



Date: September 13, 2024
To: EUP Guideline Development docket (#2023-UPs)
Subject: Updated Revised Draft 10-Year Electrical Undergrounding Plan Guidelines

New Updates

The Office of Energy Infrastructure Safety (Energy Safety) is issuing an updated version of the Revised Draft 10-Year Electrical Undergrounding Plan Guidelines (Updated Revised Draft EUP Guidelines) that were released on September 10, 2024.

The Updated Revised Draft EUP Guidelines contain the following revisions to the September 10, 2024 version:

- Section 2.3.4 – Risk Calculations for Projects Extending Beyond a Confirmed Project Polygon – Clarifies that while an Undergrounding Project may be modified to extend beyond the boundaries of a Confirmed Project Polygon, the polygon remains fixed
- Appendix B.2 – Corrected reference to Guidelines sections and deleted duplicative language
- Appendix C.2 – Updated JSON screenshots and corrected a typo

Summary of Previous Changes

For convenience, we restate below a high-level summary of some of the major revisions Energy Safety made in the September 10, 2024 draft. The Updated Revised Draft EUP Guidelines continue to reflect these changes.

Language Clarifications

Energy Safety revised and clarified language pertaining to several topics including:

- Section 2.4.7.1 – Instructions for Circuit Segment Information Lists
- Section 2.5.2 – Workforce Development Plan
- Analysis years in Section 2.7.5 – Required Core Capabilities for Risk Modeling Methodology and Section 2.8.6.1 – Portfolio Coversheet Overview
- Added Definitions in Appendix A including: Subprojects, Undergrounding Subprojects, Undergrounding Support Work, Confirmed Project Polygon
- Changed the term “Portfolio Mitigation Objective” to “Plan Mitigation Objective”
- Revised and standardized other definitions and terms used throughout the Revised Draft EUP Guidelines
- Table C.1.5 – Risk Model Backtesting data collection for Baselines

Project Acceptance Framework

Energy Safety added the following new Sections to clarify aspects of applying screens:

- Section 2.4.1 – Project Progression Through Screens – Clarifies the mechanics of the screening process and the minimum number of Undergrounding Projects required to be in Screen 3 at EUP submission.
- Section 2.4.2 – Incorporating Changes – Clarifies how and when to re-apply screens if there are changes to the models, High Fire Threat Districts, and other physical changes.

Energy Safety revised the following sections to expand on the requirements and purposes of each of the four screens:

- Sections 2.4.3 to 2.4.6 – Addressing Screens 1-4 – Expands subsections on the requirements and purpose of each screen.
- Section 2.4.7.2 – Information on Non-EUP Projects – Clarifies the information that is requested on Non-EUP Projects and how it is used in determining the Baseline.

Objectives, Targets and Standards

Energy Safety revised the following Sections to clarify language around success criteria for evaluation of the Plan Mitigation Objective and Plan Tracking Objectives:

- Section 2.3.1 – Plan Mitigation Objective
- Section 2.3.2 – Plan Tracking Objectives
- Section 2.7.3 – Key Decision-Making Metrics and Enterprise Diagrams
- Section 2.7.8 – Portfolio-Level Standards
- Section 2.7.9 – Project-Level Thresholds and Standards

Energy Safety clarified that the Standards will be used to monitor the progress toward reaching the Plan Mitigation Objective, and clarified the differences between System-Level, Portfolio-Level, and Project-Level measurements.

Subprojects

Energy Safety added a definition for Subprojects and revised the following Sections regarding identifying and reporting on Subprojects.

- Section 2.4 – Project Acceptance Framework
- Appendix A – Definitions
- Table C.1.13 – Subproject Table

Alternatives Comparisons

Energy Safety added a new Section 2.7.10 – Comparative Metrics to clarify and provide additional details about Alternative Mitigation requirements and progression through Screen 2 and 3 comparisons.

Baseline, Backtesting and Model Retention Requirements

Energy Safety added a new Section 2.7.6 – Baselines, Backtesting, Model Retention, and Subsequent Model Reports, setting requirements for the Large Electrical Corporations to retain

models and calibration data for the lifetime of the program and instructions on including new model versions in Progress Reports.

EUP Comment Period

Energy Safety removed static comment deadlines and instead will issue a comment schedule after the Large Electrical Corporation submits its plan. The new language in Section 3.6.2 – Public Comments allows for more flexibility for comment periods and is consistent with the language included in the Wildfire Mitigation Plan Guidelines.

Confirmed Project Polygon

Energy Safety introduced the concept of Confirmed Project Polygons to be generated at the beginning of Screen 3 that will encompass the entire Eligible Circuit Segment on which the Undergrounding Project is defined. See Appendix A Definitions, Section 2.4.2.4 and Appendix C Section C.4.2.

Wildfire Rebuild Areas

Energy Safety added details on the identification and treatment of Wildfire Rebuild Areas in Sections 2.3.5, 2.4.3.1, and 2.4.3.2 and in Appendix A Definitions. To be eligible for the EUP program, a Circuit Segment in a Wildfire Rebuild Area must either meet a Project-Level Threshold or the Large Electrical Corporation must justify why the Circuit Segment should be considered. As per the Draft EUP Guidelines, Eligible Circuit Segments in Wildfire Rebuild Areas must still go through Screens 2, 3 and 4.

Risk Calculations for Non-Undergrounding Subprojects, Changes to a Confirmed Project Polygon and in Wildfire Rebuild Areas

Energy Safety added three new Sections (2.3.3, 2.3.4, and 2.3.5) detailing the methods by which Large Electrical Corporations are to calculate risk for meeting Project Thresholds, determining compliance with the Plan Mitigation Objective, and for showing Comparative Metrics.

Document Versions

Energy Safety will provide a comparative redline document showing the differences between the Draft 10-Year Electrical Undergrounding Plan Guidelines and the Updated Revised Draft 10-Year Electrical Undergrounding Plan Guidelines.

Public Comments

Stakeholders are invited to provide written comments on Energy Safety's revisions to the Updated Revised Draft EUP Guidelines. The following submittal dates supersede the due dates in the September 10, 2024 Cover Letter. Written opening comments are limited to 30 pages and must be submitted by October 3, 2024. Written reply comments are limited to 15 pages and must be submitted by October 14, 2024. Supporting documents may be included as appendices or attachments and are excluded from the page limits. Written comments should

be submitted to the EUP Guideline Development docket (#2023-UPs) in Energy Safety's e-filing system. Further information on submitting documents through the e-filing system can be found on Energy Safety's website.¹

Sincerely,

A handwritten signature in black ink that reads "Kristin Ralff Douglas". The signature is written in a cursive, flowing style.

Kristin Ralff Douglas
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Office of Energy Infrastructure Safety

¹ https://energysafety.ca.gov/events-and-meetings/how-to-provide-public-comments-to-energy-safety/?et_fb=1&PageSpeed=off