



Electrical Undergrounding Plans Guideline Development Working Group #3 November 21, 2023



Safety Message

- **Take care of your posture** and sit in a comfortable position
- **Take regular breaks** to stretch, hydrate, and rest your eyes
- **Know the emergency exits and procedures** in your physical location should the need arise
- Be prepared for **earthquakes**
- **Feel something say something** and we will find a way to help



Welcome and Process Overview

- Format & Ground Rules: Recorded, Facilitated, Structured, Discussion
- Schedule:
 - Tuesdays from 10am to 12pm
 - November 21, 28 and Dec 5th
 - Topics for November 28: Compliance, reporting and independent monitor, data.

Today's Topics



- Housekeeping Items
- Flexibility
- Workforce Development Plan
- Coordinating with CPUC

Flexibility Options/Updates for 10-year Undergrounding Plan



Stakeholders have indicated that at least some elements of an Undergrounding Plan are likely to change over the 10-year time period such as:

- risk models,
- technology, techniques,
- costs,
- High Fire Threat District (HFTD) maps,
- viability or timeline of individual projects,
- climate and weather.

1. Are there others?

2. Which types of changes would benefit from additional review?

Flexibility Options/Updates for 10-year Undergrounding Plan



Suggested Options from February Workshop

1. **Framework Approach:** the Plan should be a framework so that no flexibility is needed. Projects and workplan can change within the framework. Any changes would be reported in progress reports.
2. **New Approval Needed:** Any change in projects should be subject to an approval process that includes public input. Other changes may require a formal agency action.
3. The electrical corporations should submit three separate plans over the course of the 10-year period. This could incorporate the time for the electric utility to plan projects and for stakeholders to review projects.
4. **CPUC Cost/Benefit Approach:** any project that meets the average cost-benefit ratio of the overall plan would be eligible to be substituted in for another project. Energy Safety or CPUC would need to determine how to calculate the average.
5. **Leverage Wildfire Mitigation Plan (WMP) Cycle.** The Electrical Corporation could update its project list in the annual WMP. (There is one full WMP every three years, with updates the other two years.)
(See next slide)

Flexibility Options/Updates for 10-year Undergrounding Plan



Leverage Wildfire Mitigation Plan (WMP) Cycle. The Electrical Corporation could update its project list in the annual WMP. (There is one full WMP every three years, with updates the other two years.) This could take a variety of forms:

- The Undergrounding Plan should provide a high-level architecture setting yearly goals and providing an overview of how undergrounding will be implemented.
- The WMP should be the forum for assigning specific circuits or tranches for work within the next 1 to 2 years.
- Proposed changes to the Undergrounding Plan (short and long term) should be proposed in the WMP.
- Re-validation of risk reduction and cost estimates should be detailed in the WMP.

Topic 2: Plan for Utility and Contractor Workforce Development (8388.5(c))



1. What are the elements that should be included in a utility and contractor workforce development plan for a 10-year Undergrounding Plan?
2. What is the timeframe that the workforce development plan should cover?
3. Should the workforce development plan cover recruitment as well as training?
4. Should the workforce development plan provide a plan to scale up the workforce broken down by type of personnel?
5. Should the workforce development plan include community and labor organization outreach related specifically to workforce development?

Specific Areas of Coordination with CPUC



Pre-Plan Submission

1. Staff have discussed alignment on definitions, project data, and reporting data. Are there other areas of alignment?
2. In Decision 22-12-027, the CPUC adopted a Cost/Benefit Ratio approach. At the November 14, 2023 Working Group meeting held by Energy Safety, stakeholders suggested that Energy Safety should use the CPUC Cost/Benefit Ratio in evaluating Undergrounding Plans. What coordination steps would be necessary for Energy Safety to use the CPUC Cost/Benefit Ratio?

Specific Areas of Coordination with CPUC



Plan Evaluation

Are there specific areas of coordination the agencies should consider while Energy Safety is evaluating a 10-year Undergrounding Plan?

Application Evaluation

Are there specific areas of coordination the agencies should consider while the CPUC is evaluating a utility undergrounding application?

Specific Areas of Coordination with CPUC



Post – Approval Evaluation

1. Are there specific areas of coordination the agencies should consider regarding the evaluation of the IOU progress reports?
2. Are there specific areas of coordination the agencies should consider regarding the evaluation of ongoing work plans in the annual Wildfire Mitigation Plans?
3. Are there specific areas of coordination the agencies should consider regarding the evaluation of the independent monitor's report?

See next slide for text of statute

Specific Areas of Coordination with CPUC



8388.5(f) Reporting on workplans and progress reports

- (1) every six months, file a progress report with the office and the commission.
- (2) Include ongoing work plans and progress in annual wildfire mitigation plan filings.
- (3) Hire an independent monitor, selected by the office, to review and assess the large electrical corporation's compliance with its plan and submit a report with the office each December 1 over the course of the plan."

8388.5(i) Independent Monitor

- (1) the office shall consider the independent monitor's report and whether the large electrical corporation has cured any deficiencies, and may recommend penalties to the commission.
- (2) The commission may assess penalties on a large electrical corporation that fails to substantially comply with a commission decision approving its plan."

Wrapping Up and Planning

- Additional Public Comment on today's topics
- Questions about today's discussion
- Plan for next working group, including preparing for discussion
- Questions about housekeeping items like e-filing

Upcoming Working Groups

Topics

- Costs and Sustainable Supply Chain (8388.5(c)(6))
- Reporting and Compliance
- Guiding Principles for evaluating Plan
- Data
- Communications Utilities and Undergrounding (date TBD)