

Attachment 1

Summary of PG&E's Recommendations to Energy Safety's Draft Guidelines for 10-Year Electric Undergrounding Distribution Infrastructure Plans Pursuant to Senate Bill 884

1. Section 2.4.2: Modifying Screen 2 circuit segment requirements regarding Rapid Earth Fault Current Limit Devices (REFCL).
2. Section 2.4.3: Removing the requirement to provide an individual Project Reference Sheet for all EUP projects and instead allowing electrical corporations to provide the data in a tabular format
3. Section 2.4.5.2: Reducing information requirements regarding non-EUP projects.
4. Section 2.5.1: Revising modeling requirements from 60 years to 55 years.
5. Section 2.7.5 – Core Capability 1: (1) Apportioning risk and reliability benefits across the sub-projects in a circuit segment for the Separate Analysis; (2) Excluding the requirements for a reliability Ablation Study at the time of EUP submission and instead allowing electrical corporations additional time to develop solutions to address this concept; and (3) Allowing electrical corporations to model outages and reliability improvements based on recent historical data and not forecast data.
6. Section 2.7.5 – Core Capability 4: Replacing the term “discount rate sums” with the term “discount rate” for clarity and consistency with other regulatory proceedings.
7. Section 2.7.5.1: Modifying data sharing requirements to take into consideration potential contractual limitations on sharing third-party proprietary data.
8. Section 2.7.6: Modifying the information requirements for Project Variable Modifiers to allow for a narrative description of risk model changes.
9. Section 2.7.9: Revise the definition of High-Risk Threshold to reflect the Normalized-Overall Utility Risk level above which a circuit segment is considered eligible for examination for expedited undergrounding.
10. Section 2.8: Streamlining and coordinating reporting metrics with the California Public Utilities Commission (CPUC) reporting metrics.
11. Section 2.8.7.2: Limiting the required information about third-party equipment on poles to situations where the electrical corporation has a lease or agreement with the owner of that equipment or the information is otherwise available to the electrical corporation.
12. Section 3.1.2: Specifying that the pre-submission completeness check will be complete within 10 days of submission and that electrical corporations should transmit its pre-submission EUP to Energy Safety as a confidential document.

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13. Section 3.5.2: Allowing an electrical corporation to work with Energy Safety to develop a reasonable schedule to respond to a Modification Notice.
14. Section 3.7: Revising the time for responding to stakeholder data requests from 3 business days to 5 business days.
15. Appendix C.4: Providing information about undergrounding projects in geospatial files with maps of the planned undergrounding work in either GIS or other file type, like KMZ, that is readily available;
16. Appendices C.4.1, C.4.2, C.4.3 and C.4.4: Modifying the Draft Guidelines' requirements to allow an electrical corporation to provide GIS data, or other file types, in order to satisfy the different requirements; and
17. Appendix C.4.2: Modifying the Draft Guidelines' requirements to allow electrical corporations to provide asset data that is readily available in GIS and to exclude data or combinations of data that would be considered confidential.
18. Appendix A: Modifying the definitions in the Draft Guidelines as follows. Proposed additions are shown as underlined text (proposed addition) and proposed deletions are shown as a strike through (~~proposed deletion~~):
 - a. "High-Risk Threshold." means the Normalized Overall Utility Risk level above which a circuit segment is considered eligible for examination for expedited undergrounding. This threshold is based on a normalized unit of measure across each circuit segment, such as per mile.
 - b. "Hybrid Distribution Hardening" means a sub-project that consists of at least 80 percent undergrounding and up to 20 percent overhead covered conductor or up to 20 percent line removal with remote grid.
 - c. "Outage Program Likelihood" is the likelihood of a large electrical corporation utilizing an Outage Program given a ~~probabilistic~~ historic set of environmental conditions.
 - d. "Sub-Project" is the product of dividing a circuit segment that has passed Screen 3 (Project Risk Analysis) into smaller projects for construction.
 - e. "Undergrounding" means actions taken to convert overhead electrical lines and/or equipment to underground electrical lines and/or equipment (i.e., located underground and in accordance with GO 128). ~~Undergrounding does not include microgrids.~~ Undergrounding projects can include hybrid distribution hardening work.

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19. PG&E recommends that the final guidelines be modified to include "hybrid distribution hardening" as a reasonable, acceptable approach to distribution system hardening that is covered by the 10-year EUP guidelines.