Wildfire Mitigation Plan Comparison 2023-2025 and 2026-2028

January 20, 2026

2026-2028 WMP builds upon foundations from 2023-2025 WMP with more sophisticated tools and targeted approaches

Category	2023-2025 WMP	2026-2028 WMP	Differences and Trends
Plan Overview and Objectives	Primary goals: minimize catastrophic wildfire risk from electrical lines/equipment, assess wildfire risk and develop reduction strategy, implement mitigations to minimize catastrophic wildfire likelihood, and limit customer disruption from mitigation efforts. Objectives focus on risk-informed decision-making to minimize ignition risk and outage impacts.	Primary goals: execute comprehensive strategy to reduce ignitions by implementing mitigations to minimize catastrophic wildfire likelihood while maintaining electric system reliability and limiting customer disruptions. Objectives include reducing wildfire risk from vegetation/objects contacting power lines, reducing equipment failure risk, limiting customer disruption, and maturing enterprise systems.	Evolution from general risk minimization to more specific focus on ignition reduction and comprehensive strategy execution. Added emphasis on maturing enterprise systems and data governance practices.
Service Territory	Service territory includes areas with highest risk drivers for wildfires, with comprehensive wildfire mitigation strategy addressing both system resilience and operational programs.	Service territory includes areas with highest risk drivers for wildfires, with comprehensive wildfire mitigation strategy addressing both system resilience and operational programs.	No significant changes identified in service territory coverage approach. Increased about 600 circuit miles of underground distribution lines in HFTD from 2023-2025 WMP.
Risk Methodology	Provide overview of risk methodology, key input data and assumptions, risk analysis, and risk presentation. Wildfire Distribution Risk Model (WDRM) v3, Wildfire Transmission Risk Model (WTRM) v1, Public Safety Power Shutoff (PSPS) Risk Map. Risk analysis framework with bow-tie analysis. Includes machine learning and fire simulations.	Update risk models: WDRM v4, WTRM v2, PSPS, and Enhanced Powerline Safety Settings (EPSS) models. Includes advanced machine learning, fragility curves, and consequence modeling and extreme-event scenarios. Risk evaluation aligns with the risk-informed decision-making framework from CPUC's Risk-based Decision-Making Framework (RDF) (D.22-12-027 and D.24-05-064).	Evolution to version 4 of WDRM and version 2 of WTRM, addition of EPSS model. Use risk-informed decision-making framework aligned with CPUC's RDF approved in D.22-12-027 and D.24-05-064.
Mitigation Strategy	Balanced portfolio of Operational and System Resilience Mitigations centered on: comprehensive monitoring and data collection, operational mitigations (EPSS, PSPS, maintenance/repair), and system resilience.	Wildfire Mitigation portfolio is structured around four categories: comprehensive monitoring and data collection, operational mitigations, system resilience mitigations, and community support.	Expansion from three to four mitigation categories with addition of wildfire impact limitation. Emphasize the need to continuously monitor the risk and gaps in our layers of protection and update our strategies appropriately.
PSPS	Provided comprehensive operational framework including extensive protocols and procedures, detailed metrics and forecasting.	Focused on minimize outage frequency, scope, duration and support customers during wildfire events.	Provide structured descriptions to reduce frequency, scope, and duration of PSPS activities.

Some of the measures included in this presentation are contemplated as additional precautionary measures intended to further reduce the risk of wildfires.

2023-2025 and 2026-2028 WMP Comparison (cont'd)

Category	2023-2025 WMP	2026-2028 WMP	Differences and Trends
Grid Design & System Hardening	Long-term system resilience solutions include distribution overhead system hardening and undergrounding program and transmission line removal. Expansion of Downed Conductor Detection (DCD) capability to improve the detection and isolation of high impedance faults. Installation of additional line reclosers and fuse savers to reduce EPSS reliability impact.	Overhead system hardening and undergrounding remain cornerstone initiatives. More comprehensive risk-informed decision making and project section process. Continued progress in reducing customer impacts from EPSS outages and updates to EPSS enablement criteria.	More specific quantification of the effectiveness of system hardening activities. Continued emphasis on system hardening as permanent risk reduction strategy and minimizing customer impacts from EPSS outages.
Asset Inspections	Comprehensive overview of inspection processes including transmission, distribution, and substation programs. Features Table 8-6 detailing inspection methods (patrol, detailed, aerial, climbing, LiDAR), frequency triggers based on risk model inputs with HFTD Tier variations, and governing standards. Includes workforce development plans for inspector retention.	Asset inspection strategies target high-risk ignition locations. HFTD/HFRA inspections scheduled post-winter storm period (March/April) to address issues before wildfire season (June/July). Comprehensive monitoring and data collection framework informs scheduling, with Wildfire Risk Governance Steering Committee oversight for new mitigations. Includes various transmission programs (detailed, climbing, infrared, intrusive pole, switch function, patrol).	The 2026-2028 plan shows a shift from comprehensive process documentation to strategic risk-focused inspections targeting high ignition risk locations. Enhanced seasonal timing: More specific seasonal scheduling (post-winter storm, pre-wildfire season) demonstrates improved operational planning. Expanded monitoring integration: The comprehensive monitoring and data collection framework represents a more sophisticated approach to data-driven inspection scheduling.
Equipment Maintenance	Maintenance and repair activities mentioned as operational mitigations to prevent operational failures and reduce system risk.	Predictive maintenance added; detailed programs for connectors, splices, lightning arrestors, legacy equipment; proactive replacement strategy.	Evolution from basic reactive maintenance to predictive maintenance; broader equipment scope.
Quality Assurance (QA) / Quality Control (QC)	Provided overview of QA/QC activities and target pass rates. Focused on asset management and inspections.	Expanded to include grid design, detailed ground, aerial, and climbing inspections for transmission and distribution assets.	Significant expansion of QA/QC coverage beyond basic asset inspections to comprehensive coverage, enhanced procedural documentation with more detailed reporting requirements.

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2023-2025 and 2026-2028 WMP Comparison (cont'd)

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Vegetation Management	Introduced three new programs: Vegetation Management for Operational Mitigations, Tree Removal Inventory, and Focused Tree Inspections	Focuses on streamlining and consolidating VM Distribution inspection programs, leveraging technology to inform/supplement planning, execution verification of work, utilizing operational analytics, and improving VM critical data sets. Mentions risk-informed planning and execution, targeting high-risk areas. Includes partnerships as a key component, pursuing public-private partnerships for cost-effective wildfire mitigation.	Shifting from introducing new programs to consolidating and optimizing existing ones through technology and analytics. The newer plan emphasizes a more strategic, risk-informed methodology compared to the more traditional programmatic approach of the earlier plan.
Situational Awareness	Objectives for 3- and 10-year periods for environmental monitoring, grid monitoring, ignition detection, weather forecasting, and ignition likelihood calculation. Incorporates new tools, equipment upgrades, tech integrations, model improvements, and enhanced data initiatives.	Maturing capabilities of wildfire cameras, weather stations, and Hazard Awareness Warning Center. Building real-time monitoring using Early Fault Detection, Gridscope devices, and next-generation SmartMeter devices.	Building comprehensive real-time monitoring with next-generation technologies. Focuses on target setting on environmental monitoring, grid monitoring, ignition detection systems, and weather forecasting requirements. Newer plan explicitly includes weather stations maintenance and calibration.
Emergency Preparedness	Adding 10-year objective to execute briefings with 47 counties every three years. Annual review of Company Emergency Response Plan (CERP) and wildfire-related annexes.	Section 11 covers Emergency Preparedness, Collaboration, and Community Outreach including wildfire and PSPS emergency preparedness, service restoration, resource planning, external collaboration, public communication, Access and Functional Needs (AFN) population engagement, Tribal Nations engagement, and customer support.	Provides a more comprehensive emergency preparedness framework with detailed stakeholder engagement. Maintained county briefing commitments with expanded collaboration and community outreach integration.
Community Outreach and Engagement	Community engagement events to convey local wildfire safety information to reduce wildfire or outage event impacts.	Integrated with Emergency Preparedness in Section 11. Enhanced customer outreach and support from lessons learned. Multi-channel outreach in 16 languages, AFN engagement, tribal partnerships, backup power programs.	Integration of community outreach with emergency preparedness and enhanced customer support focus.

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2023-2025 and 2026-2028 WMP Comparison (cont'd)

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Enterprise Systems	There was no dedicated section for Enterprise Systems and they are mentioned across multiple sections of the WMP in grid monitoring, ignition detection, weather forecasting, risk assessment, vegetation management sections.	Section 12 covers Enterprise Systems with qualitative targets. Objective to mature enterprise systems supporting risk reduction through improved systems, data accuracy, and governance practices.	Enterprise systems moved from scattered sections to a unified section, indicating improved organizational structure and strategic focus. Shift from system functions to data platform categories.
Lessons Learned	Incorporates lessons through evaluative discussions with other IOUs, reviewing situational awareness tools, and identifying improvement areas.	Section 13 covers lessons learned with descriptions and summaries. Strategy influenced by internal monitoring, stakeholder feedback, enhanced risk modeling, and collaboration with other electrical corporations.	More structured approach to lessons learned with formal section and systematic incorporation of internal monitoring and stakeholder feedback.

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