

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



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Order Instituting Rulemaking to  
Refine the Risk-Based Decision-  
Making Framework for Electric and  
Gas Utilities.

Rulemaking R.26-04-016  
(Filed April 30, 2026)

**MUSSEY GRADE ROAD ALLIANCE COMMENTS  
ON THE ORDER INSTITUTING RULEMAKING TO  
REFINE THE RISK-BASED DECISION FRAMEWORK**

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## **1. INTRODUCTION**

On May 7, 2026, the Commission issued Rulemaking R.26-04-016, which had been filed on April 30, 2026.<sup>1</sup> The Mussey Grade Road Alliance (MGRA or Alliance) submits these comments, pursuant to Rule 6.2 of the California Public Utilities Commission (CPUC) Rules of Practice and Procedure, and the Preliminary Schedule put forth in the OIR, setting a due date of 30 days after date of issuance.<sup>2</sup> The OIR requests comments on substantive questions raised in attached Appendix A, as well as specific scoping and procedural questions.

## **2. MGRA HISTORY AND INTEREST IN THIS PROCEEDING**

The Mussey Grade Road Alliance, established in 1999, is a grass-roots citizen-based organization located in Ramona, California. The Alliance has been actively involved in activities related to utility wildfire risk at the CPUC since 2006. MGRA has demonstrated a deep commitment to the issue of wildfire safety in California, a commitment arising from its own experience in the 2003 Cedar fire, when two-thirds of homes in the area were lost. Among MGRA's contributions to wildfire safety in California are its proposals for utility fire ignition data collection, statewide utility fire hazard maps, and utility fire prevention plans, all of which were approved by the Commission in the proceedings R.08-11-005 and R.15-05-006.

MGRA was actively involved in the original S-MAP proceedings, A.15-05-002 to 005, making specific contributions regarding wildfire and tail risk, as well as risk tolerance. MGRA continued its participation into the RDF proceeding R.20-07-020 making numerous contributions in the areas of tail risk and urging the CPUC to address risk tolerance as an urgent issue. MGRA has also addressed the issue of risk tolerance in its interventions in utility general rate cases.

In particular, MGRA made significant contributions during Phase 4 of the RDF proceeding, which was the Commission's first serious attempt to address the risk tolerance issue. SPD had issued a Risk Tolerance Proposal,<sup>3</sup> which procedurally was unlikely to produce beneficial results,

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<sup>1</sup> R.26-04-016; ORDER INSTITUTING RULEMAKING TO REFINE THE RISK-BASED DECISION-MAKING FRAMEWORK FOR ELECTRIC AND GAS UTILITIES; May 7, 2026. (OIR)

<sup>2</sup> Id.; p. 17.

<sup>3</sup> R.20-07-013; ADMINISTRATIVE LAW JUDGE'S RULING ENTERING PHASE 4 WORKSHOP #1 MATERIALS AND RELATED STAFF PROPOSAL INTO THE RECORD AND SETTING COMMENT

but contained technical mechanisms that might have been useful. MGRA issued its own Risk Tolerance Proposal,<sup>4</sup> which was not so much a Risk Tolerance guideline itself but rather a procedural framework by which the Commission could initiate a proceeding that would develop a viable risk tolerance framework. MGRA's suggestion that Risk Tolerance be separately addressed in a separate proceeding was adopted.<sup>5</sup>

D.25-08-032 required that the major utilities draft a survey report within 80 days of the issuance of the Decision:

*"...on approaches to risk tolerance in related industries and serve it on the service list of this proceeding. The survey report shall include the following information: whether a regulator sets the baseline risk tolerance, or, if not or if only partially, how industries or private companies set, implement, and modify risk tolerance thresholds. The survey report shall include, but is not limited to, the following industries: aviation, chemical, mining, oil and gas, nuclear, autonomous vehicles, spaceflight, investor-owned utilities in other jurisdictions, and large California investor-owned electric and/or gas utilities. For the section on large California investor-owned electric and/or gas utilities, the utilities shall include a description of the status quo, explaining the internal process of how each company currently sets the amount of risk they accept in safety, operations, and decision-making."*<sup>6</sup>

The Survey Report was served on November 17, 2025.<sup>7</sup> The Survey Report summarizes IOU research into risk tolerance standards over a range of industries and regulators. The Survey Report notes that:

- "Typically, the regulator first establishes baseline risk tolerance thresholds, and individual companies within those industries define additional risk tolerance metrics based on the company's role and responsibilities and specific regulatory and/or legal requirements and considerations."<sup>8</sup>

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SCHEDULE; November 8, 2024.

<sup>4</sup> R.20-07-013; MUSSEY GRADE ROAD ALLIANCE PROPOSAL FOR A COMMISSION-LED DELIBERATIVE RISK TOLERANCE PROCESS; December 3, 2024. (MGRA Proposal)

<sup>5</sup> D.25-08-032; p. 21.

<sup>6</sup> Id.; p. 130.

<sup>7</sup> R.20-07-013 (undocketed); SOUTHERN CALIFORNIA EDISON COMPANY'S (U 338-E), PACIFIC GAS AND ELECTRIC COMPANY'S (U 39-E), SOUTHERN CALIFORNIA GAS COMPANY'S (U 904 G), AND SAN DIEGO GAS & ELECTRIC COMPANY'S (U 902 M) JOINT SURVEY REPORT; (November 17, 2025).

<sup>8</sup> Id.; p. 1.

- Regulators adopt requirements specifically to avoid catastrophic (tail-risk) events.
- “..regulators serve as proxies for societal preferences, translating public expectations into enforceable thresholds to guide utility operations.”<sup>9</sup>
- “Individual risk tolerance varies significantly across individual stakeholder groups including companies, their employees, their customers, their investors, as well as members of the general public.”<sup>10</sup>
- Risk attitude is one of the components of risk tolerance.<sup>11</sup>

### 3. SCOPING AND PROCEDURAL QUESTIONS

The OIR solicits party comments on the following scoping and procedural questions:

- Whether changes to the preliminary scope of issues should be made;*
- Whether there are objections to the preliminary categorization of this proceeding;*
- Whether evidentiary hearings are needed;*
- Whether to hold workshop(s) on any of the following topics: Risk Tolerance, BCR Modifications, RAMP Schedule/Process, and/or SMJU Reporting; and*
- Whether there are any additional procedural issues that may impact just and efficient conduct of this OIR.*<sup>12</sup>

MGRA response is as follows:

- Two additions need to be made to the preliminary scope of issues.

1) While it may not be critical to put this issue in scope for this phase of the proceeding, it should be noted for inclusion in scope for a future phase. Specifically, the relationship between risk tolerance and risk attitude is fundamental, with risk attitude being an element that defines risk tolerance.

In its decisions on the 2026-2028 Wildfire Mitigation Plans, OEIS notes that “*risk scaling functions may have significant impacts on quantified benefits of mitigations*” and requiring that for the next full WMP submission that “*PG&E must collaborate with other electrical corporations to establish what attributes are appropriate to apply scaling*”

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<sup>9</sup> Id.; p. 5.

<sup>10</sup> Id.

<sup>11</sup> Id.

<sup>12</sup> OIR; pp. 18-19.

*functions and to complete a sensitivity analysis to determine how risk-averse approaches affect mitigation selection.”<sup>13</sup> Energy Safety’s Decision for SDG&E goes further, stating that “SDG&E must collaborate with large electrical corporations to evaluate the impact of attribute function scaling on mitigation planning. This will help determine if there are valid methodologies to use, and if so, which methodologies should be used for attribute scaling function through collaboration given the wide variance across the electrical corporations.”<sup>14</sup>*

Since utilities are being driven by to collaboration on risk attitude and justification of methodologies by OEIS, and because risk attitudes have been shown to be determinative for determining the expenditures and choice of mitigation, it is appropriate that the Commission should oversee and set standards for the development of risk aversion functions. This should be an output of this proceeding.

2) Substantial changes were made to the RDF process as a consequence of SB 254. Most specifically, the OEIS Wildfire Mitigation Plan process is being more closely integrated with the RDF, and the schedules are being put into alignment. However, the Commission role of ratifying the WMP has been removed in the most recent version of PUC Code 8386. Commission ratification allows the WMPs to be cited and used in Commission proceedings and adds evidentiary weight that will be missing in lieu of this ratification. Additionally, ratification was used as a keystone to allow intervenors to claim compensation for participation in WMPs. This proceeding should examine the questions:

- How can Wildfire Mitigation Plans be integrated into the RDF process so that an OEIS-approved WMP can be incorporated into the General Rate Case process?
- How can duplication and conflicts between RAMP and WMP filings, to be near-simultaneous, be avoided?
- Can a mechanism be devised to allow intervenors to receive compensation for participation in the WMP reviews that shows contributions to Commission RDF, RAMP, or GRC proceedings?
- Currently, resolutions resulting from ratified OEIS decisions can be used proceedings other than the GRC of any particular utility. Is there a

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<sup>13</sup> OFFICE OF ENERGY INFRASTRUCTURE SAFETY; DECISION; PACIFIC GAS AND ELECTRIC COMPANY 2026-2028 BASE WILDFIRE MITIGATION PLAN; February 5, 2026; p. 21.

<sup>14</sup> OFFICE OF ENERGY INFRASTRUCTURE SAFETY; DECISION; SAN DIEGO GAS AND ELECTRIC COMPANY 2026-2028 BASE WILDFIRE MITIGATION PLAN; February 2, 2026; p. 9.

mechanism to continue this process so that OEIS findings are consumable by the Commission?

- Is it possible to find that a OIES Decisions for 2026-2028 WMPs can be used to support RDF processes?

c. Evidentiary hearings should not be necessary in the current proceeding. Development of a factual basis for the policy issues being addressed in this proceeding can proceed through a thorough process of proposals, workshops, comments and replies. If disputes over questions of fact arise evidentiary hearings can be scheduled if no other resolution is possible. It would be advantageous to allow data requests be propounded on parties who present proposals or reports in order to ensure that the factual record is clear.

d. Workshops will be necessary for addressing Risk Tolerance, as this has been a topic that has long been pending before the Commission and some parties have previously put forward positions or proposals regarding risk tolerance. Workshops may be desirable for significant BCR modifications.

e. Risk Tolerance definitions and proposals are going to depend upon Commission determinations regarding utility risk scaling that are currently being addressed in the SPD-37 undergrounding application and in the PG&E and SDG&E RAMP and GRC proceedings. One of the questions that will need to be resolved in this proceeding is how Risk Tolerance relates to and can be differentiated from risk scaling.

#### **4. SUBSTANTIVE QUESTIONS FROM APPENDIX A**

Questions are answered in the order they are provided in Appendix A. If a question is not addressed, it means that MGRA currently takes no position on that question at this time.

##### **4.1. Risk Tolerance**

Questions in the Risk Tolerance subsection are numbered 4.1.n, where n is the question number.

#### **4.1.1. Affordability**

1. *Should the definition of Risk Tolerance be updated to reflect affordability concerns?*

D.25-08-032 describes Risk Tolerance as:

*“Risk tolerance is the maximum amount of overall residual risk remaining in a system managed by the utilities that is deemed acceptable to ratepayers after implementation of Controls and Mitigations, weighed against the costs needed for that incremental risk reduction.”<sup>15</sup>*

To the degree that the current definition and understanding of Risk Tolerance does not include tolerance of individuals to financial risks and burdens, it should be updated to reflect affordability concerns. If there is little to no cost to mitigating a risk, there is no harm to any ratepayer in adopting a very low Risk Tolerance for that risk. If a high burden of risk mitigation costs are assigned to a particular ratepayer, that ratepayer may prefer to tolerate the risk rather than bear the burden of mitigation costs. The definition of Risk Tolerance should include the willingness and ability to bear the cost of risk mitigation. In particular, the definition should draw attention to the potential harm of high utility rates to vulnerable ratepayers.

#### **4.1.2. Requirements**

2. *What Risk Tolerance requirements should the Commission incorporate into the RDF to improve the assessment of utility risk mitigation proposals in the GRC?*

Requirements should be developed over the course of this proceeding through a vetting process. Some candidate requirements might be:

- Risk tolerance must include cost impacts on ratepayers.
- Risk tolerance analysis should identify different categories of stakeholder and ratepayer with distinct risk tolerance profiles (WUI resident, low-income ratepayer, public safety organizations, etc.).
- Clear definition and boundaries must be set between risk tolerance and risk attitude, and the relationship between them explicitly stated.

#### **4.1.3. Standard and framework**

3. *Should the Commission adopt a Risk Tolerance Standard or a Framework?*

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<sup>15</sup> D.25-08-032; p. 9.

Yes. MGRA has been advocating for the Commission to lead the development of a risk tolerance framework for many years.<sup>16</sup> As noted by MGRA in its Proposal, in the current regulatory, and financial environment, it is in the utility interest to adopt a near-zero risk tolerance policy.<sup>17</sup> This has had substantial impacts on affordability and it is within the Commission’s mandate under Public Utilities Code §451 to ensure risk mitigation spending is in the public interest.

#### **4.1.4. Capturing Risk Tolerance relationships**

*4. How should Risk Tolerance capture the relationship between acceptable level of risk mitigation, tolerance for unmitigated risk, and affordability of rates?*

This question is central to the Risk Tolerance issue and must be addressed by any proposed Risk Tolerance Standard or Framework. Breaking it down into pieces:

“acceptable level of risk mitigation” – If risk mitigation imposed no burden, there would be no need to question what constitutes an “acceptable” level of risk mitigation. Complete mitigation (zero-risk) would be the default goal. The fact that there is an “acceptable” level of risk mitigation ties directly into the question of affordability.

“tolerance for unmitigated risk” – This will vary by stakeholder group, and the Risk Tolerance Standard or Framework should identify different groups and how their tolerance for risk varies. Likewise,

“affordability of rates” – is another variety of tolerance that will need to be balanced with risk tolerance. In general, rates will affect low income and vulnerable populations more than more affluent populations, potentially impacting their health and safety.<sup>18</sup>

The Commission’s goal should be to construct a mechanism that equitably distributes residual risk and mitigation costs among stakeholders, protecting groups that are particularly vulnerable to the risk itself or to the costs that mitigating the risk entails.

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<sup>16</sup> MGRA Proposal; pp. 2-6.

<sup>17</sup> *Id.*; pp. 4-5.

<sup>18</sup> A.21-06-021; MUSSEY GRADE ROAD ALLIANCE OPENING BRIEF ON PACIFIC GAS AND ELECTRIC COMPANY’S 2023 GENERAL RATE CASE; November 24, 2022; pp. 5-8.

#### **4.1.5. Risk Tolerance proposals**

*Should the Commission ask parties to develop Risk Tolerance proposals? If so, what guidance should the Commission provide to parties to develop Risk Tolerance proposals?*

The Commission should direct the Safety Policy Division to develop a Risk Tolerance proposal and allow parties to develop alternative Risk Tolerance proposals.

The Commission should request that SPD provide a modified proposal that improves upon its previous proposal in R.20-07-013, specifically:

- The proposal should not just be technical but include broader policy,
- The proposal should assume that risk tolerance will be set by the Commission, not the utilities as was the case with the previous proposal,
- The proposal should incorporate and respond to feedback provided by parties in R.20-07-013,
- The proposal should incorporate findings from the Joint IOU Risk Tolerance Survey and follow best practice recommendations, and
- The proposal should account for affordability.

In general, proposals should include:

- Identification of stakeholder groups and their exposures to the risk in question,
- Identification of ratepayer groups and their exposure to mitigation costs,
- Development of the technical mechanism to calculate “tolerable” risk levels,
- Mechanisms to protect particularly impacted stakeholders and ratepayers,
- Clarification of cost recovery process in the case that a known and intended residual risk results in harm that is recovered from utilities.

##### **4.1.5.1. Specific issues and questions**

*What specific issues and questions must parties address in their Risk Tolerance proposals?*

Aside from the issues included in the previous section, submitters should also identify:

- What is the relationship between risk tolerance and risk attitude, and how are they related?
- Which attributes should risk tolerance considerations be applied to. For example, most f-N curves are aimed at avoiding deaths and injuries. To the extent that Risk Tolerance is applied to other attributes each attribute should be independently justified, because each will potentially have different sets of stakeholders with different attitudes. (For example, WUI residents are exposed to wildfire, but customers outside of WUI areas are exposed to PSPS risk.)

#### **4.1.5.2. Use of previously adopted direction**

*5.2. Should Risk Tolerance proposals build upon previously adopted direction for portfolio optimization and budget scenario development to express how much Residual Risk is acceptable to ratepayers in the utility system after application of risk mitigation activities for each portfolio?*

To the extent that previous work is applicable to the development of a proposed Risk Tolerance framework or standard, it should be incorporated. To the extent that a proposal does not use accepted methodology, it should explain how it relates to and can be compatible with existing processes, or it should propose modifications to the existing processes to make it consistent with the Risk Tolerance proposal.

#### **4.1.5.3. Use of a benchmark**

*5.3 Should proposals explain how the benchmark of common risks and the Residual Risk remaining in a utility's system be used to determine a tolerable level of Residual Risk in a utility's system?*

A benchmark of common risks, if one is assembled, may inform the tolerable level of risk, but because all risks in the utility portfolio are unique it would be dangerous to make the assumption that risk attitudes and levels of tolerance are interchangeable between risks.

#### **4.1.5.4. Methods, inputs, and data**

*5.4. What additional methods, inputs, data sets, etc., if any, should the Commission adopt to support the determination of a Risk Tolerance Standard or Framework?*

The Commission should allow parties to introduce standard methodologies from other industries and frameworks. To the extent that it is relevant, external sources and data, or analyses by parties may be used to justify proposals. However, methods, inputs and data sets should be subject to data requests and review by other parties.

#### **4.1.6. Benchmark proposals**

*6. Should the Commission solicit party proposals on a benchmark that reflects the level of common risks California utility customers could be reasonably expected to tolerate in their daily lives?*

If the Commission would like to compare benchmarks on common risks to the risks imposed by the electrical utilities, it may solicit professional input from authorities studying this area. Party proposals may be useful, but the factual basis for these proposals should be open to review including being open to data requests.

#### **4.1.7. Common risk benchmark**

*7. How should a benchmark that reflects the level of common risks California utility customers could be reasonably expected to tolerate in their daily lives be calculated?*

Any benchmark used by the Commission should be in terms of probabilities and consequences for specific attributes. For example, attributes currently used in RDF include safety (fatalities and injuries), reliability, and financial impact. It should be remembered that the long term probability of avoiding fatality for any individual member of the public is 0%.

#### **4.1.7.1. Common risk factors**

*7.1. What common risk factors (e.g., motor vehicle accidents, commercial and/or private airplane accidents, violent assaults, drownings, housefires, etc.) should be included in this benchmark and how should these factors be accounted for?*

While comparisons may be enlightening and interesting and serve to provide context, useful risk factors will be related as closely as possible to the risks being considered by the utilities. An example:

Residents of WUI areas are subject to wildfire from not only utility sources but from all other causes. Utility wildfires make up less than 10% of all wildfires in California. Nevertheless, they have been historically responsible for the great majority of fatalities and property loss. Showing that the risk (frequency X consequence) of utility wildfire after mitigation were to become significantly less than the residual risk than other California wildfires would indicate success of the utility wildfire mitigation program and might indicate the residual risk was tolerable.

#### **4.1.7.2. Benchmark data sources**

*7.2. What data sources should be used to calculate this benchmark?*

See answer to previous questions. Data should be from reliable government and academic sources. Any proposed new data source or method should be subject to discovery.

#### **4.1.7.3. Benchmark use and acceptability of risk**

*7.3. How should the Commission use this benchmark to determine whether the Residual Risk remaining in a system managed by utilities after implementation of Controls and Mitigations is acceptable to ratepayers?*

The Commission should exercise caution in using any standard benchmark to determine whether residual risks are “acceptable to ratepayers”. As noted previously, “ratepayers” are not monolithic and fall into various groups with regard to both risk tolerance and rate tolerance. Also, as noted, as the benchmark risks become less like the risks being mitigated by utilities they also

may become less directly applicable. Ideally, the benchmarks can provide a useful comparison but without showing direct applicability to a certain risk problem they should not be used to set Risk Tolerance standards.

#### **4.1.7.5. Benchmarks and utility customers**

*7.5. Should this benchmark be representative of all California utility customers or representative of each utility's customers?*

Benchmark standards, if used, should ideally be statewide. If there is good cause to allow specificity for utilities because of unique customer characteristics, the standards should ensure:

- That exactly the same methodology is used to determine the benchmark for all utilities so that all California ratepayers are subject to the same protections, and
- That sufficient statistics exist for the benchmark so that differences in results between utilities do not arise from statistical fluctuations.

#### **4.1.8. Other considerations**

*8. What other additional considerations should the Commission take into account with regards to the incorporation of a Risk Tolerance Standard or Framework?*

Other considerations were listed in Section 4.1.5.

## **4.2. RAMP**

RAMP questions are addressed sequentially, with section number 4.2.n, where n is the question number.

#### **4.2.9. Due dates**

*9. Should the Commission also modify the due dates for filing opening and reply comments on RAMP submission and the SPD report?*

Yes. As a matter of practice, RAMP due dates for opening and reply comments have been shifted in every case. This has never resulted in the delay of the GRC process, and led to a more robust evidentiary record and more thorough evaluation of safety risks and costs. Proposed and actual due dates for past proceedings were submitted as part of the SDG&E 2024 RAMP proceeding, and are summarized below:

	Sempra 2021 RAMP Actual Dates	SCE 2022 RAMP Actual Dates	PG&E 2024 RAMP Actual Dates	Sempra 2025 RAMP Proposed Dates	Cal Advocates, SCGC, SBUA, MGR, TURN, IS Recommendation
Application Filed	5/17/2021	5/13/2022	5/15/2024	5/15/2025	
Protests and Responses	6/21/2021	6/20/2022	6/14/2024	6/16/2025	
Post-filing workshop	6/17/2021	6/30/2022	6/18/2024	6/20/2025	
Reply to Protests and Responses	7/1/2021	6/30/2022	6/27/2024	6/28/2025	
PHC	7/13/2021	8/15/2022	7/19/2024	7/2025	
Scoping Memo and Ruling	7/30/2021	9/19/2022	8/8/2024	7/30/2025	
Parties send workshop topics to service list					7/31/2025
Additional Workshop (s)					August 2025
Informal Comments on RAMP Report due to SPD and 2025 RAMP Service List	10/22/2021	10/10/2022	10/9/2024		10/10/2025
SPD Report	11/5/2021	11/10/2022	11/8/2024	9/1/2025	11/7/2025
Opening Comments on RAMP and SPD Report	12/6/2021	12/9/2022	12/6/2024	11/15/2025	12/5/2025
Reply Comments on RAMP and SPD Report	12/15/2021	1/4/2023	12/17/2024	12/1/2025	12/19/2025
GRC Application	5/16/2022	5/12/2023	5/15/2025	5/15/2026	5/15/2026

As can be seen, no GRC application has historically been delayed by the allowance of informal comments and the shifting of the date of the SPD Report. Due dates should be adjusted to allow for SPD to do a full review of informal comments prior to submitting its Report, consistent with the Sempra 2021, SCE 2022, and PG&E 2024 RAMP proceedings.

For the 2025 Sempra RAMP the joint proposal by all intervenors was rejected by the ALJ, and an October 10 date was required for the SPD Report, with insufficient time for intervenors to conduct adequate discovery and analysis prior to the submission of Informal Comments.

#### 4.2.10. Informal comments

##### *10. How should the formal schedule account for the optional informal comments?*

The schedule should be adjusted so that informal comments can be provided in time for SPD to adequately review them and address or incorporate them as it sees fit. SPD has often informally expressed the value of intervenor informal comments, and more importantly as incorporated and supported a number of intervenor findings in every one of its Reports. However, SPD is a Commission division and as such is required to subject all its communications to extensive internal review and approval, a process that can take up to a month. With the Scoping Memo generally issued no earlier than the end of July, and the SPD report due in mid-October, this gives no more than a few weeks after the Scoping Memo is issued for intervenors to provide Informal Comments to SPD and have them reviewed and incorporated. This is insufficient time for SPD to adequately address issues raised by intervenors or issue data requests if intervenor findings raise additional questions.

In the 2025 Sempra RAMP, the schedule for the SPD Report was extended by one rather than two months. As a result, intervenors were not able to provide original analysis to SPD in time for it to issue its Report. This might have compromised the integrity of the RAMP process and thereby SDG&E's GRC. Fortunately, however, utilities had just undergone the 2026-2028 WMP review process, and therefore MGRA was able to make original data requests, analysis, and research was available to provide to SPD on short notice. SPD made use of these in its RAMP Report.<sup>19</sup>

Finally, in the pre-2025 RAMP proceedings, SPD included informal comments in its Report. Because comments are informal, SPD has no other mechanism to cite to them. Even if intervenors include the informal comments as attachments to their formal comments, these would come after the SPD report and therefore can't be cited by SPD or by utilities, except in Reply Comments. Without a means to cite to the intervenor work, intervenor contributions to SPD's report may not be verifiable, raising the question of whether intervenor work on informal comments is compensable.

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<sup>19</sup> A.25-05-010; Safety Policy Division Evaluation Report on Sempra's 2025 RAMP Applications; October 10, 2025; pp. 114, 130, 133.

In pre-2025 RAMP proceedings, citations in the SPD report were successfully used to show substantive intervenor contribution in intervenor compensation claims.

MGRA therefore requests that the Commission reconsider changes made in the RAMP process in 2025 and return to the successful schedule and practice that was adopted from 2021 through 2024.

## 5. CONCLUSION

MGRA is pleased that the Commission is turning its attention to the vital question of risk tolerance, a question that is at the heart of enabling cost-effective risk mitigations and controlling costs for ratepayers. MGRA is grateful for the opportunity to participate in and contribute to the current proceeding.

Respectfully submitted this 8<sup>th</sup> day of June, 2026,

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