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**VIA ELECTRONIC FILING** **Docket # 2023-UPs**

Kristin Ralff Douglas
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715 P Street, 20th Floor
Sacramento, CA 95814

**RE: San Diego Gas & Electric Company's Reply Comments on Energy Safety's Draft Electrical Undergrounding Plan Guidelines**

Dear Director Thomas Jacobs:

San Diego Gas & Electric (SDG&E) hereby provides reply comments addressing the Draft Electrical Undergrounding Plan Guidelines (Draft Guidelines) issued by the Office of Energy Infrastructure Safety (Energy Safety) on May 8, 2024. SDG&E generally supports the Draft Guidelines, but as identified in other stakeholder comments, believes that certain modifications would allow for timely and successful implementation of a program that meets the intent of the Legislature in establishing an expedited electrical undergrounding program.

## I. DATA AND RISK MODELING REQUIREMENTS

### A. Data and Modeling Requirements Should Balance the Need for Expedited Risk Reduction Through the Undergrounding Program with Thorough Risk Analysis

As identified by Pacific Gas and Electric Company (PG&E), the Draft Guidelines require the 10-eyear electric distribution undergrounding plans (EUP) to include a substantial amount of information and data.[1] SDG&E shares PG&E's concern that the "magnitude and volume of data and modelling required will take an expended period of time for electric corporations to develop

[1] 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 (PG&E Comments), Docket No. 2023-Ups (May 29, 2024) at 1.

and gather," thus potentially delaying the feasible timeline to submit an EUP in the expedited manner anticipated by Senate Bill (SB 884). SDG&E is capable of supplying the majority of the information requested by Energy Safety in a timely manner. However, the extensive and complex data and modeling requirements present a considerable challenge as some of the capabilities need to be developed, integrated with existing systems, and continuously updated to meet regulatory standards in different filings at Energy Safety and the California Public Utilities Commission (Commission). In practice, this will result in a delay in the feasible timeline to submit an EUP and will require electrical corporations to make significant and time-consuming changes to their current modeling and data capabilities As stated by PG&E, "the need for data, modeling, and analysis for Energy Safety and stakeholders to understand an electrical corporation's approach to their EUP is certainly valid, [but] requiring data and analysis that goes beyond an electrical corporation's operational needs, and will require substantial time to produce, may hinder the State's goals of expeditiously reducing wildfire risk and enhancing the safety of California's communities."[2] Where feasible, Energy Safety should modify the Final Guidelines to reflect the statutory requirements, reduce potentially duplicative or inconsistent risk modeling requirements, and streamline the EUP review process to promote risk reduction in the expedited fashion necessary to reduce the impact of electrical infrastructure related wildfires and PSPS events.

### B. The Ablation Analysis Should Be Modified to Reflect Existing Capabilities

SDG&E agrees with PG&E's workload assessment regarding the extended time (18-24 months) required to develop the ablation study.[3] SDG&E understands the overall purpose of the ablation study as seeking to identify alternative risk scenarios systemwide with and without specific undergrounding projects. Rather than implementing a complex process for ablation studies for both ignition risk and reliability impacts, SDG&E proposes that existing reporting methods serve the same purpose as the ablation study with considerably less time to develop.

[2] PG&E Comments at 2.

[3] PG&E Comments at 2.

To streamline the reporting for both the WMP and SB 884 filings, SDG&E requests that the Collective, Separate, and Ablation analyses use a similar framework as Table 1 in Section 1.1.1 of SDG&E's 2025 WMP Update. See the screenshot below as an example:

**Table 1: Top 5% Wildfire Risk Circuits/Segments/Spans**

| Risk Rank | Feeder ID | Segment ID | Wildfire Risk Score | PSPS Risk Score | Wildfire / PSPS Ratio | % of Total Wildfire Risk in Top 5% |
|---|---|---|---|---|---|---|
| 1 | 237 | 237-30R | 7.01E-03 | 1.25E-04 | 55.88 | 9.09% |
| 2 | 909 | 909-805R | 6.99E-03 | 6.57E-05 | 106.30 | 9.06% |
| 3 | 222 | 222-1401R | 6.76E-03 | 1.51E-04 | 44.85 | 8.77% |
| 4 | 524 | 524-69R | 5.36E-03 | 1.03E-04 | 52.26 | 6.95% |
| 5 | 222 | 222-1364R | 4.57E-03 | 3.01E-04 | 15.17 | 5.93% |
| 6 | 448 | 448-11R | 3.07E-03 | 3.53E-04 | 8.71 | 3.99% |
| 7 | 217 | 217-983R | 2.95E-03 | 4.80E-05 | 61.41 | 3.82% |

As seen in the table above, each row represents a circuit segment, indicating its wildfire risk rank, wildfire and PSPS risk scores, and percentage of wildfire risk that each circuit segment comprises in the top 5% of the portfolio. With minor modifications to adjust the top 5% of segments to the percentage of risk within the entire portfolio, stakeholders would have transparency to understand and review the effects of removing each circuit segment from the complete portfolio. This would allow for analysis of the resulting risk that would exist in the system should each circuit segment be removed one at a time and can be reduced to a simple tabular analysis compared to the lengthy proposed ablation study that requires extensive development time at a high cost. Such an approach balances the need for informed decision making regarding the undergrounding programs with existing capabilities and the need to submit plans in a timely fashion.

## II. MITIGATION ANALYSIS AND SELECTION

### A. Energy Safety Should Reject MGRA's Mischaracterizations Regarding Covered Conductor Effectiveness and Existing Undergrounding Risk Reduction

Mussey Grade Road Alliance (MGRA) continuously attempts to further inflate the estimated effectiveness of covered conductor to 85% effectiveness based on an overly limited

analysis of SCE's ignition data including only reportable ignitions.[4] This conclusory statement attempts to tip the scales away from risk informed undergrounding strategies and is contrary to existing efforts to study risk events and covered conductor effectiveness. In urging Energy Safety to adopt this risk reduction, MGRA attempts to change the goalposts to bias the data in favor of the outcome.

PG&E, SCE, and SDG&E have been utilizing risk events – i.e., faults that could result in a probable ignition – to estimate the effectiveness of covered conductor and other mitigations because risk events provide a robust data set representing an adequate sample size to draw data based conclusions, and are considered leading indicators for ignitions. MGRA admits that SCE's estimates are approximately equal to its observed reduction in outages on fully covered conductor segments… in which it demonstrated that fully covered circuits reduce 69% of the faults, but then advocates for the use of 85% effectiveness within SDG&E's risk models based on ignition data alone. MGRA admits that SCE's effectiveness estimates are approximately equal to its observed reduction in outages on fully covered conductor segments… in which it demonstrated that fully covered circuits reduce 69% of the faults, but then advocates for the use of 85% effectiveness within SDG&E's risk models based on reportable ignition data alone.

Energy Safety should avoid overprescribing effectiveness values in the EUPs and allow the utilities to establish risk reduction in a manner that may be effectively vetted through the process. Each IOU should be allowed to utilize and substantiate its assumptions. These assumptions should be based on data gathered within their service territories or derived from independent studies, such as the Joint IOU Covered Conductor Study. This approach would ensure that the unique conditions and experiences of each IOU are taken into account in the evaluation of effectiveness and not a biased estimate is imposed on the analysis.

Further, MGRA spends much of its comments attempting to pre-litigate the merits of PG&E and SDG&E's undergrounding proposals. Many of MGRA's comments do not pertain to the Draft Guidelines, or even matters within the jurisdiction of Energy Safety.[5] Energy Safety

[4] Mussey Grade Road Alliance Comments on the Draft Guidelines for the 10-Year Electrical Undergrounding Distribution Infrastructure Plan (MGRA Comments), Docket No. 2023-UPs (May 29, 2024) at 6.

[5] For instance, MGRA advocates for installation of off-grid standalone Solar Plus Storage systems, but notes that they are "not currently practical with existing regulations," and also advocates that the CPUC consider providing long-term battery storage grants. MGRA Comments at 10-11.

should refrain from incorporating any of MGRA's characterizations of risk reduction, reliability costs, or alternative regulatory programs into the Draft Guidelines.

### B. Alternative Mitigations Should be Reasonably Limited and Reflect Electrical Corporation Capabilities

MGRA continues to malign the intention behind undergrounding programs as profit driven and argues in favor of a prescriptive directions for utility mitigation comparisons.[6] MGRA's recommended "non-UG" solution, however combines several mitigations that may not necessarily be feasible in all circumstances and—to the extent feasible—may cost significantly more than an undergrounding solution. For instance, SDG&E has repeatedly established that Rapid Earth Fault Current Limiter (REFCL) technology is not compatible with its system configuration and changing the system to accommodate the technology would pose unreasonable costs. Requiring a uniform alternative mitigation analysis, as MGRA supports, may thus be overly restrictive and not tethered to the electrical corporations' systems.

TURN points out that there is a lack of clarity regarding the alternative mitigation strategies presented in Screen 3, because at one point Energy Safety directs the electrical corporation to evaluate "all reasonable combinations" of mitigations, but ultimately requires "at least two alternative mitigations." Similar to an overly restrictive analysis, requiring the utilities to present "all" potential mitigation alternatives would prove to be unreasonable and unworkable, and would result in unnecessary delays in EUP submission. Assuming Energy Safety meant to require presentation of at least two hardening mitigations, as currently stated in the Draft Guidelines, this approach reflects a reasonable and balanced method of comparing undergrounding with the risk reduction and cost efficiency of alternative hardening approaches. To that end, SDG&E agrees with generally with MGRA that a more prescriptive direction for mitigation comparison would provide a baseline by which parties may understand these comparisons. SDG&E recommends that for every tranche (i.e., group of circuits or circuit-segments) the following comparison analysis is presented:

- Strategic Undergrounding

[6] MGRA Comments at 5-6.

- Covered Conductor in combination with advanced protections (including Vegetation Management, PSPS, and any other operational mitigation that is applicable for each circuit).

SDG&E further notes that Public Utilities Code Section 8388.5(c)(4) directs Energy Safety to compare undergrounding with alternative above ground hardening mitigations and requests that analysis of alternatives be focused on mitigation strategies involving grid hardening approaches.

## III. CONFIDENTIALITY AND STAKEHOLDER REVIEW

Several parties requested extended timeframes for review and comment on the EUP, well beyond the proposed 30-day period discussed in the Draft Guidelines. SDG&E supports a well-informed process by which stakeholders may provide meaningful feedback that facilitates Energy Safety's review of the plans. But the multi-pronged approach recommended by Cal Advocates and the 120-day review period supported by TURN fail to reasonably provide Energy Safety adequate time to issue a decision in the timeframe required by SB 884. If the comment process reaches six months, as recommended by some stakeholders, Energy Safety will be extremely limited in its ability to reach an informed decision in the remaining three months. To strike a balance and facilitate meaningful review, SDG&E recommends that the Draft Guidelines be revised to allow for 45 days for initial comments, with reply comments due after 20 days.

MGRA further advocates that Energy Safety divert from its regulations regarding confidentiality and decide in advance what data fields may be classified as confidential.[7] Without citing to specific instances or examples, MGRA asserts a pattern of overuse of confidential designations and disclosure of unclear "secret" information concerning stakeholder concerns. Energy Safety developed a regulatory framework to review and protect confidential information submitted by utilities that was subject to vetting and an appropriate rulemaking process. That process reasonably and adequately protects the electrical corporation's data—which may be confidential for several reasons, including but not limited to public safety, customer privacy, and commercial protections regarding trade secrets. There is no reason to divert from Energy

[7] MGRA Comments at 4.

Safety's existing process regarding confidentiality for the EUP submissions, which will allow for meaningful stakeholder review and appropriate protection for confidential information.

## IV. CONCLUSION

SDG&E respectfully requests that Energy Safety take these recommendations into account in the final electrical undergrounding plan guidelines.

Respectfully submitted,

*/s/ Laura M. Fulton*
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San Diego Gas and Electric Company