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Caroline Thomas Jacobs, Director

Date: January 6, 2025
To: EUP Guideline Development docket (#2023-UPs)
Subject: Edits to Revised Draft 10-Year Electrical Undergrounding Plan Guidelines

The Office of Energy Infrastructure Safety (Energy Safety) is seeking written public comments on the Second Revised Draft 10-Year Electrical Undergrounding Plan Guidelines issued today with this letter. Previously, on September 13, 2024, Energy Safety released the Revised Draft EUP Guidelines for comment. In response to written comments, Energy Safety has revised the guidelines and now invites written comments from stakeholders.[1]

The revisions are listed in the following Attachment. In addition, Energy Safety is providing a redline comparison showing the differences between the September 13, 2024 Revised Draft 10-Year Electrical Undergrounding Plan Guidelines and the January 6, 2025 Second Revised Draft 10-Year Electrical Undergrounding Plan Guidelines. Energy Safety is also providing sample data submission templates for stakeholder review. These templates are optional for large electrical corporations and will be available for reference separate from the Guidelines. Stakeholders may provide comments on the templates for Energy Safety's consideration.

Public Comments

Stakeholders 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 these revisions or templates. Opening comments on the sample data submission templates and redlined revisions in the Second Revised EUP Guidelines are due by January 27, 2025. Reply comments are due by February 6, 2025.

Sincerely,

Kristin Ralff Douglas

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Office of Energy Infrastructure Safety

[1] Information about how to e-file comments can be found here: https://efiling.energysafety.ca.gov/Documents/External%20EFiling%20User%20Guide_March%202024.PDF

Attachment

Section	Change	Reason
1	Added “pursuant to Public Utilities Code section 8388.5.”	Identified relevant code section
2.1	Changed “…supporting objectives and targets, as described…” to “…supporting Plan Tracking Objectives and targets, as described…”	Standardized the language used for tracking objectives
2.3	Changed section from “Pursuant to section 8388.5(d)(2), the EUP can only be approved if it will (1) it will “substantially increase electrical reliability by reducing the use of public safety power shutoffs (PSPS), enhanced powerline safety settings (EPSS), deenergization events, and any other outage programs,” and (2) it will “substantially reduce the risk of wildfire.”” to “Pursuant to section 8388.5(d)(2), the EUP can only be approved if it will (1) “substantially increase electrical reliability by reducing the use of public safety power shutoffs, enhanced powerline safety settings, deenergization events, and any other outage programs,” and (2) “substantially reduce the risk of wildfire.””	Improved readability of the section and accurate of section citation
2.3	Removed footnote “Outage Program is defined in the Guidelines as “(i) any program that interrupts electrical service for the purpose of mitigating or avoiding the risk of causing a wildfire including Public Safety Power Shutoff (PSPS) programs, fast trip settings (including enhanced powerline safety settings, Fast Curve Settings, and Sensitive Relay Profile) and similar programs, and (ii) any program that could result in a deenergization event. Outage Programs exclude maintenance outages and other outages not related to reducing wildfire risk.” All defined terms are located in Appendix A to these Guidelines.”	Removed redundant language
2.3	Changed “…other specific objectives and targets, as described…” to “…other specific tracking objectives, as described…”	Standardized the language used for tracking objectives
2.3.1	Changed “This system must be further detailed…” to “as described…”	Improved readability

Section	Change	Reason
2.3.1 Table 1	In column headers “Change in Cumulative Wildfire Risk over 50 years” and “Change in Cumulative Outage Program Risk over 50 years” changed “50 years” to “55 years”	Corrected error to match timing of expected infrastructure lifetime
2.3.2	Removed references to “targets” and inserted references to “tracking objectives”	Standardized the language used for tracking objectives
2.3.2(d)	Remove Section 2.3.2(d) “Include some targets based solely on Ignition Risk Reduction and some based solely on Outage Program Risk.”	Removing redundant request for targets
2.3.2	Changed section from “The Independent Monitor will use the Plan Mitigation Objective, Plan Tracking Objectives, and other objectives to assess the Large Electrical Corporation's compliance with its EUP. The Plan Mitigation Objective and Plan Tracking Objectives will be tracked in all Progress Reports pursuant to sections 8388.5(f)(3) and 8388.5(g).” to “The Independent Monitor[7] will use the Plan Tracking Objectives and other EUP objectives to assess the Large Electrical Corporation's progress with implementation of its EUP. The Plan Tracking Objectives will be tracked in all Progress Reports pursuant to sections 8388.5(f)(3) and 8388.5(g).” and added footnote [7] “See Section 4.2 below for information on the Independent Monitor and additional guidelines related to compliance.”	Adjusted language to reflect that this section is for Plan Tracking Objectives, and are treated differently than the PMO. Clarified where additional IM information can be found in the Guidelines.
2.3.2	Added section: “The Plan Tracking Objectives are the Large Electrical Corporation’s current forecast plan for meeting the Plan Mitigation Objective. Each Progress Report must use performance metrics to compare and update the Plan Tracking Objectives. The Progress Report must explain the reasons for any changes. The EUP must contain a narrative setting forth the process the Large Electrical Corporation will use to compare and update Plan Tracking Objectives in each Progress Report.”	Clarified the function of Plan Tracking Objectives and the Plan Mitigation Objective

2.3.5	Changed section from "If the Circuit Segment is in a Wildfire Rebuild Area (see Section 2.4.3.1), risk for the Circuit Segment is calculated as follows: a. **Project Threshold** (see Section 2.4.3.2, 2.7.5 and Appendix C.1.10): if the Circuit Segment does not meet a Project-Level Threshold, the Large Electrical Corporation must provide justification for the Circuit Segment to be designated as an Eligible Circuit Segment. The justification must include details about the extent of the damage to the Circuit Segment and must describe the Large Electric Corporation's rationale for including it and any benefits that support designating the Circuit Segment as an Eligible Circuit Segment. b. **Screen 2 and 3 Comparisons** (see Sections 2.4.4 and 2.7.10): for purposes of the Screen 2 Alternative Mitigation Comparison and the Screen 3 Comparative Metrics, the pre-fire distribution infrastructure and associated risk must be used as the comparison Baseline. c. **Plan Mitigation Objective and Plan Tracking Objectives** (see Sections 2.3.1,2.3.2 and 2.7.5): the risk reduction from a Wildfire Rebuild Area Undergrounding Project does not count for purposes of determining progress towards the Plan Mitigation Objective and Plan Tracking Objectives. The risk reduction from a Wildfire Rebuild Area Undergrounding Project must be tracked separately." to "If the Circuit Segment is in a Wildfire Rebuild Area (see Section 2.4.3.1), risk for the Circuit Segment is calculated as follows: a. **Project Threshold** (see Section 2.4.3.2, 2.7.5 and Appendix C.1.10): The Pre Wildfire distribution infrastructure and associated risk scores are used to determine if the Circuit Segment meets the Project Thresholds. b. **Screen 3 Comparisons** (see Sections 2.4.5 and 2.7.10): for purposes of the Screen 3 Comparative Metrics, the Pre-Wildfire distribution infrastructure and associated risk must be used as the comparison Baseline. c. **Plan Mitigation Objective and Plan Tracking Objectives** (see Sections 2.3.1,2.3.2 and 2.7.5): the risk reduction from a Wildfire Rebuild Area	Changed section 2.3.5 to state that pre-wildfire risk scores are used for Screen 1 and clarify expected Screen 2 and 3 comparisons.

Section	Change	Reason
	Undergrounding Project is compared to Pre-Wildfire distribution infrastructure and associated risk scores for purposes of determining progress towards the Plan Mitigation Objective and Plan Tracking Objectives."	
2.4 (multiple sections)	Added "and Finalization" to "Screen 4: Project Prioritization and Finalization."	Clarified purpose of Screen 4 and standardized section name
2.4.1	Moved language regarding 25 projects in Screen 3 and an example rejected portfolio from 2.4.1 to 2.4.2.5.	Moved details on Screen 3 process from overview of screens (Section 2.4.1) to Screen 3 specific section.
2.4.1	Added sentence "Projects that pass Screen 4 are considered "Prioritized Projects.""	Clarified at what stage projects are considered Prioritized.
2.4.2.1	Changed section from "After the EUP is filed, the Large Electrical Corporation must account for new information (such as project-specific information obtained through scoping and other project work), model version and calibration changes (such as those detailed in Section 2.7.5.2), updates to HFTDs or new Wildfire Rebuild Areas." to "After the EUP is filed, the Large Electrical Corporation must account for new information (such as project-specific information obtained through scoping and other project work), model version and calibration changes (such as those detailed in Section 2.7.5.2), and updates to HFTD maps or new Wildfire Rebuild Areas."	Improved readability

Section	Change	Reason
2.4.2.1	Added Sentences: “In each Progress Report, the list of Circuit Segments provided to Energy Safety, and associated risk scores, must be the same list and scores used at that time by the Large Electrical Corporation for risk modeling and decision making. This list, at minimum, must include changes to risk scores through completion of Undergrounding Projects performed via the EUP, or any other wildfire mitigation activity. Additionally, risk scores for each Circuit Segment must update to account for modeled effects of application of EUP and other wildfire mitigation/hardening, until such time as a model calibration or version update takes place and assigns new risk scores directly.”	Clarified Energy Safety’s intended method for incorporating changes to Circuit Segment Information
2.4.2.1	Added sentence “The EUP narrative must describe the process the Large Electrical Corporation will use to update this information in Progress Reports.”	Clarified Guideline’s circuit segment requirements
2.4.2.2	Added the section “The EUP narrative must include a detailed description of the decision-making process the Large Electrical Corporation will use to determine when to divide a Circuit Segment into Subprojects. This narrative must include a list of possible reasons for division, with a detailed explanation of each.”	Clarified Guideline’s subproject requirements
2.4.2.4	Changed section from “This is accounted for in three ways.” to “These changes are accounted for in three ways.”	Improved readability
2.4.2.4	Removed “provide” from the following sentence: “Any Project or Subproject which has assets outside of the Confirmed Project Polygon must have a provide justification in the C.1.14 Subproject Table.”	Corrected typo
2.4.2.4	Added the sentence “The EUP narrative must describe the process the Large Electrical Corporation will use to update this information in Progress Reports.”	Clarified Guideline’s Circuit Segment physical changes requirements
2.4.3.1	Changed title from “2.4.3.1 Identification of Circuit Segments in and out of High-Fire Threat District and Wildfire Rebuild Area” to “2.4.3.1 Identification of Circuit Segments Inside and Outside of Tier 2 or 3 High Fire-Threat Districts and Wildfire Rebuild Areas”	Specified that this only applies to Tier 2 or 3 HFTD.

Section	Change	Reason
2.4.3.1	Moved this paragraph "The EUP narrative must describe the process the Large Electrical Corporation will use to identify Wildfire Rebuild Areas and the corresponding affected Circuit Segments. The Large Electrical Corporation must include a narrative in the Progress Reports describing identified Wildfire Rebuild Areas and providing information on the wildfire date, time, location, affected Circuit Segments and facilities impacted. The narrative must indicate if any distribution infrastructure damaged in the wildfire has already been rebuilt. Only Circuit Segments that have been damaged by wildfire and have not previously been rebuilt are eligible." to later in the section.	Moved paragraph to improve section readability
2.4.3.1	Added language "If a Circuit Segment has portions both within and outside of a Tier 2 or 3 HFTD, each span crossing the Tier 2 or 3 HFTD boundary and up to two adjacent spans outside of a Tier 2 or 3 HFTD may be considered for undergrounding."	Clarified treatment of projects where a span crosses outside of HFTDs

2.4.3.1	Changed the following language "For each Circuit Segment, the following risk scores must be calculated: (i) Overall Utility Risk Score; (ii) Ignition Consequence Score; and (iii) Outage Program Reliability Score. Section 2.7.9 of these Guidelines details the requirements for these risk scores. Additionally, each Circuit Segment must be identified by location, indicating whether the Circuit Segment is (i) in a Tier 2 or 3 High Fire-Threat District; (ii) in a Wildfire Rebuild Area; or (iii) not located in either a Tier 2 or 3 HFTD or a Wildfire Rebuild Area. The EUP must include the following information in the EUP narrative or an additional table: the total number of Circuit Segments within the Large Electrical Corporation service territory, the total number of Circuit Segments located within a Tier 2 or 3 HFTD, the total number of Circuit Segments located within a Wildfire Rebuild Area, and the total mileage of lines in all Circuit Segments in each of the above groups. The Large Electrical Corporation must create three lists of In-Area Circuit Segments sorted in descending order by (i) Overall Utility Risk Score; (ii) Ignition Consequence Score; and (iii) Outage Program Reliability Score. The 20 highest scoring Circuit Segments of each list must be included in the EUP narrative as a table, with all three risk scores, the county where the Circuit Segment is located, and the HFTD Tier or Wildfire Rebuild Area that applies to the Circuit Segment." into two lists "For each Circuit Segment, the following risk scores must be reported: Overall Utility Risk Score; Ignition Consequence Score; and Outage Program Likelihood Score. Section 2.7.9 of these Guidelines details the requirements for these risk scores. Additionally, each Circuit Segment must be identified by location, indicating whether the Circuit Segment is in a Tier 2 or 3 High Fire-Threat District; in a Wildfire Rebuild Area; or not located in either a Tier 2 or 3 HFTD or a Wildfire Rebuild Area. Appendix C.1.6, Circuit	Clarified necessary submission information for projects in Wildfire Rebuild Areas and HFTDs. Improved readability with lists.

Section	Change	Reason
	Segment Identification Table, and C.1.8, Circuit Segment Risk Score Table, give instructions for the type of information required in Screen 1. The EUP must include the following information in the EUP narrative or an additional table: a. The total number of Circuit Segments within the Large Electrical Corporation service territory; b. The total number of Circuit Segments located within a Tier 2 or 3 HFTD; c.The total number of Circuit Segments located within a Wildfire Rebuild Area; and d.The total mileage of lines in all Circuit Segments in each of the above groups. In the EUP narrative, the Large Electrical Corporation must create three lists of In-Area Circuit Segments sorted in descending order by: a.Overall Utility Risk Score; b.Ignition Consequence Score; and c.Outage Program Likelihood Score. Each list should be shown as a table with only the top 20 highest scoring Circuit Segments, containing all three risk scores, the county where the Circuit Segment is located, and the Tier 2 or 3 HFTD Tier or Wildfire Rebuild Area that applies to the Circuit Segment.	
2.4.3.2	Changed section title from “Circuit Segment Risk Reduction Level” to “Identification of Risky Circuit Segments and Mitigation Standards”	Aligned section title with the purpose of the section
2.4.3.2	Changed “The Large Electrical Corporation must follow the instructions in Section 2.7 of these Guidelines to set Project-Level Thresholds and Standards that will be used to categorize Circuit Segments into three types. The EUP must present the Project-Level Thresholds and Standards in the description of the Project Acceptance Framework.” to “In the description of the Project Acceptance Framework, the EUP must present Project-Level Thresholds that establish the need for risk mitigation. Additionally, the Large Electrical Corporation must present Project-Level Standards that define a successful mitigation.”	Streamlined the reporting requirements for the Project-Level Thresholds

Section	Change	Reason
2.4.3.2	Removed “three types of” from sentence “The three types of Project-Level Thresholds and Standards to be applied to Circuit Segments are:”	The number of Thresholds and Standards to be applied is no longer three
2.4.3.2	Changed “1. Eligible Circuit Segment Thresholds: the minimum risk score thresholds that will be used to identify higher risk Circuit Segments that are eligible for the 10-Year EUP. 2. Ineligible Circuit Segment Thresholds: the minimum risk score thresholds that will be used to identify lower risk Circuit Segments that are not eligible for the 10-Year EUP. 3. Mitigated Circuit Segment Standards: the minimum Project-Level Standard risk score that an Eligible Circuit Segment must reach to be considered sufficiently mitigated under the terms of the EUP.” to “1. **Eligible Circuit Segment Thresholds**: the minimum risk score thresholds that will be used to identify Circuit Segments that are eligible for the 10-Year EUP. These thresholds are the High-Risk Threshold, Ignition Tail Risk Threshold, and High Frequency Outage Program Threshold. They are further detailed in 2.7.9.1. In-Area Circuit Segments that do not meet any of these thresholds are called Ineligible Circuit Segments. 2. **Mitigated Circuit Segment Standards**: the Project-Level risk score that an Eligible Circuit Segment must reach to be considered sufficiently mitigated under the terms of the EUP. These standards are the High-Risk Project Level Standard, the Ignition Tail Risk Project-Level Standard, and the High Frequency Outage Program Project-Level Standard. They are further detailed in 2.7.9.2.”	Aligned required threshold and standards reporting with changes made elsewhere in the Guidelines, and updated standard and threshold names.
2.4.3.2	Removed “Circuit Segments in Wildfire Rebuild Areas that do not meet these thresholds must provide justification to be designated as Eligible Circuit Segments as described in Section 2.3.5.”	Removed reference to justification required and described in another section

Section	Change	Reason
2.4.4	Removed the sentences “In Screen 2, the project may be assumed to be a fully undergrounded isolatable Circuit Segment, but once the project has completed its scoping phase, the Screen 2 comparison must be updated to reflect the scoped project. Appendix C.1.11 and C.1.14 of these Guidelines set out instructions for the Screen 2 Table and the Project Index Table. No project can be considered for the 10-Year EUP unless this information is available.”	Reflected changes in Guidelines that moved Screen 2 comparisons to Screen 4
2.4.4.1	Changed “Detailed description of alternative mitigations that the Large Electrical Corporation will use for these comparisons. Explanation of why these Alternative Mitigations are being considered. Description of the process for determining which Alternative Mitigations will be used for individual project comparisons.” to “Detailed description of mitigations that the Large Electrical Corporation will use for these comparisons. Explanation of why these Alternative Mitigations are being considered. Description of the process and criteria that the Large Electrical Corporation will use for determining the best Alternative Mitigations for individual project comparisons.”	Clarified the detailed reasoning requirement for Alternative Mitigations
2.4.5.1	Added new subheading “2.4.5.1 Screen 3 procedure”	Created new subheading to divide topics
2.4.5.1	Added “expected” to “Screen 3 considers the expected wildfire risk reduction…”	Clarified that the risk reduction is expected for the PMO of an Undergrounding Project
2.4.5.1	Added sentence “Appendix C.1.12, Screen 3 Table, and C.1.15, Project Index Table, give instructions for the type of information required for Screen 3.”	Added a reference to the data submission table where the relevant information can be found.

Section	Change	Reason
2.4.5.1	Changed sentence from “The EUP must contain a narrative detailing how the Large Electrical Corporation will use Screen 3 on individual Undergrounding Projects both before implementation of the EUP begins and after implementation begins.” to “The EUP must contain a narrative detailing how the Large Electrical Corporation will use Screen 3 on individual Undergrounding Projects and describe the typical scoping process.”	Removed confusing language from the requirements to simplify sentence meaning
2.4.5.1	Changed section from “The narrative must include a description of the scoping process the Large Electrical Corporation uses to determine what portions of an Eligible Circuit Segment will be undergrounded. Additionally, if the Large Electrical Corporation determines any portion of an Eligible Circuit Segment will require non-undergrounding work, a narrative explanation describing why that work was chosen for each non-undergrounded Subproject is required in the Appendix C.1.14 Subproject Table.” to “The narrative must describe how the scoping process will be used to determine what portions of an Eligible Circuit Segment will be undergrounded. For each Undergrounding Project with Subprojects, Appendix C.1.14 Subproject Table requires the mitigation for each Subproject and a narrative with the reason for dividing the Circuit Segment into Subprojects (using the Subproject process required by Section 2.4.2.2).”	Clarified what is required for Subproject reporting and circuit division

Section	Change	Reason
2.4.5.2	Moved Section from 2.4.1.1 to be a new section: "2.4.5.2 Twenty-Five Undergrounding Project Requirement The filed EUP must include a Portfolio of at least 25 individual Undergrounding Projects considered under Screen 3. This Portfolio must include: a. at least one Circuit with multiple Undergrounding Projects. b. at least three Undergrounding Projects with multiple Subprojects (if Subprojects will be part of the EUP). c. at least three Undergrounding Projects with non-undergrounding Subprojects (if non-undergrounding Subprojects will be part of the EUP). d. at least two Undergrounding Projects considered for the High Frequency Outage Program Threshold (if High Frequency Outage Program will be part of the EUP). e. at least two Undergrounding Projects considered for the Ignition Tail Risk Threshold (if Ignition Tail Risk will be part of the EUP). Additionally, the Large Electrical Corporation must present, in a separate section, an analysis of at least one Undergrounding Project which the Large Electrical Corporation does not plan on undergrounding due to factors that are captured in the Screen 2 and Screen 3 analysis. This analysis must be presented with narrative description and associated numerical tables in Progress Report 0, named "Example Rejected Portfolio"."	Detailed the requirements for the 25 Undergrounding Projects and provided direction for Progress Report 0 analysis.
2.4.5.2	Changed sentence from "This analysis must be presented with narrative description and associated numerical tables in a Plan and as a portfolio, named "Example Rejected Portfolio" in Progress Report 0." to "This analysis must be presented with narrative description and associated numerical tables in Progress Report 0, named "Example Rejected Portfolio".	Corrected incorrect reference and streamlined submissions

Section	Change	Reason
2.4.6	Changed section from "If a project is divided into Subprojects, the Large Electrical Corporation must consider the different completion times of Subprojects and the effect of staggered completion times, consistent with the timeline requirements in Section 2.7.5, Core Capabilities 4 and 5." to "If an Undergrounding Project is divided into Subprojects, the Large Electrical Corporation must consider the different completion times of Subprojects and the effect of staggered completion times, consistent with the timeline requirements in Section 2.7.5, Core Capabilities 4 and 5. Additionally, the costs, benefits, and CPUC CBR are calculated for the design variations that were used in Screen 3, including the "Screen 3 Alternative Mitigations, the "Project as Scoped" and the "Undergrounding as Scoped". Appendix C.1.13, Screen 4 Table, gives instructions for the type of information required in Screen 4."	Reflected changes in Guidelines that moved Screen 2 comparisons to Screen 4 and added reference to the data submission table where the relevant information can be found.
2.4.7.1	Changed sentence "As described above…" to "As seen in Figure 1. Project Acceptance Framework Flowchart and described above…"	Identified location of Circuit Segment information
2.4.7.1 Table 2	Added "Appendix C: C1.1 Plan Table" to multiple rows	Included applicable Appendix C table
2.4.7.1 Table 2	Changed cell from "List of all Eligible Circuit Segments that have been compared to multiple mitigation strategies using CBR and, after analysis, determined to be an Undergrounding Project." to "List of all Eligible Circuit Segments that have been compared to multiple mitigation strategies using Cost Benefit Analysis data." in row "Undergrounding Projects List"	Improved readability and corrected analysis type required
2.4.7.1 Table 2	Changed cell from "List of Undergrounding Projects that have had project risk analysis completed in Screen 3" to "List of Undergrounding Projects been compared to multiple mitigation strategies using KDMM data" in row "Confirmed Projects List"	Clarified analysis method for Confirmed Projects List
2.4.7.2	Added "in a Tier 2 or 3 High Fire Threat District" to the requirement for providing information on non-EUP projects.	Removed requirement for non-EUP project reporting in non-HFTD areas

Section	Change	Reason
2.6	Changed sentence from “The Large Electrical Corporation must submit an updated Progress Report 0 every six months during the period the EUP is evaluated by Energy Safety and the CPUC.” to “The Large Electrical Corporation must submit an updated Progress Report 0 every six months until the EUP start date including during the period the EUP is evaluated by Energy Safety and the CPUC.”	Clarified potential misunderstanding in Progress Report submission timing
2.6.1	Changed sentence: “For the Circuit Segment Information Lists, the Confirmed Projects List and the Prioritized Project List submitted in Progress Report 0 …” to “The Circuit Segment Information Lists, including the Confirmed Projects List and the Prioritized Project List, submitted in Progress Report 0 …”	Clarified the sentence meaning and improved readability
2.6.1.b	Added subsection b: “Example Rejected Portfolio (see Section 2.4.5.2, Twenty-Five Undergrounding Project Requirement)”	Included updated Progress Report 0 submission requirements
2.6.1.g	Changed sentence from “Updated Model Report (if applicable, see Section 2.7.2);” to “Model Report (see Section 2.7.2);”	Removed redundant language
2.6.1.h	Added subsection h: “Alternative Mitigation Selection process (narrative)”	Included updated Progress Report 0 submission requirements
2.7.1	Added “by” to the following sentence: “The overview narrative should also include any additional Key Decision-Making Metrics (KDMMs) proposed by the Large Electrical Corporation and the enterprise diagram as required by Section 2.7.3 below.”	Corrected typo
2.7.2	Changed “will” to “must” in “Additionally, this section must address any methods…”	Clarified that this section is required
2.7.3	Added “These KDMMs are not influenced by risk attitudes, risk tolerances, opportunity costs or any other decision-making parameters. They do not reflect financial considerations and must be used alongside financialized metrics reported in Screen 2 and Screen 4 to evaluate projects. The KDMMs measure key elements of risk and can be substantiated by real-world observations.”	Clarified the purpose and substance of the KDMMs

Section	Change	Reason
2.7.3.1	Corrected “sub-modules” to “sub-models”	Corrected typo
2.7.5	Under Core Capability 1, changed the sentence “The Large Electrical Corporation must explicitly define any risk scaling used in these calculations, provide examples of the computation, and report the unscaled calculations.” to “The Large Electrical Corporation must provide examples of the computation in the narrative section of the EUP and explicitly state unit-conversion factors used to assess Project-Level risks.”	Clarified risk reporting requirements for Core Capability 1
2.7.5	Under Core Capability 2, changed the sentence “This narrative may include a summation of Circuit/Circuit Segment risks or may include weighted linear or non-linear processes.” to “This narrative must include a description of the process the Large Electrical Corporation uses for the summation or aggregation of Circuit/Circuit Segment risks. This may include linear and/or non-linear processes if appropriately justified.”	Clarified that this description is required but may include certain types of processes and justifications.
2.7.5	Under Core Capability 3, added the following two sentences “The Large Electoral Corporation must explicitly state the value of any unit-conversion factors used in this computation and explain how they arrived at these value(s).” and “That is, the Large Electrical Corporation must describe how its modeled process differs from the real-world process used to intentionally deenergize lines during high-wind events (such as during a Public Safety Power Shutoff) and determine the use of fast trip settings.”	Clarified risk reporting and narrative requirements for Core Capability 3
2.7.5	Under Core Capability 5, added “as a” to “(such as a portion of the Circuit Segment…)” and removed “inputs” from “…a method to apportion inputs overall risk reduced…”	Corrected typos

Section	Change	Reason
2.7.5	Under Core Capability 6, changed the section “The Large Electrical Corporation must demonstrate how it ensures that the Risk Modeling Methodology is evaluated with up-to-date information and that comparisons between Undergrounding Projects and Alternative Mitigations are made on a statistically consistent scale. To do this, the Large Electrical Corporation must develop a system to record Baselines, and historical model calibrations.” to “The Large Electrical Corporation must demonstrate how it ensures that the Risk Modeling Methodology is evaluated with up-to-date information that accurately reflects the Large Electrical Corporation’s understanding of the risk on the system. Additionally, the Large Electrical Corporation must demonstrate that comparisons between Undergrounding Projects and Alternative Mitigations are made on a statistically consistent scale. To do this, the Large Electrical Corporation must develop a system to record Baselines and historical model calibrations. A new Baseline must be recorded by the Large Electrical Corporation at least once per calendar year. This new Baseline must account for all physical changes to the electrical distribution infrastructure performed during that year, through the EUP or any other mechanism.”	Clarified annual update requirements and how to establish an initial Baseline

Section	Change	Reason
2.7.5	Changed section from "To establish a Baseline, the Large Electrical Corporation must model the risk landscape assuming that no Undergrounding Projects from the EUP program are constructed. This Baseline modeling must include any projects outside of the EUP program that the Large Electrical Corporation plans to undertake." to "To establish an initial Baseline, the Large Electrical Corporation must model the risk landscape assuming that no EUP Undergrounding Projects are constructed. This Baseline modeling must include any non-EUP wildfire mitigation activity in Tier 2 or 3 HFTDs. In subsequent Baselines, the Large Electrical Corporation must include activity outside of the EUP program that the Large Electrical Corporation has initiated or completed since the establishment of the previous Baseline."	Clarified annual update requirements and how to establish an initial Baseline
2.7.5	Added "components" to "… as other risk model landscape components at 0, 1, 2…"	Included omitted word
2.7.5	Changed "grid" to "pre-mitigation Circuit Segment"	Corrected vague terminology
2.7.5	Under Core Capability 7, removed the sentences "the Large Electrical Corporation must consider Undergrounding the entire Circuit Segment, or as much as is feasible due to geographic constraints, and report it as another Alternative Mitigation. In this case," and "The entirely undergrounded alternative does not count toward the two required Alternative Mitigations."	The 100% Undergrounding consideration is no longer applicable
2.7.5.2	Changed "backtest report" to "historical backtest"	Corrected terminology used

Section	Change	Reason
2.7.6	Changed the section "The Large Electrical Corporation must describe its plan to update its Risk Modeling Methodology, including details regarding how and when model version updates and calibrations are planned. Any new calibration or versioning will require a new risk model id in the data submission." to "The Large Electrical Corporation must describe its plan to update its Risk Modeling Methodology, including details regarding how and when model version and calibration updates are planned. Any new version or calibration will require a new risk_model_version_id and risk_model_calibration_id in the data submission, respectively."	Clarified how to proceed with calibration updates.
2.7.6	Changed sentence "…subsection of the Progress Report to Energy Safety as well as an historical backtest of the metrics for the past three years." to "…subsection of the Progress Report to Energy Safety as well as an historical backtest of the new model's impact on all KDMMs for all Baselines since the start of the EUP (Appendix C, Section C.1.5)."	Clarified backtesting requirements to match Table C.5
2.7.6	Changed section from "In each Model Report, including in Progress Report 0 and subsequent Progress Reports, the Large Electrical Corporation must establish a new Baseline as detailed in Section 2.7.5 of these Guidelines." to "In each Model Report, including in Progress Report 0 and subsequent Progress Reports, the Large Electrical Corporation must establish a new Baseline which reflects the existing distribution system as detailed in Section 2.7.5 of these Guidelines. Risk scores for new equipment/alignment must be reported in the same granularity, scale and methodology as previously existing equipment. These evaluations must be conducted in accordance with the Large Electrical Corporation's Risk Modeling Methodology, as described in the EUP, in cases where the Large Electrical corporation has not re-evaluated the risk on the new equipment."	Clarified Baseline requirements to align with Section 2.7.5
2.7.7	Moved "available to Energy Safety" later in the sentence	Improved readability

Section	Change	Reason
2.7.8	Changed “Confirmed Projects at Screen 3 or later.” to “Confirmed Projects that have passed Screen 3.”	Corrected grammar typo
2.7.9.1.a	Changed sentence from “This threshold should consider the size of the Circuit Segment and therefore may be calculated as a normalized score, provided that the Large Electrical Corporation justifies this normalization.” to “The High-Risk Threshold must utilize normalized units, such as risk per mile, to account for the differing lengths of Circuit Segments. The Large Electrical Corporation must provide an explanation of the metric used for normalization and an explanation of why that metric was chosen.”	Clarified justification requirements for normalized threshold scores.
2.7.9.1.d	Removed “d. Mitigated Risk Threshold is the combined measure of Ignition Risk and Outage Program Risk below which a Circuit Segment is of acceptable risk.”	Removed to unify language and consistency with changes to section 2.4.3.2
2.7.9.2.a	Changed “Risk Reduction Project-Level Standard” to “High-Risk Project-Level Standard”	Unified language so that all project-level standards are named similarly
2.7.9.2.b	Changed “High Frequency Outage Program Mitigation Standard” to “High Frequency Outage Program Project-Level Standard”	Unified language so that all project-level standards are named similarly
2.7.9.2.c	Removed “Mitigation” from “Tail Risk Mitigation Project-Level Standard”	Standardized Project-Level Standard terms and removed typo

Section	Change	Reason
2.7.10	Changed section from “For each Undergrounding Project, the Large Electrical Corporation must compare its project to the required design variations outlined below, including an evaluation of at least two comparable Alternative Mitigations. Alternative Mitigations may include, but are not limited to, covered conductor, remote fault detection technologies, installation of equipment and settings related to enhanced powerline safety settings, high impedance fault detection, and any combinations thereof.” to “For each Undergrounding Project, the Large Electrical Corporation must compare its project to the required design variations outlined below, including an evaluation of at least two combinations of comparable Alternative Mitigations in Screen 2, and one combination of comparable Alternative Mitigations in Screen 3.”	Clarified number of Alternative Mitigations required in each screen and streamlined readability.
2.7.10	Added “Section C.1.13 (Screen 4 Table)” to list of sections that contain further information on required comparisons.	Included new tables added as part of Guidelines change
2.7.10	Changed section from “After the project scoping phase in Screen 3, it may be determined that an Undergrounding Project will require non-undergrounding Subprojects. If this happens, the project must be analyzed as the Project as Scoped (see Required Design Variations below) which includes all of the Undergrounding and non-undergrounding Subprojects and the Undergrounding as Scoped (see Required Design Variations below) in Screen 3. Screen 2 comparisons must then be updated to include both the Project as Scoped and the Undergrounding as Scoped.” to “After the project scoping phase in Screen 3, the project must be analyzed both as the Project as Scoped (see Required Design Variations below) which includes all of the Undergrounding and non-undergrounding Subprojects and the Undergrounding as Scoped (see Required Design Variations below).”	Simplified reporting requirements to focus on comparing only the project as it has been scoped to alternative mitigations in response to stakeholder feedback

Section	Change	Reason
2.7.10	Added sentences “If the Undergrounding Project will be a completely undergrounded Circuit Segment, the Project as Scoped, and Undergrounding as Scoped design variations will have identical information but must be included for completeness of the data submission in Screen 3 and Screen 4. In Screen 4, the costs, benefits, and CPUC CBR must be calculated for the Project as Scoped, Undergrounding as Scoped, and the Screen 3 Alternative Mitigations. Appendix C.1.13, Screen 4 Table, gives further instructions on the requirements of Screen 4.”	Added clarifying language to support the Simplified reporting requirements that focus on comparing only the project as it has been scoped to alternative mitigations in response to stakeholder feedback
2.7.10	Changed section from “100% Undergrounded: A completely undergrounded Circuit Segment must be included as a design variation. This design variation must be used to justify the Project-Level Standards.” to “100% Undergrounded: A completely undergrounded Circuit Segment must be included as a design variation in Screen 2. In Screen 3, this design variation will be replaced with Project as Scoped.”	Simplified reporting requirements to focus on comparing only the project as it has been scoped to alternative mitigations in response to stakeholder feedback
2.7.10	From bullet point “Project as Scoped”: Removed the sentence fragment “If the project is scoped to include non-undergrounding Subprojects, then” and “This design variation may be omitted if the Circuit Segment will not contain multiple mitigations”.	Simplified reporting requirements to focus on comparing only the project as it has been scoped to alternative mitigations in response to stakeholder feedback

Section	Change	Reason
2.7.10	From bullet point “Undergrounding as Scoped”: Removed sentence fragment “If the project is scoped to include non-undergrounding Subprojects, then…” and changed the sentence “This design variation may be omitted if the Circuit Segment will not contain multiple mitigations.” to “If the Circuit Segment will not contain multiple mitigations, this design variation will be identical to Project as Scoped.”	Simplified reporting requirements to focus on comparing only the project as it has been scoped to alternative mitigations in response to stakeholder feedback
2.7.10	From bullet point “Baseline”: Changed from “Baseline: For Screen 3 only, the unmitigated Circuit Segment must be analyzed as a basis for the comparison of the Undergrounding Project. For Circuit Segments in Wildfire Rebuild Areas, the pre-wildfire distribution system must be used as a baseline” to “Project Baseline: For Screen 3 only, the existing Circuit Segment must be analyzed for the comparison of the Undergrounding Project. For Circuit Segments in Wildfire Rebuild Areas, the Pre-Wildfire distribution system and associated risk must be used for the Project Baseline.”	Changed Baseline to Project Baseline to distinguish this design variation from other uses of the term “Baseline”.

Section	Change	Reason
2.7.10	Changed bullet point from "Alternative Mitigation 1: One design variation must include installation of covered conductor on the entire Circuit Segment and some type of protective equipment and device settings used to reduce wildfire ignition. The protective equipment and device settings can include, but are not limited to, one or more of the following: enhanced power safety settings (EPSS), Fast Curve Settings, Sensitive Relay Profile, downed conductor detection (DCD), high impedance fault detection, fast trip, or other electronic fault detection." to "Screen 2 Alternative Mitigations 1: One design variation must consist of aboveground hardening including installation of covered conductor on the entire Circuit Segment and some type(s) of protective equipment and device settings used to reduce wildfire ignition. The protective equipment and device settings must include protection hardware capable of fast trip and/or sensitive trip settings and modified recloser settings that can be enabled or disabled as needed based on changing conditions in the Tier 2 or 3 HFTD. Additionally, the Large Electric Corporation must include any additional protection systems and settings that can enhance the safety of the circuit segment, as deemed feasible by the Large Electric Corporation for each project. These may include, but are not limited to, early fault detection, falling conductor protection, high impedance fault protection, rapid earth fault current limiter (REFCL), and partial voltage detection. Examples of existing, qualifying programs include Enhanced Powerline Safety Settings (EPSS), Fast Curve Settings, Sensitive Relay Profile (SRP), and Advanced Protection Program. All other applicable aboveground line hardening measures utilized by the Large Electrical Corporation must be included in this design variation unless specific project constraints prevent it."	Clarified that these Alternative Mitigations only apply to Screen 2. Made mitigations plural to emphasize each comparison will contain multiple mitigations. This will direct LEC to use all standard line hardening in comparison, so that the Alternative Mitigations 1 consists of all mitigations that would likely be constructed together.

Section	Change	Reason
2.7.10	Changed “Alternative Mitigation 2: One design variation must include one other mitigation or combination of mitigations that meet or exceed the risk reduction of Alternative Mitigation 1.” to “Screen 2 Alternative Mitigations 2: One design variation must include one additional mitigation or combination of mitigations that meet or exceed the risk reduction of Alternative Mitigation 1.” and added sentence “For example, rapid earth fault current limiter (REFCL), line removal with remote grid, or advanced grid monitoring.”	Clarified that these Alternative Mitigations only apply to Screen 2. Made mitigations plural to emphasize each comparison will contain multiple mitigations.
2.7.10.h	Added “h. Screen 3 Alternative Mitigations: The Alternative Mitigations used in Screen 3 and Screen 4 will be derived from the results of the Screen 2 comparison, and any new information obtained from initial project scoping. The Screen 3 Alternative Mitigations must, at a minimum, include aboveground line hardening, covered conductor and some type of protective equipment and device settings for any line not removed, as in Screen 2 Alternative Mitigations 1. The Large Electrical Corporation must also include any other mitigation or combination of mitigations that it has determined would be well-suited for the specific project location.”	Aligned section with changes made elsewhere in the Guidelines regarding changes to Screen 3.
2.7.10	Changed “For example, if the Circuit Segment contains a large river crossing, the cost to bore under the river should not be included in the design of a fully undergrounded Circuit Segment’s cost, if it is prohibitively high relative to the rest of the project.” to “For example, if the Circuit Segment contains a large river crossing, boring under the river should not be included in the design of a fully undergrounded Circuit Segment if its cost is prohibitively high relative to the rest of the project. Instead, a more feasible design must be used, such as an over river crossing, or the use of bridge conduit if available.”	Provided details on how feasible work should be included in design variations.

Section	Change	Reason
2.7.10	Added section "In addition to the EUP narratives required in Section 2.4.4 and 2.4.5, each Progress Report must include a narrative detailing the Large Electric Corporation's ongoing review of possible Alternative Mitigations. The narrative should detail what mitigations were considered since the last Progress Report, and what factors lead to the continued use of, or change in, the Alternative Mitigations used in the EUP's Project Acceptance Framework. The narrative must also include details on any relevant new and emerging technologies, and how the Large Electric Corporation is including these technologies in its EUP. For example, the narrative must include updates on any applicable ongoing pilot programs, such as Rapid Earth Fault Current Limiters (REFCL), and details on what Portfolio-Level analysis was done to evaluate the potential benefits of implementation.	Added requirement for a Progress Report Narrative detailing the evolving selection process of LEC's Alternative Mitigations to ensure LEC's are continually evaluating best strategies through EUP. Added in response to stakeholder feedback.
2.8	Changed "the e-filing docket" to "Docket #2023-UPs"	Corrected data template location
2.8.1	Added subsection "m. A Screen 4 Table comparing the cost and benefit information of the fully scoped Confirmed Project, and the final combination of Alternative Mitigations used in Screen 3."	Aligned Progress Report requirements with changes to the Guidelines
2.8.3	Removed the following sentences: "The Large Electrical Corporation must report in its geodatabase submission all Undergrounding Projects that have passed Screen 1 (Circuit Segment Eligibility). The Large Electrical Corporation must indicate the right of way and current Project Planning and Construction Phase for all Confirmed Projects (projects that have passed Screen 3 – Project Risk Analysis)."	This section had not been updated to match the current Spatial Data section (C.4) and was incompatible with the current guidelines process which collects this information in tabular form (C.1.6 and C.1.13).

Section	Change	Reason
2.8.5.3	Changed the paragraph “If the Large Electrical Corporation changes its Risk Modeling Methodology in a way that triggers a versioning update, it must backtest the new models using at least three years of historical data. These backtests must include a Project-Level analysis of each Confirmed Project that passed through Screen 3 (Project Risk Analysis) in the past three years.” to “If the Large Electrical Corporation changes its Risk Modeling Methodology in a way that triggers a versioning update, it must backtest the new models using historical data back to the start of the EUP. These backtests must include a Project-Level analysis of each Confirmed Project that passed through Screen 3 (Project Risk Analysis) in that time. These backtests must also include Portfolio Coversheets corresponding to each calibration employed since the previous update.”	Standardized backtesting requirements to match data submission (Table C.5)
2.8.5.3	Removed sentence “These backtests must also be summarized in a series of Portfolio Coversheets corresponding to each calibration employed in the past three years.”	Rephrased sentence earlier in the section
2.8.6.2	Removed sentence “Note that the units and scales are not meant to be realistic and are for illustrative purposes only.”	Deleted redundant sentence
2.8.6.3	Changed the sentence “The second plot must show the same metrics, but measured by the version of the Risk Modeling Methodology used at the time that Portfolio was foremost.” to “The second plot must show the same metrics but measured by the version of the Risk Modeling Methodology that was most recent at the time the Portfolio was updated.”	Clarified meaning of the sentence
2.8.6.3	Changed “Circuit-miles” to “Circuit miles”	Removed unnecessary hyphen
3.1.1	Changed “pre-submission” to “submission”	Corrected typo
3.2	Changed the sentence “A Large Electrical Corporation may submit all documents referenced in the EUP, to the docket established for that Large Electrical Corporation’s EUP.” to “A Large Electrical Corporation must submit all documents referenced in the EUP, to the docket established for that Large Electrical Corporation’s EUP.”	Clarified requirements of document submissions

Section	Change	Reason
3.2	Changed OEIS address from 20th Floor to 15th Floor	Reflects change in office location
3.3	Added footnote at the end of the first sentence: "Energy Safety's evaluation and decision on the EUP is not an approval of, or agreement with, costs associated with the EUP, which will be subject to review and approval by CPUC."	Clarified roles of the CPUC and Energy Safety
3.3	Removed "plan or" from "g. The EUP plan or approach for model retention…"	Removed redundant language
3.4	Changed several instances of "erratum" to "errata"	Corrected typo
3.6.2.1	Removed sentences "Opening comments are limited to 30 pages." and "Reply comments are limited to 20 pages." Added sentence "Page limits for both opening and reply comments will be addressed in Energy Safety's published schedule."	Aligned comment schedule with the WMP's established comment schedule.
3.6.2.1	Added hyperlinks to efiling@energysafety.ca.gov and ElectricalUndergroundingPlans@energysafety.ca.gov	Identified correct email address for filing comments
3.7.1	Added hyperlinks to ElectricalUndergroundingPlans@energysafety.ca.gov	Identified correct email address for sending data requests
3.7.1	Changed section "For data requests submitted by 5:00 p.m. on a business day, the date of submission is Day 0. For data requests submitted after 5:00 p.m. or on a Saturday, or holiday (including all Sundays) as defined in Government Code section 6700, the next business day is Day 0." to "For data requests submitted by 5:00 p.m. on a business day, the date of submission is Day 0. For data requests submitted after 5:00 p.m. Pacific time or on a Saturday, Sunday, holiday, or other day when Energy Safety offices are closed, the next business day is Day 0."	Clarified data request submission schedule
3.7.2.4	Added hyperlink to ElectricalUndergroundingPlans@energysafety.ca.gov	Identified correct email address for sending data requests
3.8.1	Changed "A Large Electrical Corporation must include the website address in a cover letter to its EUP submission." to "A Large Electrical Corporation must include the website address in its EUP submission cover letter."	Improved readability

Section	Change	Reason
3.11	Changed sample submission title from “2025-06-05_SDGE_23_MNR_R1” to “2025-06-05_SDGE_2023_MNR_R1”	Standardized submission title format
3.11, Table 9	Modified the sample filenames from “[Electrical Corporation Abbreviation]_Intial_Date_R#”, for example: “PGE_ Initial_2024-01-01_R0.csv” to “[Electrical Corporation Abbreviation]_Intial_T#_Date_R#”, for example: “PGE_ Initial_2024-01-01_T1_R0.csv”	Added table number to reflect that multiple CSV files will be submitted with each Progress Report
All Figures	Added descriptive alternative text to all figures.	Increased document accessibility
Footnotes	Updated Sections reference numbers	Aligned previous Section numbers with current and correct Section numbers and titles
Figure 1	Updated the colors and layout of the flowchart in Figure 1. Updated Screen names and CBR steps.	Increased document accessibility and flowchart accuracy for Screens 2 and 4.
Figure 2	Added Figure 2. Project Acceptance Framework Wildfire Rebuild Area Flowchart	Added flowchart to show the Framework process as it pertains to Wildfire Rebuild Areas.
Figure 11	Updated Figure x-axis titles from “Plan Version” and “Plan and Model Version” to “Portfolio Version”	Corrected mislabeling of graphs
Appendix A. Definitions “Circuit Segment”	Changed definition from “ “Circuit Segment” means an isolatable Circuit Segment. Unless otherwise indicated “Circuit Segment” also refers to an isolatable Circuit Segment.” to “ “Circuit Segment” means an isolatable circuit segment.”	Removed redundant sentence
Appendix A. Definitions “Collective Alternative Comparison”	Removed definition and term.	This term no longer applies to the current guidelines
Appendix A. Definitions “GO 128”	Changed reference from “General Order 98” to “General Order 128”	Corrected inadvertent typo

Section	Change	Reason
Appendix A. Definitions "High Frequency Outage Program Project-Level Standard"	Changed "High Frequency Outage Program Mitigation Standard" to "High Frequency Outage Program Project-Level Standard"	Unified terms used to refer to Standards
Appendix A. Definitions "High-Risk Project-Level Standard"	Added the following definition: " "High-Risk Project-Level Standard" is the minimum decrease in Ignition Risk and Outage Program Risk, that an Undergrounding Project must achieve to support the Plan Mitigation Objective. This reduction in wildfire risk and increase in reliability must, at minimum, reduce the risk of the Circuit Segment to below the Mitigated Risk Threshold."	Defined term that was used in the Guidelines
Appendix A. Definitions "Non-EUP Project"	Added "in a Tier 2 or 3 High Fire Threat District" to the definition of Non-EUP Project.	Edited requirement for non-EUP projects
Appendix A. Definitions "Non-EUP Project"	Added "Tier 2 and 3" to "Non-EUP Project" means a distribution undergrounding or other system hardening project in a Tier 2 or 3 High Fire Threat District that is funded or in the Project Planning and Construction Phases, that is not included in the 10-Year EUP.	Clarified and added more description to the type of High Fire Threat District
Appendix A. Definitions "Predicted Changed"	Removed the definition "Predicted Change"	Removed term that was no longer used in current Guidelines
Appendix A. Definitions "Pre-Wildfire"	Added the definition ""Pre-Wildfire" refers to the most recently modelled undamaged distribution infrastructure and the associated risk modeling of distribution infrastructure damaged by wildfire within a Wildfire Rebuild Area."	Clarified and defined a term used in the Guidelines
Appendix A. Definitions "Prioritized Project"	Added the definition ""Prioritized Project" means an Undergrounding Project that has passed Screen 4 (Prioritization and Finalization)."	Defined a new term used in the Guidelines

Section	Change	Reason
Appendix A. Definitions "Project Completion Phase"	Standardized term changed from "Project Completion Phase" to "Project Construction Completed Phase" and added "but before" to definition.	Clarified definition to align with C.1.13
Appendix A. Definitions "Project Overhead De-Energization Phase"	Added the definition ""Project Overhead De-Energization Phase" is the Project Planning and Construction Phase when the Undergrounding Project is completed and the overhead line it replaced or upgraded has been deenergized."	Added definition to align with C.1.13
Appendix A. Definitions "Project Identification Phase"	Removed definition and term	Removed definition as it was not used in the Guidelines
Appendix A. Definitions "Project-Level Standards"	Definition changed from " "Project-Level Standards" means the Risk Reduction Project Standard, the Reliability Increase Project Standard, the Tail Risk Mitigation Project Standard." to " "Project-Level Standards" means the High-Risk Project-Level Standard, the High Frequency Outage Program Project-Level Standard, and the Tail Risk Project-Level Standard."	Standardized references to other definitions and corrected inadvertent omission of a defined term
Appendix A. Definitions "Project-Level Thresholds"	Added new definition " "Project-Level Thresholds" means the High-Risk Threshold, Ignition Tail Risk Threshold, High Frequency Outage Program Threshold, and Mitigated Risk Threshold."	Defined a term used in the guidelines

Section	Change	Reason
Appendix A. Definitions "Project Planning and Construction Phases"	Changed the definition from "means the status categories for projects as listed in CPUC Data Appendix 1. The five phases designated and defined by the CPUC are: (1) Project Scoping, (2) Project Designing/Estimating, (3) Project Permitting/Dependency, (4) Project Ready for Construction, and (5) Project Construction, and two additional phases that Energy Safety has designated and defined: Project Identification Phase and Project Completion Phase." to "means the status categories for projects as listed in CPUC Data Appendix 1, as well as two additional phases defined by Energy Safety. The five phases designated and defined by the CPUC are: (1) Project Scoping, (2) Project Designing/Estimating, (3) Project Permitting/Dependency, (4) Project Ready for Construction, and (5) Project Construction In Progress, and the two additional phases that Energy Safety has designated and defined are: (6) Project Construction Completed and (7) Project Overhead De-energization"	Edited to delete the phrase "Project Identification Phase" because that term is not used in the Guidelines. Corrected the term "Project Completion Phase" to be "Project Construction In Progress". Added the term "Project Overhead Deenergization" to match the list of status categories used in C.1.13
Appendix A. Definitions "Reliability Increase Project Standard"	Removed the definition for "Reliability Increase Project Standard"	This term no longer applied to the current guidelines
Appendix A. Definitions "Risk Reduction Project Standard"	Removed definition	Unified project standards and their definitions
Appendix A. Definitions "Subproject"	Removed a redundant "a" from the definition	Typo correction
Appendix A. Definitions "Tail Risk Mitigation Project Standard"	Changed definition term from "Tail Risk Mitigation Project Standard" to "Tail Risk Project-Level Standard"	Aligned terminology with the rest of the Guidelines

Section	Change	Reason
Appendix A. Definitions "Threshold Level"	Removed the definition for "Threshold Level"	This term is redundant and no longer applies to the current guidelines
Appendix B, Table B.1.2	Added new row "Risk Calculations" and description "See Sections 2.3.3, 2.3.4, and 2.3.5 of these Guidelines"	Added risk calculations to Narrative Requirements
Appendix B, Table B.1.3	Removed "Project Framework Change Procedure" and replaced with "Incorporating Changes to Circuit Segment Information including Subprojects"	Refined language to reflect specific Changes for Circuit Segment and Subprojects
Appendix B, Table B.1.3	Added new row "List of Top 20 highest Circuit Segment scores for Overall Utility Risk, Ignition Consequence, and Outage Program Likelihood" with the description "See Section 2.4.3.1 of these Guidelines"	Added to include a more detailed and descriptive list
Appendix B, Table B.1.3	Added "Screen 2" to "Screen 2 Common Set of Values and Assumptions"	Updated to specify that it is in Screen 2
Appendix B, Table B.1.3	Added new row "Screen 3 Requirement for 25 individual Undergrounding Projects" and description "See Section 2.4.5.2 of these Guidelines."	Added to assist with navigating and meeting Screen requirements.
Appendix B, Table B.1.4	Added "narrative" to "See Section 2.4.7.1 of these Guidelines for narrative content."	Clarified only the narrative content requirements can be found in that Section
Appendix B, Table B.1.4	Added "of these Guidelines" to "See Section 2.4.7.2 of these Guidelines."	Unified language with the rest of the table
Appendix B, Table B.1.5	Added "2.3.1 and Section 2.5.1" to "See Table 1, Section 2.3.1 and Section 2.5.1 of these Guidelines; section 8388.5(c)(3)"	Added to specify where in the updated sections are in the Guidelines

Section	Change	Reason
Appendix B, Table B.1.6	Changed sentence from “Note: the actual Progress Report 0 is submitted separately from this narrative.” to “Note: the actual Progress Report 0 narrative is submitted as a separate document attached to the Narrative Content document.”	Updated to specify that it must be provided on a separate document.
Appendix B, Table B.1.7	Changed “Reports on Models” to “Model Report”	Changed language to reflect a singular report requirement
Appendix B, Table B.1.7	Changed “2.7.7” to “2.7.6” in row “Calibration and Versioning”	Corrected location of information
Appendix B, Table B.1.9	Added new table “Comparative Metrics for Alternative Mitigations” with description “See 2.7.10”	Added missing Comparative Metrics requirements
Appendix B, Table B.2	Added “Alternative Mitigation Selection Process” with description “See 2.4.4.1 of these Guidelines”	Added to elaborate on the Alternative Mitigation Selection Process
Appendix C, Section B.2	Added new row “Alternative Mitigation Selection Process” and description “See 2.4.4.1 of these Guidelines”	Aligned Progress Report 0 required content with Guidelines
Appendix C, Section C.1	Changed “(e.g. “January 1, 2025” as “01012025”)” to “(e.g. “July 1, 2025” as “20250701”)”	Aligned date string format to match with SQL’s default date string format
Appendix C, Table C.1	Changed the Field Description for narrative_submission from “A text field to describe a plan.” to “A short form text field to describe a plan.”	Clarified what the type of text field expected for this table
Appendix C, Section C.1.3	Changed sentence from “This section establishes the requirements for a Risk Model Version History Table accompanying the submission of the PROJECT_VARIABLE_MODIFIERS JSON file with the initial submission of the Project and all subsequent Progress Reports.” to “…initial submission of the EUP and all subsequent Progress Reports”	Corrected a reference to individual Projects that was meant to refer to the full EUP.

Section	Change	Reason
Appendix C, Table C.2	Changed sentence from “The required format is set forth in Energy Safety’s template files, which are available on Energy Safety’s website.” to “The format is described in the section below and a sample is provided in Energy Safety’s template files, which are available on Energy Safety’s website.”	Aligned section with how sample template files will be provided
Appendix C, Table C.2	Changed “the template” to “a GDB”	Clarified that the template is not required, but the GDB file type eventually will be required
Appendix C, Table C.4	Changed datatype for “risk_model_version_id” and “risk_model_calibration_id” from “NVARCHAR” to “NVARCHAR(255)”	Corrected to use standardized datatypes with character limits
Appendix C, Table C.5	In rows kdmm_#_uncertainty_baseline and kdmm_#_uncertainty_portfolio, added “Write” to “numerical effects as string”	Corrected inadvertent omissions
Appendix C, Section C.1.6	Changed sentence from “This table must reflect the most current information as of each Progress Report submission, this includes construction of new Circuit Segments, the splitting of Circuit Segments into smaller Circuit Segments or the merging of segments into larger segments.” to “This table must reflect the most current modeling information (see Section 2.4.2.1) as of each Progress Report submission. As required in Section 2.4.2.1, must be the same list and scores used at that time by the Large Electrical Corporation for risk modeling and decision-making.”	Clarified the requested annual information and added Section identifier.
Appendix C, Table C.6	Changed Data Type from “BOOL” to “BOOLEAN” in row is_non_eup_project	Corrected to use standard terminology for Boolean
Appendix C, Table C.6	Added “Leave blank if is_in_area is False” to row is_non_eup_project	This information will only be required for non-EUP Projects if it is in a HFTD

Section	Change	Reason
Appendix C, Table C.6	Changed sentence from “Leave blank if Circuit Segment is not planned for mitigation, or mitigation is only expected to be undergrounding through the EUP.” to “Leave blank if is_non_eup_project is False or blank” in row planned_mitigation_explanations	This information will only be required for EUP Projects
Appendix C, Table C.6	Removed “for this circuit” from row “planned_mitigation_explanations”	Removed redundant circuit reference
Appendix C, Section C.1.6	Added “subsequent” to “When this table is submitted in subsequent Progress Reports…” in subsection b).	Clarified reporting requirements for certain Progress Reports
Appendix C, Section C.1.6	Added “or IS_NON_EUP_PROJECT is blank” to the sentence “If this Circuit Segment is not being considered for mitigations or IS_NON_EUP_PROJECT is blank, leave this field blank.” in subsection d).	Clarified that this information will be required for EUP Projects
Appendix C, Section C.1.6	Removed the word “also” from the sentence, “Additionally, the QDR_CIRCUIT_SEGMENT_ID must also map to a Circuit Segment in the spatial data provided in the most recent Wildfire Mitigation Plan Quarterly Data Report.”	Removed redundant language.
Appendix C, Table C.7	Removed “CPZ ID or isolated” from “unique CPZ ID or isolated Circuit Segment ID” in row “circuit_segment_id”	Removed redundant and outdated terms
Appendix C, Table C.7	In row “source_circuit_segment_ids”, changed “delineated” to “delimited”	Corrected typo
Appendix C, Section C.1.8	Changed sentence from “The Large Electrical Corporation must submit a Circuit Segment Risk Score Table for each Undergrounding Project at the initial submission of that project and with each Progress Report.” to “The Large Electrical Corporation must submit a Circuit Segment Risk Score Table for each Circuit Segment in the Circuit Segment Identification Table.”	Aligned text with what was intended for reports in the tables.
Appendix C, Table C.8	Removed “CPZ ID or isolated” from “unique CPZ ID or isolated Circuit Segment ID” in row “circuit_segment_id”	Removed redundant and outdated terms

Section	Change	Reason
Appendix C, Table C.8	Changed entry for “risk_category” from “Identifying if this Circuit Segment is eligible for consideration under Screen 1 and if so, how.” to “Identifying if this Circuit Segment, based on its risk score, would fall into one of the mitigation eligibility categories, and if so, how.”	Clarified relationship between data reporting and Screen 1 eligibility.
Appendix C, Table C.8	Added rows ignition_risk, ignition_likelihood, outage_program_risk, and outage_program_consequence	Added initial KDMMs to Table 8 to make them easier to find in one central location
Appendix C, Table C.8	Changed the sentence “Rank within the wildfire consequence.” to “Rank of Ignition Consequence within the system.” and “Rank of Ignition Consequence within the portfolio” in rows ignition_consequence_rank_system and ignition_consequence_rank_portfolio, respectively.	Clarified fragmented sentence
Appendix C, Table C.8	Changed the sentence “Rank within the wildfire consequence.” to “Rank of Outage Program Likelihood within the system.” and “Rank of Outage Program Likelihood within the portfolio” in rows outage_program_likelihood_rank_system and outage_program_likelihood_rank_portfolio, respectively.	Clarified fragmented sentence
Appendix C, Section C.1.8	Added section (c) “The RISK_CATEGORY variable tracks whether the Circuit Segment’s risk scores exceed the Project-level thresholds for each of the three categories, regardless of its inclusion in High Fire Threat District or Wildfire Rebuild areas. Therefore, there may be Circuit Segments with a RISK_CATEGORY not equal to “None”, but which are still not eligible for consideration in the EUP.	Clarified relationship between data reporting and Screen 1 eligibility.
Appendix C, Table C.9	Removed “CPZ ID or isolated” from “unique CPZ ID or isolated Circuit Segment ID” in row “circuit_segment_id”	Removed redundant and outdated terms

Section	Change	Reason
Appendix C, Section C.1.10	Changed sentence from “The Large Electrical Corporation will update and submit all Project Tables with each Progress Report, even if no update was made to an individual project.” to “The Large Electrical Corporation will update and submit the full Project Table with each Progress Report, even if no update was made to an individual Undergrounding Project.”	Standardized grammar used to refer to Tables
Appendix C, Table C.10	Removed “CPZ ID or isolated” from “unique CPZ ID or isolated Circuit Segment ID” in row “circuit_segment_id”	Removed redundant and outdated terms
Appendix C, Table C.10	Removed row “order_number”	Moved tracking of this data to the Subproject Table (Table C.14)
Appendix C, Table C.10	Added “Wildfire Rebuild” as an acceptable category value under risk_category	Corrected inadvertent omission of types of risk category, to align with Section 2.3.5
Appendix C, Table C.10	Changed “Number of customers served by project, as defined…” to “Number of customers served by this Circuit Segment, as defined…” in row customer_count	Corrected vague terminology
Appendix C, Table C.10	Changed “For every Circuit Segment, a justification…” to “For every Undergrounding Project, a justification…” in row selection_justification	Corrected terminology typo
Appendix C, Table C.10	Changed “Is this Project included…” to “Is this Circuit Segment included…” in row wmp_overlap_current	Corrected terminology typo
Appendix C, Section C.1.10	Deleted sentence “The PROJECT_IDs must map one-to-one to the “ORDER” category as defined in the CPUC guidelines.”	Moved tracking of this data to the Subproject Table (Table C.14)
Appendix C, Table C.11	Removed “alternative” from row “alternative_comparison_name”	Aligned with naming convention with other tables

Section	Change	Reason
Appendix C, Table C.11	Removed “Project as scoped” and “Undergrounding as scoped” from row comparison_name	Aligned table with Guidelines change regarding required Alternative Mitigations in Screens
Appendix C, Table C.11	Changed sentence “Leave blank for non-Undergrounding Projects” to “Leave blank for alternative mitigations, fill in for “100% Undergrounding”.” in row unit_cost_per_overhead_mile_deenergized	Clarified required information for different alternative mitigation types.
Appendix C, Section C.1.11	Changed sentence from “Each row of this table is a considered project, or an alternative project comparison.” to “Each row of this table is a Circuit Segment considered for inclusion in the EUP as an Undergrounding Project, or an alternative project comparison.”	Change allows for additional alternative mitigation types.
Appendix C, Section C.1.11	Removed sentences “The order of rows in this table must keep all alternatives to the same project together, in order of ALTERNATIVE_MITIGATION_ID.” and “After the Undergrounding Project has been scoped and the final undergrounding percentage can be calculated, additional rows comparing the Scoped Undergrounding and Scoped Project are to be added to this table.”	Adjusted reporting requirements for Screen 2 to reflect changes made in the Guidelines.
Appendix C, Section C.1.11	Removed “would” from the sentence “…if the CPUC definitions of any of the above terms are changed or updates to the Risk Model Version would change their values.”	Removed typo
Appendix C, Table C.12	Removed “alternative” from row “alternative_comparison_name”	Aligned with naming convention with other tables

Section	Change	Reason
Appendix C, Table C.12	Changed "The name of the alternative comparison considered. Options include: • Project as scoped • 100% Under-ground • Alternative Mitigation 1 • Alternative Mitigation 2 • Undergrounding as scoped • Baseline • Additional Comparison" to "The name of the comparison considered. Options include: • Project as scoped • Screen 3 Alternative Mitigation • Undergrounding as scoped • Project Baseline • Additional Comparison" in row comparison_name.	Aligned table with changes made to Screen 2 regarding Alternative Mitigations
Appendix C, Table C.12	Added new field "alternative_mitigation_justification" with columns "A narrative detailing how and why the alternative mitigation was chosen.", "TEXT", and "Leave blank if comparison_name is "Project as scoped", "Undergrounding as scoped", or "Project Baseline"	Added new required data field to reflect Guideline changes and increase transparency
Appendix C, Table C.12	Added "or comparison_name is not "Project as Scoped" to row additional_justification	Clarified table requirements
Appendix C, Section C.1.12	Added section "c) The ALTERNATIVE_MITIGATION_JUSTIFICATION field must provide a narrative detailing how the alternative mitigation was chosen, and why it is the best alternative to the Project as Scoped. As supporting evidence, this narrative can use data from Screen 2, and other project specific scoping details determined in Screen 3."	Aligned requirements with Guideline changes to Screens
Appendix C, Section C.1.12	Changed sentence "This table must be updated and the values recalculated if the CPUC definitions of any of the above terms are changed or updates to the Risk Model Version would change their values." to "This table must be updated and the values recalculated if updates to the Risk Model Version change their values."	Corrected typo and improved readability

Section	Change	Reason
Appendix C, Section C.1.13	Added new Section C.1.13 Screen 4 Table: "This section establishes the requirements for a Screen 4 Table that the Large Electrical Corporation must submit for each Undergrounding Project which has passed Screen 4. The Large Electrical Corporation must submit a Screen 4 Table at the initial EUP submission and with each Progress Report. This table must reflect the most current information as of each Progress Report submission. Table C.13 describes the construction and data requirements for the Screen 4 Table."	Added in the requirements for the Screen 4 Table
Appendix C, Table C.13	Inserted new Table C.13 Example Screen 4 Table Construction and Data Requirements	Inserted Table detailing the Screen 4 data requirements
Appendix C, Section C.1.13	Added the following new section: "Additional requirements for a Screen 4 Table are as follows: a) Each row of this table is a Confirmed Project, repeated three times – once for the full project as scoped, once for just the scoped undergrounding, and once to track the finalized alternative mitigation created for Screen 3. b) The WORK_TYPE field must correspond to one of the required comparisons in Section 2.7.10 and match one of the alternatives described in Chapter 3 of the EUP narrative for project acceptance framework of the approved EUP. List "multiple" if multiple mitigations are being considered on different parts of the Circuit Segment. This table must be updated, and the values recalculated, if the CPUC definitions of any of the above terms are changed or updates to the Risk Model Version change their values, or if the scoped project changes such that it receives new alignment IDs."	Added in the requirements for the Screen 4 Table
Appendix C, Section C.1.14	Changed the sentence "This table is submitted with the initial submission of the Project (Progress Report 0), as well as all subsequent Progress Reports." to "This table is submitted at the initial EUP submission and with each Progress Report."	Standardized submission requirements with language in the rest of the Appendix document

Section	Change	Reason
Appendix C, Table C.14	Removed “CPZ ID or isolated” from “unique CPZ ID or isolated Circuit Segment ID” in row “circuit_segment_id”	Removed redundant and outdated terms
Appendix C, Table C.14	Changed two references of “wmp_plan_subproject” to “wmp_subproject” under rows wmp_utility_initiative_tracking_id and wmp_cycle	Corrected reference title to match the name of another field
Appendix C, Table C.14	Added row “order_number” to track the CPUC order number for subprojects.	Moved tracking of this data from the Project Table (Table C.10)
Appendix C, Table C.14	Changed the sentence “Possible options are given by CPUC defined categories.” to “Possible options are given by the “Project Planning and Construction Phases” as defined in Appendix A.” in row status_current and changed “Overhead Deenergization” to “Overhead Deenergized”.	Changed to match existing defined term “Project Planning and Construction Phases” (CPUC defined categories are included in the defined term)
Appendix C, Section C.1.14	Changed the word “ALIGNMENT_IDs” to the phrase “alignment IDs”.	Standardized grammar for referencing variables outside of tables.
Appendix C, Section C.1.15	Changed sentences “This section establishes the requirements for a Project Index Table that the Large Electrical Corporation must submit for each project which has passed Screen 2. This table includes information found in the Screen 2 Table and other tables and reported data must be compatible with the information submitted elsewhere in the data submission.” to “This section establishes the requirements for a Project Index Table that the Large Electrical Corporation must submit for each Undergrounding Project which has passed Screen 2 and updated as Undergrounding Projects pass through Screens 3 and 4. This table includes information found in the Screen 2, Screen 3, and Screen 4 Tables and reported data must be compatible with the information submitted elsewhere in the data submission.”	Clarified the data submission requirements for the Project Index Table and its interactions with data in other tables

Section	Change	Reason
Appendix C, Table C.15	Added “Wildfire Rebuild” as an acceptable category value under project_category, to align with Section 2.3.5.	Corrected inadvertent omission of types of project category
Appendix C, Table C.15	Removed rows fulfills_project_level_standard, cumulative_risk_difference, project_risk_reduction, percent_undergrounded, project_unit_cost_per_ overhead_mile_deenergized, project_unit_cost_per_ underground_mile_energized, project_total_costs, project_cost_benefit_ratio, alt_#_comparison_name, alt_#_work_type_description, alt_#_fulfills_project_level_standard, alt_#_cumulative_risk_difference, alt_#_risk_reduction, alt_#_project_unit_cost_per_overhead_mile_deenergized, alt_#_project_unit_cost_per_underground_mile_energized, alt_#_project_total_costs, alt_#_project_cost_benefit_ratio	Streamlined Table data fields and corrected data fields that were no longer being referenced in other Tables
Appendix C, Table C.15	Added rows circuit_segment_length, 100_percent_UG_total_costs, 100_percent_UG_total_risk_reduction, 100_percent_UG_cost_benefit_ratio, project_as_scoped_percent_UG, project_as_scoped_total_costs, project_as_scoped_total_risk_reduction, project_as_scoped_cost_benefit_ratio, <alt>_work_type_description, <alt>_total_costs, <alt>_total_risk_reduction, <alt>_cost_benefit_ratio, baseline_cumulative_risk, project_as_scoped_cumulative_risk, screen_3_alt_cumulative_risk	Updated data fields to align with other Tables’ data fields and grouped fields’ placement into similar subjects

Section	Change	Reason
Appendix C, Table C.15	Added three subheadings into the table “The following columns are compilations of PUC metrics for the performance of the planned project from Screen 2 (assuming 100% undergrounded), and from Screen 4 (final values for the project as scoped).” , “The following columns are compilations of metrics for the performance of the alternatives considered in Screen 2 (assuming 100% undergrounded), and in Screen 4 (for the alternative developed in Screen 3). The following columns are repeated three times, with <alt> replaced by ‘screen_2_alt_1’, ‘screen_2_alt_2’,‘screen_3_alt’, The ‘screen_3_alt’ columns are to be left blank until the project has passed Screen 4.” and “The following columns are compilations of information on the project as scoped and the primary alternative considered, as reported in Screen 3.”	Grouped certain columns together by topic for readability and specific reporting instructions
Appendix C, Section C.1.15	Removed “b) For each alternative mitigation considered for this project, six additional columns are added, describing what alternative is being considered, and repeating the analysis for costs and benefits. The “#” character in the column names is to be replaced by an integer, e.g. (“alt_1_project_unit_cost_per_overhead_ mile_deenergized).”	Removed requirements that only applied to the previous version of Table C.15
Appendix C, Figure C.2	Replaced all figures in C.2 (screenshots of JSON) to change the sample years from “0,5,10,20,30,40,50,60” to "0,1,2,3,4,5,6,7,8,9,10,15,20,25,30,35,40,45,50,55" in accordance with Core Capability 4 of Section 2.7.5	Corrected sample file years to align with main guidelines text and improve readability
Appendix C, Section C.2.2	Changed title of section and other references throughout the section from “Risk Landscape JSON” to “Model Risk Landscape JSON”	Indicates that this section deals with the model risk

Section	Change	Reason
Appendix C, Section C.2.2	Changed "At the second level, there must be multiple potential mitigations of the Circuit Segment identified by the Project ID, including "Baseline," "Project as scoped," "100% Under-ground," "Alternative Mitigation 1," "Alternative Mitigation 2," "Undergrounding as scoped," "Additional Comparison," where these terms are all defined as in the Screen 3 Table (Appendix C.1.12)." to "At the second level, there must be multiple potential mitigations of the Circuit Segment identified by the Project ID, including "Baseline," "Project as scoped," "Screen 3 Alternative," "Undergrounding as scoped," "Additional Comparison," where these terms are all defined as in the Screen 3 Table (Appendix C.1.12)."	Aligned with Alternative Mitigation changes made in the Guidelines
Appendix C, Section C.2.2	Changed sentence "For all other mitigations, the required settings are "Separate" and "Collective." to "For all other mitigations considered, the required settings are "Separate" and "Collective."	Clarified which mitigations were being referred to
Appendix C, Section C.3	Added section "Template files to aid in submission of the data requirements are available on Energy Safety's website. The format of these files is in the form of a geodatabase (GDB), within which individual tables, such as those defined in Sections C.4.1 through C.4.6 below, are referred to as "feature classes". If the Large Electrical Corporation is unable to provide all feature classes required below in the format of the template files, file formats such as ".KMZ" or others may be submitted for the remaining feature classes. However, other file formats will be considered only if Energy Safety, at its sole discretion, determines that the submitted files adequately reflect all the information necessary for Plan evaluation, and if the Large Electrical Corporation outlines a timeline for transition to the template format during the duration of the EUP." and removed "The Large Electrical Corporation must use the template files provided by Energy Safety for data submission. Template files are available on Energy Safety's website."	Specifies file types required for submissions and allows for KMZ files.

Section	Change	Reason
Appendix C, Section C.3	Removed Section c. “All records must be for assets located at least partially within California state boundaries, except where assets outside California boundaries are being relied upon by the Large Electrical Corporation for operations within California. For example, electrical corporation cameras or weather stations installed on mountain tops in another state that are observing conditions within California would be included in the data submission.”	Simplified data submission to account for the fact no geospatial information from outside California will be required.
Appendix C, Section C.4.1	Added sentence “This table must reflect the most current modeling information (see Section 2.4.2.1) as of each Progress Report submission.”	Aligned GIS data submission with tabular data submission in C.1.6, as well as adding section reference.
Appendix C, Table C.16	Changed sentence from “Unique ID for a specific Circuit Segment on which the project was defined.” to “Unique ID for the Circuit Segment.” in row circuit_segment_id.	Improved readability and corrected reference to Circuit Segments which may not have Projects associated.
Appendix C, Section C.4.2.a	Changed sentence from “Circuit Segments must be reasonably, and completely, bounded by the Confirmed Project Polygon, using a Minimum Bounding Box algorithm or similar. However, the vertices may be manually adjusted, and in some cases may be required to be manually adjusted to avoid overlapping.” to “Circuit Segments must be reasonably, and completely, bounded by the Confirmed Project Polygon, which may be created algorithmically, manually, or using any other process the Large Electrical Corporation utilizes. However, the vertices in some cases may be required to be manually adjusted to minimize overlapping.”	Removed example algorithms to clarify choice of algorithm is up to Large Electrical Corporation
Appendix C, Table C.18	Changed two references of “historical_alignment_id” to “pre_mitigation_alignment_id” and added sentence “This must match the pre_mitigation_alignment_id in the Subproject Table.” in row “pre_mitigation_alignment_id”	Corrected the field name identifier.

Section	Change	Reason
Appendix C, Section C.4.3	Changed sentence from “b) A new ALIGNMENT_ID is issued for any change in the location of any endpoints of the Line GIS object, or any change in length.” to “b) A new PRE_MITIGATION_ALIGNMENT_ID is issued for any change in the location of any endpoints of the Line GIS object.”	Aligned the field name in text to match the table and removed redundant length change language
Appendix C, Table C.19	Changed two references of “historical_alignment_id” to “pre_mitigation_alignment_id” and added sentence “This must match the pre_mitigation_alignment_id in the Subproject Table.” in row “pre_mitigation_alignment_id”	Corrected the field name identifier.
Appendix C, Section C.4.4	Changed sentence from “b) Changes to the ALIGNMENT_ID are determined by C.4.3, the current submission must match the ALIGNMENT_ID for each Subproject to the values in that table.” to “b) Changes to the PRE_MITIGATION_ALIGNMENT_ID are determined by C.4.3, the current submission must match the PRE_MITIGATION_ALIGNMENT_ID for each Subproject to the values in that table.”	Aligned the field name in text to match the table.
Appendix C, Table C.20	Changed two references of “new_alignment_id” to “post_mitigation_alignment_id” and added sentence “This must match the post_mitigation_alignment_id from the Subproject Table.” in row “post_mitigation_alignment_id”	Corrected the field name identifier.
Appendix C, Section C.4.5	Changed sentence from “b) A new ALIGNMENT_ID is issued for any change in the location of any endpoints of the Line GIS object, or any change in length.” to “b) A new POST_MITIGATION_ALIGNMENT_ID is issued for any change in the location of any endpoints of the Line GIS object.”	Removed this clause as it was redundant with a change in endpoints and incorrectly implied improved length estimates would trigger a new alignment id and aligned the field name.
Appendix C, Section C.4.6	Added sentence: “In this feature class, each row is an individual piece of newly installed or moved equipment which will be or has been attached to a specific Subproject after the mitigation is carried out.”	Standardized language to emulate Section C.4.4

Section	Change	Reason
Appendix C, Table C.21	Changed two references of “historical_alignment_id” to “post_mitigation_alignment_id” and added sentence “This must match the post_mitigation_alignment_id from the Subproject Table.” in row “post_mitigation_alignment_id”	Corrected the field name identifier.
Appendix C, Section C.4.6	Changed two references of “ALIGNMENT_ID” to “POST_MITIGATION_ALIGNMENT_ID” in subsection a).	Corrected the field name identifier
All Guideline and Appendix Tables	Adjusted Tables with misaligned columns and merged cells to be aligned	Corrected misaligned columns and increased accessibility
All Guideline and Appendix Tables	Removed all mentions of the Portfolio Coversheet.	The Portfolio Coversheet is no longer applicable to these Guidelines.
Global	Changed capitalizations of Circuits and Circuit Segments throughout Guidelines and Appendix documents	Corrected capitalizations to reflect if terms were referencing the Circuit Segment definition
Global	Standardized all “Project” terms in the following ways: • “Subproject” capitalized consistently • Standardized capitalization of “non-undergrounding” and “Undergrounding” Subprojects and Projects • "Project" replaced with "Undergrounding Project" unless referring to a general project, repeated in the same sentence, or refers to projects not considered in the EUP • Removed instances of "Project" without a descriptor or other reference • "Confirmed Project" used for Projects past Screen 3 • Replaced "Project" with "Circuit Segment" where appropriate • Consistent use of "Confirmed Project Polygon" and "Confirmed Project" • Corrected instances of “Project” to “EUP” where appropriate	Standardized the use of defined “Project” terms and capitalizations throughout the Guidelines and Appendix and corrected inadvertent typos

Section	Change	Reason
Global	Standardized indented list numbering and lettering	Corrected mis-matched numbering and lettering in lists.
Global	Changed all “alternative mitigations” to “Alternative Mitigations”	Standardized terms’ capitalizations
Global	Changed automatic section numbering throughout documents	When new sections were added, new numbers for sections were generated. Some sections now have new or different section numbers.
Global	Capitalized instances of the term Project Risk Analysis	Standardized defined terms’ capitalizations
Global	Changed terms to match new defined terms if the definition, spelling, or capitalization changed	Standardized spelling and capitalization of terms
Global	Changed instances of unspecified High Fire Threat District to Tier 2 or 3 High Fire Threat District as appropriate	Clarified Tiers of HFTD being referenced
Global	Changed all references of Project Standard to Project-Level Standard	Standardize defined terms