

ADAMS BROADWELL JOSEPH & CARDOZO

A PROFESSIONAL CORPORATION

ATTORNEYS AT LAW

601 GATEWAY BOULEVARD, SUITE 1000
SOUTH SAN FRANCISCO, CA 94080-7037

TEL: (650) 589-1660
FAX: (650) 589-5062
agraf@adamsbroadwell.com

SACRAMENTO OFFICE

520 CAPITOL MALL, SUITE 350
SACRAMENTO, CA 95814-4721

TEL: (916) 444-6201
FAX: (916) 444-6209

ARIANA ABEDIFARD
KEVIN T. CARMICHAEL
CHRISTINA M. CARO
THOMAS A. ENSLOW
KELILAH D. FEDERMAN
RICHARD M. FRANCO
ANDREW J. GRAF
TANYA A. GULESSERIAN
RACHAEL E. KOSS
AIDAN P. MARSHALL
TARA C. RENGIFO

Of Counsel

MARC D. JOSEPH
DANIEL L. CARDOZO

June 10, 2024

VIA Email and Docket #2023-UPs

Kristin Ralff Douglas
Program Manager, Electrical Undergrounding Division
Office of Energy Infrastructure Safety
715 P Street, 20th Floor
Sacramento, California 95814
ElectricalUndergroundingPlans@energysafety.ca.gov

RE: Reply Comments of the Coalition of California Utility Employees on the Draft 10-Year Electrical Undergrounding Plan Guidelines

Dear Ms. Douglas:

We write on behalf of the Coalition of California Utility Employees (CUE) to provide reply comments on the Draft 10-Year Electrical Undergrounding Plan Guidelines (Draft EUP Guidelines).¹ CUE's comments address two proposed modeling requirements that could substantially delay consideration and implementation of EUPs.

PG&E raises concerns with the requirement that electrical corporations provide an ablation analysis because it "does not currently have the tools or models to conduct ablation analysis for reliability projects."² PG&E estimates that it could take up to 2 years to develop this new capability.³ Similarly, PG&E raises concerns with the requirement that an electrical corporation model outage or reliability risk at a level similar to wildfire risk because it does not currently have such capability as reliability improvements and outage performance have historically been assessed

¹ Office of Energy Infrastructure Safety, Draft 10-Year Electrical Undergrounding Plan Guidelines (May 8, 2024).

² Letter to Kristin Ralff Douglas, Office of Energy Infrastructure Safety from Megan Ardell, Pacific Gas & Electric Company re: Pacific Gas & 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) p. 11.

³ *Id.* at p. 2.

through empirical data.⁴ PG&E estimates it would take up to 1 year for a reliability model to achieve the same level of analysis as its current wildfire risk model.⁵

Mandating modeling frameworks that do not currently exist contradicts the expedited process envisioned by SB 884.⁶ The legislative framework aims to streamline regulatory procedures to facilitate timely development and implementation of critical infrastructure projects. Including a complex and time-intensive requirement like an ablation study runs counter to this objective, creating procedural bottlenecks and potentially delaying project approvals. Likewise, compelling an overhaul of an electrical corporation's reliability risk modeling before it can submit its application is unnecessary when existing modeling and data has been acceptable for similar submissions (i.e., undergrounding included in wildfire mitigation plans). By adhering to the statutory intent of expedited processing, Energy Safety can ensure that critical infrastructure projects proceed without unnecessary hinderances, while still ensuring that the plan will substantially increase reliability and reduce wildfire risk.

Energy Safety will have access to ample information to assess reliability improvements and wildfire risk reduction without new modeling because the Draft Guidelines require that electrical corporations provide comprehensive information through established assessment tools, historical performance data, and predictive modeling techniques which are already integrated into their standard practices. By leveraging existing datasets and modeling capabilities, Energy Safety can make informed decisions that ensure public safety and infrastructure resilience, all without the additional burden and delay of requiring ablation studies or enhanced reliability modeling. This ensures that critical improvements can proceed efficiently while still maintaining rigorous oversight and evaluation.

CUE agrees that electrical corporations should improve their modeling capabilities in the manners suggested by the Draft Guidelines, but not at the expense of moving forward with submission of an EUP when sufficient data is currently available. This balanced approach aligns with legislative intent, ensuring both swift project initiation and thorough subsequent evaluation as the utility's modeling capabilities mature. Energy Safety should revise the Draft Guidelines to remove the ablation study and enhanced reliability modeling requirements as part

⁴ *Id.* at p. 11.

⁵ *Id.* at p. 11-12.

⁶ Pub. Util. Code § 8388.5(a).

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of the initial application and require that electrical corporations provide updates on modeling maturity through the progress reports.

Thank you for your consideration of these comments.

Sincerely,



Andrew J. Graf

AJG:acp