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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, 20<sup>th</sup> Floor  
Sacramento, CA 95814

Re: **Pacific Gas and Electric Company's Comments on the Office of Energy Infrastructure Safety's Revised Draft 2026-2028 Wildfire Mitigation Plan Guidelines**

Dear Deputy Director Marino:

Pacific Gas and Electric Company ("PG&E") submits the following comments on the Revised Draft 2026-2028 Wildfire Mitigation Plan ("WMP") Guidelines Package 1 ("Revised Draft Guidelines"), issued by the Office of Energy Infrastructure Safety ("Energy Safety") on January 17, 2025.

**I. THE REVISED DRAFT GUIDELINES SHOULD PROVIDE MORE FLEXIBILITY**

**A. The Petition to Amend Process Should Also Include Cost Recovery Methods Other than the General Rate Case**

PG&E appreciates the addition of the petition to amend process to allow for an electrical corporation to amend its WMP to align with the authorized work allowed in a General Rate Case (GRC) decision,<sup>1</sup> but notes that the Revised Draft Guidelines should be expanded to include alignment of a WMP (both base plans and updates) with any Commission decision that authorizes wildfire mitigation work. Similar to aligning a WMP with a pending GRC request, utilities should also have the opportunity to align WMPs with a stand-alone application before the Commission requesting authorization to perform incremental wildfire mitigation work than what is authorized in a GRC. Given the potential for fire risk to materialize more frequently than the four-year GRC submission cycle, an electrical corporation may elect to pursue authorization for additional wildfire mitigation measures through a stand-alone application outside the GRC proceeding. Similar to pending GRC requests, a WMP should also be aligned to a stand-alone application following the Commission's disposition. Allowing for electrical corporations to align

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<sup>1</sup> Revised Draft Guidelines at 171 ("The electrical corporation may submit to Energy Safety a petition to amend its approved WMP to align the WMP with a California Public Utilities Commission decision in a general rate case (GRC) proceeding.").

their WMPs with the authorized scope of work for any application, GRC or otherwise, is consistent with the intended purpose of the Petition to Amend process to ensure alignment across regulators. An example of this is a Commission Decision on any future Electrical Undergrounding Plan (EUP). Thus, we recommend that the Petition to Amend section of the Revised Draft Guidelines be modified to state as follows:

The electrical corporation may submit to Energy Safety a petition to amend its approved WMP to align the WMP with a California Public Utilities Commission decision in a general rate case (GRC) proceeding **or other Application requesting wildfire mitigation activity authorization.**<sup>2</sup>

**B. Utilities Need a Way to Update Targets and Risk Impacts Closer to When the Actual Work Will Be Performed**

With the elimination of the change order process, the Revised Draft Guidelines lack a process for utilities to provide updated targets and risk impacts, which will cause both target and risk impacts to be less accurate. While we understand that utilities may be able to update their WMPs through the annual update process, these updates are still due between February and April of the year prior to the work described in the update. This means that these updates would not be based on the utilities' work plans, which are, of necessity, created later in the year (October through December). Since changes in work plans will necessitate changes in targets and risk impacts, the forecasted targets and risk impacts created prior to the work plans will be less accurate than those created simultaneously with the work plans.

Given this discrepancy, we recommend that a process be added, next to the Petition to Amend section of the Revised Draft Guidelines, which allows utilities to provide updated targets and risk impacts on December 1 of the year before the work is to occur.<sup>3</sup> This will allow utilities to refresh older projections—that were created nearly a full year prior to the work being performed—with more accurate projections that are grounded in the work plan for the upcoming year and prior to beginning of the compliance period for which the work will be evaluated.

**II. A CONSISTENT SCHEDULE AND EARLIER GUIDELINES WOULD LEAD TO BETTER WMPs**

The WMP proceeding is the most labor-intensive (and arguably most important) proceeding on Energy Safety's docket. All participants would benefit from a consistent schedule that begins earlier in the year. Thus, we propose the following schedule for future WMPs as an example:

- July 1—Energy Safety issues draft WMP guidelines and a draft WMP schedule for the upcoming year;
- Mid July—Energy Safety workshop on draft WMP guidelines and schedule;
- Late July—Opening comments on the draft WMP guidelines and schedule;

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<sup>2</sup> Revised Draft Guidelines at 171.

<sup>3</sup> Revised Draft Guidelines at 171.

- Early August—Reply comments on the draft WMP guidelines and schedule;
- Early September—Revised draft WMP guidelines and schedule issued, if appropriate;
- Late September—Opening comments on the revised draft WMP guidelines and schedule, if appropriate;
- Early October—Reply comments on the revised draft WMP guidelines and schedule, if appropriate;
- November 1—Final WMP guidelines and schedule are issued.
- March to April—WMP pre-submissions due on a staggered basis to allow Energy Safety additional time to perform pre-submission checks;
- April to May—Final WMPs due on a staggered basis to allow Energy Safety additional time to perform pre-submission checks.

Indeed, working off draft guidelines instead of final guidelines, as the utilities are currently doing, undermines Energy Safety's regulatory process because it indicates that the draft guidelines cannot be significantly changed in response to public comment, which makes the comment process less meaningful. Thus, the WMP Guidelines process should begin in the summer so that final WMP Guidelines and a schedule can be issued by November 1 at the latest.

## CONCLUSION

PG&E appreciates Energy Safety's efforts to refine the 2023-2025 WMP process. 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 [jay.leyno@pge.com](mailto:jay.leyno@pge.com).

Very truly yours,

*/s/ Jay Leyno*

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