California Public
Utilities Commission

Revised SB 884 Project List Data Requirements Guideline

SAFETY POLICY DIVISION

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Table of Contents

Background and Purpose: 1

Technical Working Group Questions: 3

Template and Tables Structure 4

Tables and Data Requirements 9

Table 1: Data Set 9

Table 2: Cost Breakdown 18

Table 3: Risk Model Change Tracker 20

Table 4: HFTD and Associated Asset 23

Table 5: Financial Inputs 24

Table 6: Interruption Cost Estimate Calculator Inputs 26

Recommendations 28

Background and Purpose:

Pursuant to Senate Bill (SB) 884 (McGuire; Stats. 2022, Ch. 819), the California Public Utilities Commission's (CPUC or Commission) data requirements for a large electrical corporation's Electrical Undergrounding Plan (EUP) intended to mitigate wildfire risk in the High Fire Threat District (HFTD), will be complex and require coordination with the Office of Energy Infrastructure Safety's (Energy Safety) Guidelines and data templates. Attached to Resolution SPD-15,[1] the Commission issued the *SB 884 Project List Data Requirements-Preliminary* to begin the discussion on how a utility should submit tabular and geospatial data in support of a Phase 2 Application related to its EUP.[2] Ordering Paragraph 3 of SPD-15 stated that:

> Following Energy Safety's publication of its SB 884 Guidelines, SPD is authorized to convene a Technical Working Group (TWG) to review and align the preliminary CPUC SB 884 Project List Data Requirements and Geographic Information System (GIS) data requirements with Energy Safety Guidelines, adding any data elements necessary for Commission conditional approval purposes.

On February 20, 2025, Energy Safety published Guidelines that a utility must follow to submit an EUP to that agency.[3] Energy Safety's Guidelines include extensive discussion of data requirements that require the Commission to review and determine the best way to align its own data requirements for a utility's Phase 2 Application for the EUP. The data template Guideline and data templates discussed in this Staff Proposal are intended to generate discussion during the SB 884 Data Template TWG as was envisioned by SPD-15.

On January 30, 2025, Safety Policy Division (SPD) presented a Risk Assessment and Mitigation Phase (RAMP) data template Guideline and data template as part of a TWG in Phase 4 of the Risk-Based Decision-Making Framework (RDF) Proceeding (R.20-07-013).[4] On February 11, 2025, an Administrative Law Judge Ruling filed SPD's RAMP data template Guideline and data template to the RDF Proceeding[5] SPD recognizes that it will be crucial that a data template for a Phase 2 Application also align with the data template needed in a RAMP and GRC Application. Thus, the structure of the data template Guideline and data template presented in this Staff Proposal is significantly influenced by the discussion of Staff's data template presented in the RDF Proceeding.

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[1] Resolution SPD-15 is available at https://www.cpuc.ca.gov/-/media/cpuc-website/divisions/safety-policy-division/documents/final-resolution-spd15-adopting-the-commissions-guidelines-for-the-senate-bill-sb-884-program.pdf.

[2] SPD-15, Attachment 1, Appendix 1 at 15-18.

[3] Office of Energy Infrastructure Safety, 10-Year Electrical Undergrounding Plan Guidelines, February 20, 2025, https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58006&shareable=true.

[4] The RAMP is a process, a utility complies with before initiating a GRC that requires energy-utility safety-risk threat assessments along with associated proposed mitigation plans, and estimated costs and spending requests. The RDF proceeding examines how to calculate risk mitigation levels for various safety measures in order to ensure utilities focus on the most cost effective risk reduction strategies in their safety work, including wildfire-related safety.

[5] Administrative Law Judge's Ruling Entering Phase 4 Technical Working Group Materials and Related Staff Proposal into the Record and Setting Comment Schedule, February 11, 2025, https://docs.cpuc.ca.gov/SearchRes.aspx?DocFormat=ALL&DocID=556602565.

The purpose of this data template Guideline is to provide clarity on the field name, field description, and field value constraints in the SB 884 Project List Data Template. Additionally, this Guideline is a revision of *SB 884 Project List Data Requirements-Preliminary* that was attached to SPD-15

During the SB 884 Data Template TWG meeting(s), Staff expect to receive feedback and input from stakeholders and Energy Safety, regarding how to improve the Data Template found in this Staff Proposal. Ordering Paragraph 4 of SPD-15 stated that:

> SPD is authorized to develop and issue the SB 884 Project List Data Template within 30 days of the final TWG meeting.

Thus, it is Staff's expectation that following the final TWG meeting, a final version of the SB 884 Project List Data Template will be issued.

Technical Working Group Questions:

This proposed data template is being issued to facilitate discussion during the Technical Working Groups. We expect stakeholders to comment on the following:

1) Is the Proposed SB 884 Project List Data Template helpful in reconciling differences, if any, between the data template issued in SPD-15 and the data requirements found in the current Energy Safety Guidelines? If so, how?
2) If you believe the Proposed SB 884 Project List Data Template creates difficulties in reconciling the data template issued in SPD-15 and the data requirements found in the Energy Safety Guidelines, explain your position.
3) What additional data do stakeholders recommend be included in the final SB 884 Project List Data Template? Why? In particular, how would that data help stakeholders and decision-makers in their evaluation of a utility's Phase 2 Application for an EUP?
4) Which data do stakeholders think should be omitted from the SB 884 Project List Data Template? Why? If you recommend omitting the data, explain how you believe a change will help stakeholders and decision-makers in their evaluation of a utility's Phase 2 Application for an EUP.
5) Do any field descriptions of each data stream require correction or clarification? Provide recommended language for that field description and an explanation for the proposed change.
6) Are there any incorrect field value constraints? If so, please explain what the correct field value constraint should be and why.
7) What methods, including satellite imagery, can the Commission employ to monitor the implementation of SB 884?

Template and Tables Structure

Table 1: Data Set

This table collects the key elements and characteristics of a Risk Reporting Unit (RRU), including unique identifiers, mitigation plans, and associated risks.[6] Table 1 defines how risk-related data is structured and categorized for consistent reporting across various progress reports and geographic locations.

As stated in the introduction it is necessary to align the SB 884 Project List Data Template with the RAMP Data Template discussed in the RDF Proceeding.[7] Here we present a definition of RRU to clarify that this concept must be shared across RAMP and SB-884 Applications.

- Risk Reporting Unit (RRU): A CPUC jurisdictional effort within Electric Operations or Gas Operations that simultaneously removes or mitigates the risk associated with a group of contiguous assets or systems that exhibit high levels of risk. The RRU must include common elements that must include, but are not limited to Consequence Attributes, Risk level, line-item costs, benefit-cost ratios (BCRs), work units and time. The RRU can be aggregated along several dimensions based on unique identifiers that include, but are not limited to, hierarchy,[8] scenario,[9] version,[10] risk event, tranche, and mitigation type.

Additionally, to conform with the requirements of the CPUC's SB 884 Guidelines in SPD-15, the RRU must be:

1. Traceable through all stages of a lifecycle, including but not limited to the project's scoping, designing, permitting, construction/implementation, post-construction, retirement/decommissioning.
2. Auditable in terms of timing, location, work units, cost, and risk reduction.
3. Forecastable to at least the 10th year of the EUP.
4. Able to aggregate up to the EUP.[11]

Utilities shall use these definitions and requirements (with any changes made during the stakeholder process) to present RRU level data in their EUP. The level of granularity required is discussed below.

Tables 1 through 5 are anchored around the RRU_ID field, which references uniquely identifiable RRUs with unique identification numbers (i.e., IDs). A utility's RRU_ID naming schema must be simple and

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[6] For more information on the RRU, see R.20-07-013, Phase 4 Workshop 1, SPD Staff Proposal on Definition of Scoped Work and the Risk Reporting Unit, November 8, 2024.

[7] Any updates in the RDF Proceeding may result in an update in the SB-884 Data Template Guidelines.

[8] Hierarchy refers to a utility's organizational hierarchy, such as an Electric Distribution Division or a Gas Distribution Division. as well as other ways of categorizing high risk assets and systems (i.e. HFTDs, circuits, regions, etc.).

[9] Scenario refers to forecasts, results, and projections.

[10] Version refers to a risk model version.

[11] These three requirements have been adapted from the Staff Scoped Work Proposal to conform to the requirements of the SB-884 program.

transparently understandable. A utility's RRU_ID naming schema must include the GRC Activity Code of the Undergrounding Project, which must also be listed in Table 1. A utility's RRU_ID naming schema must not result in the reuse of an RRU_ID.

Table 1 shall be submitted with the Phase 2 Application and all subsequent progress reports. In cases where RRU_IDs have not yet been created for certain projects, for the reasons outlined below, the table must be submitted using the corresponding OEIS_Project_ID.[12] Once more detailed and updated information becomes available, reporting shall transition to the RRU_IDs. The utility must also report OEIS_Project_IDs to enable traceability and continuity across reports.

The fields OEIS_Project_ID and OEIS_Subproject_ID directly align to the Energy Safety Guidelines and enable coordination with the data templates submitted with the EUP to Energy Safety.[13] All requirements found in the Energy Safety Guidelines for OEIS_Project_ID and OEIS_Subproject_ID also apply to this data template.

If the utility submits a Phase 2 Application that uses Subprojects the Commission requires that the granularity of the RRU be identical to that of the Subproject once detailed Subproject data is available, which means that each RRU_ID can only be tied to a single OEIS_Subproject_ID (Figure 1). Once an RRU_ID is created for a Subproject, all data must be reported using the unique RRU_IDs, OEIS_Project_IDs and OEIS_Subproject_IDs.

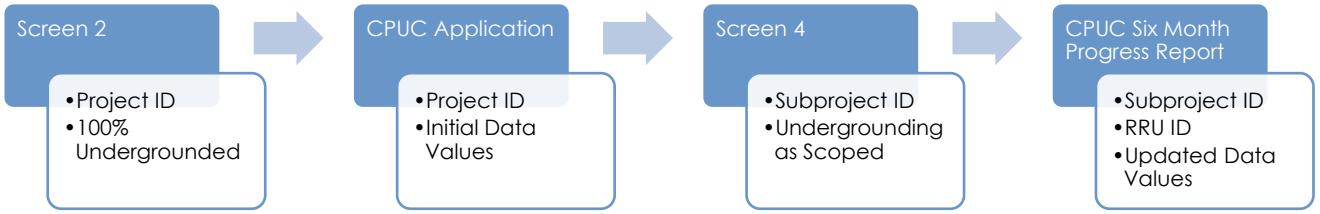

Figure 1: Process for creating an RRU_ID and Data Submissions for Phase 2 Application with Subprojects[14]

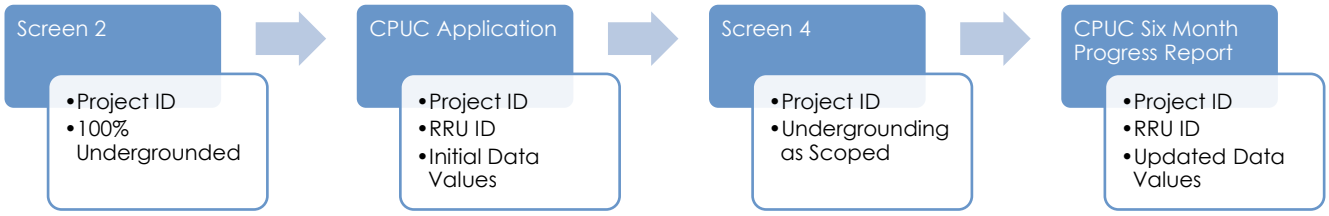

Figure 2: Process for creating an RRU_ID and Data Submissions for Phase 2 Application without Subprojects

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[12] OEIS_Project_ID corresponds to project_ID, as defined in the 10-Year Electrical Undergrounding Plan Guidelines published by Office of Energy Infrastructure Safety on February 20, 2025 (at C-24).

[13] OEIS_Subproject_ID corresponds to subproject_ID, as defined in the 10-Year Electrical Undergrounding Plan Guidelines published by Office of Energy Infrastructure Safety on February 20, 2025 (at C-36).

[14] If the utility submits a Phase 2 Application that does not use Subprojects, then the Commission requires that the granularity of the RRU be identical to that of the Project as defined in the Energy Safety Guidelines (see Figure 2).

If the utility elects to use Subprojects in its Phase 2 Application, then when the utility submits its Phase 2 Application to the Commission, it is possible that detailed Subproject level forecasts may not be available. In the case where the utility submits a Phase 2 Application that uses Subprojects and the Subproject level forecasts are not available, for the initial dataset submitted with the utility's Phase 2 Application, the utility may present forecasts at the Project Level, which should correspond with the Screen 2 data presented by the utility in Table C.11 of the Energy Safety Guidelines.[15] The forecasts presented at the Project Level in the initial dataset submitted with the Application will correspond to the "100% Undergrounded" concept defined in the Energy Safety Guidelines.[16] The RRU_ID field may be left blank at this point. Once detailed Subproject data is available, an RRU_ID must be created for each Subproject, and all data must be reported using the unique RRU_IDs, OEIS_Project_IDs and OEIS_Subproject_IDs.

When the utility submits its Phase 2 Application or six month progress reports to the Commission, it is required that for any Project (i.e., OEIS_Project_ID) that passes Screen 4 of the Energy Safety Guidelines, the utility shall provide data values in the Commission's data template that should correspond with the Screen 4 data presented by the utility in Table C.13 of the Energy Safety Guidelines.[17] If the utility submits a Phase 2 Application that uses Subprojects, then the detailed RRU level data values submitted to the Commission should correspond with the Subproject data presented by the utility in Table C.14 of the Energy Safety Guidelines.[18]

If the Project has passed Screen 4 of the Energy Safety Guidelines, then the information presented at the Project or Subproject Level in the dataset submitted with either the Phase 2 Application or the six month progress report will correspond to the "Undergrounding as Scoped" concept defined in the Energy Safety Guidelines.[19]

For utilities that submit Projects in their Phase 2 Application and do not plan to break them into Subprojects later, the utility may continue reporting data at the Project level throughout both the Phase 2 Application and subsequent six month progress reports. In these cases, the utility must still align its data with the appropriate Energy Safety Guidelines tables initially using Table C.11 for Screen 2 forecasts and then updating with Table C.13 data for Projects that pass Screen 4. RRU_IDs shall be created for the Project, and all reporting remains at the Project level. All data must be reported using the unique RRU_ID and OEIS_Project_IDs from the Phase 2 Application. (Figure 2)

Please note that Table 1 also collects Backcasted_Cost_Benefit_Ratio, Backcasted_Mitigation_Benefit and Backcasted_Present_Value_Costs. In order to align with the concept of a Backcast as discussed in the RDF Proceeding, the following definition applies:

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[15] Office of Energy Infrastructure Safety, 10-year Electrical Undergrounding Plan Guidelines, February 20, 2025, at C-25 – C-26.

[16] Office of Energy Infrastructure Safety, 10-year Electrical Undergrounding Plan Guidelines, February 20, 2025, at 44.

[17] Office of Energy Infrastructure Safety, 10-year Electrical Undergrounding Plan Guidelines, February 20, 2025, at C-30 – C-32.

[18] Office of Energy Infrastructure Safety, 10-year Electrical Undergrounding Plan Guidelines, February 20, 2025, at C-33 – C-35.

[19] Office of Energy Infrastructure Safety, 10-year Electrical Undergrounding Plan Guidelines, February 20, 2025, at 44.

- Backcast: use updated inputs (e.g., new RRUs, new risk models) to recalculate Cost_Benefit Ratios, pre-mitigated risk, post-mitigated risk or other data points. The goal of a Backcast is to establish a bridge between prior inputs and new inputs, to ensure an "apples-to-apples" comparison.

When a utility elects to use the Subproject designation, the concept of a Backcast is essential in the SB-884 context to enable a consistent comparison between the forecasted RRU values reported in the progress reports and the backcasted RRU values that would have been calculated had the RRU structure been applied in the Phase 2 Application using the data submitted at that time. For a utility that elects to use the Subproject designation the Backcasted_Mitigation_Benefit, Backcasted_Present_Value_Costs and Backcasted_Cost_Benefit_Ratio fields may be left blank in the Phase 2 Application for OEIS_Project_IDs that have yet to establish an RRU_ID. For a utility that elects to align an RRU_ID with the OEIS_Project_ID (i.e. does not use the Subproject designation) there is no need to complete the Backcasted_Mitigation_Benefit Backcasted_Present_Value_Costs, and Backcasted_Cost_Benefit_Ratio fields.

Table 1 also collects Unit_Cost_Variance_Percentage, calculated as:

$$\text{Unit\_Cost\_Variance\_Percentage} = \frac{\text{Forecasted Unit Cost in Phase 2 Application} - \text{Updated Unit Cost in progress report}}{\text{Initial Forecasted Unit Cost in Phase 2 Application}}$$

And

CBR_Variance_Percentage calculated according to the following two scenarios:

a-If the utility elects to use the Subproject designation and detailed Subproject data is not available, then this is calculated as the percentage difference between the Backcasted_Cost_Benefit_Ratio and updated Cost_Benefit_Ratio in the subsequent progress reports

$$\text{CBR\_Variance\_Percentage} = \frac{\text{Backcasted\_Cost\_Benefit\_Ratio} - \text{Updated CBR in the progress report}}{\text{Backcasted\_Cost\_Benefit\_Ratio}}$$

b-If the utility elects not to use the Subproject designation or the detailed Subproject data is available in the Phase 2 Application, this is calculated as the percentage difference forecasted Cost_Benefit_Ratio submitted in the Phase 2 Application and the updated Cost_Benefit_Ratio presented in the subsequent progress reports

$$\text{CBR\_Variance\_Percentage} = \frac{\text{Cost\_Benefit\_Ratio in Phase 2 Application} - \text{Updated Cost\_Benefit\_Ratio in the progress report}}{\text{Cost\_Benefit\_Ratio in Phase 2 Application}}$$

These two fields provide insight into the extent to which the CBR and unit cost have deviated from their original forecasted values, allowing for a clearer assessment of project performance and cost-effectiveness over time.

In Table 1, for each RRU (or project)[20] there will be one row for the utility's Undergrounding mitigation and one separate row for each alternative.[21]

Table 2: Cost Breakdown

This table breaks down the costs associated with mitigation efforts, including labor, materials, and permits, for projects under the Risk Reporting Unit. It provides detailed cost allocation to track expenditure efficiently. Data may be submitted at the project level in the Phase 2 Application and at RRU level when RRUs are created as described above.

Table 3: Risk Model Change Tracker

This table tracks changes and updates to the risk modeling and how that affects the risk associated with the assets and systems mitigated by the RRUs. This allows us to compare current and previous risk models, risk scores and costs across each of the six month progress reports. It ensures transparency and accountability in how risks related to the electric grid are managed and reported.

Utilities regularly update their risk models. At times, the outputs (calculated risks) of new risk model versions might be substantially different from the previous version(s). In some cases, utilities have changed the length and names of each circuit segment from one risk model to another. To address the lack of clarity of the impact caused by changing risk models between the six month progress reports, SPD created a template (Table 3) to track changes in each RRU (or Project) and how those changes would impact the calculation of risk from one risk model to the next. Table 3 collects data regarding changes in calculated risk, length, and name of each RRU (or Project), which utilities plan to include in its undergrounding projects. This enables analysis and comparison of data created across different risk models and supports comparison of such data across the six month progress reports and even maybe among various proceedings where such data may be presented. Data may be submitted at the project level in the Phase 2 Application and at RRU level when RRUs are created as described above. This table complements some of the information presented in Table C.7 of the Energy Safety Expedited Undergrounding Plan Guidelines.[22]

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[20] Data may be submitted at the project level in the initial Application and at RRU level in subsequent progress reports when RRUs are created as described at page 4-5. This requirement follows for any other location in these Guidelines that state "RRU (or Project)".

[21] Please see the Proposed and Alternative Mitigations field described below and in the Excel data template attached to this Guideline.

[22] Office of Energy Infrastructure Safety, 10-year Electrical Undergrounding Plan Guidelines, February 20, 2025, at C-12 – C-14.

Table 4: HFTD and Associated Asset

This table documents low-risk associated assets mitigated alongside primary electric grid infrastructure due to operational constraints or interconnected systems.[23] It includes associated costs, miles, and risk reduction for comprehensive project management of risk on electric grid infrastructure.

Table 4 attempts to collect and clarify information regarding how the additional electric grid infrastructure associated assets can affect the risk reduction, costs, and Cost-Benefit Ratio (CBR) of the proposed RRU. Data may be submitted at the project level in the Phase 2 Application and at RRU level when RRUs are created as described above

Table 5: Financial Inputs

This table provides financial parameters and metrics required to calculate and evaluate risk mitigations, including discount rates, monetized value of customer-minute interruptions (CMI), the value of statistical life (VSL), and present value revenue requirements (PVRR). These inputs ensure that economic factors are systematically integrated into risk evaluations.

Table 6: Interruption Cost Estimate (ICE) Calculator Inputs

Since SB-884 requires undergrounding projects to be completed within the HFTD, the ICE Calculator inputs must be relevant only to the HFTD. The utility must also disaggregate their inputs according to Operational Division broken by HFTD tiers. This table provides inputs that can be integrated into the ICE Calculator to estimate the cost per customer-minute interruption, by categorizing outages by time of day, season, and customer type. The ICE Calculator integrates key reliability metrics such as SAIDI and SAIFI to estimate the impact of service interruptions.

Tables and Data Requirements

Table 1: Data Set

Field Name	Field Description	Field Value Constraints
RRU_ID	A unique value identifying the Risk Reporting Unit (RRU).[24]	VARCHAR (255)

[23] In Table 4, "low-risk" is defined as electric grid infrastructure assets whose risk level is below the "High-Risk Threshold" defined by Office of Energy Infrastructure Safety, 10-year Electrical Undergrounding Plan Guidelines, February 20, 2025, page 42.

[24] For more information see R.20-07-013, Phase 4 Workshop 1, SPD Staff Proposal on Definition of Scoped Work and the Risk Reporting Unit, November 8 2024 at 20. See also the discussion in R.20-07-013, Phase 4 Workshop 3, SPD Staff Proposal on Risk Mitigation Accountability Reports December 30 2024at 22.

Field Name	Field Description	Field Value Constraints
OEIS_Subproject_ID	A unique value identifying the Subproject. This is the same value as found in the Energy Safety Guidelines. The utility must retain the same Subproject ID over time. New Subprojects must receive new Subproject IDs which have not been used for any previously submitted Subproject.	VARCHAR (255)
OEIS_Project_ID	A unique value identifying the Undergrounding Project. This is the same value as found in the Energy Safety Guidelines. PROJECT_IDs must remain consistent over time and not be altered during updates.	VARCHAR (255)
Circuit_Segment_ID	A unique value identifying the Circuit Segment ID on which this Undergrounding Project was defined. This is the same value as found in the Energy Safety Guidelines. If the Circuit Segment changes, the Circuit_Segment_ID remains identified with the original Circuit Segment, at the point Project ID is created	VARCHAR (255)
GRC_Activity_Code	This is the Activity Code for the Proposed Mitigation relevant to this RRU. Field values are expected to utilize the following notational systems: PG&E: Maintenance Activity Type (MAT) SCE: Work Breakdown Structure (WBS) Sempra: Capital Programs are defined at the budget code; Expense programs are defined at the workpaper.[25]	VARCHAR (255)
Filings	List of all filing(s), including advice letters and Petitions for Modification (PFMs), where the RRU (or Project) is reported and a budget is requested including but not limited to a GRC application and Wildfire Mitigation Plan filing.	TEXT
Customer_Count	Number of customers served by the RRU (or Project)	
State_Legislative_District	State Legislative District of the service territory in which the RRU (or Project) is located.	VARCHAR (255)
Operational_Division_Headquarters by HFTD tiers	Operational_Division_Headquarters by HFTD tiers[26] that the RRU (or Project) is located.	VARCHAR (255)
Tranche_Level	The Tranche that includes the Assets or Systems that the	VARCHAR (255)

[25] D.24-05-064, Appendix A, Row 28.

[26] Please see Table 6 for more details.

Field Name	Field Description	Field Value Constraints
	Project[27] mitigates. Each Project can only mitigate the risk exhibited by Assets or Systems found in one Tranche. Tranches are the quintiles of Likelihood of Risk Event (LoRE) and Consequence of Risk Event (CoRE) for Wildfire Ignition Risk. The structure of the Tranche level to record in this field is represented as LoRE quintile and CoRE quintile that make up each tranche. Thus, the Tranche Level should be presented in the following shorthand: CoRE 1×LoRE 2 or CoRE 2×LoRE 1 If the utility opts to write a whitepaper presenting an alternative approach to tranches, they must create a clear and concise shorthand for the structure of the tranches.[28]	
Asset_System_List	List of the unique Assets and/or the unique Systems that exhibit risk, which is mitigated by the RRU(or Project).[29] This should include, but not limited to, the following examples: Isolatable Circuit Segments or Circuit Segments, Poles and Spans. This field should also include the List of Associated Assets, if any, found in Table 4.	TEXT
Total_Circuit_Miles	Total number of pre-mitigated circuit miles included in the RRU (or Project).	REAL
Risk_Ranking	Ranking of the total pre-mitigated risk that is exhibited by the assets or systems that the RRU (or Project) mitigates (E.g., where the risk level of the assets or systems mitigated by the RRU (or Project) lies in comparison with risk level of the assets or systems mitigated by other RRUs (or Projects) across the entire Proposed Mitigation Program).	VARCHAR (255)

[27] Projects or RRUs reported in the initial Application. For any Projects reported in the initial Application, the corresponding RRUs are presumed to fall within the same Projects' Tranches.

[28] For more detail on the Tranche Level field, see D.24-05-064 at 26-33 and D.24-05-064, Appendix A, Row 14. Even if the utility records a Tranche Level in this field that accords with the tranche structure in its alternative approach to tranches, SPD reserves its right to challenge any alternative approach to tranches (See D.24-05-064 at 31).

[29] Asset is a retirement unit that exhibits risk, as defined by Federal Energy Regulatory Commission (FERC) Uniform System of Accounts (USOA). A System is defined as a regularly interacting or interdependent group of items forming a unified whole that exhibits risk and cannot be classified as a retirement unit. See R.20-07-013, Phase 4 Workshop 1, SPD Staff Proposal on Definition of Scoped Work and the Risk Reporting Unit, November 8 2024 at 20.

Field Name	Field Description	Field Value Constraints
Scoping_Date	The year, month and day the utility intends to begin or did begin the scoping process of this mitigation for the RRU (or Project).	Date (YYYY-MM-DD)[30]
Start_Date	The year, month and day the utility intends to begin or did begin the construction or implementation of the RRU (or Project).	Date (YYYY-MM-DD)[31]
Undergrounding_Alternative_Mitigations	This field must include the Undergrounding Mitigation and the Alternative Mitigations that the utility has considered for this RRU (or Project). All following risk and cost analyses are carried on based on the value inputted within this field.[32] This field enables comparing risk analyses of several alternative mitigations options for the same RRU (or Project).	VARCHAR (255)
Undergrounding_Mitigation_Justification1	Primary reason for choosing the Undergrounding mitigation that the utility proposed for the RRU (or Project). This field can include, but is not limited to, responses such as operational limitations, cost efficiency, continuity, and benefits for other risk events.	VARCHAR (255)
Undergrounding_Mitigation_Justification2	Other reasons for choosing the Undergrounding mitigation that the utility proposed for the RRU (or Project)This field can include, but is not limited to, responses such as operational limitations, cost efficiency, continuity, and benefits for other risk events.	VARCHAR (255)
Status	Preset domain to identify the current status of the RRU (or Project)The preset options include: • Scoping: Identifying the size and timeline of the RRU (or Project) Scoping is the first step to providing visibility to the construction feasibility and possible execution timing. Designing: Delineation of a plan for implementing the RRU(or Project) including determining the RRU's (or Project) integration within existing infrastructure or operations and need for materials, training, or permitting. The costs for completing the RRU (or Project), including for permitting, labor and materials, are forecasted at this stage.	VARCHAR (255)

[30] If the year, month and day is available, the utility must record this information in this field using the YYYY-MM-DD format.

[31] If the day is not yet confirmed, the utility must use 01 for the day (i.e. 2025-02-01).

[32] For more information on alternative mitigation analysis, see D.18-12-014 at 34.

Field Name	Field Description	Field Value Constraints
	• Permitting: The process of obtaining the rights and permits from relevant stakeholders to implement the RRU (or Project). This stage of the lifecycle also includes negotiating of contracts to implement the RRU (or Project) as well as final estimation of the costs associated with implementing the RRU (or Project). • Construction/Implementation: During this stage a capital investment is built out or an operational activity is put into action. Capital investments are complete when they are used and useful. Operational activities could be an ongoing means of maintaining a level of risk. • Post-Construction: For capital investments, there can be final paperwork and updates to asset registries after the scoped work is used and useful.[33]	
Used_and_Useful_Date	The year, month and day the utility intends to make or did make this RRU (or Project) used and useful. Used and useful means to be fully complete and providing service to customers.	Date (YYYY-MM-DD)[34]
Useful_Life	The value of the useful life of the Undergrounding mitigation and the Alternative Mitigations, typically represented as years.	REAL
Ignition_Pre_Mitigated_Likelihood	The likelihood of Ignition before Undergrounding and Alternative Mitigations measures are applied to the assets or system associated with this RRU (or Project).	REAL
Ignition_Pre_Mitigated_Safety_Consequences	The unscaled expected value of Safety Consequences of Ignition (e.g., injuries or fatalities) before the Undergrounding and Alternative Mitigations measures are applied to the assets or system associated with this RRU (or Project). (Natural Units)	REAL
Ignition_Pre_Mitigated_Reliability_Consequences	The unscaled expected value of Reliability Consequences of Ignition (e.g., Customer minutes interrupted) before the Proposed and Alternative Mitigations measures are applied to the assets or system associated with this RRU (or Project). (Natural Units)	REAL
Ignition_Pre_Mitigated_Financial_Consequences	The unscaled expected value of Financial Consequences of Ignition before the Undergrounding and Alternative Mitigations measures are applied to the assets or system	REAL

[33] Information about the Status field can also be found in R.20-07-013, Phase 4 Workshop 1, SPD Staff Proposal on Definition of Scoped Work and the Risk Reporting Unit, November 8 2024 at 10-11.

[34] If the day is not yet confirmed, the utility must use 01 for the day (i.e. 2025-02-01).

Field Name	Field Description	Field Value Constraints
	associated with this RRU (or Project). (Natural Units)	
Ignition _Post_Mitigated_Likelihood	The likelihood of Ignition occurring after the Undergrounding and Alternative Mitigations measures are applied to the assets or system associated with this RRU (or Project).	REAL
Ignition_Post_Mitigated_Safety_Consequences	The unscaled expected value of Safety Consequences of Ignition (e.g., injuries or fatalities) after the Undergrounding and Alternative Mitigations measures are applied to the assets or system associated with this RRU (or Project). (Natural Units)	REAL
Ignition_Post_Mitigated_Reliability_Consequences	The unscaled expected value of Reliability Consequences of Ignition (e.g., Customer minutes interrupted) after the Undergrounding and Alternative Mitigations measures are applied to the assets or system associated with this RRU (or Project). (Natural Units)	REAL
Ignition_Post_Mitigated_Financial_Consequences	The unscaled expected value of Financial Consequences of Ignition after the Undergrounding and Alternative Mitigations measures are applied to the assets or system associated with this RRU (or Project). (Natural Units)	REAL
Outage_Program_Pre_Mitigated_Likelihood	The likelihood of Outage Program occurring before Undergrounding and Alternative Mitigations measures are applied to the assets or system associated with this RRU (or Project).	REAL
Outage_Program_Pre_Mitigated_Safety_Consequences	The unscaled expected value of Safety Consequences of Outage Program (e.g., injuries or fatalities) before the Undergrounding and Alternative Mitigations measures are applied to the assets or system associated with this RRU (or Project). (Natural Units)	REAL
Outage_Program_Pre_Mitigate_Reliability Consequences	The unscaled expected value of Reliability Consequences of Outage Program (e.g., Customer minutes interrupted) before the Undergrounding and Alternative Mitigations measures are applied to the assets or system associated with this RRU (or Project). (Natural Units)	REAL
Outage_Program_Pre_Mitigated_Financial_Consequences	The unscaled expected value of Financial Consequences of Outage Program before the Undergrounding and Alternative Mitigations measures are applied to the assets or system associated with this RRU (or Project). (Natural Units)	REAL
Outage_Program_Post_Mitigated_Likelihood	The likelihood of Outage Program occurring after the Undergrounding and Alternative Mitigations measures are applied to the assets or system associated with this RRU (or Project).	REAL
Outage_Program_Post_Mitigated_Safety_Consequenc	The unscaled expected value of Safety Consequences of Outage Program (e.g., injuries or fatalities) after the	REAL

Field Name	Field Description	Field Value Constraints
es	Undergrounding and Alternative Mitigations measures are applied to the assets or system associated with this RRU (or Project). (Natural Units)	
Outage_Program_Post_Mitigated_Reliability_Consequences	The unscaled expected value of Reliability Consequences of Outage Program (e.g., Customer minutes interrupted) after the Undergrounding and Alternative Mitigations measures are applied to the assets or system associated with this RRU (or Project) (Natural Units)	REAL
Outage_Program_Post_Mitigated_Financial_Consequences	The unscaled expected value of Financial Consequences of Outage Program after the Undergrounding and Alternative Mitigations measures are applied to the assets or system associated with this RRU (or Project). (Natural Units)	REAL
Pre_Mitigated_Ignition_Risk	Unscaled value of Ignition Risk before the Undergrounding and Alternative Mitigations measures are applied to the assets or system associated with this RRU (or Project). (Dollar Value)	REAL
Post_Mitigated_Ignition_Risk	Unscaled value of Ignition Risk after the Undergrounding and Alternative Mitigations measures are applied to the assets or system associated with this RRU (or Project). (Dollar Value)	REAL
Pre_Mitigated_Outage_Program_Risk	Unscaled value of Outage Risk before the Undergrounding and Alternative Mitigations measures are applied to the assets or system associated with this RRU (or Project). (Dollar Value)	REAL
Post_Mitigated_Outage_Program_Risk	Unscaled value of Outage Risk after the Undergrounding and Alternative Mitigations measures are applied to the assets or system associated with this RRU (or Project). (Dollar Value)	REAL
Pre_Mitigated_Overall_Utility_Risk	Unscaled value of Overall Utility Risk before the Undergrounding and Alternative Mitigations measures are applied to the assets or system associated with this RRU (or Project) (Dollar Value)	REAL
Post_Mitigated_Overall_Utility_Risk	Unscaled value of Overall Utility Risk after the Undergrounding and Alternative Mitigations measures are applied to the assets or system associated with this RRU (or Project) . (Dollar Value)	REAL
Discount_Rate_Scenario	The discount rate (See Table 5) used to calculate the Mitigation Benefit, Present Value Costs, and Benefit-Cost Ratio, among others. Input in this field should be one of the following: • WACC Discount Rate Scenario • Societal Discount Rate Scenario	VARCHAR (255)

Field Name	Field Description	Field Value Constraints
	• Hybrid Discount Rate Scenario	
Ignition_Risk_Mitigation_Benefit	Present value of the Ignition Risk Reduction from the Undergrounding and Alternative Mitigations measure for the RRU (or Project). (Dollar Value)	REAL
Outage_Program_Risk_Mitigation_Benefit	Present value of the Outage Program Risk Reduction from the Undergrounding and Alternative Mitigations measure for the RRU (or Project). (Dollar Value)	REAL
Mitigation_Benefit	Present value of the Risk Reduction from the Undergrounding and Alternative Mitigations measure for the RRU (or Project). (Dollar Value)	REAL
Average_Unit_Cost_per_Mile	The average unit cost of the Undergrounding and Alternative Mitigations for the RRU (or Project) per mile.	REAL
Total_CapEx	Total nominal value of the Capital expenditures of the Undergrounding and Alternative Mitigations for the RRU (or Project).	REAL
Total_OpEx	Total nominal value of the Operational expenditures of the Undergrounding and Alternative Mitigations for the RRU (or Project).	REAL
Present_Value_All_Costs	Present value of the Operational and Capital expenditure of the Undergrounding and Alternative Mitigations for the RRU (or Project).	REAL
Cost_Benefit_Ratio	Cost-Benefit Ratio of the Undergrounding and Alternative Mitigations for the RRU (or Project).	REAL
Backcasted_Mitigation_Benefit	Retrospective present value of the Risk Reduction from the Undergrounding and Alternative Mitigations measure for the RRU using the assumptions and data submitted in the Phase 2 Application (Dollar Value)	REAL
Backcasted_Present_Value_Costs	Retrospective present value of the costs of the Proposed and Alternative Mitigations for the RRU using the assumptions and data submitted in the Phase 2 Application	REAL
Backcasted_Cost_Benefit_Ratio	Retrospective Cost-Benefit Ratio of the Undergrounding and Alternative Mitigations for the RRU using the assumptions and data submitted in the Phase 2 Application	REAL
Unit_Cost_Variance_Percentage	The percentage difference between forecasted Unit Costs submitted in the Phase 2 Application and updated Unit Costs in the subsequent progress reports	REAL

Field Name	Field Description	Field Value Constraints
CBR_Variance_Percentage	If the utility elects to use the Subproject designation then this is calculated as the percentage difference between either the Backcasted_Cost_Benefit_Ratio and Cost_Benefit_Ratio in the subsequent progress reports If the utility elects not to use the Subproject designation this is calculated as the percentage difference forecasted Cost_Benefit_Ratio submitted in the Phase 2 Application and the updated Cost_Benefit_Ratio presented in the subsequent progress reports	REAL
Risk_Model	Name and Version of Risk Model used to calculate Benefit-Cost Ratio of the Undergrounding and Alternative Mitigations for the RRU (or Project).	VARCHAR (255)
Reporting_Date	The date the risk and costs for the Undergrounding and Alternative Mitigations for the RRU (or Project). are reported.	Date (YYYY-MM-DD)
Calculated_Date	The date the risk and costs for the Undergrounding and Alternative Mitigations for the RRU (or Project). are calculated.	Date (YYYY-MM-DD)
CBR_Year_Zero	The year the risk and costs for the Undergrounding and Alternative Mitigations for the RRU (or Project) are discounted to.	INT

Table 2: Cost Breakdown

Field Name	Field Description	Field Value Constraints
RRU_ID	A unique value identifying the RRU.	VARCHAR (255)
OEIS_Subproject_ID	A unique value identifying the Subproject. This is the same value as found in the Energy Safety Guidelines. The utility must retain the same Subproject ID over time. New Subprojects must receive new Subproject IDs which have not been used for any previously submitted Subproject.	VARCHAR (255)
OEIS_Project_ID	A unique value identifying the Undergrounding Project. This is the same value as found in the Energy Safety Guidelines. PROJECT_IDs must remain consistent over time and not be altered during updates.	VARCHAR (255)
Undergrounding_Alternative Mitigations	This field must include the Undergrounding Mitigation and the Alternative Mitigations that the utility has considered for this RRU (or Project). All following cost analyses are carried on based on the value inputted within this field. This field enables comparing risk analyses of several alternative mitigations' options for the same RRU (or Project). This value must be identical with the Undergrounding and Alternative Mitigations field in Table 1.	VARCHAR (255)
CapEx_Labor	Including all the required Engineering, Design, and Construction.	REAL
CapEx_Materials	All the required material costs.	REAL
CapEx_Permits_Environmental	Permitting fees from local and state agencies that cover, for instance, but not limited to, environmental impact assessments.	REAL
CapEx_Other_Costs	Other Capital Expenditure that are not categorized in the rows above.	REAL
Total_CapEx	Total nominal value of the Capital expenditures of the Undergrounding and Alternative Mitigations for the RRU. This value must be equal to Total_CapEx fields in Table 1.	REAL
Total_OpEx	Total nominal value of the Operational expenditures of the Undergrounding and Alternative Mitigations for the RRU. This value must be equal to Total_OpEx fields in Table 1.	REAL

Field Name	Field Description	Field Value Constraints
Initial_Application_Total_Costs	Total nominal value of the Capital and Operational expenditures of the Undergrounding and Alternative Mitigations for the RRU (or Project) from the Phase 2 Application to the Commission.	REAL
Reporting_Date	The date the risk and costs for the Undergrounding and Alternative Mitigations for the RRU (or Project) are reported.	Date (YYYY-MM-DD)
Calculated_Date	The date the risk and costs for the Undergrounding and Alternative Mitigations for the RRU (or Project) are calculated.	Date (YYYY-MM-DD)

Table 3: Risk Model Change Tracker

Field Name	Field Description	Field Value Constraints
RRU_ID	A unique value identifying the RRU.	VARCHAR (255)
OEIS_Subproject_ID	A unique value identifying the Subproject. This is the same value as found in the Energy Safety Guidelines. The utility must retain the same Subproject ID over time. New Subprojects must receive new Subproject IDs which have not been used for any previously submitted Subproject.	VARCHAR (255)
OEIS_Project_ID	A unique value identifying the Undergrounding Project. This is the same value as found in the Energy Safety Guidelines. PROJECT_IDs must remain consistent over time and not be altered during updates.	VARCHAR (255)
Current_Asset_System_List	List of current unique Assets and/or the unique Systems that exhibit risk, which is mitigated by the RRU (or Project). The list in this field should be the same as the list in the List of Asset(s) or System(s) field in Table 1. This should include, but not limited to, the following examples: Isolatable Circuit Segments or Circuit Segments.	TEXT
Current_Risk_Model	Name and Version of the updated Risk Model used to calculate the risk score for the assets mitigated by the RRU (or Project). (E.g., V2)	VARCHAR (255)
Current_Total_Miles	Total circuit miles under Current Risk Model for the RRU (or Project).	VARCHAR (255)
Current_Non_HFTD_Miles	Total miles (if any) that extend beyond the High Fire-Threat District (HFTD) under Current Risk Model for the RRU (or Project).	VARCHAR (255)
Current_Pre_Mitigated_Risk_Score	The pre-mitigated risk score for the	VARCHAR (255)

Field Name	Field Description	Field Value Constraints
	assets mitigated by the RRU (or Project) calculated under the Current Risk Model. (Dollar Value)	
Current_Risk_Percentage	The pre-mitigated risk score for the assets mitigated by the RRU (or Project) divided by the total risk score calculated using the Current Risk Model.	VARCHAR (255)
Change_Type	Identification of how the assets or systems mitigated by the RRU have been defined and redefined since the last update: • New Data Inputs to Risk Model • New Construction of Asset(s) or System(s) • Renaming of Asset(s) or System(s) • Splitting of Asset(s) or System(s) • Merging of Asset(s) or System(s) • Other	VARCHAR (255)
Change Date	Date the assets or systems mitigated by the RRU (or Project) were changed.	Date (YYYY-MM-DD)
Previous_Asset_System_List	For each RRU (or Project), if the value in the Change Type field in this Table is one of the following: • New Construction of Asset(s) or System(s) • Renaming of Asset(s) or System(s) • Splitting of Asset(s) or System(s) • Merging of Asset(s) or System(s) Then list the unique Assets and/or the unique Systems mitigated by the RRU(or Project), prior to the Change Date.	TEXT
Previous_Risk_Model	Name and Version of the previous Risk Model used to calculate the risk	VARCHAR (255)

Field Name	Field Description	Field Value Constraints
	score for the assets mitigated by the RRU (or Project).	
Previous_Total_Miles	Total circuit miles under the Previous Risk Model for the RRU (or Project).	VARCHAR (255)
Previous_Non_HFTD_Miles	Total miles (if any) that extend beyond the High Fire-Threat District (HFTD) under Previous Risk Model for the RRU (or Project).	VARCHAR (255)
Previous_Pre_Mitigated_Risk_Score	The pre-mitigated risk score for the assets mitigated by the RRU (or Project) calculated under the Previous Risk Model. (Dollar Value)	VARCHAR (255)
Previous_Risk_Percentage	The pre-mitigated risk score for the assets mitigated by the RRU (or Project) divided by the total risk score calculated using the Previous Risk Model.	VARCHAR (255)
Initial_Application_Total_Miles	Total number of circuit miles included in the RRU (or Project) from the Phase 2 Application to the Commission. Even if the total circuit miles do not change in a six month progress report, this value must still be entered.	REAL
Initial_Application_Non_HFTD_Miles	Total miles (if any) that extend beyond the High Fire-Threat District (HFTD) for the RRU (or Project) from the Phase 2 Application to the Commission. Even if the total circuit miles do not change in a six month progress report, this value must still be entered.	REAL
Reporting_Date	The date the risk and costs associated with the Current Risk Model are reported.	Date (YYYY-MM-DD)
Calculated_Date	The date the risk and costs associated with the Current Risk Model are calculated.	Date (YYYY-MM-DD)

Table 4: HFTD and Associated Asset

Field Name	Field Description	Field Value Constraints
RRU_ID	A unique value identifying the RRU.	VARCHAR (255)
OEIS_Subproject_ID	A unique value identifying the Subproject. This is the same value as found in the Energy Safety Guidelines. The utility must retain the same Subproject ID over time. New Subprojects must receive new Subproject IDs which have not been used for any previously submitted Subproject.	VARCHAR (255)
OEIS_Project_ID	A unique value identifying the Undergrounding Project. This is the same value as found in the Energy Safety Guidelines. PROJECT_IDs must remain consistent over time and not be altered during updates.	VARCHAR (255)
Undergrounding_Alternative_Mitigations	This field must include the Undergrounding Mitigation and the Alternative Mitigations that the utility has considered for this RRU (or Project). All following cost and risk analyses are carried on based on the value inputted within this field. This field enables comparing risk analyses of several alternative mitigations' options for the same RRU (or Project). This value must be identical with the Undergrounding and Alternative Mitigations field in Table 1.	VARCHAR (255)
Associated_Assets	List of all connected low-risk Associated Assets that the utility plans to mitigate because of operational constraints or reasons other than the reducing risk (e.g., Service lines and Secondary lines).	TEXT
HFTD_Tier2_Miles	If applicable, the total number of miles included in the RRU (or Project) located in HFTD Tier 2.	REAL
Wildfire_Rebuild_Miles	If applicable, the total number of miles included in the RRU (or Project) located in the Wildfire Rebuild Area.	REAL
Associated_Assets	List of all connected low-risk Associated Assets that the utility plans to mitigate	TEXT

Field Name	Field Description	Field Value Constraints
	because of operational constraints or reasons other than the reducing risk (e.g., Service lines and Secondary lines).	
Associated_Asset_Miles	Total associated asset miles included in the RRU (or Project) that the utility plans to mitigate.	REAL
Discount_Rate_Scenario	The discount rate (See Table 5) used to calculate the Mitigation Benefit, Present Value Costs, and Benefit-Cost Ratio, among others. Input in this field should be one of the following: • WACC Discount Rate Scenario • Societal Discount Rate Scenario • Hybrid Discount Rate Scenario	VARCHAR (255)
Associated_Assets_Present_Value_Costs	The Present Value of costs of the Undergrounding and Alternative Mitigations for all of the Associated Assets that the utility plans to mitigate.	REAL
Associated_Assets_Mitigation_Benefit	Present value of the Risk Reduction of the Undergrounding and Alternative Mitigations for all of the Associated Assets that the utility plans to mitigate.	REAL
Reporting_Date	The date the risk and costs for the Undergrounding and Alternative Mitigations for the RRU (or Project) are reported.	Date (YYYY-MM-DD)
Calculated_Date	The date the risk and costs for the Undergrounding and Alternative Mitigations for the RRU (or Project) are calculated.	Date (YYYY-MM-DD)

Table 5: Financial Inputs

Field Name	Field Description	Field Value Constraints
WACC_Discount_Rate	The Weighted Average Cost of Capital (WACC) Discount Rate Scenario the utility must use to calculate Present Value Benefits and Costs as well as the CBR for an RRU (or Project).[35]	REAL

[35] D.24-05-064 at 103.

Field Name	Field Description	Field Value Constraints
Societal_Discount_Rate	The Societal Discount Rate Scenario the utility must use to calculate Present Value Benefits and Costs as well as the CBR for an RRU (or Project).[36]	REAL
VSL	Dollar value of statistical life used to monetize the Safety Consequence.[37]	REAL
Financial	Dollar value used to monetize the Financial Consequence and it equals to $1	Real
OpEx_Escalation_Factor	The escalation factor to account for the anticipated increase in costs over time due to factors like inflation, labor cost increases, material cost changes, or other economic conditions.	REAL
PVRR	If applicable, PVRR or Present Value Revenue Requirement is the financial metric the utility used in its rate case and long-term planning to evaluate the cost implications of investments or programs over the life of the asset. Providing the PVRR is optional.	REAL
ICE_Calculator_Version	The ICE Calculator version that utility uses to estimate dollar value per customer minute interrupted	REAL
Reporting_Date	The date the Financial Inputs are reported	Date (YYYY-MM-DD)
Calculated_Date	The date the financial Inputs are calculated	Date (YYYY-MM-DD)

[36] D.24-05-064 at 102-103.

[37] D.22-12-027, OP 2a.

Table 6: Interruption Cost Estimate Calculator Inputs

Field Name	Field Description	Field Value Constraints
Operational_Division_Headquarters_By_HFTD_Tiers	Operational Division or Headquarters, further broken down by HFTD Tier 2 and Tier 3. (E.g., Yosemite3 or Yosemite2)	VARCHAR (255)
Affected_Customers_Residential	Total number of residential customers affected by risk events.	REAL
Affected_Customers_Small_CI	Total number of small commercial and industrial customers affected by risk events.	REAL
Affected_Customers_Medium_Large_CI	Total number of medium and large commercial and industrial customers affected by risk events.	REAL
Average_Annual_Usage_Residential	Average annual electricity usage in megawatt-hours for residential customers.	REAL
Average_Annual_Usage_Small_CI	Average annual electricity usage in megawatt-hours for small commercial and industrial customers.	REAL
Average_Annual_Usage_Medium_Large_CI	Average annual electricity usage in megawatt-hours for medium and large commercial and industrial customers.	REAL
Medium _Large_CI_Manufacturing_Percentage	Percentage of medium and large commercial and industrial customers engaged in manufacturing.	REAL
Small_CI_Construction_Percentage	Percentage of small commercial and industrial customers engaged in construction.	REAL
Small_CI_Manufacturing_Percentage	Percentage of small commercial and industrial customers engaged in manufacturing.	REAL
Small_CI_Backup_Generation_Percentage	Percentage of small commercial and industrial customers with backup generation.	REAL
Outage_Morning_Percentage	Percentage of outages occurring in the morning, from 6am-12pm.	REAL
Outage_Afternoon_Percentage	Percentage of outages occurring in the afternoon, from 12pm-5pm.	REAL

Field Name	Field Description	Field Value Constraints
Outage_Evening_Percentage	Percentage of outages occurring in the evening, from 5pm-10pm.	REAL
Outage_Night_Percentage	Outages by time of Day-Night (10 pm to 6 am).	REAL
Outage_Summer_Percentage	Percentage of outages occurring in the Summer, from June through September	REAL
Outage_Non_Summer_Percentage	Percentage of outages occurring in the non-Summer months, from October through May.	REAL
SAIDI	System Average Interruption Duration Index. It is calculated by dividing the total minutes of customer interruptions by the total number of customers served.	REAL
SAIFI	System Average Interruption Frequency Index. It is calculated by dividing the total number of customer interruptions by the total number of customers served.	REAL
Electric Reliability_Valuation	Dollar value per customer minute interrupted as estimated by the Interruption Cost Estimate Calculator for each Operational_Division_Headquarters_By_HFTD_Tiers.[38]	REAL
Reporting_Date	The date the ICE Calculator Inputs are reported for each Operational_Division_Headquarters_By_HFTD_Tiers.	Date (YYYY-MM-DD)
Calculated_Date	The date the ICE Calculator Inputs are calculated for Operational_Division_Headquarters_By_HFTD_Tiers	Date (YYYY-MM-DD)

[38] D.22-12-027, OP 2b.

Recommendations

These recommendations are based on the preceding sections and assume the reader has read and understood those sections.:

1. SPD Staff make updates and changes to the SB 884 Project List Data Template without the need for a Commission Decision or Staff Resolution.
2. Require any large electrical corporation that submits an EUP to Energy Safety, to submit the SB 884 Project List Data Template with its Phase 2 Application for the EUP.