



State of California – A Natural Resources Agency

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Gavin Newsom, Governor

Caroline Thomas Jacobs, Director

Date: February 19, 2025  
To: EUP Guidelines Development Docket (#2023-UPs)  
Subject: Proposed Final 10-Year Electrical Undergrounding Plan Guidelines

Enclosed is the Office of Energy Infrastructure Safety's (Energy Safety) proposed final 10-Year Electrical Undergrounding Plan Guidelines (Guidelines). Included is a redlined version that shows changes from the Second Revised Draft issued on January 6, 2025. Energy Safety has edited that draft for clarity only.

The revisions are listed in the following attachment. Energy Safety is providing a redline comparison showing the differences between the January 6, 2025 Second Revised Draft 10-Year Electrical Undergrounding Plan Guidelines and the February 19, 2025 proposed final 10-Year Electrical Undergrounding Plan Guidelines.

### **Adoption Meeting**

Stakeholders are invited to attend the virtual public meeting to consider adoption of the Guidelines on February 20, 2025, at 10 a.m. to 12 p.m.<sup>1</sup> Energy Safety will take comments on the Guidelines. Energy Safety will not be taking written comments on the Guidelines.

Sincerely,

Kristin Ralff Douglas  
Program Manager, Electrical Undergrounding Division  
Office of Energy Infrastructure Safety

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<sup>1</sup> For information on joining the Adoption Meeting, please refer to the Adoption Meeting notice at: <https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57962&shareable=true>

## Attachment

Section	Change	Reason
2.4.5.2 and 2.6.1	Changed “Example Rejected Portfolio” to “Example Rejected Project(s)”	Clarifies that the LEC only needs to present at least one rejected project and not a “portfolio” of rejected projects.
2.7.5, Core Capability 5	Changed “Alternative Mitigation” to “non-Undergrounding”	Corrected term to specify which strategies are being referred to.
2.7.6	Changed title from “Baselines, Backtesting, Model Retention, and Subsequent Model Reports” to “Model Retention and Update Schedule”	Streamlined title
2.7.9.1	Changed “The Large Electrical Corporation must set and explain a High-Risk Threshold, Ignition Tail Risk Threshold, High Frequency Outage Program Threshold, and Mitigated Risk Threshold (collectively, Project-Level Thresholds), using a combination of the KDMMs to establish the need for mitigation on a Circuit Segment.” to “The Large Electrical Corporation must set and explain a High-Risk Threshold, Ignition Tail Risk Threshold, and High Frequency Outage Program Threshold (collectively, Project-Level Thresholds), using a combination of the KDMMs to establish the need for mitigation on a Circuit Segment.”	Removed term that was no longer accurate to the current Guidelines and should have been removed in the Second Draft version.
Appendix A. Definitions “Mitigated Risk Threshold”	Removed the definition for Mitigated Risk Threshold.	This term is no longer used by the Guidelines, and should have been removed in the previous draft.

Section	Change	Reason
Appendix A. Definitions “Mitigated Circuit Segment Standards”	Added definition ““Mitigated Circuit Segment Standards” are the Project-Level risk scores that an Eligible Circuit Segment must reach to be considered sufficiently mitigated under the terms of the EUP. These standards consist of the High-Risk Project Level Standard, the Ignition Tail Risk Project-Level Standard, and the High Frequency Outage Program Project-Level Standard.”	Added new term to collectively refer to existing Standards and already referenced in the Guidelines.
Appendix A. Definitions “Project-Level Thresholds”	Removed “Mitigated Risk Threshold” from “Project-Level Thresholds” definition.	Removed outdated term
Appendix B, Section B.1 Chapter 8	Changed title from “Chapter 8 Narrative for Baseline, Backtesting, Model Retention and Subsequent Model Reports” to “Chapter 8 Model Retention and Update Schedule”	Aligned title with title change in Guidelines
Appendix B, Section B.1 Chapter 9	Removed Chapter 9 – Comparative Metrics for Alternative Mitigations	Chapter 9 does not have a narrative component, and therefore should not have been included in Section B.1 – Narrative Content
Appendix C, Section C.1.7	Changed “The comment should be sufficient as to allow Energy Safety to identify what the relationship is that this Circuit Segment has to previous Circuit Segments in the same geographic area.” to “The comment should be sufficient as to allow Energy Safety to identify the relationship between this Circuit Segment and the prior Circuit Segments listed under SOURCE_CIRCUIT_SEGMENT_IDS.”	Improved readability and accuracy.
Appendix C, Section C.1.9, Table C.9	Changed “Screen 4: Project Prioritization” to “Screen 4: Project Prioritization and Finalization” in row screen_name	Corrected Screen 4 title to match Guidelines
Appendix C, Section C.1.10, Table C.10 and Section C.1.15, Table C.15	Removed “Wildfire Rebuild” from row “risk_category”	Aligned categories with previous Draft Guideline Section 2.3.5 changes.

Section	Change	Reason
Appendix C, Section C.1.14, Table C.14	Swapped the order of columns "CPUC Order number.", "NVARCHAR(255)", and "Must match CPUC Guidelines for SB 884 Program Appendix 1." in row "order_number"	Corrected order of columns' text to match the rest of the table.
Appendix C, Section C.4.4, Table C.19	Changed "Integer" to "String" in row pre_mitigation_alignement_id	Changed datatype to match that used in Table C.14 – Subproject Table
Appendix C, Section C.4.6, Table C.21	Changed "Integer" to "String" in row post_mitigation_alignement_id	Changed datatype to match that used in Table C.14 – Subproject Table
Global	Removed the term "Mitigated Risk Threshold" and replaced with the term "High-Risk Threshold" where appropriate.	This term is no longer used by the Guidelines, and should have been removed in the previous draft. Corrected to refer to the current term.
Global	Corrected minor typos and misspellings such as changing "real word" to "real world", capitalizing defined terms, etc.	Improved readability
Global	Changed "Alternative Mitigations" to "Alternative Mitigation"	Corrected grammar where appropriate
Global	Added several blank pages to the Guidelines	Added blank pages to address printing and formatting issues
Global	Changed table and section numbers	Auto-numbering of sections and tables may have changed between versions