

June 6, 2025

**BY ENERGY SAFETY E-FILING**

Shafi Mohammed  
Chief Data Officer, Data Analytics Division  
Office of Energy Infrastructure Safety  
California Natural Resources Agency  
715 P Street, 20<sup>th</sup> Floor  
Sacramento, CA 95814

Re: **Annual WMP Tabular Wildfire Mitigation Data Revision of 2026 Filing**  
**Docket: 2025 Data Submissions**

Dear Mr. Mohammed:

Pacific Gas and Electric Company (PG&E) is notifying you of the resubmission of PG&E's 2026 Annual WMP Tabular Wildfire Mitigation Data. In response to the letter from the Office of Energy Infrastructure Safety (Energy Safety) titled "Annual-WMP Template Workbook Y1 Data Validation Issues," PG&E is resubmitting its Annual-WMP Template. This submission also includes other validation issues from previous letters.

### **Description of Revision**

#### **Revision 1 (Table 1):**

Secondary units from the UNIT(s) field in Table 1 were removed per Energy Safety's guidelines.

#### **Revision 2 (Table 12):**

Secondary units from the UNIT(s) field in Table 12 were removed per Energy Safety's guidelines.

#### **Revision 3 (Table 11):**

PG&E revised data in the 'Projected Cycle Year 1 Value', 'Projected Cycle Year 2 Value', and 'Projected Cycle Year 3 Value' columns in Table 11 so that the amounts shown align with the most up-to-date 2027 General Rate Case (GRC) forecasts that were provided in Table 3-3 with PG&E's Non-Substantive Errata.

### **Explanation of Revision**

#### **Revision 1 (Table 1):**

PG&E inadvertently included secondary units to Quality commitment.

#### Revision 2 (Table 12):

PG&E inadvertently included secondary units to Quality commitment.

#### Revision 3 (Table 11):

In accordance with the Data Guidelines, v4.01, Section 2.1, PG&E submitted the Annual-WMP Template Workbook, including Table 11 for projected expenditures, on April 1, 2025, three days prior to filing the Base WMP. At that time, PG&E had not yet completed refining and validating financial forecasts for the 2027 GRC and submitted projected expenditures in Table 11 with the best available forecast data.

Subsequent forecast refinement resulted in updated projections for work described in the WMP. Due to the overlap between the periods covered by the two proceedings (2026-2028 for the WMP and 2027-2030 for the GRC), PG&E submitted errata updating Table 3-3 – Projected Expenditures and resubmitted the Annual WMP Template Workbook.

Energy Safety rejected this resubmission because the values reported for the ‘PROJECTED CYCLE YEAR ... VALUE’ columns were not consistent with expenditure commitments in the filed 2026-2028 WMP Base Plan or those updated in subsequent errata. The inconsistency arose because the Annual-WMP Template Workbook did not include predefined rows for Section 7 – Public Safety Power Shutoff or rows for other miscellaneous wildfire mitigation costs, which PG&E felt did not fully align with the included initiatives and activities. Therefore, these were included in Table 3-3 Projected Expenditures in the WMP but omitted from the Annual-WMP Template Workbook.

Following feedback, PG&E allocated these forecasts into appropriate existing activities within Table 11 to ensure alignment with the Non-Substantive Errata values in Table 3-3.

Between PG&E’s May 16, 2025 submission of Non-Substantive Errata and Energy Safety’s rejection of the amended Annual-WMP Template Workbook, the Safety Policy Division (SPD) of the California Public Utilities Commission issued a data request asking PG&E to review the Most Recent Proceeding column of the workbook. SPD requested an explanation for listing “2022 WMP,” “2023 WMP,” and “refer to 8.4” as the most recent proceeding to review the associated programs. PG&E responded by identifying the 2023 General Rate Case and 2021 Transmission Owner Rate Case as appropriate proceedings. To maintain consistency between data provided to Energy Safety and the CPUC, PG&E reviewed and edited the Most Recent Proceeding column of this version of the Annual-WMP Template Workbook. These edits simplified cases where several proceedings were listed, listed non-rate-making proceedings such as OIRs, and corrected spelling errors.

### **Record IDs**

#### Revision 1 (Table 1):

- Metric Numbers: 2010000010, 2010000011, 2010000014, 2010000015, 2010000016, 2010000017, 2010000018, 2010000019, 2010000037, 2010000038, 2010000043, 2010000044, 2010000045.

#### Revision 2 (Table 12):

- Metric Numbers: 2120000007, 2120000008, 2120000010, 2120000011, 2120000012, 2120000013, 2120000014, 2120000015, 2120000028, 2120000029, 2120000034, 2120000035, 2120000036.

Revision 3 (Table 11):

- **Most Recent Proceeding** Column (includes spelling corrections and using ‘n/a’ for rows without forecasts): 2110000000, 2110000001, 2110000002, 2110000003, 2110000024, 2110000025, 2110000026, 2110000027, 2110000028, 2110000029, 2110000030, 2110000031, 2110000032, 2110000033, 2110000034, 2110000035, 2110000036, 2110000037, 2110000038, 2110000039, 2110000040, 2110000041, 2110000042, 2110000043, 2110000048, 2110000049, 2110000050, 2110000051, 2110000052, 2110000053, 2110000054, 2110000055, 2110000056, 2110000057, 2110000058, 2110000059, 2110000060, 2110000061, 2110000062, 2110000063, 2110000064, 2110000065, 2110000066, 2110000067, 2110000068, 2110000069, 2110000070, 2110000071, 2110000072, 2110000073, 2110000074, 2110000075, 2110000076, 2110000077, 2110000078, 2110000079, 2110000080, 2110000081, 2110000082, 2110000083, 2110000084, 2110000085, 2110000086, 2110000087, 2110000088, 2110000089, 2110000090, 2110000091, 2110000116, 2110000117, 2110000118, 2110000119, 2110000120, 2110000121, 2110000122, 2110000123, 2110000124, 2110000125, 2110000126, 2110000127, 2110000132, 2110000133, 2110000134, 2110000135, 2110000164, 2110000165, 2110000166, 2110000167, 2110000168, 2110000169, 2110000170, 2110000171, 2110000172, 2110000173, 2110000174, 2110000175.
- **Memorandum Account (MA)** (to indicate that portions of the 2026 forecast will be reviewed in a MA): 2110000034, 2110000035, 2110000060, 2110000061, 2110000062, 2110000063, 2110000098, 2110000099, 2110000110, 2110000111, 2110000124, 2110000125, 2110000126, 2110000127, 2110000170, 2110000171, 2110000172, 2110000173.
- **Projected Cycle Year 1 Value:** 2110000002, 2110000035, 2110000060, 2110000061, 2110000080, 2110000081, 2110000082, 2110000083, 2110000098, 2110000099, 2110000110, 2110000111, 2110000162, 2110000163, 2110000178, 2110000179.
- **Projected Cycle Year 2 Value:** 2110000002, 2110000080, 2110000081, 2110000082, 2110000083, 2110000110, 2110000111, 2110000162, 2110000163, 2110000178, 2110000179.
- **Projected Cycle Year 3 Value:** 2110000002, 2110000080, 2110000081, 2110000082, 2110000083, 2110000110, 2110000111, 2110000162, 2110000163, 2110000178, 2110000179.

**Conclusion**

We appreciate the opportunity to update Tables 1, 11, and 12 of the Annual-WMP Template Workbook. Please do not hesitate to reach out if you have any questions.

Very truly yours,

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Jay Leyno

Director, Wildfire Mitigation PMO