Pacific Gas and Electric Company

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715 P Street, 20th Floor
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Re: **Pacific Gas and Electric Company's Reply 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**

Dear Ms. Douglas:

Pacific Gas and Electric Company (PG&E) appreciates the opportunity to provide reply comments on the Office of Energy Infrastructure Safety's (Energy Safety) Draft Guidelines to implement Senate Bill (SB) 884 for the submission of 10-year electric distribution infrastructure undergrounding plans (EUP). In addition to PG&E, six parties submitted initial comments on the Draft Guidelines.[1] We appreciate these parties' thoughtful comments and agree with a number of their recommended revisions to the Draft Guidelines. However, some comments propose processes and data submissions that will only delay electrical corporations' EUP submissions and Energy Safety's review of the EUPs within the nine-month statutory timeframe. These proposals should be rejected. Below, PG&E addresses the initial comments by party and then includes a final section that addresses the timing for EUP comments, an issue that was addressed by a number of parties.

[1] Initial comments were submitted by the Public Advocates Office at the California Public Utilities Commission (Cal Advocates), AT&T California, the California Broadband and Video Association, Crown Castel Fibert LLC, and Sonic Telecom, LLC (collectively the Communications Providers), the Coalition of California Utility Employees (CUE), the Mussey Grade Road Alliance (MGRA), Robert A. Johnson, and The Utility Reform Network (TURN).

I. RESPONSE TO CAL ADVOCATES

Cal Advocates raises concerns regarding: (1) the use of eligible circuit segments rather than specific projects in the Draft Guidelines' screens; (2) alleged bias created by using circuit segments; (3) comparisons of alternatives to promote cost efficiency; and (4) the stakeholder comment period. Issues 1-3 are addressed below. Issue 4 is addressed in Section VII.

A. Use of Circuit Segments in Lieu of Individual Underground Projects

Cal Advocates argues that circuit segments are not a substitute for the mature projects required by SB 884 and that reliance on circuit segments, in lieu of actual underground projects to be constructed, presents risks to the approval process. Cal Advocates also claims that Energy Safety cannot meet the legislative requirements for approving a plan that will substantially increase electric reliability and substantially reduce the risk of wildfire, by approving eligible circuit segments. Additionally, Cal Advocates argues that the Draft Guidelines would exacerbate potential inconsistencies with Resolution SPD-15, adopted by the California Public Utilities Commission (CPUC), by requiring the electrical corporation to submit only 25 projects for the project risk analysis in Screen 3. Finally, Cal Advocates recommends that the Draft Guidelines be modified to require a utility to provide all the information that the Draft Guidelines identify as required to complete Screen 3 for all projects identified in Screen 2.[2]

Cal Advocates' proposals are flawed for several reasons. First, Cal Advocates' arguments are based on an incorrect understanding of the definition of "projects." As we explained in our Opening Comments, circuit segments that are identified for undergrounding will be divided into smaller, individual "sub-projects" based on design, construction, permitting, or other considerations. We define sub-projects as the product of dividing a circuit segment that has passed Screen 3 (Project Risk Analysis) into smaller projects for construction.[3] Thus, at least for PG&E, and as defined in the Draft Guidelines,[4] a "circuit segment" is the "project" and the smaller sections readied for construction are the sub-projects. Because the terms "circuit segment" and "project" are synonymous, there should be no concerns about using "circuit segments" for Screens 1 and 2 in the Draft Guidelines.

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[2] Cal Advocates Comments at 4-6.

[3] PG&E Comments at 10 and Attachment 2 at 23.

[4] Draft Guidelines at A-6

Second, Energy Safety can only approve an EUP that will substantially increase electrical reliability and substantially reduce the risk of wildfire.[5] Energy Safety's Draft Guidelines establish a framework that includes rigorous requirements that an electrical corporation demonstrate how it will meet these statutory objectives by setting a Portfolio Mitigation Objective for the EUP. Under the Draft Guidelines, the electrical corporation will select projects consisting of individual isolatable circuit segments during the 10-year program. As we discuss in the final paragraph of this sub-section, it is reasonable to conduct risk reduction and reliability improvement analyses at the circuit segment level, and there is no benefit from requiring an electrical corporation to submit fully designed "sub-projects" in lieu of eligible circuit segments as Cal Advocates suggests.

Third, as Cal Advocates notes, SB 884 provides that an electrical corporation must identify the undergrounding projects that will be constructed.[6] However, Cal Advocates incorrectly asserts that the Draft Guidelines are inconsistent with this statutory requirement. As PG&E explained above, because the term "project" and "circuit segment" are synonymous, the Draft Guidelines readily satisfy the statutory requirements. Moreover, it is entirely reasonable for an electrical corporation not to have every sub-project that will be worked over a decade identified or scoped at the time a 10-year EUP is submitted. Locking into a decade of sub-projects almost a year and a half before an EUP begins—*i.e.*, the 18 month approval period for Energy Safety and the CPUC—would be both impractical and imprudent because circumstances and situations will invariably change over the next decade. To address this issue, the Draft Guidelines adopt a reasonable and pragmatic approach consistent with the Legislature's intent. Under the Draft Guidelines, a universe of eligible circuit segments (*i.e.*, projects) are identified in Screens #1 and #2. Sub-projects associated with these segments then go through Screens #3 and #4 over the 10-year EUP to identify "the undergrounding projects that will be constructed as a part of the program ...."[7] This approach is consistent with the statutory language and results in an EUP that includes both projects and an initial group of sub-projects.

Fourth, the Draft Guidelines do not create inconsistency with Resolution SPD-15. As noted above, since the term "circuit segment" and "project" are synonymous, references in the

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[5] Cal. Pub. Util. Code § 8388.5(d)(2).

[6] Cal. Pub. Util. Code § 8388.5(c)(2).

[7] Cal. Pub. Util. Code § 8388.5(d)(2).

Draft Guidelines to "circuit segment" are not inconsistent with Resolution SPD-15's use of the term "project." Moreover, the CPUC expressly recognized that an EUP may change over time and allowed for coordination with Energy Safety both on EUP changes and project specific information.[8] Through this process, Energy Safety's four screens and the corresponding circuit segments (*i.e.* project) and sub-project information for each can be reconciled with the requirements of Resolution SPD-15. In addition, during the May 22, 2024, Question and Answer session, Energy Safety clarified that all projects will be evaluated under Screen 3 but only 25 projects need to be included in the initial EUP submission.[9] Because all projects for which an electrical corporation will seek rate recovery will proceed through Screen 3, there will not be any potential inconsistencies with SPD-15.

Finally, requiring an electrical corporation to conduct Screen 3 analyses at the sub-project level for all sub-projects that will occur over the next decade will not add value when analyzing ignition risk reduction or reliability improvements and will unnecessarily delay EUP submissions. PG&E intends to conduct risk and reliability modeling analysis at the circuit segment (*i.e.*, project) level and not at the more granular sub-project level. In our Opening Comments, we recommended that to meet the requirement for conducting separate, project-level risk analysis—more accurately referred to as sub-project level—PG&E proposes that the risk reduction and reliability improvements for a circuit segment based on risk model output be normalized and apportioned across the circuit segment for sub-project reporting. This apportionment would be done outside of the risk model.[10] Therefore, there would be no additional benefit from evaluating sub-projects in Screen 3 because the risk reduction and reliability improvements are simply the sum of an individual circuit-segment's sub-projects.

B. Alleged Bias Resulting from the Use of Circuit Segments

Cal Advocates states that by relying on a circuit segment as the organizing unit of a project, Energy Safety is constraining the maximum possible length of projects for an EUP portfolio. Therefore, according to Cal Advocates, the maximum possible risk reduction for a project, or its alternative, is artificially constrained and will result in a systemic bias in the EUP that disadvantages non-undergrounding alternatives because of their lower per mile efficacy. Cal

[8] Resolution SPD-15, Ordering Paragraph 3 and Attachment 1 at 13-14.

[9] PG&E Comments at 16.

[10] PG&E Comments at 10.

Advocates recommends that Energy Safety modify the Draft Guidelines' definition of a project to eliminate the constraint on the circuit segment length and require applicants to prepare a portfolio of overhead alternatives such that the alternatives demonstrably reduce the same amount of risk from the system as the proposed portfolio undergrounding projects identified in Screen 2.[11]

PG&E agrees in part with Cal Advocates. In our Opening Comments, we noted that because circuit segments' lengths can vary dramatically, we interpret the High Risk Threshold as being based on a normalized unit of measure across each circuit segment, such as per mile. We recommended normalizing the overall utility risk calculation method which would allow the electrical corporation to identify the highest risk circuit segments regardless of length.[12] Further, the effectiveness of a mitigation (*e.g.*, 97.7 percent for undergrounding) is not a per mile measure. Additionally, PG&E has proposed that the final guidelines permit electrical corporations to complete hybrid hardening projects that include undergrounding and covered conductor where most appropriate on a single circuit segment. PG&E's recommendations address Cal Advocates' concerns about artificially constraining maximum possible risk reduction for a circuit segment.

Like Cal Advocates, PG&E agrees that given the different effectiveness of undergrounding and covered conductor, overhead hardening requires more segment miles to achieve an equivalent risk reduction as undergrounding. A benefit of undergrounding is that it provides greater risk reduction than other mitigations, meaning that fewer system miles need to be undergrounded to reduce an equivalent amount of system risk. This is one of the reasons PG&E considers undergrounding as an important tool for addressing wildfire risk.

Cal Advocates also recommends that an electrical corporation provide a plan-wide (system-wide) comparison of underground and overhead alternatives that achieve roughly equal risk reduction. This is not required by SB 884. Instead, SB 884 requires a comparison of undergrounding and above ground hardening for prioritized undergrounding projects (defined as circuit segments in the Draft Guidelines),[13] not a system-wide comparison.

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[11] Cal Advocates at 7-9.

[12] PG&E Comments at 14 and Attachment 2-22.

[13] Cal. Pub. Util. Code § 8388.5(c)(4).

C. Accurate Comparison of Alternatives

Cal Advocates states that costs for alternative mitigations must be compared on a "like-for-like basis," asserting that when an electrical corporation removes 0.8 miles of overhead conductor it is replaced by 1.0 miles of undergrounding, which leads to a 25 percent difference in "linear efficiency."[14] PG&E already accounts for the difference in the amount of overhead line removed and the amount of undergrounding installed in our model by multiplying overhead miles installed by 1.25 to achieve the underground miles. Thus, the forecast costs for undergrounding in our alternatives analysis recognize the linear inefficiency raised by Cal Advocates.

II. RESPONSE TO COMMUNICATIONS PROVIDERS

Communications Providers argue that an electrical corporation's EUP should address all "relevant" costs, including undergrounding costs allegedly imposed on third parties such as telecommunications companies.[15] This proposal is impractical and is based on a misreading of SB 884. First, SB 884 focuses on the costs of an electrical corporation's projects and the corresponding benefits.[16] Nowhere in the statutory language did the Legislature direct that third-party costs, such as telecommunication provider costs, be included in an EUP analysis. Second, there are practical reasons why the Legislature declined to include consideration of third-party costs in the EUP process. While electrical corporations can prepare and validate their own costs forecasts, it would be difficult and time-consuming to forecast and validate all potential third-party costs involved in an undergrounding project. Third-party costs are speculative and not subject to validation by electrical corporations. Nor are third-party costs identified for recovery in the SB 884 cost recovery application before the CPUC. Thus, Energy Safety should not include the Communications Providers' cost proposal in the final guidelines.

The Communications Providers also suggest that the EUP classifications be expanded to include service lines and that electrical corporations should "specify whether service lines are proposed for undergrounding."[17] PG&E does not oppose this recommendation. We recommend

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[14] Cal Advocates Comments at 9.

[15] Communications Providers Comments at 1-3.

[16] *See e.g.* Cal. Pub. Util. Code § 8388.5(c)(3) and (6).

[17] Communications Providers Comments at 4-5.

that instead of adding a new classification for "service lines," the existing classification for "secondary distribution" be modified to read "secondary distribution and service lines."

III. RESPONSE TO CUE

CUE's comments on the Draft Guidelines are limited to the workforce development plans. CUE asserts that the EUP should include headcount targets for the entire 10-year EUP period, as well as information identifying the mix of electrical corporation employees and contractors that will be used to perform the undergrounding program work. PG&E does not oppose CUE's request, with one exception, and agrees that the additional information should not have a "penalty component."[18] The workforce targets[19] and other information recommended by CUE should be based on the best information available to the electrical corporation at the time of EUP submission, and could be shared as forecasts, rather than being a commitment for the entire 10-year period.

The one recommendation by CUE that PG&E does not agree with concerns breaking down staffing levels by either electrical corporation employees or contractors. Given that the EUP covers a 10-year period, the mix of electrical corporation employees and contractors will likely change, potentially substantially, over time as different projects are undertaken. Moreover, SB 884 does not require that workforce numbers be broken down between employees and contractors. Thus, this element of CUE's proposal should not be adopted.

IV. RESPONSE TO MGRA

MGRA's comments raise concerns regarding: (1) the confidentiality of information included in the EUP; (2) the number of alternative mitigations considered; (3) changes to the project data and models; and (4) stakeholder comment periods. Issues 1-3 are addressed below and Issue 4 is addressed in Section VII.

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[18] CUE Comments at 3.

[19] CUE defines workforce targets as "the number of forecasted EUP field employees net of attrition needed each year to execute the EUP." (CUE Comments, p. 4). In line with CUE's definition, the workforce information PG&E will provide will be estimates based the best available information and are not workforce targets.

A. Use of Confidential Information

MGRA expresses concerns about transparency asserting that "many of the recent Declarations made regarding confidentiality have been overbroad."[20] MGRA acknowledges, however, the importance of maintaining confidentiality for certain electrical corporation data given potentially devastating "third-party threats to infrastructure . . ."[21] Accordingly, MGRA suggests that Energy Safety draft final guidelines that distinguish between public and confidential data, in the abstract, and propose redaction methods for confidential information. [22] PG&E disagrees and supports the Draft Guidelines' proposal that Energy Safety use the well-established confidentiality rules and processes included in the California Code of Regulations (CCR).[23] The CCR rules and processes are familiar to Energy Safety and stakeholders and provide parties the opportunity to dispute confidentiality designations where appropriate.

B. Alternative Mitigations

MGRA believes that the requirements in Screen 2 to compare at least two alternative mitigations need to be much more prescriptive. MGRA recommends that Energy Safety: (1) require at least one non-undergrounding solution that should combine at least: covered conductor, REFCL, downed/open conductor protection, fast trip/EPSS settings, high impedance fault detections, and electronic fault detection;[24] and (2) revise the language in Section 2.4.2 to state that electrical corporations' alternative mitigation analysis must include at least three alternative mitigations that have been found to have the highest effectiveness in combination with covered conductor. [25]

PG&E supports the requirement in the Draft Guidelines to compare undergrounding to at least two alternative mitigations. The requirement does not need to be more prescriptive because an electrical corporation needs the ability to model the alternative mitigations—individually or in combination—that are the most effective at reducing ignition risk and improving reliability on its system. Every electrical corporation's electric system is unique, and different technologies will

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[20] MGRA Comments at 3.

[21] MGRA Comments at 3.

[22] Draft Guidelines at 53.

[23] Draft Guidelines at 53.

[24] MGRA Comments at 4-6.

[25] MGRA Comments at 12.

perform differently on each electric system. Additionally, if the Draft Guidelines are too prescriptive, they would limit the ability for an electrical corporation to test and integrate new mitigation measures into its portfolio over the life of a 10-year EUP.

With regards to the mitigations that MGRA recommends, downed conductor detection and high impedance fault detection[26] are integrated into PG&E's EPSS settings. Electronic fault detection is a generic setting and, as we discussed in our Opening Comments, PG&E cannot model REFCL at the circuit segment level.[27] It is not necessary to include in the Draft Guidelines a specific list of mitigation alternatives that electrical corporations must model. Electrical corporations should have the freedom to compare at least two operationally feasible and reasonable alternatives that incorporate the technologies that are most effective at reducing ignition risk and improving reliability, recognizing that those mitigations may change over the life of the program.

C. Cost per Customer for Avoiding Public Safety Power Shutoff (PSPS) and Long Segment Costs

MGRA recommends that Energy Safety add an additional screen to the circuit segment analysis analyzing the cost per customer for avoiding PSPS on a given circuit. It is unnecessary to include PSPS cost avoidance as a separate screen. Electrical corporations can identify and address the issue raised by MGRA using metrics already required by the Draft Guidelines and flexibility to select the appropriate mitigation solution.

MGRA's concerns are misplaced. First, it is unnecessary to add an additional screen or metric for customer PSPS avoidance costs to the evaluation framework. The High Frequency Outage Program Threshold value required by the Draft Guidelines will identify those circuit segments where there is a high likelihood of frequent or prolonged outages. The cost-benefit ratio (CBR) calculation incorporates customer minutes interrupted (CMI). The combination of a circuit segment with a high likelihood of frequent or prolonged outages and a low CMI value will identify circuit segments at risk for high frequency outages that serve few customers.

Second, we agree with MGRA that it may be unreasonable to underground an entire circuit segment of significant length that serves very few customers. As we explained in our Opening Comments, there will be locations on our system where it is most reasonable to harden

[26] High impedance fault detection is limited to three wire systems.

[27] PG&E Comments at 5-6.

portions of a circuit segment through methods other than undergrounding including covered conductor or line removal with remote grid.[28] The issue that MGRA describes in its comments—a long circuit segment supporting few customers—would be remedied, however, by our proposal to allow an electrical corporation to use multiple mitigation methods including line removal with remote grid.

D. Recommendations Related to Risk Modeling and Data Requirements

MGRA makes seven recommendations related to risk modeling, enterprise diagrams, and data requirements that we address below.[29] First, MGRA recommends that the Narrative Requirements Supporting Risk Modeling Methodology (Table 2 in the Draft Guidelines) be revised to: (1) cross reference to the latest risk model information in the WMP; (2) include both public and redacted versions of supplemental information; and (3) describe how the model was tested and validated to ensure accuracy including references to third-party assessments. PG&E agrees that an electrical corporation should include references to model discussions in the most recent Wildfire Mitigation Plan (WMP) similar to the requirements in Table 2 and describe how models are tested and validated, including providing references to third party assessments.

Second, MGRA recommends that language in Section 2.7.5, Core Capability 6 (Comparisons with Alternative Mitigation Strategies) be revised to require electrical corporations to include at least three alternative mitigations that have been found to have the highest effectiveness in combination with covered conductor. For the reasons discussed in Section IV.B above, MGRA's proposal should not be adopted.

Third, MGRA recommends that the weather model box in Figure 1 should show an additional arrow (causal linkage) between the weather model and the consequence model. PG&E supports this recommendation.

Fourth, MGRA recommends that modelling system inputs and considerations for Weather should include the type of weather modeling, if used, version and input parameters, as well as the weather history set used in the model. As described in our Opening Comments, PG&E recommends that the final guidelines be modified to require a narrative summary describing the inputs used to calculate the various metrics.[30]

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[28] PG&E Comments at 21.

[29] MGRA Comments at 11-14.

[30] PG&E Comments at 13.

Fifth, MGRA recommends that Cost per Minute of Averted PSPS be added to the Project Index Table (Appendix C.1.13), unit cost per customer PSPS minute avoided be added to Tables C.9 and C.13, and linked projects to achieve PSPS resilience be added to the Screen 2 tables. PG&E does not support these recommendations for the reasons discussed in Section IV.C above.

Sixth, MGRA recommends that there should be a public review process if an electrical corporation changes its model in ways that result in substantive changes to the set of circuit segments to be undergrounded. In line with this recommendation, PG&E supports the process in the Draft Guidelines for updating risk models (Section 2.7.7) that includes submitting a model report and describing how calibrations are planned. The existing significant change review process that is part of the WMP provides stakeholders with the requested opportunity for review of models and therefore it is not necessary to introduce a public review process in the final guidelines.

Seventh, MGRA recommends that the project lifecycle analysis should occur in Screen 2 instead of Screen 3 because this analysis can affect the choices of circuits and mitigations. The CBR provided in Screen 2, which incorporates safety, reliability, and financial metrics over the life of the asset, is sufficient for determining which eligible circuit segments can proceed as undergrounding projects and move onto Screen 3. The life of the asset analysis required in Screen 3 is the basis for determining if circuit segments selected for undergrounding can meet the wildfire reduction and reliability increase elements of the Portfolio Mitigation Objective and includes comparing risk metrics for undergrounding and alternative mitigations. It is unnecessary and burdensome to conduct a life of the asset analysis for all circuit segments in Screen 2 as certain circuit segments will not pass to Screen 3.

V. RESPONSE TO ROBERT A. JOHNSON

Mr. Johnson states that there are several problems in the Draft Guidelines due to the lack of a valid overall evaluation theory and requests that normal cost benefit analysis methods be used for comparing alternatives.[31] PG&E supports the Draft Guidelines (with certain limited exceptions as described in our Opening Comments) and, contrary to Mr. Johnson's position, believes that they will lead to more certainty in which projects to approve, will generate reports that are objective and useful, will lead to rigorous decision-making, and will ensure

[31] Robert A. Johnson Comments at 1-3.

accountability. The Draft Guidelines also adhere to the methods and requirements for calculating cost benefit ratios adopted in CPUC Decision (D.) 22-12-027.

VI. RESPONSE TO TURN

TURN's comments raise concerns regarding: (1) the cost effectiveness of mitigations moving past Screen 2; (2) ensuring that undergrounding is the best alterative; and (3) stakeholder comment periods. Issues 1 and 2 are addressed below and Issue 3 is addressed in Section VII.

A. Basis for Selecting Mitigation Alternatives

TURN criticizes the Draft Guidelines for allegedly failing to make it clear that the EUP should exclude projects where there are more cost-effective alternatives to undergrounding. TURN notes that SB 884 requires that undergrounding provide substantial improvements compared to other hardening measures.[32] PG&E disagrees with TURN's criticism. The Draft Guidelines appropriately recognize that there will be situations where mitigation selection will not be based solely on CBR values because the CBR does not account for all the elements Energy Safety requires an electrical corporation to consider when choosing a mitigation.[33]

For example, the Draft Guidelines require an electrical corporation to set an Ignition Tail Risk Threshold to establish the need for mitigation on a circuit segment. Ignition Tail Risk Threshold is the measure of consequence above which a circuit segment is considered to have significant potential for catastrophic wildfire. Ignition tail risk is not considered in a CBR but is a critical consideration when choosing a mitigation. In the event a circuit segment has an ignition tail risk above the established threshold, an electrical corporation will likely select undergrounding as the preferred mitigation because of the potential consequence for a catastrophic wildfire. Similarly, the Draft Guidelines require an electrical corporation to set a High Frequency Outage Program Threshold measuring the potential for a significantly high likelihood of frequent or prolonged disruption of service to customers. Again, the frequency of prolonged outages is not included in the CBR calculation but is an important consideration in choosing a mitigation. Contrary to TURN's assertion, the Draft Guidelines appropriately recognize that while CBR is an important factor in selecting the best mitigation alternative, it is not the only factor that should be considered.

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[32] TURN Comments Section 3.

[33] The CBR calculation includes safety (number of fatalities), reliability (customer minutes interrupted), and financial Decision (D.) 22-12-027, p. 19.

B. Requiring Additional Mitigation Alternatives

TURN recommends that the Draft Guidelines be enhanced to ensure that an electrical corporation presents all mitigation alternatives and permutations of alternatives, specifically insulated conductor including potential advanced protections. Additionally, TURN recommends that cost-efficiency, which is currently considered in Screen 4, be evaluated in Screen 3.

As we discuss in response to MGRA's recommendations regarding alternative mitigations in Section IV.B above, PG&E supports the requirement for an electrical corporation to model at least two mitigation alternatives. Thus, TURN's recommendation to model permutations of alternatives is unnecessary. Because only certain combinations of mitigations are operationally feasible, it is reasonable for the electrical corporation to model only those mitigation alternatives—such as covered conductor plus certain advanced protections as TURN recommends—that are practicable alternatives. It is unreasonable to require electrical corporations to model multiple permutations of alternatives if they are not operationally feasible based on an electrical corporation's current system.

The Draft Guidelines are consistent with the SB 884 requirements, which state that an EUP must substantially increase electrical reliability and substantially reduce the risk of wildfire. The electrical corporation must also include a means of prioritizing undergrounding projects based on wildfire risk reduction, public safety, cost efficiency, and reliability benefits.[34] The comparison of alternatives shall emphasize risk reduction and include an analysis of the cost of each activity.[35] Screen 3 in the Draft Guidelines identifies the mitigations that an electrical corporation will install at the circuit segment level to achieve substantial increases in reliability and wildfire risk reduction. PG&E supports the process established in the Draft Guidelines that aligns to the legislation.

VII. RESPONSE TO PROPOSALS ON COMMENT PERIODS

Cal Advocates, TURN, and MGRA all propose revisions to the stakeholder comment period for the initial EUP submission.[36] MGRA proposes that public comments be submitted

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[34] Cal. Pub. Util. Code § 8388.5(c)(2).

[35] Cal. Pub. Util. Code § 8388.5(c)(4).

[36] The Draft Guidelines currently include six opportunities for stakeholders to comment including opening and reply on EUP submission, opening and reply on modification notice responses, and opening and reply on a Draft EUP decision. *See* Draft Guidelines at 57.

within 45-60 days after EUP submission, while TURN proposes 90-120 days and an additional comment period for any material changes to the EUP. Cal Advocates' recommendation is more complicated, involving multiple rounds of comments at different points in time during the process. PG&E supports extending the initial comment period on initial EUP submissions and recommends adopting TURN's proposal of 90 days and that reply comments be due 30 days later, as recommended by Cal Advocates, as long as the additional time for stakeholder comments does not extend the nine-month period for Energy Safety to review and approve an EUP. This will allow stakeholders three months to conduct discovery and prepare their comments and will provide sufficient time for reply comments.

MGRA also recommends 15 days to respond to modifications to the EUP as opposed to 10 days included in the Draft Guidelines.[37] PG&E supports a 10-day comment period for Modification Notice Responses given that the modification issues will likely be limited and providing additional time at this stage of the review process may detrimentally impact Energy Safety's ability to meet its statutory review deadline.

Cal Advocates proposes that if a project list identified in the EUP changes during the Energy Safety review process, stakeholders be given an opportunity to comment on the proposed project changes.[38] PG&E supports this proposal and recommends that stakeholders be given a reasonable time to comment on any project changes that occur during the review process but limiting these additional comments only to the changed projects submitted in the original EUP.

VIII. CONCLUSION

PG&E appreciates the opportunity to provide these reply comments and looks forward to continuing to partner with Energy Safety and stakeholders on this important work. If you have any questions, please do not hesitate to contact the undersigned at Megan.Ardell@pge.com.

Very truly yours,

/s/ Megan Ardell

Megan Ardell

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[37] Draft Guidelines at 57.

[38] Cal Advocates Comments at 3.