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VIA ELECTRONIC FILING
Docket # 2023-UPs

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

RE: San Diego Gas & 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 Program Manager Douglas:

San Diego Gas & Electric (SDG&E) hereby provides reply comments on issues raised by PG&E and other parties in opening comments on the Second Revised Draft 10-Year Electrical Undergrounding Plan Guidelines (Second Revised Guidelines) issued by The Office of Energy Infrastructure Safety (Energy Safety) on January 6, 2025. SDG&E appreciates the time and efforts of Energy Safety and participating stakeholders reflected in the development of the Second Revised Guidelines.

SDG&E generally supports Pacific Gas and Electric's (PG&E) Opening Comments, and specifically PG&E's stated concerns with how the Second Revised Guidelines do not align with other regulatory requirements. Given the expedited timeframes of the Senate Bill (SB) 884 Undergrounding Plan review process, alignment of regulatory requirements and risk modeling requirements will benefit all parties in facilitating review and comment on utility SB 884 proposals. SDG&E's support of additional issues raised in PG&E's comments are further detailed below.

I. ENERGY SAFETY GUIDELINES CONTRADICT OTHER CURRENT GUIDELINES

Like PG&E, SDG&E is concerned that the Second Revised Guidelines run counter to other guidelines surrounding risk evaluation that Electrical Corporations (ECs) must adhere to in evaluating undergrounding projects. Specifically, the risk evaluation requirements are inconsistent with those of the California Public Utilities Commission's (CPUC) Risk Assessment

Mitigation Phase (RAMP) and General Rate Case (GRC) proceedings, as well as Energy Safety's own Wildfire Mitigation Plan (WMP) requirements. Below are specific examples where the Second Revised Guidelines still remain in conflict with other directives and will produce different results while addressing the same question. SDG&E cautions against processes that will result in conflicting and contradictory regulatory reviews and outcomes, as such processes will likely result in confusion and delays that are inconsistent with the intent of the expedited SB 884 process.

For instance, PG&E raised concerns around the requirements detailed in Section 2.7.3 around Key Decision-Making Metrics (KDMMs) not being influenced by risk attitudes, risk tolerances, opportunity costs or any other decision-making parameters, and asserts that Large ECs should be allowed to express their values-based preferences through a risk attitude. SDG&E has similar concerns, particularly to the extent these requirements would require the EC's to diverge from the Risk-based Decision-making Framework (RDF) as ordered in both the RAMP and GRC filings. The results in those filings will not be the same as what will be produced in an Electric Undergrounding Plan (EUP) filing and will result in decision making that is not comparable.

Assuming no change to the Second Revised Guidelines, the calculated values for SDG&E's Overall Utility Risk, Ignition Risk, Ignition Likelihood, and Outage Program Risk for each feeder-segment in SDG&E's service territory would likely differ from those presented in SDG&E's WMP, RAMP and Test Year 2028 GRC filings. This discrepancy arises despite the fact that both the Second Revised Guidelines and Energy Safety's revised draft 2026-2028 Wildfire Mitigation Plan Guidelines ostensibly follow and accept the same Risk definitions¹

The divergence in risk values, and potentially the selection of the most suitable mitigation measures for each feeder segment between EUP and RAMP/GRC, highlight the inherent inconsistencies and challenges in aligning various regulatory frameworks and requirements. This situation highlights the critical need for a unified approach to risk assessment. By adopting a consistent methodology, Energy Safety, Stakeholders, and participant ECs can ensure that risk evaluations are coherent, transparent, and comparable, ultimately leading to a more effective and harmonized process.

Additionally, SDG&E agrees with PG&E's comments regarding Section 2.7.9.2 and Project-level Standards remaining fixed when risk model versioning or calibration changes occur. It is reasonable to expect that risk model outputs will change over time as models are updated and seek some level of flexibility as model versions evolve with more data and enhanced analytics. SDG&E is also concerned about utilizing normalized units, such as risk per mile, when determining Project-Level Thresholds, as currently implied in Section 2.7.9.1. Leveraging a normalized risk unit, such as risk per mile, renders the threshold to be set as the circuit-segment's average risk for any given mile. This would obscure the full likelihood and consequence of risk events posed by the particular section of the grid considered for undergrounding. SDG&E recommends leveraging a cost-benefit unit analysis of the overall risk

¹ *Office of Energy Infrastructure Safety's Draft Wildfire Mitigation Plan Guidelines* (January 17, 2025) at Pg. 30, OEIS Docket No 2026-2028-WMPs.

of the entire section of a circuit-segment is the best approach to setting a high-risk threshold for a project, as this would accurately account for all expected impacts that could occur on that given section. Additionally, when accounting for the cost-benefit ratio of any given proposed project, the length of the circuit-segment is proportionally captured in the estimated installation and lifecycle costs.

II. CONCLUSION

SDG&E respectfully requests that Energy Safety take these recommendations into account in the final electrical undergrounding plan guidelines.

Respectfully submitted,

/s/ Laura M. Fulton

Attorney for
San Diego Gas and Electric Company