RURAL COUNTY REPRESENTATIVES OF CALIFORNIA

November 2, 2026

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

Electronically Filed to Docket #EUP-PGE

RE: Opening Comments of the Rural County Representatives of California on PG&E's 10-Year Electrical Undergrounding Plan R0

Dear Director Kaser:

On behalf of the Rural County Representatives of California (RCRC), we are pleased to provide comments on Pacific Gas and Electric's (PG&E's) 10-Year Electrical Undergrounding Plan (EUP), filed on September 30, 2026. RCRC is an association of forty rural California counties, with a Board of Directors comprised of elected supervisors from each member county.

Safeguarding Californians from utility-caused wildfires remains one of RCRC's highest public policy priorities. Communities across California have experienced great financial hardships in attempting to recover from catastrophic wildfire events and in mitigating the risk of consequences, including implementing home hardening measures, maintaining defensible space, and sustaining frequent, and often unpredictable, prolonged power outages that negatively impact residents, business, and critical community facilities and infrastructure. RCRC appreciates the delicate balance that lower-cost wildfire mitigation programs (like Enhanced Powerline Safety Settings, or EPSS) can play as a short-term method to safeguard high-risk communities from catastrophic wildfire ignitions from utility equipment.

While wildfire risk reduction benefits have been realized through PG&E's heavy reliance on Public Safety Power Shutoffs (PSPS) and EPSS programs, the resulting impacts on local energy reliability are unsustainable long-term. It is imperative for PG&E to expeditiously undertake system hardening improvements; undergrounding can play an important role in increasing reliability while also reducing the risk of wildfire ignitions, and reducing operations and maintenance expenditures like vegetation management.

Public Utilities Code Section 8388.5 does not merely authorize a generic undergrounding plan, it specifically requires the identification of underground projects that *will be* constructed as part of the program. The statute further includes a means for project prioritization, project timelines, cost and mileage targets, and analyses of alternatives for those identified projects. PG&E's EUP, on the other hand, is better characterized as a portfolio of options that *may* be considered over the 10-year period, subject to substantial ongoing refinement.

While PG&E provides a great deal of transparency as to the criteria that is considered for project selection, there is a lack of clarity about what projects will be implemented pursuant to the program. While the map[1] provides a broad overview of identified projects by county, it is difficult to ascertain what circuits and segments will be executed in the EUP. This is vital for stakeholders to understand and evaluate program implementation and impacts.

By not meaningfully disclosing the specific segments, it is unclear whether many of the ancillary benefits that SB 884 (Ch. 819, Statutes of 2022) originally intended to achieve may be fully realized. Moreover, that information is important for affected communities to meaningfully evaluate and coordinate planning for complementary infrastructure investments or rights-of-way disturbances in order to maximize ratepayer dollars, taxpayer funds, and limited local resources.

Rights-of-Way Issues Warrant Early Consultation

RCRC supports PG&E's stated view that ten-year planning would enable better preparedness and coordination with agencies and communities.[2] Similarly, we agree with PG&E that previously scoped projects should be incorporated into the EUP to minimize disruption to current customers and municipalities.[3] Unfortunately, the EUP does not clearly envision that a county or local permitting authority will be engaged *before* routing, design, and scope are materially fixed. Early consultation is critical because local governments are often in the best position to identify planned transportation improvements, drainage projects, broadband deployments, utility conflicts, roadway restoration requirements, and long-term maintenance considerations that may substantially affect feasibility, cost, and public impacts. Shoulder issues and culverts are of particular concern given the innovative "undergrounding" methods PG&E has previously piloted.

Specifically, PG&E's raised curb approach, or Ground-Level Distribution System (GLDS)/Minimum Cover Distribution System (MCDS), is an unconventional method with

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[1] Page 8, Figure 1-1, *PG&E 10-Year (2028-2037) Electrical Undergrounding Plan*, Volume 1 of 2, September 30, 2026.
[2] See https://www.pge.com/en/outages-and-safety/safety/community-wildfire-safety-program/electrical-undergrounding-plan.html, accessed October 23, 2026.
[3] Pages 155-156, *PG&E* Volume 1.

a mix of potential drawbacks, including long-term effects in a county right-of-way (ROW). Local agencies should know where each underground construction technique is proposed and retain a meaningful role in deciding whether it is compatible with safety, such as traffic, drainage, snow removal, emergency response, turnouts, widening or other long-term road maintenance needs. This could also impact cost considerations not currently present in the EUP.

PG&E's portrayal of GLDS/MCDS within the EUP suggests that these methods could play a significant role in achieving undergrounding objectives, especially given the insistence that GLDS/MCDS is no longer considered a "new mitigation technology."[4] PG&E describes these alternative methods as potentially quicker and cheaper approaches[5], however, because these methods differ from conventional undergrounding construction, local agencies should have greater advanced visibility into where and how they may be deployed and what implications they may have. Early consultation milestones, therefore, would be beneficial before the final routing and construction methods are determined; such consultation should include (at a minimum) detailed mapping, preliminary design, schedule, and restoration plans.

Unlike conventional underground installations, the GLDS/MCDS methods may introduce unique maintenance, access, or relocation considerations that are not fully addressed in the EUP, but may have long-term implications nonetheless. This could impact, for instance, road reconstruction, future widening, culverts drainage, or retaining structures; grading, shoulder, ditch, and future maintenance activities; traffic control and emergency access; planned broadband and middle-mile/last-mile facilities; and joint trenching or installation of spare conduit. That said, we don't dispute potential benefits that GLDS/MCDS solutions could have in certain locations, including where there are pavement-cut moratoria, recently resurfaced roads, or where there are water, sewer, or other unique utility conflicts.

Reliability Considerations

Again, RCRC supports permanent infrastructure investments that can simultaneously reduce utility wildfire ignitions and restore reliable electric service. Reliability improvement is one of the central purposes of SB 884. The statute authorizes approval only where a utility demonstrates that its plan will substantially increase reliability by reducing the use of PSPS and other outage programs while also reducing wildfire risk. However, customers have already borne the economic consequences through lost service. Businesses have lost revenue, residents have invested in costly backup generation and battery systems, and local governments have incurred significant emergency preparedness, response, and resiliency costs. As overhead hardening and underground projects take place over time, we also urge utility regulators to take a more

[4] Page 116, *PG&E* Volume 1.
[5] Page 215/Table5-5, *PG&E* Volume 1.

discerning approach to the reasonability of future planned power outages (via PSPS or programs such EPSS).

Given the impacts that EPSS and PSPS events continue to have on our counties, and in light of the fact that they are intended to be used as interim measures and only as a last resort, we appreciate and support PG&E's use of alternative modeling that excludes PSPS and EPSS when calculating risk reduction benefits. It is important for modeling to appropriately account for the reliability benefits that will accrue from reduced reliance on PSPS and EPSS and avoid biases that those programs will become the permanent and primary method to reduce system wildfire risk. Even so, a favorable benefit-cost ratio should not be treated alone as evidence that the EUP is affordable. Energy Safety—and the CPUC—should separately evaluate whether the proposed investments reduce customers' overall financial burden, particularly in communities that have already suffered disproportionate impacts from wildfire-related outages.

Lastly, PG&E states that undergrounded facilities experience approximately 90 percent fewer outages.[6] While this appears to represent a considerable improvement, the EUP does not explain the primary causes of the remaining outage exposure or whether those outages are associated with upstream facilities, transmission infrastructure, planned maintenance activities, equipment failures, or other causes. Additional information would help stakeholders better understand the practical reliability benefits that customers can expect to experience.

Conclusion

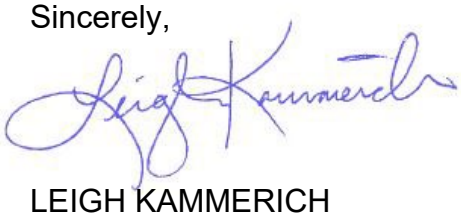
For the foregoing reasons, we urge Energy Safety and PG&E to address the following matters in the EUP:

- How does PG&E define an underground mile, and are there a minimum or maximum depth of cover?
- How much of the 5,000-mile target includes GLDS/MCDS construction methods?
- What independent testing or performance criteria must be completed and satisfied before broader GLDS/MCDS deployment in a public ROW?
- What role does the affected ROW authority have in determining whether GLDS/MCDS is an appropriate method at a particular location?
- Who bears lifecycle maintenance, damage, relocation, restoration, and liability costs for unconventional underground systems (like GLDS/MCDS)? Have those costs been fully factored into the EUP?
- How will actual reductions in PSPS and EPSS exposure be measured after each EUP project is completed?
- How does outage identification, response, and restoration times compare on undergrounded infrastructure versus overhead distribution?

[6] Page 25, *PG&E* Volume 1.

An optional program, such as the expedited utility distribution infrastructure undergrounding program created pursuant to SB 884, should identify specific projects that will result in clear benefits. To ensure those benefits are realized, Energy Safety should require greater project specificity, meaningful local government coordination, greater transparency regarding alternative or untraditional undergrounding methods, and measurable long-term reliability outcomes. We appreciate your consideration of our feedback. If you have any questions, please do not hesitate to contact me at (916) 447-4806 or lkammerich@rcrcnet.org.

Sincerely,



LEIGH KAMMERICH
Senior Policy Advocate