

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

Docket #2023-UPs
ElectricalUndergroundingPlans@energysafety.ca.gov

**MUSSEY GRADE ROAD ALLIANCE REPLY TO STAKEHOLDER COMMENTS
ON THE DRAFT GUIDELINES FOR THE 10-YEAR ELECTRICAL
UNDERGROUNDING DISTRIBUTION INFRASTRUCTURE PLAN**

Joseph Mitchell, Ph.D.
M-bar Technologies and Consulting, LLC
19412 Kimball Valley Rd.
Ramona, CA 92065
Telephone: (858) 228 0089
Email: jwmitchell@mbartek.com

for

Diane Conklin, Spokesperson
Mussey Grade Road Alliance
P.O. Box 683
Ramona, CA 92065
Telephone: (760) 787-0794
Email: dj0conklin@earthlink.net

Dated: June 10, 2024

1 INTRODUCTION

The following reply comments have been prepared for Mussey Grade Road Alliance (MGRA or Alliance) in response to stakeholder comments on the Development of Guidelines for 10-Year Electrical Undergrounding Distribution Infrastructure Plan.¹ As per the cover letter posted to the docket on May 8, 2024 by Program Manager Kristin Ralff Douglas May 29, 2024 is the due date for comments and June 10, 2024 the due date for reply comments.² MGRA filed comments timely on May 29, 2024.³ MGRA responds primarily to comments by PG&E⁴ and its associated attachments, although it also comments briefly on comments by Cal Advocates,⁵ TURN,⁶ and CUE.⁷

1 PG&E COMMENTS

Section 2.4.2 - Screen 2: Project Information and Alternative Mitigation Comparison

PG&E states that *“Because REFCL occurs at the substation level, it cannot be compared to other mitigations at the circuit segment level as required by the Draft.”*⁸ Instead, *“PG&E recommends modifying the final guidelines to allow an electrical corporation to provide an alternatives analysis for REFCL, or other mitigations as necessary, at a different level of granularity than the circuit segment level, where appropriate.”*⁹

¹ Docket #2023-Ups; TN14039; OFFICE OF ENERGY INFRASTRUCTURE SAFETY DRAFT 10-YEAR ELECTRICAL UNDERGROUNDING PLAN GUIDELINES; May 8, 2024 (Draft).

² Docket #2023-Ups; TN14049; Letter Re: Draft Electrical Undergrounding Plan Guidelines; May 8, 2024.

³ Docket #2023-Ups; MUSSEY GRADE ROAD ALLIANCE COMMENTS ON THE DRAFT GUIDELINES FOR THE 10-YEAR ELECTRICAL UNDERGROUNDING DISTRIBUTION INFRASTRUCTURE PLAN; May 29, 2024.

⁴ Docket #2023-Ups; TN14138_20240529T231002; Pacific Gas and Electric Company’s Comments on the Office of Energy Infrastructure Safety’s Draft Guidelines for Submission of 10-Year Electric Undergrounding Distribution Infrastructure Plans Pursuant to Senate Bill 884; May 29, 2024.

⁵ Docket #2023-Ups; Public Advocates Office’s Comments on the Draft Guidelines for the 10-Year Electrical Undergrounding Plan (EUP); May 29, 2024.

⁶ Docket #2023-Ups; Comments of The Utility Reform Network on Draft 10-Year Electrical Undergrounding Plans Guidelines; May 29, 2024.

⁷ Docket #2023-Ups; Comments of the Coalition of California Utility Employees on the Draft 10-Year Electrical Undergrounding Plan Guidelines); May 29, 2024.

⁸ PG&E Comments; p. 5.

⁹ Id.

While seemingly reasonable, MGRA’s opening comments showed an excerpt from PG&E’s 2025 Update WMP in which it used this proposed method.¹⁰ What resulted is clearly an “apples and oranges” result which purported to show that a combination of REFCL, Covered Conductor, Downed Conductor Detection, and EPSS had an effectiveness of only 65%, whereas covered conductor alone is estimated to have an effectiveness of 66.4%. REFCL itself is estimated by utilities to have wildfire ignition reduction efficiency of 50%, although MGRA’s comments quoted Australian authorities indicating that this efficiency is significantly higher.

PG&E’s “blended average” approach is therefore useless unless all other mitigations – including undergrounding, are blended as well. SCE’s approach was to assume that REFCL was feasible for all evaluated SRA sites,¹¹ even though this is not a realistic assumption. Likewise, PG&E should make similar assumptions regarding REFCL.

Section 2.4.3 – Screen 3: Project Risk Analysis

PG&E states that it “*envisions including hundreds of individual projects as part of our 10-year EUP.*”¹²

In light of massive scale that PG&E proposes for this exercise, it is essential that stakeholders have adequate time to review and analyze the hundreds of projects that are going to be put forward, including seeking additional data. In its Comments, MGRA urged that OEIS substantially increase the period allowed for stakeholder review.¹³ PG&E’s reveal of its understanding of the EUP process underscores the inadequacy of the original comment timelines in the Draft Guidelines.

Cal Advocates have put forward a number of alternative proposals regarding stakeholder comment timelines that Energy Safety should consider.

¹⁰ MGRA Comments; p. 5.

¹¹ Southern California Edison 2025 WMP Update; p. 63; fn. 36.

¹² PG&E Comments; p. 6.

¹³ MGRA Comments; p. 14.

Section 2.7.5.1 – System Inputs and Considerations

Metrics

Regarding the calculation of metrics, PG&E “*recommends that the final guidelines be modified to require a narrative summary describing the inputs used to calculate the various metrics. This higher-level information will provide a sufficient understanding of the electrical corporation’s risk model landscape for Energy Safety and stakeholder to assess the validity of those models and can be supplemented through data requests if additional, specific information is needed.*”

Energy Safety should reject this recommendation. Given Energy Safety’s goal of an accelerated review process, it is essential that information be “front loaded” to the full extent possible so that additional data requests are unnecessary. PG&E will have months to prepare its application and put forward information to support its methodology. Stakeholders and regulators will have significantly less time to review PG&E’s application and prepare any additional data

Confidentiality of Modeling Information

PG&E asks that “*the final guidelines be revised to indicate that third-party proprietary modeling information be provided where needed, and if possible, to Energy Safety on a confidential basis subject to the terms of any contractual limitations on sharing such information.*”¹⁴

At the very least, Energy Safety should validate that any claim of confidentiality based on “contractual limitations” be shown explicitly in PG&E’s confidentiality request. Unless there are specific contractual restrictions the modeling information should be made public. In the case where such contractual obligations exist, redacted versions of the model excluding the proprietary information should be filed publicly.

¹⁴ PG&E Comments; p.13.

3.7.2.2 – Data Request Process for Data Requests from Stakeholders

PG&E’s comments request that “*in the final guidelines the response period for data requests from stakeholders be increased to five business days.*”¹⁵ PG&E justifies its request by stating: “*given the volume of data requests electrical corporations will likely receive from numerous stakeholders, responding to these requests requires significant time from a limited population of subject matter experts and thus a five-business day turnaround for stakeholder data requests is reasonable.*”¹⁶

PG&E’s request is unreasonable, particularly in the light of the fact that elsewhere in its comments it argues for reducing the amount of information that should be required as part of its filing. MGRA and other intervenors have argued that the 30 day response time proposed in the Draft Guidelines is inadequate. Granting PG&E’s request would further compound the issue by reducing the amount of time stakeholders have to request, review, and clarify PG&E data requests. The Wildfire Mitigation Plan process has required a 3 day turnaround time, with allowances for delay in the servicing of particularly burdensome requests. There is no reason that the EUP process should be treated differently. Energy Safety should refuse PG&E’s request.

IV. APPENDIX C – DATA ORGANIZATION AND STRUCTURE

File Format

PG&E requests that Appendix C.4 be modified to allow PG&E to provide “*information about undergrounding projects in geospatial files with maps of the planned undergrounding work in either GIS or other file type, like KMZ, or combinations of file types, that are readily available.*” MGRA does not have any objection to PG&E providing GIS files. PG&E provides extensive GIS files to OEIS as part of its quarterly data reports. However, MGRA would object to PG&E providing KMZ files *instead* of GIS files. These file types are not equivalent: KMZ files do not provide attributes and metadata that describes the geospatial objects.¹⁷

¹⁵ PG&E Comments; p. 17.

¹⁶ *Id.*

¹⁷ <https://pro.arcgis.com/en/pro-app/latest/help/data/kml/what-is-kml-.htm>

PG&E argues that: “A KMZ file is viewable in various, readily available GIS applications including Google Earth. KMZ files provide similar information as a GIS file, and we currently share planned undergrounding information using KMZ files with local governments and other interested parties through our community wildfire resource program.”¹⁸

The “similarity” of KMZ and GIS files that PG&E refers to is that both represent geographic information. If geographic information alone is being represented, then the files can be equivalent. However, if other attributes or metadata is associated with the geographic information, then providing a KMZ file instead of a GIS file will remove this information. Therefore, PG&E should not be permitted to substitute a KMZ file for a GIS file in the case in which the GIS file contains relevant attributes or metadata.

Confidentiality

Regarding GIS data, PG&E asks to change the guidelines to allow GIS data “*and to exclude data or combinations of data that would be considered confidential.*”¹⁹ This begs the question: considered confidential by whom?

As MGRA noted in its opening comments,²⁰ PG&E has recently taken an overly aggressive stance regarding confidentiality of GIS information and has not yet demonstrated its contention regarding certain data. MGRA suggests that questions regarding excluded classes or combinations of GIS data be resolved during the pre-filing process so that this time is not lost during the evaluation process determining which data may be included or excluded.

¹⁸ Id.; p. 18.

¹⁹ Id.

²⁰ MGRA Comments; pp. 2-4.

V. RECOMMENDED ADDITIONS TO THE DRAFT 10-YEAR ELECTRICAL UNDERGROUNDING PLAN GUIDELINES

Hybrid Distribution Hardening

PG&E proposes that the EUP include a “hybrid electric distribution hardening” classification for “*a sub-project that consists of at least 80 percent undergrounding and up to 20 percent overhead covered conductor or line removal,*”²¹ explaining that: “*there are likely to be mixed hardening solutions (a mix of overhead, underground, and line removal) deployed for many circuit segments, with some having 80 percent or more undergrounding and others having less than 80 percent undergrounding.*”²²

Regarding this proposal, we note that:

- MGRA has observed, most recently in its 2025 WMP Update Comments, that PG&E and other utilities are underestimating the wildfire ignition reduction of covered conductor by a factor of 2.²³ If this finding is supported by OEIS and/or the CPUC, this will lead to a greater use of covered conductor for wildfire mitigation purposes compared to undergrounding.
- Covered conductor and complimentary wildfire mitigation technologies can be deployed considerably faster than undergrounding, reducing risk more quickly.
- MGRA has also demonstrated that covered conductor can significantly reduce the duration, scale, and frequency of PSPS outages.²⁴ However, it does not eliminate them, particularly in areas prone to extreme winds.
- Undergrounding effectively eliminates the need for PSPS and fast trip programs such as EPSS. However, in order for this to be true, all circuit segments exposed to wildfire risk need to be undergrounded.
- PG&E is currently executing on its 2023-2025 General Rate Case plan, which includes a “hybrid” 1230 miles of undergrounding and 778 miles of covered

²¹ PG&E Comments; p. 21.

²² Id.

²³ MGRA 2025 WMP Update Comments; pp. 22-24.

²⁴ MGRA 2023-2025 WMP Comments; pp. 108-112.

conductor.²⁵ It was the expectation of the Commission that this solution would maximize risk buy-down: *“We expect PG&E to prioritize conducting its work in the highest risk areas to achieve as much risk reduction as possible.”*²⁶

- PG&E is now entering its 2026-2028 rate case, and has filed its 2024 RAMP. It should be anticipated that like its 2023-2025 General Rate case, the Commission will urge PG&E to develop an effective hybrid mitigation solution that will concentrate on the highest risk areas.
- At the earliest, PG&E can file its EUP in 2024, although given the reasonable OEIS requirements put forward in the Draft Guidelines may require PG&E to file somewhat later.²⁷ It is intended that the EUP supplement, not replace, the General Rate Case. EUP is intended for a 10-year timeline. Therefore PG&E’s EUP filing will be focused on projects to be initiated starting in 2029. Projects, including undergrounding projects, occurring earlier will be evaluated in the GRC.

By 2029, it should be anticipated that PG&E will have achieved substantial risk buy-down through mitigation projects funded through the 2023-2025 and 2026-2028 General Rate Cases. Currently, PG&E gives a relatively small weight to reliability in its prioritization of wildfire mitigation projects. Therefore, the relative fraction of the PG&E territory having moderate to low wildfire risk but comparatively greater reliability issues due to EPSS or PSPS will increase as it executes its mitigation projects through 2028. Possibly not coincidentally, SB 884 emphasizes reliability improvements as a primary requirement.²⁸ As noted, undergrounding has a relatively greater effectiveness at improving reliability compared to other mitigations than it does in reducing wildfire risk, for which combinations of other mitigations can be extremely effective. However, in order for undergrounding to be an effective mitigation for PSPS and EPSS the entire network serving an area to be mitigated needs to be undergrounded, meaning that a “hybrid” configuration may not deliver the necessary reliability improvements.

Summarizing and addressing PG&E’s “hybrid” proposal, Energy Safety should urge PG&E to ensure that projects that are potentially “hybrid” projects be front-loaded into the GRCs rather

²⁵ D.23-11-069; p. 273.

²⁶ Id.; p.272.

²⁷ PG&E Comments; p. 3.

²⁸ MGRA Comments; p. 7.

than postponed to the EUP. This will also result in faster risk buy-down, since covered conductor can be deployed more rapidly than undergrounding. Finally, given the implication that the EUP puts reliability first and foremost, MGRA’s proposals for including reliability cost effectiveness metrics should be implemented and used for screening EUP projects.²⁹

2 CUE COMMENTS

CUE notes that: “*Undergrounding projects are labor-intensive and could significantly draw from the pool of available field personnel, potentially diverting attention and resources from critical maintenance and safety initiatives.*”³⁰

CUE raises a valid concern. Energy Safety should ensure that as PG&E focuses its attention on its extremely ambitious undergrounding goals that it not lose focus on the overall goal of safety and wildfire risk reduction.

3 TURN AND CAL ADVOCATES COMMENTS

TURN and Cal Advocates mirror MGRA’s concerns regarding the curtailed timeline that the Draft Guidelines propose for public comments and replies. Cal Advocates in particular proposes a number of potential improvements that would significantly enhance the ability of stakeholders to participate in the EUP process.

3.7

2.7.3

4 CONCLUSION

The Mussey Grade Road Alliance respectfully requests that Energy Safety consider its comments and appreciates the opportunity to provide input.

²⁹ MGRA Comments; pp. 7-11.

³⁰ CUE Comments; p. 3.

Respectfully submitted this 10th day of June, 2024,

By: /s/ **Joseph Mitchell**

Joseph W. Mitchell, Ph.D.
Prepared for: Mussey Grade Road Alliance
M-bar Technologies and Consulting, LLC
Ramona, CA 92065
Tel: (858) 228 – 0089
Email: jwmitchell@mbartek.com

On behalf of

/s/ **Diane Conklin**

Diane Conklin, Spokesperson
Mussey Grade Road Alliance
P.O. Box 683
Ramona, CA 92065
Telephone: (760) 787-0794
Email: dj0conklin@earthlink.net