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October 25, 2026

Office of Energy Infrastructure Safety
California Natural Resources Agency
715 P Street, 20th Floor
Sacramento, CA 95814

SOLVED Engineering Inc. Opening Comments

Docket EUP-PGE — PG&E 2028–2037 Electrical Undergrounding Plan

SOLVED Engineering Inc. supports reducing wildfire risk and improving distribution reliability through carefully planned undergrounding. We recommend the following implementation clarifications, building on the controls already described in PG&E's plan. These comments address the September 30 filing and relevant October 12 errata; they do not allege a construction defect or missed deadline.

Construction readiness

PG&E's Table 5-3 identifies design and construction milestones. Please explain how issued-for-construction drawings, permits, land rights, utility-conflict resolution and applicable material availability are verified before mobilization. Where phased construction proceeds with unresolved conditions, identify the responsible party, resolution date and limits on authorized work. [1]

Permitting and land rights

Please distinguish agency-review time from incomplete applications, engineering revisions and unresolved property rights in schedule reporting. Explain how permit conditions and easement restrictions are incorporated into construction packages and communicated when approvals change. [1]

Schedule records and revision traceability

The initial Table C.23 CSV contains two records for subproject Proj00028-3UG-UGAS with different milestone dates, including construction-finish/de-energization dates of September 7 and November 3, 2028. Please clarify whether these represent revisions, distinct work packages or an inadvertent duplicate, identify the controlling schedule, and explain how superseded records are distinguished. All 40 unique C.23 subproject identifiers match the corrected C.14 table; our request concerns record interpretation and version control. [2, 3]

Quality and closeout

We support PG&E's inclusion of successful quality assurance in completion criteria. Please explain how first-pass inspection acceptance, unresolved defects and corrective-action closure are monitored. Table C.23 has no separately named restoration or record-drawing completion fields; please identify where these obligations are tracked and how they connect to the subproject schedule. Use existing reporting mechanisms where practical. [1, 2]

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Engineering resource forecasts

Workpaper 007 already includes project difficulty and engineering, permitting, surveying and other support disciplines. Please explain how actual permit-cycle duration, engineering rework, construction-support demand and closeout backlogs will inform periodic updates to productivity assumptions and resource forecasts. [4]

These clarifications would improve delivery transparency and accountability without creating duplicative tracking systems.

Respectfully submitted,
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President and CEO
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References

[1] PG&E EUP Volume 1, Chapter 4, Section D.1.b, printed pp. 167–168; Chapter 5, Table 5-3 and Sections C.1–C.2, pp. 183–195.

[2] Volume 2, Attachment A-2, initial electronic Tables C.14 and C.23, supplied in Progress Report 0 ZIP; attachment inventory at printed p. 484.

[3] October 12, 2026 errata supporting documents, corrected Table C.14; the reviewed correction package contains no replacement Table C.23.

[4] Volume 2, Attachment B, Workpaper 007, Undergrounding Resource Model, including assumptions at printed p. 568 and Program Wide View.

Source documents: https://www.pge.com/en/outages-and-safety/safety/community-wildfire-safety-program/electrical-undergrounding-plan.html