



October 16, 2023

**To:** Interested Stakeholders for Expedited Utility Distribution Undergrounding Plans  
**Date:** October 16, 2023  
**Re:** Development of the Draft Electrical Undergrounding Guidelines for Large Electrical Corporations (Docket 2023-UPs)

The Office of Energy Infrastructure Safety (Energy Safety) opened Docket 2023-UPs to develop guidelines for submission of a 10-Year Electrical Undergrounding Distribution Infrastructure Plan (Undergrounding Plan) by a large electric corporation. Senate Bill 884 (McGuire, 2022) enacted Public Utilities Code sections 8385 and 8388.5 directing Energy Safety and the California Public Utilities Commission (CPUC) to implement the program. The Energy Safety guidelines will include submission and content requirements for the Undergrounding Plans.

This memo is being sent to CPUC and Energy Safety service lists<sup>1</sup> to notify interested stakeholders how to stay informed and participate in Docket 23-UPs.

1. Electrical Undergrounding Plan Docket and Service List
2. October Stakeholder Comment Request **due November 2, 2023**
3. Scheduling November Workshop/Working Groups **due October 23, 2023**

### **Docket and Notification Service List**

Docket #2023-UPs is available here: [Docket #2023-UPs \(ca.gov\)](https://www.ca.gov/energy-safety/docket-2023-ups)

To receive notifications about these draft guidelines and other related documents, subscribe to Energy Safety's Electrical Undergrounding Plans service list by following the instructions at: <https://energysafety.ca.gov/events-and-meetings/how-to-participate-in-public-events/>.

### **Stakeholder Comment Request**

Energy Safety is in the process of developing guidelines for large electrical corporations planning to submit a distribution system undergrounding plan. Although the creation of guidelines is not specifically called for in the legislation, it has been the practice for Energy Safety to develop guidelines in order to facilitate the submission and review of robust plans.

Energy Safety's first set of questions for stakeholder comment is attached to this memo. Interested stakeholders are invited to respond to the questions no later than Thursday November 2, 2023, 5:00 p.m. Pacific Time.

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<sup>1</sup> These service lists include R.18-10-007, A.21-06-021, and R.20-07-013

Comments must be sent to [ElectricalUndergroundingPlans@energysafety.ca.gov](mailto:ElectricalUndergroundingPlans@energysafety.ca.gov) Energy Safety will then make the comments publicly available on Docket #2023-UPs.

Comments should be titled “[Committer Name] – Comments Undergrounding Plan Guidelines.”

### **Workshop/Working Group Planning**

In November, Energy Safety intends to host a workshop and/or a series of working group meetings to facilitate development of the guidelines. Given that many interested stakeholders are participating in other proceedings at the CPUC and Energy Safety, we would like interested stakeholders to provide input about the schedule and topics. This input must be emailed to [ElectricalUndergroundingPlans@energysafety.ca.gov](mailto:ElectricalUndergroundingPlans@energysafety.ca.gov) no later than October 23, 2023.

#### **Which Schedule Option would be the most productive given the time constraints?**

The working groups will be open to all participants and held remotely via Teams.

- A. 2-hour working group meeting every Tuesday in November from 10am to noon.
- B. 1-day workshop
- C. Other (please specify)

Please let us know your preference, as well as time and date preferences and restrictions. We are interested in a format that is productive. We also want to avoid schedule conflicts with previously scheduled meetings and deadlines in other proceedings.

#### **Are there particular topics that should be covered in a workshop or working group format?**

We are developing a list of topics to be considered in the November meetings. We are interested in hearing from stakeholders about topics that would benefit from a workshop or working group setting.

### **Background on Senate Bill 884**

Senate Bill 884, which became law on Jan. 1, 2023, requires the CPUC to establish a program for expediting the undergrounding of a large electrical corporation’s distribution infrastructure. This program is available to Pacific Gas and Electric, Southern California Edison, and San Diego Gas & Electric.

Once the CPUC has opened the program, a large electrical corporation may submit a 10-year distribution infrastructure Undergrounding Plan to Energy Safety. Energy Safety is required to review and approve or deny the Plan within nine months of submission. Energy Safety may only approve the Undergrounding Plan if it finds that the large electrical corporation’s Undergrounding Plan will achieve, at the least, both of the following:

1. Substantially increase reliability by reducing use of public safety power shutoffs, enhanced powerline safety settings, de-energization events, and other outage programs.
2. Substantially reduce wildfire risk.

Sincerely,

Kristin Ralff Douglas  
Program Manager, Electrical Undergrounding Division  
Office of Energy Infrastructure Safety

