



OFFICE OF ENERGY INFRASTRUCTURE SAFETY

715 P Street, 15th Floor | Sacramento, CA 95814
916.902.6000 | www.energysafety.ca.gov

Caroline Thomas Jacobs, Director

August 19, 2025

To: Wildfire Mitigation Plans Guidelines (WMP Guidelines) Docket
Subject: Draft Wildfire Mitigation Plan Update Requirements Chapter

Dear Wildfire Mitigation Plan stakeholders:

Pursuant to Government Code section 15475.6, the Office of Energy Infrastructure Safety (Energy Safety) releases the following draft guidelines associated with the electrical corporations' Wildfire Mitigation Plans (WMP) Update submittals for public comment. The existing WMP Guidelines¹ will be updated to a new version to incorporate these WMP Update guidelines, after their adoption, in a new Chapter VI.

Public Comment

On August 19, 2025, the Draft WMP Update Requirements Chapter of the WMP Guidelines is hereby published for public review and comment. Comments will be accepted through September 18, 2025, 5:00p.m. Pacific Time. Reply comments will not be considered.

Comments must be submitted to the WMP Guidelines Docket² and titled: "[Commenter Name] Comments on the Draft Wildfire Mitigation Plans Update Guidelines [Attachment #]."

To receive notifications of the comments on these documents, subscribe to Energy Safety's WMPs service list by following the instructions at: <https://energysafety.ca.gov/events-and-meetings/how-to-participate-in-public-events/>.

Public Workshop

Energy Safety will present the Draft WMP Update Requirements Chapter at a public workshop in September. Energy Safety will accept verbal public comments and questions during the workshop. The workshop will be held virtually. Energy Safety will release information on how to participate in the public workshop, along with an agenda, at a later date.

Adoption Meeting

Pursuant to Government Code section 15475.6, Energy Safety will hold a public meeting to receive public and stakeholder comments on the draft WMP Update Requirements Chapter of

¹ [WMP Guidelines](#)

(URL:<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58026&shareable=true>, accessed August 12, 2025).

² [WMP Guidelines Docket](#)

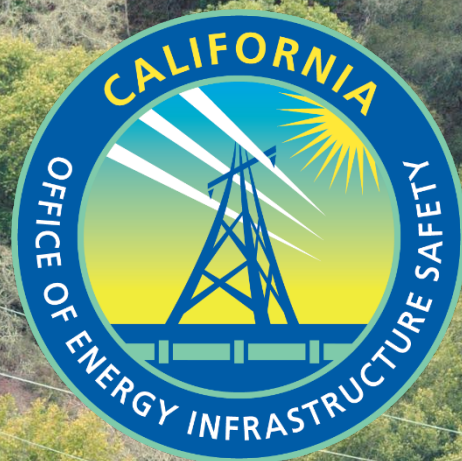
(URL:<https://efiling.energysafety.ca.gov/EFiling/DocketInformation.aspx?docketnumber=WMP-Guidelines>, accessed August 12, 2025).

the WMP Guidelines prior to adoption. Energy Safety will provide notice of the meeting at least 10 days in advance.

Sincerely,

/s/ Tony Marino

Tony Marino
Deputy Director | Electrical Infrastructure Directorate
Office of Energy Infrastructure Safety



OFFICE OF ENERGY INFRASTRUCTURE SAFETY

WMP GUIDELINES DRAFT CHAPTER

VI: WILDFIRE MITIGATION PLAN

UPDATE REQUIREMENTS

August 2025

TABLE OF CONTENTS

VI. WMP UPDATE REQUIREMENTS	2
1. General Instructions	3
1.1 Required Components of a WMP Update	3
1.2 Reportable Updates	4
1.3 Non-reportable Updates	5
2. Reportable Update Categories	6
2.1 Areas for Continued Improvement	6
2.2 Risk Models	6
2.3 New or Discontinued Programs	11
2.4 Approved Targets	12
2.5 Projected Expenditures	14
2.6 Administrative Information	15
3. WMP Update Evaluation Process	16

LIST OF TABLES

Table 2-1. Example Showing Changes to Top 20% Risk Circuits/Segments/Spans	10
Table 2-2. Reportable Projected Expenditure Updates for [Update Year], per Category	14

VI. WMP UPDATE REQUIREMENTS

This chapter sets forth requirements and reportable updates for the electrical corporation WMP Update submissions.

The electrical corporation must refer to the other chapters of the WMP Guidelines, the Energy Safety Policy Division Process Guidelines, the Electrical Corporation Wildfire Mitigation Maturity Model and Survey Guidelines, the Energy Safety Data Guidelines and any other supporting documents for additional applicable requirements on technical details, processes, maturity survey, and data.

1. General Instructions

This section provides general instructions for the electrical corporation to prepare its WMP Update. See Chapter II (Process and Evaluation), Section 2 for instructions that apply to both Base WMP and WMP Update submissions. Specific requirements for reportable updates are set forth within this chapter in Sections 1 and 2. A description of the Energy Safety evaluation process for WMP Updates is found in Section 3 of the chapter.

1.1 Required Components of a WMP Update

The following documents are required components of the electrical corporation's WMP Update submission:

1. WMP Update: A standalone document that describes the electrical corporation's proposed reportable updates for the update year¹ of the current WMP cycle or provides confirmation of no such reportable updates to the approved Base WMP in accordance with this WMP Update Requirements Chapter.
 - a. Required Categories (if no updates in the category, the electrical corporation must state "no updates"):
 - i. Areas for Continued Improvement
 - ii. Risk Models
 - iii. New and Discontinued Programs
 - iv. Approved Targets
 - v. Projected Expenditures
 - vi. Administrative Information
 - b. Any reportable update may have downstream impacts. The electrical corporation must include any downstream impacts of the reportable updates. This includes impacts in other required categories from an update in any one category and impacts in the remaining years of a WMP cycle following the update year.
 - c. As an appendix to the WMP Update, the electrical corporation must provide a table summarizing the sections and pages in the Redlined Base WMP where there is redlined material. This table must reference specific subsections (e.g.,

¹ The "update year" is the year following the filing of the WMP update.

“6.2.2” rather than just “6.2”) and page numbers to link each change reflected in the WMP Update with the associated Redlined Base WMP.

2. Redlined Base WMP: A redlined version of the electrical corporation's Base WMP showing proposed reportable updates to the approved Base WMP. Redlines must be text-inserted in tracked changes form. For example, when changes are made in a Microsoft Word document with the “Track Changes” feature on:
 - a. Deleted text is shown in ~~strikeout~~ and may be a different color.
 - b. New text is shown in a different color and underlined.

If the electrical corporation does not have any reportable updates for the update year, the electrical corporation does not need to submit a Redlined Base WMP but must still provide a WMP Update, the content of which is specified in Section 1.2 of this Chapter.

All changes due to reportable updates that impact information in Appendix B: Supporting Documentation for Risk Methodology and Assessment must also be captured, as required above (in redline), in Appendix B of the Redlined Base WMP.

All updates reported in the WMP Update must be consistently reflected in the Redlined Base WMP and vice versa. That is, every redline in the Base WMP must be associated with a proposed update described in the WMP Update document, and every proposed update in the WMP Update must have an associated redline.

1.2 Reportable Updates

“Reportable updates” are specific changes for the update year to the electrical corporation’s wildfire mitigation initiatives and activities in its approved Base WMP. Reportable updates include:

- Required information for each of the WMP Update Required Categories listed in Section 1.1(1)(a) (see details for each category in Section 2).
- As applicable, the downstream impacts within or following the update year of a WMP cycle. For example, the electrical corporation must explain what the update year impacts of a reportable new program are, including reference to any associated updates to approved targets reported, and any related impacts to the final year of a WMP cycle.

The electrical corporation must describe each requested update in its WMP Update and reflect the updated information in the Redlined Base WMP.

For example, any new mitigation initiatives or activities planned for the update year that were not included in its approved Base WMP must be included in the “New or Discontinued Programs” section and reflected as required in the Redlined Base WMP. Similarly, any updated targets that are reportable per Section 2.4 must be described in the WMP Update and be reflected in the Redlined Base WMP.

Specific reportable updates may need to be reflected in more than one section. For example, if a risk model update results in the creation of a new program, the risk model update would be documented in Section 2.2, the new program would be described in Section 2.3, and new targets associated with the new program discussed in Section 2.4 of the WMP Update. The WMP Update would reference all sections in the Redlined Base WMP that include associated redlined changes (e.g., Section X, Lessons Learned, Section X [mitigation category describing new program], Table X with new targets, etc.).

If the electrical corporation has no reportable updates that fall within the six categories listed in Section 1.1, it must affirmatively state in its WMP Update that it has no reportable updates for the update year, and that the information provided in its Base WMP covering the update year is current and accurate.

1.3 Non-reportable Updates

The following are non-reportable updates and must not be included in the WMP Update:

- Updates that solely affect the year prior to or after the update year.
- Updates outside the reportable update categories described in these Guidelines.

Non-reportable updates will not be evaluated by Energy Safety.

2. Reportable Update Categories

2.1 Areas for Continued Improvement

The electrical corporation must report its progress on areas for continued improvement **only** for those areas where progress is required in the update year.² For these areas for continued improvement, the electrical corporation must detail its progress and provide narrative responses that include:

- Code and title of the area for continued improvement,
- Description of the area for continued improvement,
- Required progress as described in the area for continued improvement, and
- A detailed response to the required progress for the update year.

The electrical corporation must refer to other sections of its WMP Update when reporting on areas for continued improvement if there is a duplication of reporting. The electrical corporation must not simply refer to the Redlined Base WMP without the narrative response described above in the WMP Update.

Reporting on progress in the areas for continued improvement must be limited to 20 pages total. Figures and tables are excluded from the 20-page limit.

2.2 Risk Models

The electrical corporation must report its updates to risk models when the updated models, including data and scenarios, are associated with or result in the creation of reportable updates to either:

- Areas of Continued Improvement (Section 2.1),
- New or discontinued programs (Section 2.3), or
- Approved targets (Section 2.4).

That is, if the electrical corporation is required to report on risk models as a result of an area for continued improvement or if it adjusts its risk models in a way that results in a reportable

² See Process and Evaluation Chapter, Section 4.1.4: Decision.

update under Section 2.3 or 2.4, the electrical corporation must explain the adjustment and include it as a reportable update to its risk models.

Reportable updates **do not** include:

- Changes to risk modeling that are not expected to be implemented by the time of the update year.
- Changes to risk modeling that solely derive from already deployed mitigations described in the approved Base WMP – initiatives that have been or are fully expected to be accomplished prior to the update year. For example, if a circuit was undergrounded prior to the update year, it is not expected to cause a reportable update to risk modeling in the WMP Update.³

For each reportable update to risk models, the electrical corporation must:

- Discuss in detail its updated methodology and models (e.g., using a new algorithm, changing how wildfire consequences are calculated, or changes to assumptions);
- Provide the reasons, including supporting analysis and documentation detailing what circumstances, insights, or requirements, etc., that necessitated the updates, and describe how the risk modeling improved from the update;
- Show how risk scores and associated prioritization have shifted;
- Describe, including supporting analysis and documentation, any changes to prioritization of mitigation initiatives or activities, and to scheduling and workplans for the implementation of mitigation initiatives or activities resulting from these updates. This reporting may refer to other sections of the WMP Update that discuss the resulting updates to targets or initiatives/activities;
- Summarize changes to the top risk-contributing circuits, segments, or spans, as described in Section 2.2.1 below; and
- Provide consistent changes in the Redlined Base WMP, including updates as needed to Tables 5.5, 6.1, and 6.4.

Discussions of updates to risk models must be limited to 20 pages total. Figures and tables are excluded from the 20-page limit.

³ This type of deployed mitigation may however affect reportable updates to targets, which would then be described in the Approved Targets Section.

2.2.1 Reanalysis of High Risk Circuits

When there is a reportable risk model update, the electrical corporation must reanalyze the top 20 percent of its highest risk circuits, segments, or spans⁴ and provide a summary description of the resulting changes in its WMP Update or indicate there are no such changes.

In particular, the electrical corporation must reflect any changes to the top 20 percent of the highest risk circuits resulting from a reportable risk model update in Table 3-1 of the WMP Update,⁵ with the following:

- Circuit names and/or IDs,
- Updates in risk scores (previous risk scores in parentheses),
- Contribution to the top 20 percent of risk, and
- Any updates to associated risk drivers for these circuits.

Table 2-1 in the WMP Update requires a quantitative summary of changes to the top 20 percent highest risk circuits in the WMP Update, compared to the electrical corporation's previous list of circuits in the Base WMP. The sample table below shows examples of four circuit changes that must (if applicable) be included in the submitted table:

1. **Example Circuit 1:** If an update does not change the risk scores or percentage contributions of a circuit that remains in the top 20 percent compared to the Base WMP analysis;
2. **Example Circuit 2:** If an update changes the risk scores or percentage contributions of a circuit that and that circuit remains in the top 20 percent compared to the Base WMP analysis;
3. **Example Circuit 3:** If an update results in a circuit being included in the top 20 percent when that circuit was not previously included in the Base WMP analysis. In this case, the electrical corporation must show that circuit in Table 3-1 in bold font and must also include the new percentage of risk-contribution to the top 20 percent in the 100 percent summation at the bottom of the table (column 7 in the example).
4. **Example Circuit 4:** If an update results in a circuit falling out of the top 20 percent of the highest risk circuits compared to the Base WMP analysis. In this case the electrical

⁴ Electrical corporations must use the granularity – circuit, segment, or span – it used to report its “Top Risk-Contribution Circuits/Segments/Spans” in accordance with the WMP Guidelines, Section 5.5.2.

⁵ Note that hereinafter the word “circuits” is used to represent the granularity of “circuits, segments, or spans”)

corporation must show that circuit at the bottom of the table in strikeout font and must **not** include the circuit's percentage of risk contribution in the 100 percent summation at the bottom of the table (column 7).

Table 2-1 in the WMP Update may be a shortened list of the top 20 lines; however, a full and complete table must be provided in the associated Excel spreadsheet file as required by Section 2.1.1 of the Process and Evaluation Chapter.

The electrical corporation must provide a short description of the changes to risk circuits listed in Table 2-1, at a minimum describing:

- How and why the circuit(s) changed in overall, wildfire, or outage program risk; delineating between changes in wildfire risk and outage program risk,
- What risk model change led to the circuit(s) risk change, and
- Whether any associated risk drivers changed and why.

Table 2-1. Example Showing Changes to Top 20% Risk Circuits/Segments/Spans

Risk Ranking	Circuit, Segment, or Span ID	Length (miles)	Revised Overall Utility Risk Score (Previous Score)	Wildfire Risk	Outage Program Risk	Percent of Overall Utility Risk Within Top 20% Percent	Associated Risk Drivers
1	Example Circuit 1	33.22	99.7 (99.7)	92.6 (include previous score)	7.1 (include previous score)	0.5%	
	Example Circuit 2		95 (90)			0.5%	
2	Example Circuit 3	7.45	91.52 (13)	91.51	0.01	0.46% (New in top 20 Percent; included in total below)	
3	Etc.						
4	Etc.						
NA	Example Circuit 4		5 (87)			No longer in top 20 percent Not included in total below	
			975			100%	

2.3 New or Discontinued Programs

The electrical corporation must report on the creation of new programs impacting the update year or the discontinuance of any existing programs described in its approved Base WMP.

An alteration of the name, purpose, or scope of an existing program must be reported in this section. Each creation or discontinuance must include a justification, which may include one or more of the following:

- Lessons learned,⁶
- Internal policy changes,
- New laws, regulations, executive orders, or
- Corrective actions resulting from Energy Safety's compliance process.⁷

If a new or discontinued program does not impact or affect work in the update year, the electrical corporation must state the nature of the program change, explain why there is no impact in the update year (e.g. impacts preceding or following the update year), and show the changes within the Redlined Base WMP.

The electrical corporation's discussion on new or discontinued programs must be limited to 15 pages total. Figures and tables are excluded from the 15-page limit.

⁶ "Lessons learned" should be interpreted broadly and is not limited by any definitions, categorizations, or examples presented in the WMP Guidelines, Section 13: Lessons Learned.

⁷ Including, but not limited to, any compliance assessment, audit, determination, evaluation, investigation, notice, or report pursuant to Government Code sections 15475.1 et seq., Public Utilities Code section 8386.3, or other applicable law, regulation, or guidelines.

2.4 Approved Targets

The electrical corporation must provide reportable updates to its quantitative and qualitative targets for the following mitigation categories and initiatives:

- Grid design, grid operations, or grid management (such as asset inspections, grid hardening installations, etc.);
- Vegetation management (preparation and prevention, wood management, restoration, collaboration/defensible space, etc.);
- Situational awareness (monitoring, forecasting, detection, etc.); and
- Emergency preparation, community engagement, and collaboration.

In its WMP Update, the electrical corporation must justify each reportable target update with an explanation, which may be based on one or more of the following:

- Lessons learned,⁸
- Internal policy changes,
- New laws, regulations, executive orders,
- Corrective actions resulting from Energy Safety's compliance process,
- A new or discontinued program described in Section 2.3, or
- Other rationale for the update.⁹

When reporting qualifying target updates, the electrical corporation must also describe any downstream impacts of these updates. For example, if a qualifying update impacts subsequent target(s) in the WMP cycle, the electrical corporation must include these updates to future targets, in addition those in the update year.

The electrical corporation must not add or remove 3-year targets set forth in its approved Base WMP, except when clearly related to and justified by a risk model update described in Section 2.2 or a new or discontinued program described in Section 2.3.

⁸ "Lessons learned" should be interpreted broadly and is not limited by any definitions, categorizations, or examples presented in the WMP Guidelines, Section 13: Lessons Learned.

⁹ Including, but not limited to, California Public Utilities Commission General Rate Case proceeding, or any compliance assessment, audit, determination, evaluation, investigation, notice, or report pursuant to Government Code sections 15475.1 et seq., Public Utilities Code section 8386.3, or other applicable law, regulation, or guidelines.

2.4.1 Reportable Qualitative Target Updates

Updates to qualitative targets are reportable when status updates occur within the update year and when these updates impact the status of the target in future years of the WMP cycle.

2.4.2 Reportable Quantitative Target Increases

For a quantitative target increase to qualify as reportable, the target must increase by 15 percent or greater in the update year.

2.4.3 Reportable Quantitative Target Decreases

The electrical corporation must not report reductions in update year quantitative targets unless:

- The electrical corporation exceeded the approved target in the year prior to the update year, so that lowering the update year target does not reduce the cumulative 3-year target from the Base WMP and the expected risk reduction.¹⁰ The electrical corporation must provide a description of the exceedance, including the previously approved target for the year prior, the amount by which the electrical corporation exceeded that target, and the reduction for the update year. The electrical corporation must explain how such target reduction in the update year would maintain or increase the expected risk reduction.
- The electrical corporation cannot meet the prior target due to a General Rate Case (GRC) Decision. For these reportable updates, the electrical corporation must provide information in its WMP Update according to the Petition to Amend chapter of these Guidelines.¹¹
- The target reduction is directly a result of a reportable risk model change or new or discontinued program.
- The target reduction reduces rather than increases risk, such as with the following mitigation initiatives/activities:

¹⁰ For example, if the electrical corporation has modified a mitigation initiative/activity so that the expected risk reduction is maintained or increased while the 3-year target for an initiative/activity has decreased (e.g. – due to switching to a different mitigation activity to maintain risk reduction), the electrical corporation must explain why risk reduction is maintained or enhanced with reduced 3-year targets for an initiative/activity.

¹¹ See Chapter IV “Petition to Amend” for instructions on aligning the WMP with a California Public Utilities Commission decision in a GRC proceeding.

- PSPS/outage target reductions (number of outages, customers impacted, etc.)
- Fast-trip settings target reductions (number of outages, customers impacted, etc.)
- Past due mitigation inspection report target reductions (e.g. – reducing the maximum limit on such past-due actions).

The electrical corporation must **not** include update year target reductions in its WMP Update for any other reasons. If the electrical corporation is expecting to not meet one or more of its approved targets for the update year, it should raise the issue during Energy Safety's compliance process.

Discussions of updates to approved targets must be limited to 20 pages total. Figures and tables are excluded from the 20-page limit.

2.5 Projected Expenditures

The electrical corporation must report updates to projected expenditures in the update year **only** at the category level and **only** if the projected expenditure updates occur due to another reportable update, such as a reported change to a target or a new or discontinued program.

The electrical corporation may report its category-level projected expenditure updates in a table format. Table 2-2 provides a template that may be used for this table.

Table 2-2. Reportable Projected Expenditure Updates for [Update Year], per Category

Mitigation Category	Approved in Base WMP	Proposed Update	Difference
Category Title 1	\$191 million	\$251 million	\$60 million
Category Title 2	\$208 million	\$158 million	-\$50 million
Etc.			
Etc.			

Discussions of updates to projected expenditures must be limited to 5 pages total. Figures and tables are excluded from the 5-page limit.

2.6 Administrative Information

The electrical corporation may report administrative updates to its Base WMP **only** if those updates are required to evaluate the WMP, communicate with the electrical corporation, or to avoid confusion. For example, an administrative update is reportable if:

- 1) A responsible person for a WMP section changes (e.g. a listed responsible person is reassigned or leaves the company);
- 2) The phone number or contact information changes for a responsible person;
- 3) A company reorganization changes which division or person is responsible for a WMP section; or
- 4) There is a typo in the Base WMP that substantively changes the meaning of a sentence.

Examples include:

- a) The inadvertent inclusion of the word “not” in a sentence suggesting inaccurately that the electrical corporation is not pursuing an action; or
- b) The mistaken inclusion of something like “to be completed” when the measure has already been completed.

Other typos that don’t substantively change meaning but are mere corrections of words or grammar are not reportable.

Discussions of updated administrative information in this section must be limited to 5 pages total. Figures and tables are excluded from the 5-page limit.

3. WMP Update Evaluation Process

Energy Safety will not accept pre-submissions of the WMP Update or Redlined Base WMP.

Energy Safety will use the Evaluation Process and Criteria set forth in Chapter II (Process and Evaluation), Section 4 of these Guidelines when evaluating the electrical corporation's WMP Update submissions.

Energy Safety may reject in whole or in part a WMP Update submission that contains non-reportable updates without further evaluation. During its review, Energy Safety determines whether the electrical corporation's WMP Update will be approved or denied in whole or in part.

If any part of the WMP Update is rejected or denied by Energy Safety, Energy Safety may direct the electrical corporation to resubmit its WMP Update.¹² Energy Safety may direct the electrical corporation, for those portions of the WMP Update rejected or denied, to keep in place the corresponding previously approved Base WMP portions for the WMP cycle, as with any previously approved Base WMP portions for which there are no WMP Updates.

Energy Safety's statutory evaluation period commences upon the submission or resubmission of the WMP Update, whichever is later.¹³

¹² Pub. Util. Code, § 8386.3(a).

¹³ See Energy Safety Policy Division Process Guidelines for additional information regarding submission schedules.

DATA DRIVEN FORWARD-THINKING INNOVATIVE SAFETY FOCUSED



OFFICE OF ENERGY INFRASTRUCTURE SAFETY
A California Natural Resources Agency
www.energysafety.ca.gov

715 P Street, 15th Floor
Sacramento, CA 95814
916.902.6000

