

February 6, 2025

Kristin Ralff Douglas
Program Manager, Electrical Undergrounding Division
Office of Energy Infrastructure Safety
715 P Street, 20th Floor
Sacramento, CA 95814

Re: Pacific Gas and Electric Company’s Reply Comments on the Second Revised Draft 10-Year Electrical Undergrounding Plan Guidelines Issued by Energy Safety on January 6, 2025

Dear Ms. Douglas:

PG&E appreciates the opportunity to submit these reply comments on the Second Revised Draft 10-Year Electrical Undergrounding Plan (EUP) Guidelines (Second Revised Guidelines) issued by the Office of Energy Infrastructure Safety (Energy Safety) on January 6, 2025. We are primarily responding to issues raised by the Public Advocates Office at the California Public Utilities Commission (Cal Advocates). We also discuss the CalBroadband letter posted on OEIS Docket # 2023-UPs.

Undergrounding Outside of High Fire Threat Districts and Rebuild Areas

Cal Advocates argues that the language of the Second Revised Guidelines is non-compliant with the statutory requirements of Public Utilities Code Section 8388.5(c)(2) and that Energy Safety should strike the words that permit undergrounding, “up to two adjacent spans outside of a Tier 2 or Tier 3 HFTD.”¹

PG&E supports the requirements in Section 2.4.3.1 of the Guidelines as written in the Second Revised Guidelines, which state that if a Circuit Segment has portions both within and outside of the High Fire Threat District (HFTD), each span crossing an HFTD boundary, and up

¹ Public Advocates Office’s Comments on the Second Revised Draft of the Guidelines for the 10-Year Electrical Undergrounding Plans (Revised EUP), Docket 2023-UPs, January 27, 2025, (Cal Advocates) pages 1-2.

to two adjacent spans outside of the HFTD, may be considered for undergrounding. Section 2.4.3.1 appropriately addresses the issues we raised regarding the need to underground a small section of circuit segments that are outside of the HFTD.² We explained that the HFTD maps developed by the CPUC do not align to the placement and equipment of PG&E’s electric grid. Thus, there are areas in our service territory where circuit segments cross an HFTD boundary into a non-HFTD area and, in some cases, the circuit segment crosses back and forth between HFTD and non-HFTD areas. Excluding circuit segments from EUP eligibility because a few spans are outside of the HFTD would significantly hinder constructability, increase project costs, and increase impacts on the community where work is occurring because projects or subprojects would need to be routed in inefficient ways and/or unnecessarily require sections of overhead hardening.

Clarifying Definitions

Cal Advocates recommends adding or clarifying definitions for three terms in the EUP Guidelines.³ We provide our comments on each of these three terms below:

- (1) Span: PG&E supports Cal Advocates’ suggested definition of span.
- (2) Project as Scoped: PG&E supports including a definition for Project as Scoped in Appendix A because it is already described in Section 2.7.10. The Second Revised Guidelines already describe the Project as Scoped as the “design variation that includes all work in the final project design, including all Undergrounding and non-undergrounding Subprojects” (Section 2.7.10). For clarity, PG&E supports adding this definition to Appendix A.
- (3) Circuit Segment: PG&E supports the current definition of Circuit Segment that is in the Second Revised Guidelines. PG&E does not support Cal Advocates’ proposed definition for Circuit Segment because it is too prescriptive and does not adequately account for the significant diversity of risk in an area. It would significantly increase

² PG&E’s Comments on the Revised Draft 10-Year Electrical Undergrounding Plan Guidelines Issued by Energy Safety on September 13, 2024, October 3, 2024, pages 14-15.

³ Cal Advocates, pp. 4-5.

the number of circuit segments in the territory and force the creation of many small projects, which creates execution inefficiencies on a circuit segment and limits an LEC's ability to keep undergrounding cost effective.

Data Submission Templates

Cal Advocates recommends that: (1) the Energy Safety data submission templates be mandatory for all LECs to facilitate data comparison across EUPs; (2) Energy Safety host a workshop to refine the guidelines and possibly revise the templates to ensure that data submissions are clear, comparable and compliant with the data requirements; and (3) the data templates be comparable with the Wildfire Mitigation Plan Quarterly Data Reports (WMP QDRs) and that they are aligned to the data required in Resolution SPD-15.⁴

PG&E plans to use the Energy Safety data templates for submitting our EUP data, but we recommend the data submission templates not be mandatory. While we intend to use the Energy Safety data submission templates, occasional modifications may be necessary to align the data available in PG&E's systems. Should Energy Safety require parties to use the EUP data submission templates, PG&E recommends that a LEC be permitted to modify the templates, as needed, to accommodate an individual LEC's data reporting constraints.

PG&E supports holding a workshop to review the data submission templates and to make any necessary changes to them to ensure that data submissions are clear, comparable, and compliant with the data requirements. PG&E also supports aligning the templates, where possible, to the WMP QDRs and the Resolution SPD-15 data requirements.

PG&E does not support Cal Advocates' recommendation to refine the guidelines pertaining to data requirements and associated templates. Stakeholders have had ample opportunity to suggest refinements to the guidelines—including the data submission requirements—and it is unreasonable to delay the issuance of Final EUP Guidelines until a workshop is held to address potential changes to non-mandatory data submission templates.

Additional Information for Tabular Data Submissions

Cal Advocates recommends that Energy Safety require utilities to identify the substation and geographic region of each EUP project. The substation name should be required along with "circuit_id" in tabular data submission templates. This would allow Energy Safety to analyze

⁴ Cal Advocates, pp. 5-6

whether a utility's 10-year EUP entails multiple projects associated with the same substation. If so, the utility should analyze alternative risk mitigations that are based at the substation, such as rapid earth fault current limiters (REFCL).⁵

PG&E does not support adding an additional requirement to identify the substation for each EUP project because it is already provided. The Large Electrical Corporation is already required to provide circuit ids for EUP projects (Table C.6, field: circuit_id). For PG&E, the circuit id consists of nine characters—the first five numbers are a unique identifier for distribution substations, the 6th & 7th numbers are the nominal circuit voltage and the final two are unique circuit numbers. With this information parties can determine the substation to which the EUP project is associated. It would be unnecessary and redundant for PG&E to also provide the name of the substation associated with each EUP project. The Second Revised Guidelines also already require the LECs to provide the geographic region of each EUP project. Section 2.8.1(j) requires the LECs to provide a Project Table for each project after passing Screen 2 that details each Undergrounding Project including location at the county and division level. No additional information should be required.

Regarding Cal Advocates' interest in using substation information associated with EUP projects to indicate if a utility should analyze alternative mitigations such as REFCL, Section 2.7.10 very clearly establishes the required alternative mitigation design variations. The LEC must analyze aboveground hardening with some type of protective equipment and device settings used to reduce wildfire ignition (Screen 2 Alternative Mitigation 1). Additionally, the LEC must include any additional protection systems and settings that can enhance the safety of the Circuit Segment and are feasible, which can include REFCL, Enhanced Powerline Safety Settings (EPSS) or other programs (Screen 2 Alternative Mitigation 1). For Screen 2 Alternative Mitigation 2, the LEC must analyze one other mitigation or combination of mitigations that meet or exceed the risk reduction of Screen 2 Alternative Mitigation 1. This can include technologies such as REFCL or other new and proven technologies that could be reasonably implemented. While these additional protection systems or other proven technologies may include REFCL, the choice of which alternative mitigations to analyze is at the discretion of the LEC, as long as they meet the Second Revised Guideline requirements.

⁵ Cal Advocates, p. 6.

Response to CalBroadband

REF# 15249 on the OEIS Docket # 2023-UPs is a CalBroadband Letter on Revised Draft 10-Year Electrical UP Guidelines. The letter is dated November 12, 2024—more than a month after Opening Comments on the Revised Guidelines were due to Energy Safety—and is commenting on/requesting revisions to the Revised Draft 10-Year Electrical Undergrounding Plan Guidelines issued by OEIS on September 13, 2024 (Revised Guidelines).

Energy Safety clearly stated in its January 6, 2025, cover letter accompanying the Second Revised Guidelines that, “[s]takeholders are invited to provide written comments only on the redlined revisions in Energy Safety’s Second Revised Draft EUP Guidelines and the sample data submission templates. Energy Safety will not consider written comments that are unrelated to either those revisions or templates.” The CalBroadband letter was drafted before the Second Revised Guidelines were issued, refers to the Revised Guidelines—not the Second Revised Guidelines—and is commenting on Section 1.2, Purpose and Scope, which was not a redlined revision in either the Revised Guidelines or the Second Revised Guidelines.⁶

CalBroadband’s suggested changes should be disregarded by Energy Safety because they do not address a redline revision in the Second Revised Guidelines. Moreover, PG&E opposes CalBroadband’s suggested revision acknowledging Energy Safety’s position on certain EUP matters as it is unnecessary because these items have already been considered.⁷ Moreover, PG&E

⁶ PG&E notes that there are redline changes to Section 1.2 in both the Revised Guidelines or the Second Revised Guidelines but those revisions are simply capitalizing the first letters in the term “Large Electrical Corporation” (Revised Guidelines) and replacing the word “Corporations” with “Corporations” (Second Revised Guidelines).

⁷ PG&E has responded to issues raised by the communications providers in our June 10, 2024 Reply Comments on the OEIS Draft Guidelines for Submission of 10-Year Electric Undergrounding Distribution Infrastructure Plans Pursuant to Senate Bill 884 (p.6) and our October 14, 2024 Reply Comments on the Revised Draft 10-Year Electrical Undergrounding Plan Guidelines (pp. 10-11). Specifically, we addressed the communications providers’ recommendation that a Large Electrical Corporation should include the costs of undergrounding communications facilities in the overall cost of undergrounding and use the combined utility and communication facility undergrounding cost to calculate a CBR. PG&E opposed this recommendation because SB 884 focuses on the costs of an electrical corporation’s projects and the corresponding benefits. Nowhere in the statutory language did the Legislature direct that third-party costs, such as telecommunication provider costs, be included in an EUP analysis. Additionally, we noted that while we could provide information to the third parties or communications companies with whom we have a lease or agreement, we cannot provide information about equipment on poles where the communications company or third party has a lease or agreement with another entity because only the communications company would have such information.

opposes CalBroadband's suggested addition to Section 1.2 of the Revised Guidelines which includes an acknowledgement of topics outside of the EUP guidelines.

Thank you in advance for considering our comments. Please feel free to contact me if you have questions about these items or need additional information from me at Megan.Ardell@pge.com.

Very truly yours,

/s/ Megan Ardell

Megan Ardell