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Forest Kaser, Director

Date: July 8, 2026  
To: EUP Guideline Development docket (#2023-UPs)  
Subject: Frequently Asked Questions

The Office of Energy Infrastructure Safety (Energy Safety) is issuing this “Frequently Asked Questions” (FAQ) document addressing the 10-Year Electrical Undergrounding Plan Guidelines (EUP Guidelines) issued by Energy Safety on February 20, 2025.

This FAQ clarifies sections of the EUP Guidelines and addresses questions that Energy Safety has received since publishing the EUP Guidelines. Additionally, the FAQ includes corrections for certain minor typographical errors in the EUP Guidelines. Energy Safety is providing the corrections here, to prevent confusion and facilitate a better understanding of the EUP Guidelines.

This FAQ also addresses how recent regulatory and legislative changes impact the EUP process. Following the adoption of Resolution SPD-37, the California Public Utilities Commission (CPUC) published the Senate Bill (SB) 884 Project List Data Requirements Guidelines on May 11, 2026, which changed the format of the data that utilities must submit to both the CPUC and Energy Safety. In addition, SB 254 was introduced and passed during the 2025/2026 legislative session, which amended sections of the Public Resources Code that authorizes the EUP. Both documents have relatively minor impacts on the EUP, but those impacts are described in this FAQ for clarity.

Sincerely,

/s/ Suzie Rose

Suzie Rose  
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Office of Energy Infrastructure Safety



# Electrical Undergrounding Plan FREQUENTLY ASKED QUESTIONS

JULY 8, 2026

## Risk Modeling

**Question 1. How is the defined term “Portfolio-Level” applied? Is it calculated for individual Circuit Segments or for Circuits?**

Circuits may include multiple Circuit Segments. Each Circuit Segment may only contain one Undergrounding Project but may include multiple Subprojects. Portfolio-Level refers to a measurement that accumulates into a single value the information from all Circuit Segments on all Circuits that have a Confirmed Project. See Electrical Undergrounding Plan (EUP) Guidelines Appendix A (Definitions) for additional information.

**Question 2. Can you provide an example of how a Plan Mitigation Objective could be “measured on a *pro rata* basis” as is required by Section 2.3.1?**

Yes. A Plan Mitigation Objective measured in overall utility risk reduced per mile of overhead line deenergized is an example of a *pro rata* measurement.

**Question 3. What does Model Year 0 mean in Core Capability 4?**

Year 0 as outlined in Core Capability 4 and as reported in the Model Risk Landscape JSON begins and ends on the date the Large Electrical Corporation designates as the start date of the EUP. Years 1-10 within Core Capability 4 and the Model Risk Landscape JSON align with Years 1-10 as reported in the Target/Timeline Table. Year 1 begins on the date the Large Electrical Corporation designates as the start date of the EUP.

## Table Completion

**Question 4. If a Circuit Segment is eligible to be an Undergrounding Project under more than one Risk Category, how should the Large Electrical Corporation**

**complete the fulfills\_project\_level\_standard field in Table C.12 (Screen 3 Table)?**

Background: The Large Electrical Corporation must include all Confirmed Projects in the Screen 3 Table.<sup>1</sup> There are three risk categories under which a Circuit Segment may qualify to be an Undergrounding Project. The three risk categories are: High Risk, Ignition Tail Risk, and High Frequency Outage Program. Each risk category has a Project-Level Threshold and a corresponding Project-Level Standard.<sup>2</sup>

The fulfills\_project\_level\_standard field answers whether the proposed mitigation fulfills the applicable Project-Level Standard. If a Circuit Segment qualifies under more than one Risk Category, the Large Electrical Corporation should mark the field fulfills\_project\_level\_standard:

- TRUE if the mitigation fulfills the applicable Project-Level Standard for one or more of the Risk Categories under which the Circuit Segment qualifies.
- FALSE if the proposed mitigation does not fulfill the applicable Project-Level Standard for any of the Risk Categories under which the Circuit Segment qualifies.

If the Large Electrical Corporation marks the fulfills\_project\_level\_standard field FALSE, the Large Electrical Corporation must complete the additional\_justification field, as required by Appendix Section C.1.12 of the EUP Guidelines. The Large Electrical Corporation must complete this field with an explanation as to why the project should still be included in the portfolio despite not meeting any of the applicable Project-Level Standards.

**Question 5. If the Large Electrical Corporation elects to do any additional design variations for Screen 3, how should the Large Electrical Corporation fill out EUP Guidelines Appendix C.1.13, Table C.13 (Screen 4 Table Construction and Data Requirements)?**

The rows in the table represent a Confirmed Project and must be repeated at least 3 times, as required in the EUP Guidelines Appendix Section C.1.13 Screen 4 Table. The Large Electrical Corporation may also include additional rows for any other design variations that the Large Electrical Corporation wishes to include.

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<sup>1</sup> 10-Year Electrical Undergrounding Plan Guidelines, Section 2.4.5.1, pg. 19.

<sup>2</sup> 10-Year Electrical Undergrounding Plan Guidelines, Section 2.7.9.2, pg. 43.

**Question 6. How should the Large Electrical Corporations distinguish multiple Additional Comparisons from each other when completing the comparison\_name field in Tables C.11, C.12 and C.13?**

If the Large Electrical Corporation has multiple Additional Comparisons, they can be identified by appending numbers to “Additional Comparison.” For example, Additional Comparison 1, Additional Comparison 2, etc., would be acceptable naming options.

**Question 7. Can the Large Electrical Corporations complete the comparison\_name field in Tables C.12 and C.13 using “100% Underground”?**

The Large Electrical Corporation may use “100% Underground” as a naming option, if desired.

**Question 8. Section 2.6.1 of the EUP Guidelines requires a Project Management Template. Should the template be filled out as part of Progress Report 0?**

Yes. Energy Safety requests that the Large Electrical Corporation fill out the Project Management Table and include it in Progress Report 0. See Section 2.6.1 for further instructions on Progress Reports.

**Question 9. Can you provide additional direction on completing the Target/Timeline Table over the course of the 10-year program?**

Yes. The Large Electrical Corporation should update the Target/Timeline Table in each Progress Report to reflect actual progress for completed years as well as updated projections for the future years of the EUP.

Energy Safety requests that the Large Electrical Corporation follow these instructions for completing specific columns:

Column 2: Enter the date range for the applicable EUP year and label the column “Date Range” rather than “Start Date.” For example, if the EUP start date is January 1, 2028, Column 2 for Year 1 would be January 1, 2028– December 31, 2028.

Column 3 (Miles Completed) and Column 4 (Overhead Miles Deenergized): For past years, enter miles for projects completed during that year. For current and future years, enter projected/expected miles completed for each year.

Column 5 (Cumulative Miles Completed): Enter the sum of miles reported in Column 3 for all years prior to and including the specified year.

Column 6 (Preconstruction Miles): For each year of the EUP, enter the total number of miles for projects that will complete Screen 3 during that year. Enter actual miles for past years and projected miles for the current year and future years.

Include miles for all projects that pass Screen 3 during the year whether or not construction begins in the same year.

Columns 8, 9, 10, and 11: For past years, include only risk reduction for projects completed in that year. For current and future years, include only risk reduction for projects projected to be completed in that year.

**Question 10. Table C.14 is called the “Subproject Table” and it is required for each Undergrounding Project that reaches Screen 4, but it is possible that a Confirmed Project won’t have any Subprojects. In that case, how should the Large Electrical Corporation fill out the table?**

As stated in Section 2.4.2.2, “if a Circuit Segment does not have multiple Subprojects during the scoping process, then it should be reported as a single Subproject” in the Subproject Table.

**Question 11. Should the Screen 3 Table include all of the Undergrounding Projects/Circuit Segments that the Large Electrical Corporation evaluated and considered undergrounding, or just the Circuit Segments for which it is planning to underground some or all of the Circuit Segment (Confirmed Projects)? If the latter, where should the Large Electrical Corporation report the information for Eligible Circuit Segments that it does not plan to underground?**

The Screen 3 Table does not have to be filled out for all Undergrounding Projects that the Large Electrical Corporation has considered undergrounding. The Screen 3 Table must be filled out for Undergrounding Projects that have passed Screen 3 and are Confirmed Projects, as described in the Section 2.4.1 Screen 3 Procedure. A Confirmed Project includes a “Project as Scoped” design variation which undergrounds some or all of the Circuit Segment.

If the Large Electrical Corporation does not plan to underground any part of an Eligible Circuit Segment through the EUP, the project should be reported as a non-EUP Project if the Large Electrical Corporation intends to move forward with mitigations outside of the EUP.

## Progress Reports

**Question 12. Should a new Baseline be established in a Model Report with each Progress Report?**

No. Refer to Section 2.7.5 Core Capability 6 for instructions on when a new Baseline must be established and reported. Core Capability 6 states that a “new Baseline must be recorded by the Large Electrical Corporation at least once per calendar year.” When Section 2.7.6

references “subsequent Progress Reports,” it is referring only to those subsequent Progress Reports that contain a Model Report. The new Baseline should be reported in the Model Report, as part of applicable Progress Reports, at least once per calendar year.

**Question 13. Is the Large Electrical Corporation required to update Progress Report 0 during Energy Safety’s evaluation of the EUP?**

Section 2.6 of the EUP Guidelines states that the Large Electrical Corporation is required to submit an updated Progress Report 0 every six months until the EUP start date. However, Energy Safety will not require the Large Electrical Corporation to submit an update to Progress Report 0 during Energy Safety’s evaluation of the EUP. Progress Reports are due every six months after the start date of the EUP.

**Question 14. EUP Guidelines Section 2.3.2 states that “The EUP must contain a narrative setting forth the process the Large Electrical Corporation will use to compare and update Plan Tracking Objectives in each Progress Report.” What is expected in this process and what changes can the Large Electrical Corporation make to the Plan Tracking Objectives?**

The Large Electrical Corporation must lay out the Plan Tracking Objectives in its EUP narrative. This is a fixed list of plan objectives that must comply with the requirements of Section 2.3.2.

In each Progress Report, the Large Electrical Corporation must provide updates on how its actual progress compared to its prior projections. The Large Electrical Corporation should also update the values of the Plan Tracking Objectives as needed. When the values of the Plan Tracking Objectives change, the Large Electrical Corporation must provide an explanation for the change(s).

## Typos

**Question 15. Are there any typos in the EUP Guidelines?**

Yes. There are several typos in the EUP Guidelines. These will be corrected in the next revised EUP Guidelines. In the meantime, the following typos and corrections are called out to avoid any confusion:

In Section 2.8.5.1, Table 4 the column labeled “Is KDMM?” in row “Ignition Likelihood” should say “**Yes**” instead of “No” because Ignition Likelihood is a KDMM.

Section 3.11 should read “Electronic file names for the associated tabular and ~~special~~ **spatial** data submissions must follow the standardized electronic naming convention illustrated in Table 9 below.”

Appendix Definition “Confirmed Project Polygon” should read “Confirmed Project Polygon” means a ~~special spatial~~ boundary generated at the beginning of Screen 3 that encompasses the entire Eligible Circuit Segment on which the Undergrounding Project is defined, except any sections already contained in another Confirmed Project Polygon.”

Appendix C.1.14.d should reference “PROJECT\_RISK\_REDUCTION\_~~FRACTION~~” instead of “PROJECT\_RISK\_REDUCTION” to align with the table above it.

Appendix Definition “Portfolio-Level” should read “Portfolio-Level” refers to a measurement that accumulates information from every Circuit Segment on ~~a each~~ Circuit which has one or more Confirmed Projects as well as the effects of Confirmed Projects on the overall Circuit into a single number.”

The Section 2.7.1 heading should read “Overview of Risk Modeling ~~Methodology~~ Methodology”.

The Appendix B.2 Table, row “Alternative Mitigation Selection Process” should read “See 2.4.4.1 ~~and 2.7.10~~ of these Guidelines.”

## California Public Utilities Commission (CPUC) Impacts

### **Question 16. SPD-37 directed CPUC staff to make changes to the CPUC SB 884 Project List Data Requirements Guidelines. How should the new CPUC data requirements be included in the EUP?**

The Large Electrical Corporation must submit all CPUC data in a separate tabular data file called “Appendix D. CPUC Project List Data.” The data submitted to Energy Safety must be an identical copy of the data submitted to the CPUC. The Large Electrical Corporation is responsible for verifying that the data are compliant with the requirements of the CPUC SB 884 Project List Data Requirements Guidelines. As of the date of publication of these FAQs, the CPUC published the most recent version of the CPUC SB 884 Project List Data Requirements Guidelines on May 11, 2026.

### **Question 17. How should the Large Electrical Corporations refer to Benefit-Cost Ratios?**

The EUP Guidelines refer to the CPUC’s Cost-Benefit Ratios (“CBRs”). The CPUC SB 884 Project List Data Requirements Guidelines, revised on May 11, 2026, now refer to the CBRs as Benefit-Cost Ratios (“BCRs”). The Large Electrical Corporation may use the term Benefit-Cost Ratio and the acronym BCR in its EUP.

## SB 254 Impacts

### **Question 18. What is the impact of Senate Bill (SB) 254 on the EUP Guidelines?**

SB 254 made changes to the Expedited Electrical Undergrounding Plan's statutory language. These changes will be incorporated into the EUP Guidelines when they are next revised. These changes will also be reflected in the Performance Guidelines when they are issued. However, for the sake of expediency, these changes are listed below. The EUP Guidelines refer to EUP "compliance." To align with SB 254, this will now be referred to as EUP "adherence." This is purely a change in terminology and will not impact EUP Guideline requirements. Plan "compliance" is currently referenced in Sections 2.3.2 footnote 6, 2.3.3, 3.1.2, 3.3.e, and Section 4 heading.

The EUP Guidelines also reference Public Utilities Code sections 8388.5(c) and (d)(2), which refer to "Public Safety Power Shutoffs." SB 254 updated the statutory language to "Public Safety Power shut off." This is also purely a change to terminology and will not impact any EUP Guideline requirements. The sections affected by this change are Sections 2.3, 2.4 footnote 7, and 3.3.

SB 254 also changed Public Utilities Code section 8388.5(d)(2) from "[b]efore approving the plan, the office may require the Large Electrical Corporation to modify the plan" to "[b]efore approving the plan, the office may require the Large Electrical Corporation to modify the plan *or to modify and resubmit the plan.*" The EUP Guidelines directly quote this statutory language in Section 3.5. To comply with SB 254, the EUP Guidelines will be revised to include Energy Safety's ability to require Large Electrical Corporations not only to "modify the plan" but also "to modify and resubmit the plan."

## Resources

**Senate Bill (SB) 884:** ([Electricity: Expedited Utility Distribution Infrastructure Undergrounding Program \[2021-2022\]](#))

**Senate Bill (SB) 254:** ([Energy \[2025-2026\]](#))

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