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**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

Office of Energy Infrastructure Safety
Wildfire Safety Division,
California Public Utility Commission

Resolution SPD-35

**COMMENTS OF THE GREEN POWER INSTITUTE
ON DRAFT RESOLUTION SPD-35**

May 29, 2025

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COMMENTS OF THE GREEN POWER INSTITUTE ON DRAFT RESOLUTION SPD-20

The Green Power Institute, the renewable energy program of the Pacific Institute for Studies in Development, Environment, and Security (GPI), provides these *Comments of the Green Power Institute on Draft Resolution SPD-35*.

The GPI has been involved in the review and analysis of WMPs since their inception and was actively engaged in the review and analysis of Liberty's 2025 WMP Update, approved by the OEIS in April 2025. GPI generally supports the decision in Draft Resolution SPD-35 to ratify the OEIS Decision on Liberty's 2025 WMP Update. Eleven new and updated ACIs issued in the OEIS Decision will guide continued improvement across Liberty's annual WMP filings, as will required cross-utility benchmarking towards advancing wildfire risk mitigation methods across the CPUC jurisdictional footprint.

Liberty is in a relatively early stage of shifting its wildfire risk modeling approach to leverage Technosylva modeling, which is used by the three large IOUs and the other SMJUs. An ACI addressing timely and traceable model development will support iterative improvements to Liberty's WMP model sophistication. However, substantive differences between CPUC jurisdictional utility wildfire risk model designs and model application methods threaten ratepayer equity in terms of the resulting safety, reliability, and cost outcomes that customers across California will experience.

Ongoing development and clear agency guidance is critical to establish improved standards for wildfire and reliability risk tolerance thresholds, risk model design, risk model output reporting, model output application, and proposed mitigation portfolio reporting that also unify utility wildfire risk modeling across California. Establishing quantifiable top-down planning standards through state authority, instead of at each utilities discretion, will make strides towards clarifying suitable risk modeling approaches that inform least-cost best-fit wildfire and related reliability risk mitigations across California's HFTD.

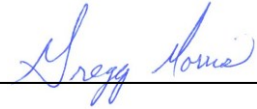
GPI is also supportive of the Resolution statement that highlights the potential for a subsequent GRC review process to modify WMP revenue requirement and scope of work. CPUC review in the context of holistic system needs and rising costs is critical to balancing California's electrification and greenhouse gas emission goals, which intersect with wildfire mitigation planning through timely distribution system buildout, DER and system-level resource procurement, service reliability, and customer rate containment.

Conclusions

We support swift passage of the OEIS led, and CPUC ratified 2025 Liberty WMP Update Approval via Resolution SPD-35, especially considering the incremental improvements, ongoing iterative development needs, and Liberty's forthcoming 2026-2028 WMP.

Dated May 29, 2025

Respectfully Submitted,

A handwritten signature in blue ink, appearing to read "Gregory Morris", is positioned above a horizontal line.

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