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VIA ELECTRONIC FILING

Docket: WMP-Guidelines

September 18, 2025

Tony Marino Deputy Director
Office of Energy Infrastructure Safety
715 P Street, 20th Floor
Sacramento, CA 95814

RE: Bear Valley Electric Service, Inc., Liberty Utilities, Pacific Gas and Electric, PacifiCorp, San Diego Gas & Electric and Southern California Edison Company's Comments on the Draft WMP Guidelines

Dear Mr. Marino:

Bear Valley Electric Service, Inc., Liberty Utilities (CalPeco Electric) LLC, Pacific Gas and Electric Company, PacifiCorp, San Diego Gas & Electric, and Southern California Edison, ("the Joint Utilities") hereby provide comments addressing the Draft WMP Guidelines issued by the Office of Energy Infrastructure Safety ("Energy Safety") on August 19, 2025 ("WMP Guidelines") related to Electrical Corporations' implementation of their Wildfire Mitigation Plans ("WMP"). The Joint Utilities generally support the adoption of the WMP Guidelines and have limited the comments below to the most salient issues.

I. COMMENTS

A. 1. General Instructions

The Joint Utilities respectfully request clarification regarding the anticipated timeline for the WMP Update submission. Specifically, it is unclear when Energy Safety intends to release the initial schedule outlining key dates and deadlines. Early visibility into the expected timeframe would support planning and coordination efforts across the utilities.

B. 1.3 Non-reportable Updates

The Joint Utilities request that an inconsistency between Section 1.3 and Section 2.3 of the WMP Guidelines be reconciled in the final version of the guidelines. Section 1.3, titled Non-reportable Updates, indicates "updates that solely affect the year prior to or after the update year" are non-reportable. Section 1.3 is inconsistent with Section 2.3, titled New or Discontinued Programs, which states new or discontinued programs that

do not affect the update year are reportable. In the workshop held on September 4, 2025, Energy Safety clarified that Section 2.3, which governs reporting new or discontinued programs that do not affect the update year, is an exception to Section 1.3 of the WMP Guidelines. The Joint Utilities request that Energy Safety clarify this exception in the final version of the guidelines.

C. 2.1 Areas for Continued Improvement (ACI)

The Joint Utilities respectfully request that Energy Safety consider revising the total page limit for reporting on ACIs to a page limit per ACI. The WMP Guidelines provide that reporting on ACIs progress must be limited to 20 pages total. However, a utility with multiple ACIs may require more than 20 pages to provide a sufficient response. Shifting to a page limit per ACI would enable utilities to provide a more comprehensive response, while maintaining alignment with Energy Safety's review objectives.

D. 2.2 Risk Models

The Joint Utilities recommend removing "Areas of Continued Improvement" as a reportable update in Section 2.2 because reporting on Risk Model ACIs is covered in Section 2.1. If the reportable risk model update results in new or discontinued programs (Section 2.3) or updates to approved targets (Section 2.4), then the utility would provide updates according to the remainder of Section 2.2. However, reporting on ACI progress on its own should not require additional updates. Progress on a Risk Model ACI may be reported in the Update year but plans for implementation may be expected in a future year. In this case, Section 2.2 states "Changes to risk modeling that are not expected to be implemented by the time of the update year" are *not* reportable. Removing "Areas of Continued Improvement" as a reportable update in Section 2.2 would still require reporting progress on the ACI and would reserve the requirements outlined in Section 2.2 for risk model updates associated with or resulting in new/discontinued programs or approved target changes.

E. 2.2.1 Reanalysis of High-Risk Circuits

This section mentions Table 3-1, however there is not a Table 3-1 presented within the guidelines. This section should be revised to reference Table 2-1.

Reportable Risk Model Updates require a reanalysis of the top 20 percent of its highest risk circuits, segments, or spans. While this is feasible, the Joint Utilities emphasize that the risk ranking of circuits/segments alone does not represent how mitigations are selected and prioritized. In support of providing clear information, Energy Safety is facilitating a Risk Modeling Working Group ("RMWG") meeting on September 24, 2025, where the topic of risk reduction presentation will be discussed among the Joint Utilities. The Joint Utilities recommend incorporating feedback or recommendations from the RMWG and subsequent related discussions before the Guidelines are adopted. Further,

while we can populate Table 2-1 as prescribed, we request flexibility to also submit additional table(s) and/or supporting visualization(s) to present changes to risk rankings in a manner that more accurately and realistically represents mitigation selection and prioritization.

F. 2.3 New or Discontinued Programs

The Joint Utilities request that Energy Safety clarify whether the requirements in Chapter III Base WMP Technical Requirements are to be reported in the WMP Update or only in the Redlined Base WMP for new and discontinued programs. For example, if introducing a new program in Grid Design, Ops, and Maintenance, is the utility expected to include technical requirements outlined in Section 8 in its WMP Update or only in the Redlined Base WMP?

The Joint Utilities also request that Energy Safety consider revising the total page limit for this section to a page limit per new/discontinued program. A proportional approach would enable utilities to provide a complete and representative response, while maintaining alignment with Energy Safety's review objectives, and would ensure that each program is adequately addressed.

G. 2.4 Approved Targets

Section 2.4 requires utilities to provide reportable updates to quantitative and qualitative targets for grid design, grid operations, or grid management; vegetation management; situational awareness; and emergency preparation, community engagement, and collaboration; but it excludes Enterprise Systems. The Joint Utilities request Energy Safety consider adding Enterprise Systems as a category for reportable target updates as this category includes several qualitative targets that may merit an update.

H. 2.4.3 Reportable Quantitative Target Decreases

The Joint Utilities request that Section 2.4.3 be revised to account for regulatory proceedings other than the General Rate Case ("GRC") that may affect a utility's ability to achieve its WMP initiative targets. The draft Guidelines currently identify the GRC as the only regulatory proceeding under which an electrical corporation may justify reducing a previously established target in an annual Update. The Joint Utilities recommend a revision to the second bullet point to state "The electrical corporation cannot meet the prior target due to a Decision in a cost-recovery proceeding (such as the General Rate Case (GRC))..." This revision would enable a utility to cite certain decisions, for example, undergrounding initiatives impacted by a regulatory decision by Energy Safety on an Electrical Undergrounding Plan (EUP) or by the Commission on an



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EUP cost recovery application, as a rationale if that decision affected the utility's ability to meet a previously established WMP target.

II. Conclusion

The Joint Utilities appreciate the opportunity to provide these comments.

If you have any questions or require additional information, please contact me at jay.leyno@pge.com, Gary Chen (SCE) at Gary.Chen@sce.com, Lena McMillin (SDG&E) at RMcMillin@sdge.com, Paul Marconi (BVES) at Paul.Marconi@bvesinc.com, Melissa Swenson (PacifiCorp) at Melissa.Swenson@pacificorp.com, or Jordan Parrillo (Liberty Utilities) at jordan.parrillo@libertyutilities.com.

Sincerely,

/s/ Jay Leyno