



Electrical Undergrounding Plans Guideline Development Working Group #4 November 28, 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
- Final Working Group: Dec 5th 10am to 12pm
- Topics for December 5th: Costs and Sustainable Supply Chain (8388.5(c)(6)); Guiding Principles for evaluating Plan

Today's Topics



- Compliance
- 6-month Progress Reports
- Annual WMP Filing
- Independent Monitor
- Data and Modeling
- Future Topics, Schedule



Compliance

Section 8388.5 directs Energy Safety to “consider the independent monitor’s report and whether the large electrical corporation has cured any deficiencies and may recommend penalties to the commission.”

- How can the guidelines ensure that the reports provide sufficient and useful information for a compliance review?
- Are there specific reporting requirements that Energy Safety should be required to focus on for compliance and any penalty recommendation?
- Are there guiding principles that should inform identification of crucial report items?



6-month Progress Reports

When implementing an approved Plan, the electrical corporation must file a progress report every six months.

- a. What categories of information should be included in the progress reports?
- b. Should the progress reports address each of the section 8388.5(c) plan components separately?
- c. Should stakeholders be able to file comments on the reports?
- d. Should these reports be incorporated into the independent monitor annual report?



Annual WMP Filings

The electrical corporation is also required to include ongoing work plans and progress in annual Wildfire Mitigation Plan (WMP) filings.

- a) How should “work plan” be defined?
- b) What specifically should be included in the annual WMPs? Should the reporting be different in WMP update years?
- c) Should the WMP include the complete progress reports and independent monitor report from the last year?
- d) Should information and findings from the WMP be incorporated



Independent Monitor Report

- a. The independent monitor is directed to “review and assess the large electrical corporation’s compliance with its plan” and “assess whether progress on undergrounding work has been consistent with the objectives identified in its plan.”
- Should the independent monitor report address each of the section 8388.5(c) components separately?
 - How should the phrase “compliance with its plan” be specifically defined? Should this include all of the components listed in 8388.5(c)? Why or why not?
 - Should the independent monitor report on costs and related information?
 - Should the independent monitor report on the electrical corporation’s efforts to apply for federal, state, and other non-ratepayer funds?
 - What other topics would be appropriate for the independent monitor to address?



Independent Monitor Report

b. The independent monitor report shall include “any failure, delays, or shortcomings” and “provide recommendations for improvements to accomplish the objectives.”

- How should the word “failure” be defined? “delay”? or “shortcoming”?
- How should these issues be categorized or otherwise ranked?



Independent Monitor Report

c. The electrical corporation has 180 days to “correct and eliminate any deficiency specified in the independent monitor’s report.”

- How should “correct and eliminate” be defined?

d. The independent monitor report is due “on before December 1 of each year.”

- Should we consider setting a date earlier in the year?
- Should the date match up with the date of other events such as CPUC filings or the WMP?



Data and Modeling

These working group questions are intended to set the groundwork for future, more in-depth development of data and modeling requirements. To understand and evaluate submitted Plans, Energy Safety expects to use the following questions as a starting point. Are the questions below an appropriate starting point? For each item, please comment on any specifications or limitations that Energy Safety should consider as we begin considering data and modeling requirements.

- i. What is the input data?
- ii. What type of model does the electrical corporation use? (taxonomy)
- iii. How was the model solved/trained?
- iv. What is the expected shelf-life of the model?
- v. What are the outputs?

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
- Future topics for working group and/or written comments
- Questions about housekeeping items like e-filing