens when utilities fail to meet Energy Safety’s standards.

As the Draft 2026-2028 WMP Guidelines currently stand, there is no discussion of potential remedies and repercussions if utilities fail to meet the reporting standards. Energy Safety should update the Draft 2026-2028 WMP Guidelines to describe options, including the outright denial of a submitted WMP, for failure to comply with the guidelines. Energy Safety should revise Sections 8.5 and 9.10, by adding the language proposed below to the end of each section.**[[24]](#footnote-24),** **[[25]](#footnote-25)**

Section 8.5.8: Failure to Report QA and QC Data Related to Asset Inspections.

* In this section, the electrical corporation must follow the requirements related to reporting QA and QC data for Asset Inspections contained in the WMP Guidelines and in the Areas for Continued Improvement contained in previous decisions issued by Energy Safety. Should an electrical corporation’s QA and QC data not meet the standards set forth by the Guidelines or previous Energy Safety decisions, Energy Safety may deny the electrical corporation’s submitted WMP or WMP Update, conduct supplemental audits of records and data, conduct supplemental compliance inspections, refer the non-compliance to the California Public Utilities Commission (CPUC) for enforcement action, or require the electrical corporation to undertake other remedial actions (the costs of which should be tracked in a distinct sub-account of the electrical corporation’s WMP memorandum account so that the CPUC can review them for reasonableness).

Section 9.10.8: Failure to Report QA and QC Data Related to Vegetation Management.

* In this section, the electrical corporation must follow the Guidelines related to reporting QA and QC data for Vegetation Management. Should an electrical corporation’s QA and QC data not meet the standards set forth by the Guidelines, Energy Safety reserves the right to deny the electrical corporations submitted WMP or WMP Update. Should an electrical corporation’s QA and QC data not meet the standards set forth by the Guidelines or previous Energy Safety decisions, Energy Safety may deny the electrical corporation’s submitted WMP or WMP Update, conduct supplemental audits of records and data, conduct supplemental compliance inspections, refer the non-compliance to the CPUC for enforcement action, or require the electrical corporation to undertake other remedial actions (the costs of which should be tracked in a distinct sub-account of the electrical corporation’s WMP memorandum account so that the CPUC can review them for reasonableness).

It is prudent for Energy Safety to include this language within the current Draft 2026-2028 WMP Guidelines and at the beginning of a WMP cycle, to set expectations prior to the new WMP cycle. The additional language would strengthen the 2026-2028 WMP Guidelines, provide clarity, and help prevent further utility non-compliance with the WMP Guidelines and Areas of Continued Improvement.

## Energy Safety should require utilities to include actual WMP expenditures from the prior WMP cycle.

The Draft 2026-2028 WMP Guidelines direct utilities to report their projected WMP expenditures for the upcoming WMP cycle’s three years.[[26]](#footnote-26) WMP costs have generally risen year after year throughout the past two WMP cycles, as indicated in the following table of0PG&E’s actual WMP expenditures for 2020-2023.

**PG&E’s WMP Expenditures (Thousands of Dollars)**

|  |  |
| --- | --- |
| Year | Actual Expenditures |
| 2020[[27]](#footnote-27) | $4,287,104 |
| 2021 | $4,673,631 |
| 2022 | $5,310,302 |
| 2023[[28]](#footnote-28) | $5,205,235 |
| 2024 (projected) | $6,173,839 |
| 2025 (projected) | $6,358,224 |

Actual cost data from the past WMP cycle indicates that PG&E’s annual WMP expenditures rose by nearly $1 billion from 2020 to 2023 and are expected to rise another $1.1 billion by 2025. However, actual 2023 costs were not reported in the 2025 WMP Update, and the Draft 2026-2028 WMP Guidelines do not require reporting on actual costs from 2023-2025. This omission limits transparency on these rising WMP expenditures.[[29]](#footnote-29)

Energy Safety should update the Draft 2026-2028 WMP Guidelines to require utilities to report actual recorded WMP expenditures from the previous WMP cycle alongside the California Public Utilities Commission (CPUC) authorized levels.[[30]](#footnote-30) Additionally, Energy Safety should ensure that guidelines for future WMP Updates require utilities to update the table with the actual expenditure data for the most recent completed plan year, the CPUC authorized levels, and a current forecast for the year that is underway.

# DATA TABLES

## Energy Safety should require practical and accessible data formats in the Draft 2026-2028 WMP Guidelines.

Section 2.1.1 of the Draft 2026-2028 WMP Guidelines requires the utilities to, “submit an excel file matching the information in each table within its WMP.”**[[31]](#footnote-31)** Additionally, to enhance accessibility and uniformity, the Excel files submitted to Energy Safety must adhere to specific formatting requirements.**[[32]](#footnote-32)**

### Energy Safety should provide explicit guidance on accessible data file formats.

While the Draft 2026-2028 WMP Guidelines use naming and formatting requirements for data files,**[[33]](#footnote-33)** it does not specifically require accessible formats. For example, the Guidelines do not specifically ask that data be provided in widely usable formats such as CSV to facilitate independent analysis and integration with other datasets.**[[34]](#footnote-34)** Requiring accessible formats would enhance usability for stakeholders, and ensure that data can be efficiently analyzed.

### Energy Safety should require the provision of raw data to support graphs, maps, and figures.

The Draft 2026-2028 WMP Guidelines do not require the provision of the raw data that underpins graphs, maps, and figures,**[[35]](#footnote-35)** nor does it ensure that this data is provided in a format that can be directly accessed and analyzed.**[[36]](#footnote-36)** Adding these requirements would enable Energy Safety and stakeholders to verify the accuracy of the visual representations or to perform independent analyses. Without access to raw data, users are forced to rely on static graphs, maps, and figures provided by the utility.

### Energy Safety should include a requirement for detailed footnotes or metadata.

The guidelines also lack a requirement for detailed footnotes or metadata within data files, which is essential for contextual clarity. For instance, a table of wildfire ignition events should include a footnote specifying the data source (such as CAL FIRE’s incident database), along with a description of the criteria used to classify events as reportable ignitions.

Without footnotes or metadata, stakeholders are deprived of the data’s origin and underlying assumptions. This hinders stakeholders’ ability to interpret and utilize the information effectively. Therefore, Energy Safety should:

* Revise the Draft 2026-2028 WMP Guidelines to explicitly require data to be provided in accessible and widely usable formats, such as CSV, to support independent analysis and integration with other datasets.
* Update the Draft 2026-2028 WMP Guidelines to require the provision of raw data to support graphs, maps, and figures. This data should be submitted in an accessible and analyzable format.
* Amend the Draft 2026-2028 WMP Guidelines to require detailed footnotes and metadata within data files to clarify data origins and provide context regarding assumptions or criteria.

Energy Safety should update the Draft 2026-2028 WMP Guidelines to close gaps in data accessibility. Cal Advocates’ recommendations aim to enhance the usability and transparency of information in WMP submissions, facilitating more effective evaluation and oversight.

## Energy Safety should refine Table 3-1 for clearer risk prioritization.

While Table 3-1 includes a priority column, the risk drivers are not arranged in a logical or sequential order based on their assigned priorities (e.g., from highest to lowest).**[[37]](#footnote-37)** As shown in the sample figure below, with example rankings in red for emphasis, this misalignment diminishes the table’s clarity and effectiveness, making it more difficult for stakeholders to interpret the information.



Energy Safety should add outage-related data to Table 3-1 to enhance the connection of wildfire risks with broader operational impacts. Including this data would provide a more comprehensive view of how these risks affect system operations and public safety. Additionally, defining a clear timeframe for the reported metrics would enhance consistency, enabling more meaningful trend analysis and cross-comparisons. These improvements would significantly increase the table’s effectiveness in addressing wildfire risk drivers.

### Energy Safety should require sequential ordering of risks by priority.

Currently, the risks identified in Table 3-1 are not arranged according to their relative importance or priority.**[[38]](#footnote-38)** Energy Safety should revise the table so that risks are listed in a clear, sequential order based on their assigned priority level. If the priority column includes non-sequential risk priorities dispersed throughout the table, this may diminish the table’s utility. Consistent ordering enhances readability and ensures stakeholders can quickly identify and examine the most critical risks.

### Energy Safety should require utilities to provide outage data.

Table 3-1 should be expanded to include outage-related metrics by linking wildfire risks to their operational consequences to provide a more comprehensive perspective. Energy Safety should add the following columns of data:

* The frequency of outages (annual average number since 2019) associated with each risk in the table.
* The duration of outages (annual average customer hours of interruption, since 2019)[[39]](#footnote-39) associated with each risk in the table.

Including these data fields will ensure that Table 3-1 not only identifies risks but also highlights their implications for system operations and public safety and reliability.

### Energy Safety should define timeframes for data consistency.

Table 3-1 should be revised to define the timeframe for the reported data. Establishing a standardized reporting period allows stakeholders to evaluate the effectiveness of risk mitigation measures over time and benchmark performance against other utilities. Without a specific timeframe, a table entry could represent data from one year, five years, or an undefined period, leading to confusion about the scale and urgency of the risk. Cal Advocates recommends that the data in Table 3-1 be calculated based on the average of the 2019-2024 period.[[40]](#footnote-40)

The improvements described above will make Table 3-1 a more effective tool for prioritizing wildfire risks, evaluating operational impacts of those risks, and guiding strategic mitigation efforts.

## Energy Safety should enhance reporting on wildfire history in Table 4-2.

Table 4-2 includes data on catastrophic wildfires in each utility’s service territory, which largely replicates data that is available from authoritative sources such as CAL FIRE or the U.S. Forest Service.**[[41]](#footnote-41)** While the data in Table 4-2 is valuable, it focuses solely on high-consequence wildfires and overlooks smaller ignitions that may not meet reporting thresholds.**[[42]](#footnote-42)** This scope limits the table’s ability to provide a comprehensive understanding of wildfire risk, since smaller recurring ignitions could indicate systemic vulnerabilities or emerging trends.

### Energy Safety should require utilities to provide geospatial data on smaller fires.

Utilities should be required to augment their geospatial data submissions to include smaller, potentially non-reportable ignitions that are currently excluded.**[[43]](#footnote-43)** These smaller events, while not individually catastrophic, may be early indicators of risk factors such as equipment vulnerabilities, vegetation management challenges, or localized environmental conditions. Incorporating these ignitions would create a more complete risk picture and would improve utilities’ ability to identify wildfire risks proactively.

### Energy Safety should require utilities to identify the causes of all utility-related wildfires in their territories, not just catastrophic ones.

Energy Safety should broaden Table 4-2 to include causes of all fires, not just those classified as catastrophic.**[[44]](#footnote-44)** Specifically, utilities should report the best available causal information.[[45]](#footnote-45) Understanding the root causes of smaller incidents can improve risk analysis and uncover patterns that might otherwise go unnoticed. For example, frequent, small ignitions caused by equipment failures in a specific region, or by failure of a particular type of equipment, could signal the need for targeted infrastructure upgrades. Similarly, a pattern of ignitions linked to vegetation might inform enhanced vegetation management practices.

Cal Advocates’ recommendations regarding Table 4-2 will enable utilities and stakeholders to track trends more effectively and evaluate mitigation efforts at a granular level. In this way, Energy Safety can drive a more proactive approach to evaluating wildfire prevention.

## Energy Safety should require utilities to provide detail about corrective actions in Table 4-3.

Table 4-3 provides data on frequently deenergized circuits during planned outages. Based on this information, Energy Safety should require utilities to clearly outline the corrective actions they have taken or plan to take, incorporating lessons learned from PSPS outage reporting.**[[46]](#footnote-46)**

Energy Safety should improve Table 4-3 by including timelines and requiring utilities to provide updates in subsequent WMP submissions. This will allow stakeholders to monitor the implementation, and evaluate the effectiveness, of these corrective measures over time.

### Energy Safety should link corrective actions to lessons.

Energy Safety should add a “lessons” column in Table 4.3 to describe issues that the utility identified during PSPS events. This enhancement would help to bridge the gap between recognizing problems and resolving them, and thereby foster greater accountability. Utilities should explicitly link lessons with actionable steps. Stakeholders will then be able to better evaluate whether utilities are effectively addressing the root causes of challenges encountered during PSPS events.

### Energy Safety should establish timelines and progress updates for corrective actions.

Utilities should clearly define the timeframe for implementing each corrective action, to provide a roadmap for when identified issues will be resolved. To ensure ongoing transparency, utilities should include progress updates on these measures in subsequent WMP submissions, allowing for the evaluation of the measures’ effectiveness over time.

For example, if delayed customer notifications are identified as a key issue during a PSPS event, the utility should document planned corrective actions, such as upgrading notification systems, specify a completion timeframe (e.g., six months), and report on the deployment and outcomes in the next WMP submission. This approach promotes accountability and demonstrates a commitment to continuous improvement.

In conclusion, Energy Safety should enhance the quality and accountability of PSPS reporting, to ensure that utilities not only learn from past events but also take meaningful action to address identified issues. By adopting the improvements to Table 4-3 that are described above, Energy Safety will promote a more proactive and transparent approach to PSPS event management. This not only supports better risk mitigation and operational efficiency but also reinforces the public’s trust.

# PROCEDURAL and scheduling ISSUES

In comments filed on May 6, 2022 and April 8, 2024 regarding WMP guidelines, Cal Advocates proposed several ways to improve the WMP process.[[47]](#footnote-47) Our previous recommendations remain applicable. Cal Advocates hereby incorporates those comments herein and urges Energy Safety to review and incorporate those recommendations into the 2026-2028 WMP Guidelines.

## Energy Safety should direct PG&E, PacifiCorp, and Liberty to submit comprehensive WMPs in 2025, and require SCE, SDG&E, and BVES to submit WMP Updates.

In 2023, six electric utilities[[48]](#footnote-48) submitted comprehensive WMPs (or “base WMPs”), which covered the period from 2023 through 2025. These documents were extensive, complicated, and lengthy.[[49]](#footnote-49) Such lengthy documents impose significant resource requirements on intervenors as well as on Energy Safety. It takes considerable time and effort to review, analyze, and draft substantive comments on these plans.

In contrast, the WMP Updates submitted in 2025 were much shorter. Under the current schema, a substantial burden is placed on Energy Safety and intervenors for years in which six comprehensive WMPs are submitted, while a much lighter burden exists in the years when utilities submit updates.

Energy Safety should stagger the submission of base WMPs to spread the workload more evenly across the three years of a WMP cycle. The upcoming submissions in 2025 present a unique opportunity to implement this change. Currently, each electrical corporation must submit a comprehensive WMP at least once every three years.[[50]](#footnote-50) All six utilities submitted comprehensive WMPs in early 2023. Per statute, a new comprehensive WMP is not required until 2026. Energy Safety can take advantage of this situation to distribute the burden of reviewing comprehensive WMPs across the next two years, rather than compacting all six into 2025.

While none of the utilities have yet submitted a WMP for the 2026 planning year, Energy Safety can take advantage of the current timing by directing certain utilities to extend their current (already approved) base WMPs. The selected utilities would file an additional WMP update to address 2026, using the existing guidelines for WMP updates.

Cal Advocates proposes the following schedule for 2025:

* SCE, SDG&E, and BVES submit comprehensive WMPs in 2025, covering the period from 2026-2028.
* PG&E, PacifiCorp, and Liberty submit WMP Updates in 2025, covering the year 2026. These utilities would then submit comprehensive WMPs in 2026 for the period of 2027-2029.

Cal Advocates recommends these groupings for several reasons. First, it separates the electric utilities into northern and southern groups. Second, this schedule aligns with general rate case (GRC) applications for at least two of the large utilities.[[51]](#footnote-51) It is sensible to synchronize new comprehensive WMPs with GRC cycles, because it encourages the utilities to coordinate their program design and investment choices across these two large filings. Third, PG&E’s WMPs have required the most time and have historically presented the most difficult policy issues. Therefore, since there must be a year (due to the statutory requirements and timing of the last comprehensive WMP filings) in which only one large utility files a comprehensive WMP, it is appropriate for PG&E to be that utility. Fourth, SDG&E has typically presented fewer major concerns than the other large utilities, and so it is appropriate for it to be paired with another large utility.

The comprehensive WMP submissions should adhere to the Draft 2026-2028 WMP Guidelines (the focus of these comments). Meanwhile, the utilities selected to file additional WMP updates for 2026 should follow the 2025 WMP Update Guidelines, published in January of 2024.[[52]](#footnote-52)

This approach would significantly even out workloads over time. It would also reduce the burden on all parties (including Energy Safety and the utilities) that arises from submitting and reviewing six comprehensive WMPs in one year. Additionally, the WMPs filed in 2026 would benefit from any adjustments based on lessons learned from the comprehensive WMP filing made in 2025.

Moreover, on October 30, 2024, Governor Newsom issued an executive order (N-5-24) that directs the CPUC and Energy Safety to ensure that utility investments and activities are focused on cost-effective wildfire mitigation measures.[[53]](#footnote-53) The governor’s executive order signals the need for clear alignment between WMP programs and utility costs, which are addressed in GRCs. As such, it is reasonable to expect continued interest in staggering WMP submissions to coordinate with GRC applications. It would therefore be beneficial for Energy Safety to begin this process now, to work out any complications in the process prior to a change in statute.

## Energy Safety should work with the CPUC to require alignment between the cost-accounting used in GRCs and WMPs.[[54]](#footnote-54)

Wildfire mitigation costs have increased substantially since 2020 and have been the subject of significant debate in GRCs.**[[55]](#footnote-55)** While Energy Safety and the CPUC have differing roles in approving programs and spending, they have a common interest in ensuring transparency of potential wildfire mitigation costs and benefits. In addition, Executive Order N-5-24 directs Energy Safety and the CPUC to consult with each other to reduce wildfire risk and manage ratepayer costs.**[[56]](#footnote-56)**

To promote transparency, affordability, and effective regulatory oversight, Energy Safety should require each WMP to identify the applicable GRC accounting category for each WMP initiative. For example, PG&E categorizes spending in GRC proceedings into Major Work Categories (MWC). Each Major Work Category contains several Maintenance Activity Type (MAT)codes for various functions within the category. These MWC-MAT code combinations do not always track cleanly to WMP programs as structured in the WMP guidelines. Requesting this mapping from the utilities on a program-by-program basis is labor-intensive. Aligning cost-accounting between the GRC and WMP would improve the ability of intervenors to understand wildfire mitigation programs and track utility performance. Appendix A provides an illustrative example of how accounting categories can be matched in a logical way.

# CONCLUSION

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

Respectfully submitted,

/s/ ***Marybelle Ang***

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**Appendix A**

The following tables are intended to illustrate how activities can be defined and categorized in helpful or unhelpful ways. A logical mapping across proceedings allows regulators and stakeholders to track utility activities, performance targets, cost forecasts, and actual spending over time. These tables are intended purely for illustrative purposes.

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| **Example 1: Logical mapping between proceedings** | | | | |
| **GRC program definitions** | | **WMP initiative definitions** | | |
| Asset Inspections – Distribution | Compliance | Patrol | Compliance | Asset Inspections – Distribution |
| Enhanced | Detailed ground | Enhanced |
| Aerial |
| Asset Inspections – Transmission | Compliance | Patrol | Compliance | Asset Inspections – Transmission |
| Enhanced | Detailed ground | Enhanced |
| Climbing |
| Aerial |

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| **Example 2: Poor mapping between proceedings** | | | | | |
| **GRC program definitions** | | **WMP initiative definitions** | | | |
| Asset Inspections – Compliance | Distribution | Asset Inspections – Distribution | | Asset Inspections – Transmission | |
| Transmission | Compliance | Enhanced | Compliance | Enhanced |
| Asset Inspections – Enhanced | Distribution | Patrol | * Detailed ground * Aerial | Patrol | * Detailed ground * Climbing * Aerial |
| Transmission |

1. Office of Energy Infrastructure Safety, *Soliciting Public Input for Next Iteration of WMP Guidelines*, March 4, 2024, docket WMP-Guidelines. [↑](#footnote-ref-1)
2. Public Advocates Office, *Input for Next Iteration of WMP Guidelines*, April 8, 2024 in docket WMP-Guidelines. [↑](#footnote-ref-2)
3. Office of Energy Infrastructure Safety, *Draft Wildfire Mitigation Plan Guidelines (Package 1)*, November 12, 2024, docket WMP-Guidelines (Draft 2026-2028 WMP Guidelines). [↑](#footnote-ref-3)
4. Draft 2026-2028 WMP Guidelines at 78 (Section 8.2). [↑](#footnote-ref-4)
5. Draft 2026-2028 WMP Guidelines at 78-79. [↑](#footnote-ref-5)
6. See, e.g., *Comments of the Public Advocates Office on PG&E’s 2025 Wildfire Mitigation Plan Update* at 36-38, May 7, 2024 in docket 2023-2025-WMPs; *Public Advocates Office’s Informal Comments on the Staff Proposal for the SB 884 Program* at 9-10, September 27, 2023 in docket 2023-UPs. [↑](#footnote-ref-6)
7. See, e.g., *Comments of the Public Advocates Office on PG&E’s 2025 Wildfire Mitigation Plan Update* at 41-42, May 7, 2024 in docket 2023-2025-WMPs. [↑](#footnote-ref-7)
8. For example, Cal Advocates previously noted that PG&E’s estimate for undergrounding effectiveness was higher than observed, while its estimate for covered conductor was lower than observed. This can skew effectiveness and cost-benefit ratio estimates. See, e.g., *Comments of the Public Advocates Office on PG&E’s 2025 Wildfire Mitigation Plan Update* at 36-37, May 7, 2024. [↑](#footnote-ref-8)
9. For example, Cal Advocates previously noted that PG&E’s unit cost estimate for covered conductor in 2023 was nearly double its actual recorded costs in prior years. See, e.g., *Comments of the Public Advocates Office on the 2023 to 2025 Wildfire Mitigation Plans of the Large Investor-Owned Utilities*, footnote 10 at 10, May 26, 2023. [↑](#footnote-ref-9)
10. See, e.g., *Comments of the Public Advocates Office on PG&E’s 2025 Wildfire Mitigation Plan Update* at 36-38, May 7, 2024. [↑](#footnote-ref-10)
11. Draft 2026-2028 WMP Guidelines at 61-62 (Section 6.1.3.1). [↑](#footnote-ref-11)
12. Draft 2026-2028 WMP Guidelines at 78 (Section 8.2). [↑](#footnote-ref-12)
13. See, e.g., *Comments of the Public Advocates Office on PG&E’s 2025 Wildfire Mitigation Plan Update*, at 13-14 and 38, May 7, 2024. [↑](#footnote-ref-13)
14. Draft 2026-2028 WMP Guidelines at 94 (Table 8-7). [↑](#footnote-ref-14)
15. The four columns are circuit ID, number of outages in past three years, cumulative outage duration, and cumulative number of customer accounts impacted by outages. [↑](#footnote-ref-15)
16. 3-year average data should be used as this column might have a unique number each year. [↑](#footnote-ref-16)
17. 3-year average data should be used as this column will have a unique number each year. [↑](#footnote-ref-17)
18. Draft 2026-2028 WMP Guidelines at 86-91 (Section 8.5). [↑](#footnote-ref-18)
19. Draft 2026-2028 WMP Guidelines at 106-110 (Section 9.10). [↑](#footnote-ref-19)
20. Draft 2026-2028 WMP Guidelines at 86-91. [↑](#footnote-ref-20)
21. Draft 2026-2028 WMP Guidelines at 106-110. [↑](#footnote-ref-21)
22. See, e.g., *Comments of the Public Advocates Office on PG&E’s 2025 Wildfire Mitigation Plan Update* at 31-32, May 7, 2024. [↑](#footnote-ref-22)
23. See, e.g., *Comments of the Public Advocates Office on SDG&E’s 2025 Wildfire Mitigation Plan Update* at 12-13, May 7, 2024. [↑](#footnote-ref-23)
24. In Section 8.5, Energy Safety should add a sub-section titled: *Section 8.5.8: Failure to Report QA and QC Data Related to Asset Inspections.* [↑](#footnote-ref-24)
25. In Section 9.10, Energy Safety should add a sub-section titled: *Section 9.10.8: Failure to Report QA and QC Data Related to Vegetation Management.* [↑](#footnote-ref-25)
26. Draft 2026-2028 WMP Guidelines at 21 (Table 3-3). [↑](#footnote-ref-26)
27. Data for 2020, 2021, 2022, 2024 (projected), and 2025 (projected) are from Table 4-1 in PG&E’s *2023-2025 Wildfire Mitigation Plan R6* at 73, July 5, 2024. [↑](#footnote-ref-27)
28. Data for 2023 are from Table 11 in PG&E’s Quarterly Data Report for Q4 of 2023, revision 2, April 15, 2024. The total is a summation of the reported actual capital and operating expenditures for the entire territory. [↑](#footnote-ref-28)
29. Cost data can be extracted from Table 11 of the Quarterly Data Reports for Q4 of a given year, but this is not a transparent way of assessing billions in potential ratepayer funded spending a year. [↑](#footnote-ref-29)
30. Specifically, Energy Safety should revise Table 3-3 to include actual spending. Cost data for 2025 will not be available as of the filing date of the 2026-2028 WMPs, so the 2026-2025 WMP Guidelines should require the utility to provide a forecast. Complete, actual 2025 cost data should be included in the following year’s WMP Update. [↑](#footnote-ref-30)
31. Draft 2026-2028 WMP Guidelines at 4. [↑](#footnote-ref-31)
32. Draft 2026-2028 WMP Guidelines at 4. [↑](#footnote-ref-32)
33. Draft 2026-2028 WMP Guidelines at 4. [↑](#footnote-ref-33)
34. CSV refers to Comma-Separated Values. CSV is a widely-used file format that stores tabular data in plain text, where each line represents a data record, and fields within a record are separated by commas. CSV files are compatible with various software tools, making them ideal for data analysis and integration. [↑](#footnote-ref-34)
35. Draft 2026-2028 WMP Guidelines at 4. Table data is explicitly required but data for graphs, maps, and figures is not mentioned. [↑](#footnote-ref-35)
36. Draft 2026-2028 WMP Guidelines at 4. Table data format is explicitly described, but data formats for graphs, maps, and figures are not mentioned. [↑](#footnote-ref-36)
37. Draft 2026-2028 WMP Guidelines at 14-19. Section 3.4, Prioritized List of Wildfire Risks and Risk Drivers, *Table 3-1. List of Risks and Risk Drivers to Prioritize.* [↑](#footnote-ref-37)
38. Draft 2026-2028 WMP Guidelines at 14-19. Section 3.4, Prioritized List of Wildfire Risks and Risk Drivers, *Table 3-1. List of Risks and Risk Drivers to Prioritize.* [↑](#footnote-ref-38)
39. The year 2019 was significant as it was the first time utilities were required to submit Wildfire Mitigation Plans (WMPs). This introduced a formal process for utilities to outline their approaches to reducing wildfire risks and report on their efforts, providing a baseline for tracking progress and improving safety measures. [↑](#footnote-ref-39)
40. The year 2019 was significant as it was the first time utilities were required to submit Wildfire Mitigation Plans (WMPs). This introduced a formal process for utilities to outline their approaches to reducing wildfire risks and report on their efforts, providing a baseline for tracking progress and improving safety measures. [↑](#footnote-ref-40)
41. Draft 2026-2028 WMP Guidelines at 24: “The electrical corporation must cite to an authoritative government source (e.g., CPUC, CAL FIRE, U.S. Forest Service, or local fire authority) for all data provided to the extent this information is available.” [↑](#footnote-ref-41)
42. Draft 2026-2028 WMP Guidelines at 23-24:

    For this section, wildfire history must be limited to electrical corporation ignited catastrophic fires (i.e., fires that caused at least one death, damaged over 500 structures, or burned over 5,000 acres). This includes catastrophic wildfire ignitions reported to the CPUC that may be attributable to facilities or equipment owned by the electrical corporation and where the cause of the ignition is still under investigation by the CPUC, CAL FIRE, and/or other authoritative government sources. [↑](#footnote-ref-42)
43. Draft 2026-2028 WMP Guidelines at 23-24. See footnote 11. [↑](#footnote-ref-43)
44. Draft 2026-2028 WMP Guidelines at 23-24. See footnote 11. [↑](#footnote-ref-44)
45. In some cases, the cause of ignition may be unknown or undetermined. [↑](#footnote-ref-45)
46. Draft 2026-2028 WMP Guidelines at 24-26. Section 4.3, Frequently Deenergized Circuits, *Table 4-3. Example of Frequently Deenergized Circuits.* [↑](#footnote-ref-46)
47. *Comments of the Public Advocates Office on the 2023 Wildfire Mitigation Plan Guideline Development Workshop*, May 6, 2022 in docket 2023-2025-WMPs; Public Advocates Office, *Input for Next Iteration of WMP Guidelines*, April 8, 2024 in docket WMP-Guidelines. [↑](#footnote-ref-47)
48. These comments refer to PG&E, SCE, SDG&E, PacifiCorp, Liberty, and BVES. The transmission-only operators are not discussed here. [↑](#footnote-ref-48)
49. For example, PG&E’s 2023-2025 Wildfire Mitigation Plan, March 27, 2023, was a 1,504-page pdf file. [↑](#footnote-ref-49)
50. Public Utilities Code section 8386(b). [↑](#footnote-ref-50)
51. PG&E will file a new GRC application (test year 2027) in mid-2025. With our proposed schedule, PG&E’s next comprehensive WMP and its next GRC cycle will start simultaneously in 2027.

    SCE’s currently approved GRC covers 2025-2028. With our proposed schedule, SCE will file a comprehensive WMP to cover the last three years of its current GRC cycle (2026-2028). Then, its subsequent comprehensive WMP would start simultaneously with the test year 2029 GRC cycle.

    SDG&E’s current GRC application (for which a proposed decision is pending) is test year 2024 and covers the period 2024-2027. With our proposed schedule, SDG&E would submit a new comprehensive WMP shortly after the CPUC issues a decision on its GRC in 2025, which is appropriate because the GRC decision will affect the resources available for wildfire mitigation. [↑](#footnote-ref-51)
52. Energy Safety, *2025 Wildfire Mitigation Plan Update Guidelines*, January 2024. Energy Safety would need only to add a brief section to the Draft 2026-2028 WMP Guidelines to direct SCE, SDG&E, and BVES to use the 2025 WMP Update Guidelines, with the explanation that all instances of “2025” should be interpreted to refer to 2026. This would obviate the need for Energy Safety to release two sets of new guidelines. [↑](#footnote-ref-52)
53. Executive Order N-5-24, October 30, 2024. See a summary of the executive order at <https://www.gov.ca.gov/2024/10/30/governor-newsom-issues-executive-order-tackling-rising-electric-bills/> [↑](#footnote-ref-53)
54. *Comments of the Public Advocates Office on the 2023 Wildfire Mitigation Plan Guideline Development Workshop*, May 6, 2022, at 15-17. [↑](#footnote-ref-54)
55. *See, e.g.*, PG&E’s 2023-2026 GRC Decision, which authorized $4.7 billion for wildfire mitigation system hardening. CPUC Decision 23-11-069, November 17, 2023, Figure F at 273. [↑](#footnote-ref-55)
56. Executive Order N-5-24, October 30, 2024:

    The Office of Energy Infrastructure Safety is directed, and the California Public Utilities Commission is requested, to consult with each other on adjustments to utility wildfire safety oversight processes, procedures, and practices that would yield administrative efficiencies and focus utility investments and activities on cost-effective wildfire mitigation measures that reduce wildfire ignition risk while managing costs to electric ratepayers.

    The full text is available at <https://www.gov.ca.gov/wp-content/uploads/2024/10/energy-EO-10-30-24.pdf> [↑](#footnote-ref-56)