



December 12, 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: Reply 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 reply 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) or Henry Burton (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,

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I. 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 The Public Advocates Office at the California Public Utilities Commission (Cal Advocates) submitted comments on April 8, 2024.²

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 and reply comments by December 12, 2024.³ On November 26, 2024, Energy Safety hosted a workshop regarding the Draft 2026-2028 WMP Guidelines.

On December 6, 2024, Cal Advocates, the Green Power Institute (GPI), Pacific Gas and Electric Company (PG&E), San Diego Gas & Electric Company (SDG&E), and Southern California Edison Company (SCE) submitted opening comments. Pursuant to the cover letter of the Draft 2026-2028 WMP Guidelines, Cal Advocates timely submits these reply comments.

II. DISCUSSION

A. Cal Advocates supports GPI's recommendations regarding planning for distribution load growth.

In opening comments, GPI recommends that Energy Safety add a section to the Draft 2026-2028 WMP Guidelines that requires utilities to address Integrated Distribution System Planning.⁴ GPI argues that gaining insight into distribution system planning is necessary for identifying wildfire mitigation measures that optimally “balance safety, reliability and affordability.”⁵ GPI notes that long-term planning for distribution system needs is “especially

¹ Office of Energy Infrastructure Safety, *Soliciting Public Input for Next Iteration of WMP Guidelines*, March 4, 2024, docket WMP-Guidelines.

² Public Advocates Office, *Input for Next Iteration of WMP Guidelines*, April 8, 2024 in docket WMP-Guidelines.

³ Office of Energy Infrastructure Safety, *Draft Wildfire Mitigation Plan Guidelines (Package 1)*, November 12, 2024, docket WMP-Guidelines (Draft 2026-2028 WMP Guidelines).

⁴ Comments of the Green Power Institute on the Draft WMP Guidelines – Package 1 (GPI Opening Comments) at pages 21-23, December 6, 2024, Docket WMP-Guidelines.

⁵ GPI Opening Comments at 23.

relevant given trends in [wildland-urban interface] growth and anticipated climate change impacts.”⁶

Cal Advocates supports GPI’s analysis and recommendations regarding distribution system planning. However, GPI recommends a two-page limit for the new section, which is likely insufficient space for the proposed narrative.⁷ We recommend a limit of four pages instead. Planning for future load growth is a particular issue at this moment, due to the rapid evolution of the electric utility sector. The electrification of buildings and vehicles in California is likely to place increased demand on the electric grid in the decades ahead. As GPI observes, accommodating an increased penetration of distributed energy resources also poses challenges for the distribution grid.⁸

The system hardening initiatives in WMPs entail major changes to distribution grids, with large capital investments. Major distribution equipment (such as poles, conductors, and underground infrastructure) typically has an expected useful life of approximately 50 years. As utilities undertake these capital projects, it is important to ensure that the new infrastructure has the capacity to adequately serve utility customers for the long term. The increasing focus of utilities on undergrounding amplifies this issue. For example, if a utility installs an underground circuit without much spare capacity, the utility might need to dig up the circuit to place an additional conduit and conductors in the trench. Such projects will disrupt service, burden customers with unnecessary costs, and obligate utility personnel who could be more beneficially assigned to other operational needs.

Furthermore, as GPI notes, CPUC decisions currently require utilities to use a 13-year forecast horizon,⁹ well below the expected useful life of underground infrastructure. To minimize the financial and reliability impacts to ratepayers, utilities need to consider longer time horizons.¹⁰ GPI’s proposed addition to the WMP narrative would allow Energy Safety and

⁶ GPI Opening Comments at 23.

⁷ GPI Opening Comments at 22.

⁸ GPI Opening Comments at 21.

⁹ GPI Opening Comments at 22-23.

¹⁰ For example, per PG&E’s response to data request CalAdvocates-PGE-2023WMP-26 Question 3, August 10, 2023, PG&E does not use longer time horizons when evaluating the effect of forecasted load growth on the design and scope of system hardening projects.

stakeholders to evaluate whether the costly infrastructure being installed in the near term will adequately serve Californians in the long term.

Requiring utilities to explain in their WMPs how they plan for future distribution loads is a modest and prudent step. This information will help to ensure that utilities plan system hardening projects with a broad perspective on the future demands and challenges for the distribution grid. It will also help Energy Safety and stakeholders review system hardening plans to make sure that utilities do not undertake projects that will need to be replaced or fixed in the near future.

B. Energy Safety should schedule WMP submissions in 2025 no earlier than mid-June.

In opening comments, PG&E, SCE, SDG&E, and GPI all address the submission and review schedule for WMPs in 2025. The three large utilities all emphasize the need for “adequate time for utilities to conduct the considerable analysis required to produce a comprehensive, three-year WMP.”¹¹ Noting the complexity and length of base WMP submissions, PG&E requests that Energy Safety allow “a minimum of four months” between the issuance of final WMP guidelines and the utilities’ pre-submissions. PG&E holds that four months is necessary for “preparation, strategy, and drafting” before the pre-submissions since utilities are not permitted to substantively alter their WMPs after the pre-submissions.¹² Cal Advocates agrees.¹³ Given that Energy Safety will not issue final guidelines before January, PG&E’s recommendation would result in pre-submissions no earlier than May.

SDG&E proposes that utilities pre-submit WMPs in March and file final WMPs in May.¹⁴ suggests “a submission deadline no earlier than mid-April 2025.”¹⁵ GPI supports a filing deadline no sooner than mid-June.¹⁶

¹¹ *Southern California Edison Company’s Opening Comments on the Draft WMP Guidelines - Package 1* (SCE Opening Comments) at page 1, December 6, 2024, Docket WMP-Guidelines.

¹² *Pacific Gas and Electric Company’s Comments on the Draft WMP Guidelines – Package 1* (PG&E Opening Comments) at page 3, December 6, 2024, Docket WMP-Guidelines.

¹³ *Comments of the Public Advocates Office on the 2023 Wildfire Mitigation Plan Guideline Development Workshop* at page 11, May 6, 2022, Docket 2023-2025-WMPs.

¹⁴ *San Diego Gas & Electric Company’s Comments on Draft 2026-2028 WMP Guidelines Package 1* (SDG&E Opening Comments) at pages 1-2, December 6, 2024, Docket WMP-Guidelines.

¹⁵ SCE Opening Comments at 1.

¹⁶ GPI Opening Comments at 3.

Energy Safety should establish a predictable filing schedule that provides sufficient time for utilities to prepare their comprehensive WMPs, while also providing time for Energy Safety to review the plans before they take effect. Additionally, Energy Safety should take into consideration other major proceedings that call upon the time and resources of all stakeholders, such as general rate cases and cost-recovery proceedings. Cal Advocates recommends that Energy Safety set a filing date for the 2026-2026 comprehensive WMP that is no sooner than mid-June 2025, with a pre-submission date four weeks earlier.

Our proposed schedule will allow Cal Advocates' staff to address two major wildfire safety proceedings consecutively. Importantly, our proposed schedule also satisfies the large utilities' requests for reasonable time to prepare their 2026-2028 WMPs. Finally, it provides ample time for Energy Safety to review the 2026-2028 WMPs before the utilities begin to implement the plans in 2026.¹⁷ Given the statutory three-month review period for WMPs,¹⁸ Energy Safety could issue draft decisions on WMPs in September, accept public comments, and then issue final decisions by late October 2025.

III. CONCLUSION

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

Respectfully submitted,

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¹⁷ Note that Cal Advocates has previously recommended a WMP filing date around September 1st. *Comments of the Public Advocates Office on the 2023 Wildfire Mitigation Plan Guideline Development Workshop* at pages 10-11, May 6, 2022, Docket 2023-2025-WMPs.

¹⁸ Public Utilities Code section 8386.3(a).