



Workshop Slides and Recording

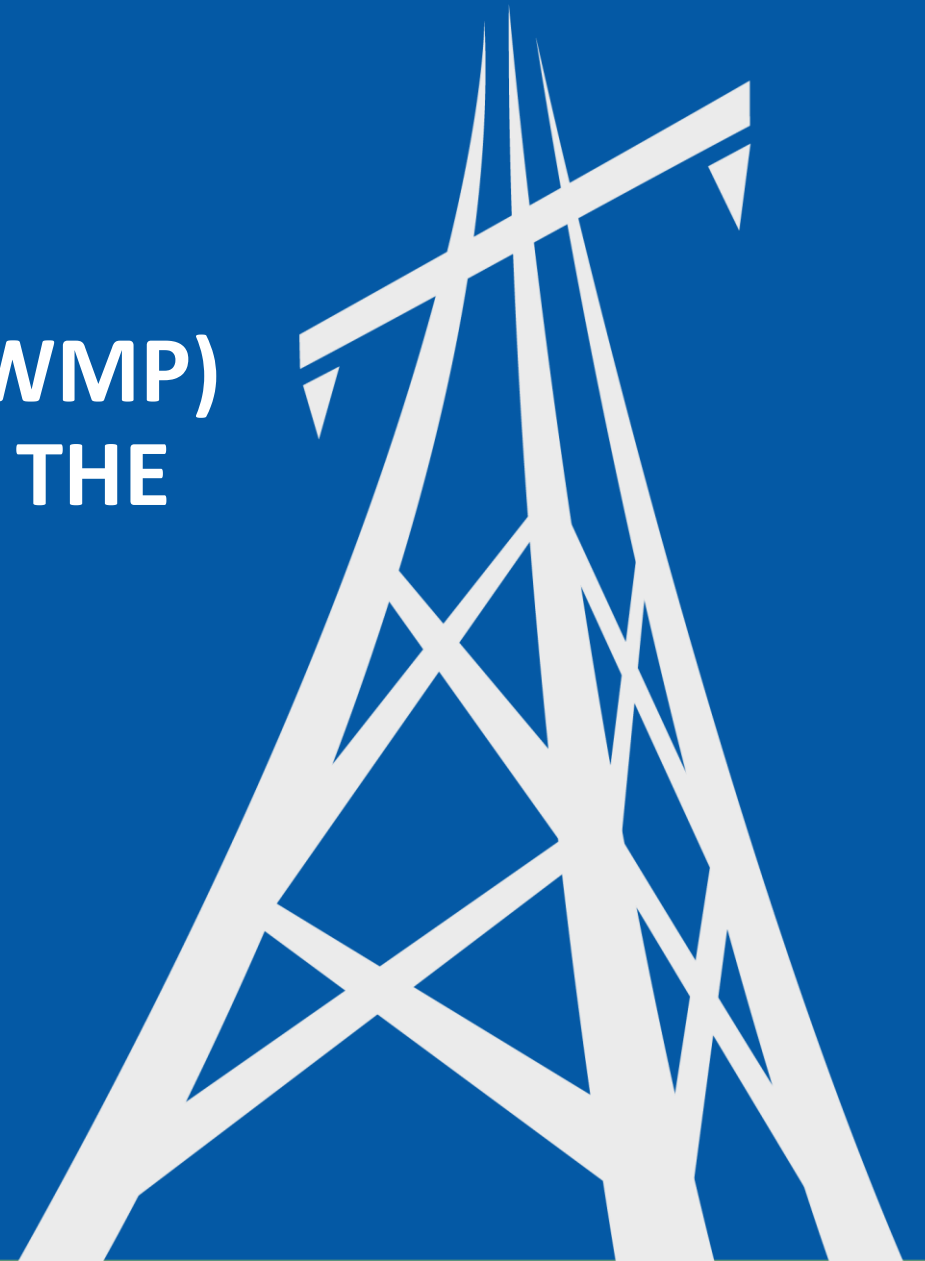
Workshop on the Draft Wildfire Mitigation Plan Update Requirements Chapter (WMP Update Guidelines)

The Office of Energy Infrastructure Safety (Energy Safety) held a workshop on the Draft Wildfire Mitigation Plan Update Requirements Chapter (WMP Update Guidelines) on September 4, 2025. A recording of the workshop can be found on Energy Safety's YouTube channel at [Link](#). The slides shown during the workshop presentations are attached to this document.

PUBLIC WORKSHOP ON THE DRAFT WILDFIRE MITIGATION PLAN (WMP) UPDATE REQUIREMENTS CHAPTER OF THE WMP GUIDELINES



September 4, 2025



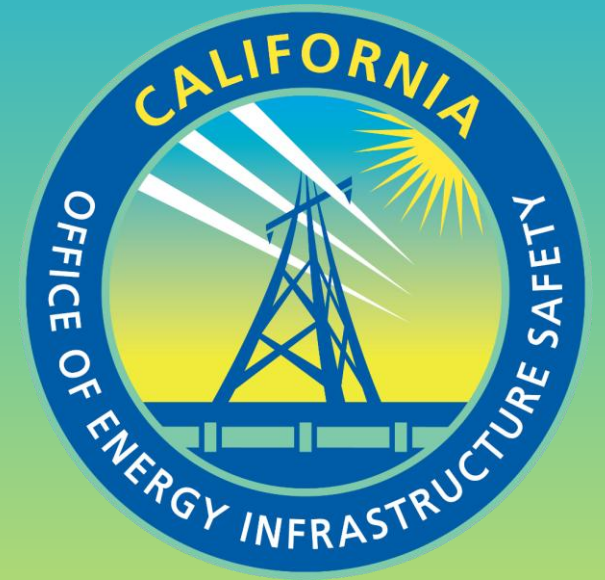


SAFETY MESSAGE

- Be aware of your surroundings
- Know your emergency exits and evacuation route
- Take regular breaks; get up and stretch
- Keep emergency contact information readily available

AGENDA

Time	Topics
9:35 – 9:45 am	Purpose, Background, and Objectives
9:45 – 10:45 am	Draft Wildfire Mitigation Plan Update Requirements Chapter <ul style="list-style-type: none">• Required Components• Reportable Update Categories• WMP Update Evaluation Process
10:45 – 11:45 am	Discussion & Q&A
11:45 – 12:00 pm	Next Steps & Closeout





Purpose of Today's Workshop:

- Present the draft WMP Update Requirements Chapter (Chapter VI) of the WMP Guidelines, highlighting notable changes from the previously published WMP Update Guidelines.
- Provide an opportunity for stakeholder questions and feedback on the draft WMP Update Requirements Chapter.
- Provide an opportunity to inform stakeholders' written comments – due by 5 PM on September 18, 2025.



Background:

Public Utilities Code Section 8386(b):

*“[Energy Safety] may allow the annual submissions to be **updates to the last approved comprehensive Wildfire Mitigation Plan**, provided that each electrical corporation shall submit a comprehensive Wildfire Mitigation Plan at least once every three years.”*



Where We Are in the WMP Cycle:

- In 2025, Energy Safety is evaluating and approving or denying the electrical corporations' comprehensive or "Base" 2026–2028 Wildfire Mitigation Plans submitted earlier this year.
- In 2026, electrical corporations will submit a **WMP Update**, focusing on 2027 updates to their 2026–2028 Plan.



Objectives for the WMP Update Submissions:

- Enable each electrical corporation to provide **new and updated information** regarding its WMP in a focused, streamlined way for the applicable “*update year.*”
- Allow Energy Safety to evaluate any **significant updates** and provide direction to the electrical corporations’ *mid-WMP cycle.*



Energy Safety's Draft Chapter VI: WMP Update Requirements

WMP GUIDELINES OVERVIEW

WMP Guidelines Document

- ❖ Chapter I – Introduction
- ❖ Chapter II – Process and Evaluation
- ❖ Chapter III – Base WMP Technical Requirements
- ❖ Chapter IV – Petition to Amend
- ❖ Chapter V – ITO Modified Requirements
- ❖ **Draft Chapter VI – WMP Update Requirements**
- ❖ Attachment 1 – Data Request Log Template
- ❖ Appendix A – Definitions
- ❖ Appendix B – Supporting Documentation for Risk Methodology and Assessment
- ❖ Appendix C – Additional Maps
- ❖ Appendix D – Areas for Continued Improvement
- ❖ Appendix E – Referenced Regulations, Codes, and Standards





Required Components of a WMP Update

The WMP Update – a standalone document containing:

- The Reportable Updates organized by the six required categories.
- A description of the downstream impacts of Reportable Updates.
- An appendix listing the changes made to the Redlined Base WMP and tying them to the associated Reportable Update.

Redlined Base WMP

- Text must be inserted/deleted in “Track Changes” format.
- A Redlined Base WMP is not needed if there are no Reportable Updates.

Note: A “clean” Base WMP is not required upon initial submission.



Reportable Updates

Definition:

“Reportable Updates” are specific changes, focused on the **“update” year**, that meet the requirements described in the Update Requirements Chapter.

For each Reportable Update, the electrical corporation must:

- **Include the required information** for each category.
- **Include any related impacts** of the Reportable Updates in other categories and any downstream impacts for the final year of a WMP cycle.
- **Reflect the Reportable Update** in corresponding changes in the Redlined Base WMP.



Required Reportable Update Categories

The electrical corporation must provide its **Reportable Updates** in each of the following required categories:

1. **Areas for Continued Improvement**
2. **Risk Models**
3. **New or Discontinued Programs**
4. **Approved Targets**
5. **Projected Expenditures**
6. **Administrative Information**

Note: If an electrical corporation has no Reportable Updates in a category, it must affirmatively state “no Reportable Updates” for that category and affirm that the previously approved Base WMP is current.



Non-Reportable Updates

Definition:

“Non-Reportable Updates” include:

- Changes that only affect the year(s) prior to or after the update year.
- Changes outside the required six Reportable Update categories.
- Changes within those categories that do not meet the specific requirements outlined in the Update Requirements Chapter.

Note: Energy Safety will not evaluate Non-Reportable Updates submitted in a WMP Update.



REPORTABLE UPDATE CATEGORIES



1. AREAS FOR CONTINUED IMPROVEMENT



Areas for Continued Improvement

The electrical corporation must report **progress in areas for continued improvement** where Energy Safety has required reporting **by or in the update year**.

For **each reportable area of continued improvement**, the electrical corporation must report:

- Code and title of the area
- Description of the area of continued improvement
- Detailed description of progress made compared to what is required

Note: This section is limited to 20 pages.



2. RISK MODELS



Reportable Risk Model Updates

There is **no longer** a “significant” versus “non-significant” distinction.

The electrical corporation must report updates to its risk models **ONLY** when they are associated with or result in other **Reportable Updates** to:

- ✓ Areas of Continued Improvement
- ✓ New or Discontinued Programs
- ✓ Approved Targets

Non-Reportable Updates for risk models include:

- Changes not expected to be implemented by the update year.
- Changes derived solely from already deployed mitigations (these may change targets, etc., but do not constitute Reportable Risk Model Updates).



Reportable Risk Model Updates

For each Reportable Risk Model Update, the electrical corporation must provide:

- **Detailed discussion of changes** to methodology and models.
- **Reasons for the updates**, including supporting analysis.
- **Description of how risk scores and prioritization have changed.**
- **Description, with supporting analysis, of resulting changes** to prioritization, scheduling, and workplans of mitigation initiatives or activities impacted by the risk model update.
- **Summary of changes to the top 20% riskiest circuits**, including:
 - ✓ Description consistent with Table 2-1 (requirements and example in next slides).
 - ✓ Description of Risk Model changes responsible for circuit changes.
 - ✓ Discussion of wildfire and outage risk changes as appropriate.

Note: This section is limited to 20 pages.



Reportable Risk Model Updates

If the electrical corporation has a Reportable Risk Model Update, it must **reanalyze the top 20% highest risk circuits** (segments/spans) and:

- Provide a **narrative discussion** of the resulting changes or indicate there are no such changes.
- Show resulting changes in Table 2-1, including as indicated:
 - Risk ranking
 - Circuit names/IDs and length in miles
 - Updates in risk scores (previous scores in parentheses)
 - Overall, wildfire, and outage risk scores included
 - Contribution to top 20% of risk
 - Updates to risk drivers for circuits, if any

Note: Electrical corporation must provide Excel spreadsheet with full table of top 20 percent risk circuits; may limit Table 2-1 to the top 20 lines in the WMP Update if necessary.

DRAFT WMP UPDATE REQUIREMENTS CHAPTER



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%	



3. NEW OR DISCONTINUED PROGRAMS



New or Discontinued Programs

The electrical corporation must report on the **creation of new programs it has created since its Base WMP submission, as well as any programs it has discontinued.**

- *Completed programs should not be reported as discontinued programs.*

Each update must be **justified** by lessons learned, internal policy changes, new laws, regulations, etc.

If there is **no update-year impact** from the new/discontinued program, the electrical corporation must:

- ✓ State the nature of the change
- ✓ Explain why there is no impact
- ✓ Reflect it in the Redline Base WMP

Any program for which the electrical corporation has **altered or plans to alter the name, purpose, or scope** must be included in this section.

Note: This section is limited to 15 pages.



4. APPROVED TARGETS



Reportable Updates – Approved Targets

The electrical corporation must provide Reportable Updates to approved targets for:

- **Grid design, operations, management**
- **Vegetation management**
- **Situational awareness**
- **Emergency preparation, community engagement, and collaboration**

Each **Reportable Approved Target Update** must be **justified** based on:

- Lessons learned
- Internal policy changes
- New laws, regulations, or executive orders
- Corrective actions deriving from Energy Safety's compliance process
- New or discontinued programs
- Other rationale



Reportable Updates – Approved Targets

Qualitative Target Updates (formerly objectives) are reportable when:

- Status updates occur **within the update year**.
- The update **impacts the status of the target** in future years of the WMP cycle.

Quantitative Target Updates are reportable when:

- **The target increases by 15% or more** in the update year.



Reportable Quantitative Target Decreases

Quantitative target decreases are reportable **ONLY** when:

- The target was exceeded in the prior year, so lowering in the update year **does not reduce the cumulative 3-year target**. The electrical corporation must explain how risk reduction is maintained.
- The target is changed due to **GRC Decision** (e.g., a funding change). The electrical corporation must meet all requirements in the Petition to Amend (Chapter IV) of the WMP Guidelines.
- The decrease is directly the result of a **Reportable Risk Model Update** or **new/discontinued program**.
- The target reduction **reduces risk** (e.g., PSPS outage reductions, Fast-trip setting outage reductions).



Reportable Updates – Approved Targets

The electrical corporation must **not**:

- **Add or remove any 3-year targets**, unless clearly related to and justified by a Risk Model Update or new/discontinued program.

Note: This section is limited to 20 pages.



5. PROJECTED EXPENDITURES



Projected Expenditures

- Expenditure updates are **significantly limited** compared to previous Update and are **not reportable on their own**.
- The electrical corporation must report updates to projected expenditures in the update year **ONLY**:
 - At the mitigation category level.
 - If the update occurs as a result of another **Reportable Update** (approved target change or new/discontinued program).
- The electrical corporation may use Table 2-2 to summarize the changes.

Note: This section is limited to 5 pages.

DRAFT WMP UPDATE REQUIREMENTS CHAPTER



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.			



6. ADMINISTRATIVE INFORMATION



Administrative Reportable Updates

Administrative information may be reported **only** if the update is needed to evaluate the WMP, communicate with the electrical corporation, or avoid confusion.

Examples include:

- A responsible person for a section changes.
- The phone number or contact information for a responsible person changes.
- A company reorganization changes which division is responsible for a section.
- A typo substantively changes the meaning of a sentence, causing confusion, e.g.:
 - ✓ Inadvertent inclusion of “not” when that is not meant.
 - ✓ Description stating “to be completed” when activity has already been completed.

Note: This section is limited to 5 pages.



ENERGY SAFETY EVALUATION PROCESS




Energy Safety WMP Update Evaluation

- Pre-submissions will not be accepted
- Evaluation will follow Process and Criteria stated in Chapter II, Section 4
- Non-reportable information may result in partial or full rejection of the WMP Update submission
- Denial of a WMP Update may occur in whole or in part

If denied or rejected:

- Energy Safety may allow the electrical corporation to **resubmit**
- Energy Safety may direct the electrical corporation to **retain previously approved Base WMP portions**



DISCUSSION AND Q&A



Pre-Submitted Questions



1. General Instructions

- Is there an expectation for ECs to submit a clean document in addition to the redline version?

1.1 Required Components of a WMP Update

- Is there an expectation for ECs to update maps that may correspond to downstream impacts? Clarification regarding updating maps that are referenced in Appendix C, specifically map tied to 'Figure 5-3 Geospatial Maps of Top Risk Areas within the High Fire Risk Area (HFRA)'



1.3 Non-reportable Updates

- Section 1.3 states that updates solely affect the year prior or after the update year are non-reportable items, whereas, section 2.3 states that new/discontinued programs that do not affect the update year are reportable (e.g. impacts preceding or following the update year). How are ECs to approach guidance in 1.3 and 2.3?



2.1 Areas for Continued Improvement

- Regarding the 20 page limit, could this be revised to be either 1 page per ACI, or 20 page limit?

2.2 Risk Models

- If risk model updates are reported in section 2.1 (ACIs), do those risk model updates also need to be reported in section 2.2. (Risk Models). If so, how do they differ?
- If changes to the risk model are not associated with or the result in the creation of reportable update, but do result in a change to the risk ranking of circuits, should the risk model change be reported in Section 2.2?



2.2.1 Reanalysis of High Risk Circuits

- This section mentions Table 3-1, however there is not a Table 3-1. Is this reference meant to be Table 2-1?



2.3 New or Discontinued Programs

- If introducing/new program in section 2.3, do we also need to follow technical guidelines section 8.1.1.2, providing the additional detail required in that section (as below)?
 - Utility Initiative Tracking IDs.
 - Projected targets for each of the three years of the Base WMP and relevant units.
 - Quarterly, rolling targets for 2023 and 2024 (inspections only).
 - The expected “x% risk impact” for each of the three years of the Base WMP. The expected x% risk impact is the expected percentage risk reduction per year, as described in Section 7.2.2.2.
 - Method of verifying target completion
- Do New/discontinued programs relate to ALL years, NOT just 2027?



2.4 Approved Targets

- Consider adding 'Enterprise Systems' as a category/initiative for reportable changes.
- Is there a specific format expected for updates to its qualitative and quantitative targets

2.4.3 Reportable Quantitative Target Decreases

- Clarification on Petition to Amend (2nd bullet point): Does inclusion of Petition to Amend information apply only if a Petition to Amend been submitted to ES? If not, what is the intent in having this information included when not yet submitted



2.4.3 Reportable Quantitative Target Decreases

- Please advise on how to reconcile a potential misalignment between section 2.4 (p. 12), which allows 'other rationale' for a reportable target change—including regulatory factors beyond a GRC decision—and section 2.4.3 (p. 13), which limits the rationale for a target decrease to only a GRC decision and references the Petition to Amend process (Chapter IV). For instance, if an EUP-related decision requires an electrical corporation to lower a UG target, it seems to qualify under 'other rationale' per footnote 9 in section 2.4, but would not be permitted under section 2.4.3. What would be the appropriate course of action in such a situation?
- The second bullet point of section 2.4.3 currently identifies the General Rate Case (GRC) decision as the only regulatory proceeding under which an electrical corporation may justify not meeting previously established targets. However, this appears to conflict with section 2.4 and footnote 9, which allow for 'other rationale,' including regulatory factors beyond a GRC decision. To ensure consistency across the document and provide flexibility to account for other regulatory proceedings, we propose revising the language in section 2.4.3 to include 'GRC and other regulatory decisions' similar to footnote 9 in section 2.4.



2.5 Projected Expenditures

- If future regulatory developments result in changes to the budget or projected budget that impact the General Rate Case (GRC), is there an established mechanism within the current framework to accommodate such changes and adjust targets accordingly?

2.6 Administrative Information

- If we have an incorrect figure in a table, can we update the figures in the table? What is the mechanism to make a simple update in a table without any type of rejection occurring?

HOW TO PARTICIPATE

If You Wish to Speak:

- Press the “**Raise Hand**” button in Teams; participants will be unmuted in the order hands are raised.
- For dial-in users via telephone, press **#5** to raise or lower your hand.
- Use the **chat** feature to submit a question at any time.



NEXT STEPS & CLOSE OUT



Written Comments

- Comments must pertain only to the **Draft WMP Update Requirements Chapter**.
- Written comments must **not exceed 15 pages**. Supporting documents may be included as appendices or attachments and are excluded from the 15-page limit.
- Written comments are due **September 18, 2025**, and must be filed in the WMP-Guidelines Docket ([Docket #WMP-Guidelines](#)).



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