

**PACIFIC GAS AND ELECTRIC COMPANY**  
**PG&E Ref. DRU14330-Case-Electric Undergrounding Expediting Program-Senate**  
**Bill (SB) 884**  
**Data Request CPUC Safety Policy Division**  
**Requester DR No. Undergrounding Order Documents (SPD-PGE-SB884-010)**

**Requester: Schmitt, Edwin; Hanes, Fred**

**Request Date: September 13, 2024**

**Response Date: September 27, 2024**

**Question No. 001:**

Describe every step taken in the scoping phase of an undergrounding project from the moment a risk model informs the decision that an overhead line should be undergrounded to the beginning of the design phase.

- a. Using the list of documents found in worksheet a.35299631 of the DRU14086\_Q01\_Atch01\_SB884\_CONF.xlsx workbook, indicate which document is relevant to each step of the scoping phase. Produce any document that provides an overview of this phase or any step in the phase.
- b. If there is not a document associated with order number 35299631 that is relevant to a given step in the scoping phase described by PG&E, but a document found in worksheets b.35329009, c.35329010 and/or d.35329011 is relevant to the steps described by PG&E, then PG&E must indicate those documents associated with order numbers 35329009, 35329010 and 35329011 in its response.
- c. If a document from the Distribution Operations Tool (DOT) referenced in the response to SPD-PGE-SB884-005 Question 1 is relevant to a given step in the scoping phase, PG&E must indicate that document in its response.
  - i. PG&E must provide a summary description of any indicated DOT document relevant to a given step in the scoping phase
- d. PG&E must highlight which steps of the scoping phase address whether or not the project is located within an HFTD Tier or Non-HFTD.
  - i. Indicate which documents listed in DRU14086\_Q01\_Atch01\_SB884\_CONF.xlsx discuss the HFTD designation of the project.
- e. Explain where the costs of the scoping phase are recorded in the documents associated with order number 35299631.
- f. If the costs of the scoping phase are not recorded in any of the documents associated with order number 35299631, PG&E should refer to any relevant documents associated with order numbers, 35329009, 35329010 and 35329011.
- g. If the costs of the scoping phase are not recorded in any of the documents listed in DRU14086\_Q01\_Atch01\_SB884\_CONF.xlsx, PG&E must provide a list of documents where this information can be found.
- h. If the costs of the scoping phase are not recorded in any of the documents listed in DRU14086\_Q01\_Atch01\_SB884\_CONF.xlsx, provide an explanation for why this information was not included in DRU14086\_Q01\_Atch01\_SB884\_CONF.xlsx in response to SPD-PGE-SB884-005 Question 1.

## **Response to Question No. 001 Response No. 001:**

The risk model itself does not dictate a mitigation decision such as overhead hardening (OH) or undergrounding (UG). The risk model informs which Circuit Protection Zone (CPZ) should be considered for System Hardening.

Once a CPZ has entered into the scoping phase, the following high-level steps are taken to complete scoping:

1. **Order Creation** – A primary order is created for every 10 miles of a CPZ which keeps the Advanced Authorization (AA) at this early stage within a reasonable approval level in PG&E's Delegation of Authority (DOA).
  2. **High-Level Feasibility** – The Grid Design team prepares a Draft design of both an "OH All" alternative (overhead harden the entire CPZ) and UG All (underground the entire CPZ) or Hybrid (a hybrid project includes sections of both undergrounding and overhead hardening on the same CPZ) alternative. This Draft design is completed in .KMZ form (Google Earth) focusing on identifying routes and whether the line would require Mainline or Tapline design. This is sent out to the scoping team to review for a future Field Scoping Desktop Meeting.
  3. **Advance Authorization (AA)** – Grid Implementation creates and routes the AA in our Electronic Document Routing System (EDRS) and requests a Project Manager be assigned to the project through Project Front Door. This allows for the scoping team to charge costs to the job.
  4. **Field Scoping Desktop Meeting** – A Field Scoping Desktop Meeting is held with teams involved in project scoping such as Land, Environmental, Estimating, Construction, Engineering, Project Management, Vegetation Management, Public Safety Specialist, and Local Customer Teams. While some teams have completed field reviews and others have completed a desktop review, this meeting allows us to identify changes to routes, dependency impacts, segmentation needs, and other scope improvements to most effectively address identified risks. The planned method of mitigation (OH, UG or hybrid) is determined at this stage in the scoping process.
  5. **Segmentation** – The project is segmented into the required sub-projects based on various factors to support execution. The Grid Design team initiates the creation of additional orders for the sub-projects that are tied to the original order created in Step 1 (e.g. the first sub-project under project order 1 is sub-project 1.1, the second sub-project is 1.2, etc.). The AA and final scoping documents will be tied to the original order in Step 1 but will cover all sub-projects created to execute the overall project.
  6. **Preliminary Key-Sketch and Work Description** – Using the information collected from the Field Scoping Desktop Meeting and the new sub-orders created by Grid Design, the Grid Implementation team completes the preliminary Key-Sketch and Work Description. This sketch is completed in .pptx and Work Description is in .xlsx form. This details specific conductor size, protection, switch, voltage regulation, reactive power, and any other required equipment.
  7. **Final Scope Approval** – The final scope is attached to and approved in EDRS. Once approved, the scope documents are attached in SAP to each sub-project. The land team then begins base-mapping. Estimating will begin detailed design once base-maps are received.
- a. EDRS-Project Scope documents are the final scope and supporting documents and are the result of the work conducted in steps 1-7 above. EDRS-AA (Advance Authorization) is associated with Steps 1-3 above. All other documents shared in a.35299631 of the DRU14086\_Q01\_Atch01\_SB884\_CONF.xlsx workbook, are associated with post-scoping activities. Everything created prior to the final scoping documents (i.e., final scoping documents are in Step 7 above) are draft form only and are not included in the final project package.

- b. Worksheet a.35299631 of the DRU14086\_Q01\_Atch01\_SB884\_CONF.xlsx contains all the required scoping information for worksheets b.35329009, c.35329010, and d.35329011. No additional documents are included that would be different than what is included in a.35299631.
- c. The Distribution Operations Tool (DOT) is a reporting database and does not store any documents within.
- d. The Preliminary Key-Sketch (created in Step 6 above) can be used to determine if facilities are in the HFTD or non-HFTD area. Once project or sub-project orders are added to the DOT for tracking, the HFTD designation of the project is included in the appropriate field.
- e. The costs for teams charging to the Order in the scoping phase are collected in SAP through the time-keeping system and charged to the first order created (typically sub-project 1.1). PG&E did not provide documents associated with the costs of the scoping phase in the documents associated with order number 35299631.
- f. Costs for project scoping are not recorded and reported in a project package document for any of the orders provided. Scoping costs are tracked in SAP through the time-keeping system.
- g. Financial information for individual projects is found in SAP using Analyses for Office (AO) report PROJ002-PS Monthly Detail.
- h. PG&E interpreted DRU14086\_Q01\_SB884 as a request for project documents, exclusive of cost reports. Therefore, PG&E did not provide SAP costs reports related to those projects. As explained in subpart g, financial information for individual projects is retained and reported outside of these project documents.

**Question No. 002:**

Describe every step taken in the design phase of an undergrounding project from the end of the scoping phase to the beginning of the permitting phase.

- a. Using the list of documents found in worksheet a.35299631 of the DRU14086\_Q01\_Atch01\_SB884\_CONF.xlsx workbook, indicate which document is relevant to each step of the design phase. Produce any document that provides an overview of this phase or any step in the phase.
- b. If there is not a document associated with order number 35299631 that is relevant to a given step in the design phase described by PG&E, but a document found in worksheets b.35329009, c.35329010 and/or d.35329011 is relevant to the steps described by PG&E, then PG&E must indicate those documents associated with order numbers 35329009, 35329010 and 35329011 in its response.
- c. If a document from the Distribution Operations Tool (DOT) referenced in the response to SPD-PGE-SB884-005 Question 1 is relevant to a given step in the design phase, PG&E must indicate that document in its response.
  - i. PG&E must provide a summary description of any indicated DOT document relevant to a given step in the design phase
- d. PG&E must highlight which steps of the design phase address whether or not the project is located within an HFTD Tier or Non-HFTD.
  - i. Indicate which documents listed in DRU14086\_Q01\_Atch01\_SB884\_CONF.xlsx discuss the HFTD designation of the project.
- e. Explain where the costs of the design phase are recorded in the documents associated with order number 35299631.
- f. If the costs of the design phase are not recorded in any of the documents associated with order number 35299631, PG&E should refer to any relevant documents associated with order numbers, 35329009, 35329010 and 35329011.

- g. If the costs of the design phase are not recorded in any of the documents listed in DRU14086\_Q01\_Atch01\_SB884\_CONF.xlsx, PG&E must provide a list of documents where this information can be found.
- h. If the costs of the design phase are not recorded in any of the documents listed in DRU14086\_Q01\_Atch01\_SB884\_CONF.xlsx, provide an explanation for why this information was not included in DRU14086\_Q01\_Atch01\_SB884\_CONF.xlsx in response to SPD-PGE-SB884-005 Question 1.

**Response to Question No. 002 Response No. 001:**

The work involved after scoping and before permitting is design and estimating. This entails designing the specific project to determine trench location, connection points, equipment details, materials needed, and related details, such as circuitry and pull boxes. The design also provides information about the land rights needed and produces the drawings that are submitted for permits. The project cost, including expected labor and materials, is calculated at this stage.

- a. To efficiently correlate the previously listed documents (in DRU14086\_Q01\_Atch01\_SB884\_CONF.xlsx) to their respective project phases, an additional “Project Phase” column (column D) has been added in the updated attachment *DRU14330\_Atch01\_EUP\_DR\_SPD\_010\_Q001-011\_CONF.xlsx*. In this format, documents that are associated with one, multiple, or no project phases can be sorted and filtered across the reported orders. PG&E’s WMP section 8.1.2.2. (R6, pp. 406-407) describes an overview of the project phases.
- b. Please see response to subpart a.
- c. The Distribution Operations Tool (DOT) is a reporting database and does not store any documents within.
- d. Please see response to Question 1 subpart d.
- e. PG&E did not provide documents associated with the costs of the design phase in the documents associated with order number 35299631.
- f. PG&E did not provide documents associated with the costs of the design phase in the documents associated with order numbers 35329009, 35329010, or 35329011.
- g. Financial information for individual projects is found in SAP using Analyses for Office (AO) report PROJ002-PS Monthly Detail.
- h. PG&E interpreted DRU14086\_Q01\_SB884 as a request for project documents, exclusive of cost reports. Therefore, PG&E did not provide SAP costs reports related to those projects. As explained in subpart g, financial information for individual projects is retained and reported outside of these project documents.

**Question No. 003:**

Describe every step taken in the permitting phase of an undergrounding project from the end of the design phase to the beginning of the construction phase.

- a. Using the list of documents found in worksheet a.35299631 of the DRU14086\_Q01\_Atch01\_SB884\_CONF.xlsx workbook, indicate which document is relevant to each step of the permitting phase. Produce any document that provides an overview of this phase or any step in the phase.
- b. If there is not a document associated with order number 35299631 that is relevant to a given step in the permitting phase described by PG&E, but a document found in worksheets b.35329009, c.35329010 and/or d.35329011 is relevant to the steps described by PG&E, then PG&E must

indicate those documents associated with order numbers 35329009, 35329010 and 35329011 in its response.

- c. If a document from the Distribution Operations Tool (DOT) referenced in the response to SPD-PGE-SB884-005 Question 1 is relevant to a given step in the permitting phase, PG&E must indicate that document in its response.
  - i. PG&E must provide a summary description of any indicated DOT document relevant to a given step in the permitting phase
- d. PG&E must highlight which steps of the permitting phase address whether or not the project is located within an HFTD Tier or Non-HFTD.
  - i. Indicate which documents listed in DRU14086\_Q01\_Atch01\_SB884\_CONF.xlsx discuss the HFTD designation of the project.
- e. Explain where the costs of the permitting phase are recorded in the documents associated with order number 35299631.
- f. If the costs of the permitting phase are not recorded in any of the documents associated with order number 35299631, PG&E should refer to any relevant documents associated with order numbers, 35329009, 35329010 and 35329011.
- g. If the costs of the permitting phase are not recorded in any of the documents listed in DRU14086\_Q01\_Atch01\_SB884\_CONF.xlsx, PG&E must provide a list of documents where this information can be found.
- h. If the costs of the permitting phase are not recorded in any of the documents listed in DRU14086\_Q01\_Atch01\_SB884\_CONF.xlsx, provide an explanation for why this information was not included in DRU14086\_Q01\_Atch01\_SB884\_CONF.xlsx in response to SPD-PGE-SB884-005 Question 1.

### **Response to Question No. 003 Response No. 001:**

The permitting requirements for a project are based on the conditions developed by the Authority Having Jurisdiction (AHJ). AHJ's are typically the City or County agency that the project is located in. Cities and Counties most commonly require PG&E to obtain an encroachment permit. Other permits can include building permits and grading permits, environmental permits, CalTrans permits, and railroad permits. PG&E Permit Facilitators develop, request, and process all City and County permits. Additionally, as part of this phase, land rights are reviewed for the projects and easements are obtained from private and public landowners as needed.

- a. To efficiently correlate the previously listed documents (in DRU14086\_Q01\_Atch01\_SB884\_CONF.xlsx) to their respective project phases, an additional "Project Phase" column (column D) has been added in the updated attachment *DRU14330\_Atch01\_EUP\_DR\_SPD\_010\_Q001-011\_CONF.xlsx*. In this format, documents that are associated with one, multiple, or no project phases can be sorted and filtered across the reported orders. PG&E's WMP section 8.1.2.2. (R6, pp. 406-407) describes an overview of the project phases.
- b. Please see response to subpart a.
- c. The Distribution Operations Tool (DOT) is a reporting database and does not store any documents within.
- d. Please see response to Question 1 subpart d.
- e. PG&E did not provide documents associated with the costs from the end of the design phase to the beginning of the construction phase in the documents associated with order number 35299631.
- f. PG&E did not provide documents associated with the costs from the end of the design phase to the beginning of the construction phase in the documents associated with order numbers 35329009, 35329010, or 35329011.

- g. Financial information for individual projects is found in SAP using Analyses for Office (AO) report PROJ002-PS Monthly Detail.
- h. P&GE interpreted DRU14086\_Q01\_SB884 as a request for project documents, exclusive of cost reports. Therefore, PG&E did not provide SAP costs reports related to those projects. As explained in subpart g, financial information for individual projects is retained and reported outside of these project documents.

**Question No. 004:**

Describe every step taken in the construction phase of an undergrounding project from the end of the permitting phase to the beginning of the post-construction phase.

- a. Using the list of documents found in worksheet a.35299631 of the DRU14086\_Q01\_Atch01\_SB884\_CONF.xlsx workbook, indicate which document is relevant to each step of the construction phase. Produce any document that provides an overview of this phase or any step in the phase.
- b. If there is not a document associated with order number 35299631 that is relevant to a given step in the construction phase described by PG&E, but a document found in worksheets b.35329009, c.35329010 and/or d.35329011 is relevant to the steps described by PG&E, then PG&E must indicate those documents associated with order numbers 35329009, 35329010 and 35329011 in its response.
- c. If a document from the Distribution Operations Tool (DOT) referenced in the response to SPD-PGE-SB884-005 Question 1 is relevant to a given step in the construction phase, PG&E must indicate that document in its response.
  - i. PG&E must provide a summary description of any indicated DOT document relevant to a given step in the construction phase
- d. PG&E must highlight which steps of the construction phase address whether or not the project is located within an HFTD Tier or Non-HFTD.
  - i. Indicate which documents listed in DRU14086\_Q01\_Atch01\_SB884\_CONF.xlsx discuss the HFTD designation of the project.
- e. Explain where the costs of the construction phase are recorded in the documents associated with order number 35299631.
- f. If the costs of the construction phase are not recorded in any of the documents associated with order number 35299631, PG&E should refer to any relevant documents associated with order numbers, 35329009, 35329010 and 35329011.
- g. If the costs of the construction phase are not recorded in any of the documents listed in DRU14086\_Q01\_Atch01\_SB884\_CONF.xlsx, PG&E must provide a list of documents where this information can be found.
- h. If the costs of the construction phase are not recorded in any of the documents listed in DRU14086\_Q01\_Atch01\_SB884\_CONF.xlsx, provide an explanation for why this information was not included in DRU14086\_Q01\_Atch01\_SB884\_CONF.xlsx in response to SPD-PGE-SB884-005 Question 1.

**Response to Question No. 004 Response No. 001:**

The construction phase of an undergrounding project consists of two primary phases: (1) civil construction and (2) electric construction.

- (1) Civil construction involves:
  - Mobilization and yard setup

- Soil sampling
- Layout, potholing and saw cutting
- Trenching
- Installation of the conduit system and boxes
- Setting of all substructures and pads for electrical equipment
- Backfilling of trench lines and temporary restoration
- Paving and final restoration of all areas effected by our work.

Project schedules may be significantly impacted during civil construction due to unanticipated weather, discovery of hard rock, and/or detection of unmarked existing utility infrastructure.

- (2) Once civil construction is complete with conduit and boxes installed, electric construction resources pull the electric cable through the conduit, splice segments together and re-connect the customers to the new underground system. Other electric construction activities include:

- Mobilization and yard setup
- Pole hole excavation and pole setting
- Installation of equipment
- Obtain clearances to energize new system and de-energize existing system
- Wreck out of replaced facilities.

Customer input regarding the timing of re-connection, material availability, weather, and other risks can impact the electric construction schedule as well.

In addition to the construction activities above, PG&E also performs the following project management tasks during the life of the project.

- Safety management – Ensuring public, employee, and contract partner safety is essential. All Program Team Members, Contractors, and other Program participants must demonstrate working knowledge of PG&E’s safety principles. Each entity is accountable for following proper safety procedures, and adherence to safety protocols for public and workplace safety.
- Stakeholder Management and Customer Communication – This includes direct-to-customer outreach, communications with the community, and stakeholder engagement. The Project Manager and the Customer Outreach Specialist, coordinate stakeholder engagement with local teams, including Local Government Affairs (LGA), Customer Communications (Media), and Regional Senior Managers (RSM).
- Cost Management – Project Cost Management includes the processes involved in estimating, budgeting, and controlling costs to complete the project within the approved authorization and annual budget targets.
- Schedule Management – The Project Schedule defines the planning, engineering, procurement, construction, and closeout activities required to meet project objectives. It serves as a means of communication amongst the project team, regional management, program leadership and stakeholders with the periodic status of a project, as well as future steps and requirements needed for planning.
- Procurement Management – Procurement management is the identification, sourcing, and delivery of construction/material goods required in the performance of System Hardening work.
- Quality Management – Quality Management consists of both quality assurance (QA) and quality control (QC), based on system-wide policies and procedures.

- a. To efficiently correlate the previously listed documents (in *DRU14086\_Q01\_Atch01\_SB884\_CONF.xlsx*) to their respective project phases, an additional “Project Phase” column (column D) has been added in the updated attachment *DRU14330\_Atch01\_EUP\_DR\_SPD\_010\_Q001-011\_CONF.xlsx*. In this format, documents that are associated with one, multiple, or no project phases can be sorted and filtered across the

reported orders. PG&E's WMP section 8.1.2.2. (R6, pp. 406-407) describes an overview of the project phases.

- b. Please see response to subpart a.
- c. The Distribution Operations Tool (DOT) is a reporting database and does not store any documents within.
- d. Please see response to Question 1 subpart d.
- e. PG&E did not provide documents associated with the costs from the end of the permitting phase to the beginning of the post-construction phase in the documents associated with order number 35299631.
- f. PG&E did not provide documents associated with the costs from the end of the permitting phase to the beginning of the post-construction phase in the documents associated with order numbers 35329009, 35329010, or 35329011.
- g. Financial information for individual projects is found in SAP using Analyses for Office (AO) report PROJ002-PS Monthly Detail.
- h. PG&E interpreted DRU14086\_Q01\_SB884 as a request for project documents, exclusive of cost reports. Therefore, PG&E did not provide SAP costs reports related to those projects. As explained in subpart g, financial information for individual projects is retained and reported outside of these project documents.

**Question No. 005:**

Describe every step taken in the post-construction phase of an undergrounding project from the end of the construction phase to the beginning of the operative phase of the asset.

- a. Using the list of documents found in worksheet a.35299631 of the DRU14086\_Q01\_Atch01\_SB884\_CONF.xlsx workbook, indicate which document is relevant to each step of the post-construction phase. Produce any document that provides an overview of this phase or any step in the phase.
- b. If there is not a document associated with order number 35299631 that is relevant to a given step in the post-construction phase described by PG&E, but a document found in worksheets b.35329009, c.35329010 and/or d.35329011 is relevant to the steps described by PG&E, then PG&E must indicate those documents associated with order numbers 35329009, 35329010 and 35329011 in its response.
- c. If a document from the Distribution Operations Tool (DOT) referenced in the response to SPD-PGE-SB884-005 Question 1 is relevant to a given step in the post-construction phase, PG&E must indicate that document in its response.
  - i. PG&E must provide a summary description of any indicated DOT document relevant to a given step in the post-construction phase
- d. PG&E must highlight which steps of the post-construction phase address whether or not the project is located within an HFTD Tier or Non-HFTD.
  - i. Indicate which documents listed in DRU14086\_Q01\_Atch01\_SB884\_CONF.xlsx discuss the HFTD designation of the project.
- e. Explain where the costs of the post-construction phase are recorded in the documents associated with order number 35299631.
- f. If the costs of the post-construction phase are not recorded in any of the documents associated with order number 35299631, PG&E should refer to any relevant documents associated with order numbers, 35329009, 35329010 and 35329011.
- g. If the costs of the post-construction phase are not recorded in any of the documents listed in DRU14086\_Q01\_Atch01\_SB884\_CONF.xlsx, PG&E must provide a list of documents where this information can be found.



- h. If the costs of the post-construction phase are not recorded in any of the documents listed in DRU14086\_Q01\_Atch01\_SB884\_CONF.xlsx, provide an explanation for why this information was not included in DRU14086\_Q01\_Atch01\_SB884\_CONF.xlsx in response to SPD-PGE-SB884-005 Question 1.

**Response to Question No. 005 Response No. 001:**

Post-construction, or project closeout, refers to the process to archive information for projects that have completed construction. The three post-construction phases are: pre-mapping; as-built package mapping; and financial order closure.

- Pre-mapping: Project information is updated in the Distribution Management System (DMS), and Electric Distribution Geographic Information System (EDGIS) after undergrounding projects are energized. Mapping of facility changes as they are energized is documented in the Pre-Mapping Circuit Map Change Sheet (CMCS) process, and maps are updated in the systems of record to reflect the current conditions of the facilities.
  - As-built package mapping: As-built Packages (ABP's) formally record undergrounding project information. ABPs contain final construction drawings and deliverables that reflect the final, constructed work in the field, acknowledging any changes from the construction package.
  - Financial order closure: Project Managers will initiate Project Order closeout after verifying that the project close-out tasks are complete. Financial Order closure formally establishes the project as complete.
- a. To efficiently correlate the previously listed documents (in DRU14086\_Q01\_Atch01\_SB884\_CONF.xlsx) to their respective project phases, an additional "Project Phase" column (column D) has been added in the updated attachment *DRU14330\_Atch01\_EUP\_DR\_SPD\_010\_Q001-011\_CONF.xlsx*. In this format, documents that are associated with one, multiple, or no project phases can be sorted and filtered across the reported orders. PG&E's WMP section 8.1.2.2. (R6, pp. 406-407) describes an overview of the project phases.
- b. Please see response to subpart a.
- c. The Distribution Operations Tool (DOT) is a reporting database and does not store any documents within.
- d. Please see response to Question 1 subpart d.
- e. PG&E did not provide documents associated with the post-construction phase in the documents associated with order number 35299631.
- f. PG&E did not provide documents associated with the costs from the post-construction phase in the documents associated with order numbers 35329009, 35329010, or 35329011.
- g. Financial information for individual projects is found in SAP using Analyses for Office (AO) report PROJ002-PS Monthly Detail.
- h. PG&E interpreted DRU14086\_Q01\_SB884 as a request for project documents, exclusive of cost reports. Therefore, PG&E did not provide SAP costs reports related to those projects. As explained in subpart g, financial information for individual projects is retained and reported outside of these project documents.

**Question No. 006:**

PG&E must explain how the steps described in WDRM System Hardening Circuit Segment Methodologies (see Attachment 1 to Energy Safety-DR-EUP-24-08) are relevant to order numbers 35299631, 35329009, 35329010 and 35329011.

- a. Explain where any changes made to the Clark Road 110281296 CPZ during any of the steps listed in Questions 1-5 are described in documents associated with order numbers 35299631, 35329009, 35329010 and 35329011.
- b. If no changes were made to the Clark Road 110281296 CPZ during any of the steps listed in Questions 1-5, PG&E must provide a list of completed order numbers within the System Hardening Accountability Report (AL 7312-E) where changes were made to the CPZ during one or more of the steps listed in Questions 1-5.

**Response to Question No. 006 Response No. 001:**

The steps defined in Attachment 1 to Energy Safety-DR-EUP-24-08 are the steps used to apply probability, consequence, and wildfire distribution risk model results to circuit segments.

Once a CPZ has been ranked in the wildfire distribution risk model and identified for mitigation consideration, we analyze the CPZ in the context of the scoping process to determine the appropriate mitigation. Once that scope is finalized, PG&E does not change the scope if a CPZ is redefined in a future risk model. The mitigation selection is focused on the original circuit segment boundaries.

- a. The Clark Road 1102811296 CPZ was divided into 4 sub-projects during the steps listed in questions 1-5 for execution and dependency management. Those 4 sub-projects were provided in orders 35299631, 35329009, 35329010, and 35329011.
- b. N/A.

**Question No. 007:**

Provide a summary description of the Distribution Operations Tool (DOT) referenced in the response to SPD-PGE-SB884-005 Question 1.

- a. What types of documents are located within this database?
  - i. Provide a summary description of each document type

**Response to Question No. 007 Response No. 001:**

The Distribution Operations Tool (DOT) is a reporting database and does not store any documents within. Its primary purpose is to aggregate project data into a standard reporting format to be used by functional groups to manage the program workplan at the PM Order level.

- a. N/A - DOT is not a document repository.
  - i. N/A

**Question No. 008:**

Describe every step in the process of aggregating each undergrounding project order into the GRC Results of Operation (RO) model.

- a. Using the list of documents found in DRU14086\_Q01\_Atch01\_SB884\_CONF.xlsx, indicate which documents allows PG&E to know that the costs associated with the order numbers are properly aggregated into the GRC RO model.
  - i. Describe what information in each document is relevant to the process of aggregating each undergrounding project into the GRC RO model.

#### **Response to Question No. 008 Response No. 001:**

To develop PG&E's General Rate Case (GRC) operating costs forecast, PG&E includes historic costs in the GRC application filing and that recorded data is used to support the costs forecast to calculate the Revenue Requirements in the Results of Operations (RO) Model.

To aggregate each undergrounding project order costs into the GRC RO model, the following steps are considered:

##### **1. Identify and classify each undergrounding project**

Please see responses provided for Questions 1 through 5 that provide steps and details for Scoping, Design and Estimating, Permitting, Construction, and Post-construction (project closeout) phases.

##### **2. Compile Project Costs**

Financial information for individual projects is tracked in PG&E's SAP Financials System and included in the Analysis for Office (AO) report.

##### **3. Business Planning Process**

All expected activities and costs associated with those activities are validated by the Underground Project teams working with Business Finance in the Finance organization to ensure correct forecast methodology is considered, proper Expense and Capital Expenditures are planned at the planning order level, planning order descriptions are clear and understandable, review of major Work Categories (MWC) and Maintenance Activity Types (MAT) for mapping accuracy as well as ensuring that data does not include costs that are not funded by GRC ratepayers (for example, Shareholder funded costs or separately funded items).

##### **4. Incorporating undergrounding project costs into the GRC RO model**

Validated functional data from Step 3 above is aggregated as part of the Electric Distribution Expense and Capital cost inputs, which are provided to the Revenue requirements and Capital Recovery team to develop the input files to the GRC RO Model (2023 GRC RO Model).

- a. The documents listed in DRU14086\_Q01\_Atch01\_SB884\_CONF.xlsx do not contain any cost information that was used in the 2023 GRC RO model.

#### **Question No. 009:**

On the Summary tab of DRU14086\_Q01\_Atch01\_SB884\_CONF.xlsx for EDRS-Project Scope, PG&E states the following:

"The project scope document associated with order 3529631 covers the work of all four orders in this request." (Cell C20)

- a. If it is not described in Questions 1-5, here describe the process that led to the project scoping document for 3529631 being able to cover the work of all four orders.

- b. Explain why this order number was chosen to have a project scoping document instead of the other three orders.
- c. Explain the relationship between the four orders.
- d. Explain the steps PG&E took to designate the relationship between the four orders.
  - i. In its explanation of these steps, PG&E must indicate any of the documents listed in DRU14086\_Q01\_Atch01\_SB884\_CONF.xlsx that is relevant to each step in the process of establishing the relationship between these four orders.
- e. Does the project scope document associated with order 3529631 cover the work of any orders that were not listed in SPD-PGE-SB884-005 Question 1?
  - i. If so, list the order numbers and provide a summary description of all the documents associated with that order number akin to the structure found in DRU14086\_Q01\_Atch01\_SB884\_CONF.xlsx.
  - ii. If it does not cover the work of any other orders, explain why it does not.

**Response to Question No. 009 Response No. 001:**

- a. The scoping process described in Question 1, describes how the Project was segmented into the 4 individual sub-projects.
- b. The mitigation decision is made at the Project level which includes all sub-projects. This project was the first PM order made and is the 1<sup>st</sup> segment of the project. The additional segments are referenced in the scope documents.
- c. They are the 4 sup-parts of the whole project.
- d. Once the project segmentation is determined during the scoping meeting for execution, the Grid Design team creates the additional orders and identifies in the short text (as noted by the “PH X.X in the list below) in SAP the relationship between the 4 orders:
  - 35299631 - PSPS CLARK ROAD 1102 LR81296 PH 1.1
  - 35329009 - PSPS CLARK ROAD 1102 LR81296 PH 1.2
  - 35329010 - PSPS CLARK ROAD 1102 LR81296 PH 1.3
  - 35329011 - PSPS CLARK ROAD 1102 LR81296 PH 1.4
- i. The scoping process and related documents described in Steps 1-5 establish the relationship among the four orders.
- e. No, those scope documents only address the scope of the 4 sub-projects provided. There were no other sub-projects needed to support the execution of the work.

**Question No. 010:**

Why does only order number 35329009 include the document type “SAP-Invoices / Receipts”?

- a. Why do order numbers 35299631, 35329010 and 35329011 not have the document type “SAP-Invoices / Receipts”?

**Response to Question No. 010 Response No. 001:**

Uploading this document type to SAP is optional but is added at the discretion of the Project Manager for reference. Invoices are uploaded into Contract Management Database (CMDB), for Project Manager approval, then uploaded into Taulia for final approval, both of which are official repositories for invoices and receipts.

**Question No. 011:**

Why does only order number 35329010 include the document type “SAP-Approval Sheet/EDRS”?

- a. Why do order numbers 35299631, 35329009, and 35329011 not have the document type “SAP-Approval Sheet/EDRS”?

**Response to Question No. 011 Response No. 001:**

This document type is a screenshot of the approval page in EDRS, which is PG&E’s official repository for approvals of the listed documents. Uploading this document type to SAP is optional but is added at the discretion of the Project Manager for reference.

- a. The scope of the three orders were included in the EDRS approval from the parent order (35329010).