

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

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

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

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1. INTRODUCTION

The following comments have been prepared for Mussey Grade Road Alliance (MGRA or Alliance) regarding stakeholder comments on the Revised Draft Guidelines for 10-Year Electrical Undergrounding Distribution Infrastructure Plan.¹ As per the cover letter posted to the docket on October 3 is the due date for comments and October 14, 2024 the due date for reply comments.²

2. BACKGROUND

MGRA provided initial comment³ and reply comment⁴ on the Development of Guidelines for 10-Year Electrical Undergrounding Distribution Infrastructure Plan.⁵

While we have fundamental issues with the whole prospect of making undergrounding a preferred mitigation, Energy Safety Staff have put tremendous effort into developing a rigorous methodology that will ensure that the proposed undergrounding projects that will be passed on to the CPUC will be highly vetted and ready for appropriate Commission action. MGRA appreciates that OEIS has adopted its own and other intervenor suggestions regarding the Guidelines.

In the case that stakeholders contribute to the decision making of Energy Safety staff, MGRA requests that these contributions be acknowledged in the event that these guidelines contribute to a future CPUC action resulting in a resolution or decision, in which case it may be possible for stakeholders to request compensation for time allotted to contributions making a material difference.

MGRA will use the OEIS numbering scheme to raise its comments.

¹ Docket #2023-Ups; TN144755; REVISED DRAFT 10-YEAR ELECTRICAL UNDERGROUNDING PLAN GUIDELINES; September 13, 2024. (Draft Guidelines)

² Docket #2023-Ups; TN14754; Letter Re: Updated Revised Draft 10-Year Electrical Undergrounding Plan Guidelines; September 13, 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. (MGRA Comments)

⁴ Docket #2023-Ups; MUSSEY GRADE ROAD ALLIANCE REPLY TO STAKEHOLDER COMMENTS ON THE DRAFT GUIDELINES FOR THE 10-YEAR ELECTRICAL UNDERGROUNDING DISTRIBUTION INFRASTRUCTURE PLAN; June 10, 2024. (MGRA Reply)

⁵ Docket #2023-Ups; TN14039; OFFICE OF ENERGY INFRASTRUCTURE SAFETY DRAFT 10-YEAR ELECTRICAL UNDERGROUNDING PLAN GUIDELINES; May 8, 2024 (Draft).

2.3.1. Plan Mitigation Objective

MGRA supports the changes to this section, particularly the new section g. which provides extra detail regarding how Undergrounding and Non-Undergrounding projects will be integrated and reported out in the plan. This is an issue MGRA raised in its Reply Comments, where MGRA noted that in the upcoming rate case it is likely that “*the Commission will urge PG&E to develop an effective hybrid mitigation solution that will concentrate on the highest risk areas.*”⁶

2.2.4.1. Timelines

MGRA’s comments expressed concern that project timelines were only being addressed in Screen 3.⁷ This seems to now be addressed in the Plan Mitigation Objective (section j).

2.3.2 Objectives and Targets

Transparency:

In its Comments, MGRA explained that while the required disclosure of utility fire wildfire and outage threat scores is positive, Energy Safety should ensure that this data is not excessively restricted by the utilities based on confidentiality. While Energy Safety explains that rules following confidentiality must follow state regulations, it does not provide any further guidance on what should be considered confidential and what should not.

We would repeat our request that Energy Safety as part of these Guidelines and prior to accepting applications from utilities resolve this problem:

- Energy Safety should determine what data fields may properly be classified as confidential and which should be in the public domain.
- Where utilities are required to provide data as part of their SB884 submission, they should be required to release both public and secure versions of these data.

⁶ pp. 6-8.

⁷ p. 14.

- Where data is redacted it should be done in the most non-destructive manner that still protects the confidential information – reassigning names/numbers to random elements and adding “wiggle” to location data may still provide adequate information for public scrutiny without causing harm.

2.4.4 Screen 2: Project Information and Alternative Mitigation Comparison

Alternative Mitigations

MGRA in its Comments expressed significant concern that the Draft Guidelines were not sufficiently prescriptive in specifying the nature and kind of Alternative Mitigations that the utilities need to employ.⁸ It is therefore positive to have the addition of Section 2.10 that provides greater detail regarding requirements for Alternative Mitigation analyses.

Customer PSPS Avoidance Cost

MGRA recommended that another screen that be applied to circuits showing the cost of PSPS avoidance per customer for a given circuit. MGRA provided considerable analysis and data and analysis⁹ supporting this potential metric which derived from MGRA’s Comments on the 2025 WMP Update.¹⁰

OEIS did not adopt any of the recommendations coming out of this analysis, likely because this analysis was cost-efficiency based and the OEIS mandate is to focus on utility wildfire risk reduction and corresponding reliability improvements. The reason that this metric is critical to the overall decision is that in some cases, so few customers are on a line that the cost of undergrounding mitigation per customer becomes outrageous and begins to favor off-grid or micro-grid solutions, or covered conductor with elevated shutoff thresholds. Whether to consider this factor will ultimately be a CPUC decision, however it would be most efficient if some pre-screening could be done by the OEIS to prevent projects from being rejected at the CPUC level due to their extreme cost per customer and per CMI after passing the OEIS screens.

⁸ pp. 4-6.

⁹ MGRA Comments; pp. 7-11.

¹⁰ MGRA 2025 WMP Comments; pp. 27-49.

2.7.3.1 Enterprise Diagram

Figure 2: Example Enterprise Diagram for Risk Modeling Methodology

As noted in our original comments, this figure has an error. The weather model box should show an additional arrow (causal linkage) between the weather model and the consequence model. Weather is a driver for outage rates, ignition potential, and fire growth.¹¹ PG&E has concurred with MGRA on this point but currently I am not able to find the citation.

3.6.3 Public Comments

MGRA and many other stakeholders expressed concern about the initial 30 day comment period.¹² MGRA supports Energy Safety's change that would define this period in a published schedule. MGRA also supports the addition of comments for Modification Notes Responses.

CONCLUSION

The Mussey Grade Road Alliance thanks Energy Safety for its careful consideration of earlier stakeholder comments, and generally supports the current EUP guidelines. While MGRA remains reticent about a process specifically tailored to a specific mitigation that is favored by utilities, OEIS has put significant effort into creating a framework that can help protect the public from excessive costs while accelerating wildfire risk reduction.

¹¹ Mitchell, J.W., 2013. Power line failures and catastrophic wildfires under extreme weather conditions. *Engineering Failure Analysis*, Special issue on ICEFA V- Part 1 35, 726–735.
<https://doi.org/10.1016/j.engfailanal.2013.07.006>

¹² MGRA Comments; p. 13.

Respectfully submitted this 3rd day of October, 2024,

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