

1.1 2023 WSAB Recommendations for the WMPs and Energy Safety Response

1.1.1 Structure and Scope

**Table 1-1: Energy Safety’s Evaluation of the WSAB’s Recommendations for the WMPs:
Structure and Scope**

Year Provided	WSAB Recommendation	Energy Safety Recommendation (Key: Fully Incorporate, Incorporate with Adjustments, Do not Incorporate)	Energy Safety Analysis
2023	1.1 - Executive Summary The executive summary should serve as a standalone document, precede the table of contents, and include all of the key targets and cost estimates for the reporting period by program categories (e.g., grid design and system hardening, community outreach and engagement). The utilities¹ should include this information in a table similar to that of the example shown in	Incorporate with adjustments. Energy Safety agrees that the current structure of the executive summary can be improved and will revisit this recommendation for the next 2026-2028 WMP Guidelines.	- Energy Safety is reserving any changes to the upcoming 2025 WMP Update Guidelines for high priority items that fit within the objectives for the update year. - This recommendation and many others below will be revisited in drafting the 2026-2028 WMP Guidelines.

¹ In this document, “utilities” should be understood to mean “electrical corporations”.

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	Appendix A.		
2023	1.2 - Citation of Guidelines Statutory or specific guidelines included in the relevant sections should be placed in the footnotes or endnotes. See the before and after example in Appendix B.	Incorporate with adjustments. Energy Safety proposes to incorporate this recommendation with adjustments, Energy Safety will provide guidance to the electrical corporations that the Technical Guidelines should not be repeated in WMP submissions, inclusive of including foot/endnotes.	Energy Safety currently does not include guidance pertaining to the citation of statutory or specific guidelines. Electrical corporations should not be repeating the Technical Guidelines at the start of each section and Energy Safety will include this guidance in the 2026-2028 WMP Guidelines.

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2023	1.3 – Table of Contents The table of contents should have hot links for ease of access. Also, the list of tables/figures should be put in an appendix.	Incorporate. Energy Safety proposes to clarify the table of contents “hot links” requirement and move the lists of tables and figures into an appendix in the 2026-2028 WMP Guidelines.	- The 2023-2025 WMP Technical Guidelines require the use of hyperlinks for figures and tables. Electric bookmarks for major divisions are also required for PDF submissions. - Energy Safety will re-evaluate the wording of the hyperlink requirements to make clear that the table of contents should include “hot links.” - Removing the lists of tables and figures would downsize the table of contents, which can be up to 30 pages in length as is.
2023	1.4 - Interactive WMP Webpage The utilities should develop an interactive webpage to accompany the WMP submission that includes a map showing targeted projects, where known. The utilities should also include	Do not incorporate. This recommendation is not within the currently considered scope of the 2025 WMP Update Guidelines or 2026-2028 WMP Guidelines and will not be	While this feature would be beneficial for stakeholders and customers to learn about where and when wildfire mitigation projects will occur, it is outside of Energy Safety’s scope for the WMP Guidelines. Energy Safety will consider providing an option for the

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	summary materials showing the targets by program over the WMP planning period and what goals have been accomplished to date. Additionally, they should describe their mitigation operations and technologies for the average customer.	incorporated at this time.	electrical corporations to provide this information without requiring it.

1.1.2 System Design and Operation

**Table 2-1: Energy Safety's Evaluation of the WSAB's Recommendations for the WMP Guidelines:
System Design and Operation**

Year Provided	WSAB Recommendation	Energy Safety Recommendation (Key: Fully Incorporate, Incorporate with Adjustments, Do not Incorporate, Already Incorporated)	Analysis
2023	2.1 - Local Agency Coordination Where known and feasible, the utilities should incorporate local public works plans or trenching efforts from partner agencies such as communications or sewage providers into the prioritization and planning of their undergrounding efforts.	Incorporate with adjustments. Energy Safety proposes to ask utilities how they take local plans and projects into consideration and ensure that some form of coordination is occurring within the 2026-2028 WMP Guidelines.	Energy Safety acknowledges the importance and efficiency of working with local public works projects but wants to ensure prioritization still occurs to maximize wildfire risk reduction, first and foremost.

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2023	2.2 - Providing PSPS Information The utilities need to provide their assumptions and essential information in their WMPs that are used to estimate the benefits of PSPS avoidance and/or outage avoidance for each program. https://bof.fire.ca.gov/media/hffh3kdv/post-last-week-of-dec-2023-forest-practice-rules-and-act-final.pdf	Incorporate with adjustments. Energy Safety proposes to continue to evaluate this recommendation in conjunction with the findings from current modeling efforts/studies and re-visit this during the 2026-2028 WMP Guidelines.	- Energy Safety’s current guidelines require the utilities to have (available upon request) documentation for PSPS assumptions and detailed information. Energy Safety acknowledges that this area could be clearer and will re-evaluate the requirement in the next Base Year Guidelines. - Energy Safety will evaluate findings from on-going relevant modeling studies to inform the next Base Year years.

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2023	2.3 - Communicating Mitigation Efforts The utilities need to clearly communicate how they estimate the effectiveness of their mitigations and how they control for factors such as weather and the effects of other wildfire mitigation programs to explain how ignition reductions can reasonably be attributed to specific mitigation efforts.	Incorporate with adjustments. Energy Safety proposes that the utilities be required to estimate the effectiveness of their mitigations, including the evaluation of specific ignition drivers in the 2026-2028 WMP Guidelines.	- Energy Safety proposes to include this recommendation into the updates within the RSE/cost benefit section of the 2026-2028 WMP Guidelines. - Energy Safety does not recommend incorporating the weather control factor, as this is currently too complicated. However, this is something that can be looked at in the future.

1.1.3 Communication and Community Outreach

**Table 2-2: Energy Safety’s Evaluation of the WSAB’s Recommendations for the WMP Guidelines:
Communication and Community Outreach**

Year Provided	WSAB Recommendation	Energy Safety Recommendation (Key: Fully Incorporate , Incorporate with Adjustments , Do not Incorporate , Already Incorporated)	Analysis
2023	3.1 - Communicating Mitigation Efforts When the utilities are aware of conditions that may either trigger Protective Equipment and Device Settings ^[2] outages or have already triggered such outages, they should communicate this information where feasible on their website to the same stakeholders and partners that they would communicate with for PSPS events. This includes but is not limited to public safety partners and local governments, as well as stakeholders and customers.	Incorporate with adjustments. Energy Safety will consider requiring electrical corporations to provide their communication and outreach strategy for Protective Equipment and Device Settings) in the 2026-2028 WMP Guidelines.	- Energy Safety currently does not ask electrical corporations for their Protective Equipment and Device Settings communication strategy. - Energy Safety acknowledges that communicating every potential curve outage

² The WSAB use the term enhanced powerline safety settings (EPSS) which is a term that Pacific Gas and Electric company (PG&E) use to describe Protective Equipment and Device Settings. Energy Safety has changed all references of EPSS to Protective Equipment and Device Settings. This refers to the increased sensitivity in settings for fault-sensing devices on the electric distribution grid, such as a circuit breaker and/or a line recloser, that causes the line segment to automatically de-energize when contacted by a foreign object such as a tree limb that could otherwise potentially lead to an ignition.

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			resulting from Protective Equipment and Device Settings could result in a significant over-notification and therefore will keep this in mind when considering new requirements.
2023	3.2 - HFTD Communication The utilities should expand on the already recognized communication platforms and services for HFTD customers affected by outages relating to Protective Equipment and Device Settings and PSPS. This notification may occur, for example, via an outage app unique to the HFTD areas and communities. Additionally, the utilities should each create a readily available website with information pared down to be easily understood yet informative enough to the	Incorporate with adjustments. Energy Safety will consider including requirements for utilities to provide their communication and outreach strategy for Protective Equipment and Device Settings in the 2026-2028 WMP Guidelines.	- Energy Safety currently does not ask electrical corporations for their Protective Equipment and Device Settings communication strategy. - With respect to the recommendation that the utilities create a readily available

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	customer and stakeholders, to assist in their response to elevated wildfire risk in HFTD areas.		website providing information on wildfire risk in the HFTD, it is outside the scope of Energy Safety's authority to mandate prescriptive requirements regarding the electrical corporation's communication platforms.