

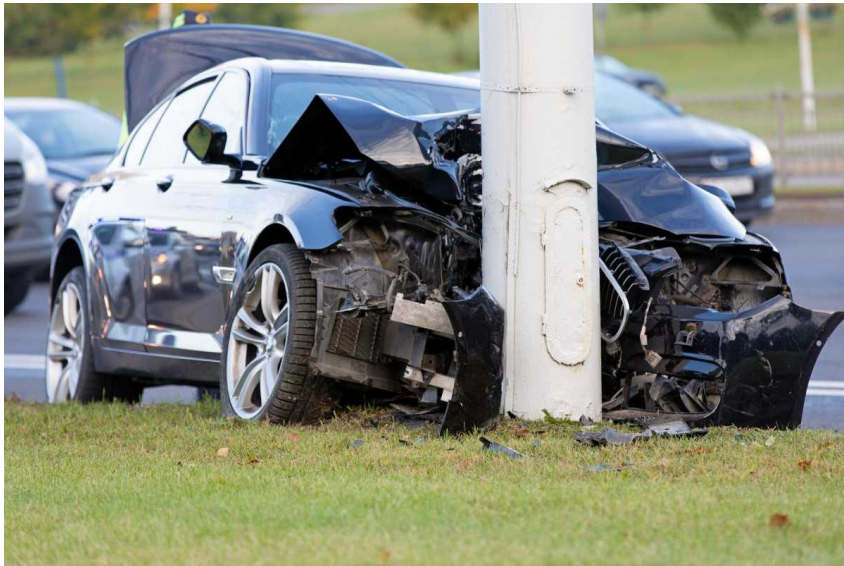
California Public Utility Commission's SB 884 Data Guidelines –Updates : Jan 20, 2026

Technical Working Group #4 –Safety Policy Division



California Public
Utilities Commission

The Dangers of Distracted Driving



- California is one of the top states for distracted driving-related fatalities.
- Over 3,000 people are killed each year due to distracted driving.
- Despite fewer accidents occurring overall, the use of technology and other distractions while behind the wheel account for a large portion of the rise in crash severity.

[Source](#)

Agenda

Introductions	2:00 – 2:05 pm
Purpose and Expected Outcomes of TWG	2:05 – 2:10 pm
SB 884 Project List Data Template Updates: Safety Policy Division (SPD) Presentation	2:10 – 2:40 pm
Break	2:40 – 2:50 pm
PG&E Presentation	2:50 – 3:20 pm
General Discussion: Stakeholder Feedback SB 884 Project List Data Template	3:20 – 4:00 pm

Purpose and Expected Outcomes of TWG

2:05 pm – 2:10 pm

SPD 37 Data Direction

- Resolution SPD-37, adopted on December 10, 2025, states:

"In order to consider the practical implications of the proposed CBR methodologies, audit methodologies, and cost recovery conditions, upon filing their EUP with Energy Safety, large electrical corporations shall file in the Phase 1 Application proceeding the most recent versions of all available data identified in the SB 884 Project List Data Requirements Guidelines using the SB 884 Project List Data Template. In order to facilitate full and transparent review of these issues, staff are directed to modify the data requirements to include the annual total capital costs and total operating and maintenance costs for each proposed undergrounding project over its useful life; for each alternative project for its useful life; and for an assumed no-build scenario in which no project is built over the useful life of the existing equipment."

- Moreover, Ordering Paragraph 11 of SPD-37 states the following:

"We authorize Safety Policy Division to make future updates and changes to the SB 884 Project List Data Requirements Guidelines and SB 884 Project List Data Template after hosting at least one technical working group meeting to present and discuss the changes"

[Source](#)

BCR Calculation Disclaimer

- The mechanisms for how Benefit-Cost Ratio (BCR) calculations must be performed are the subject of the Phase 1 Application.
- As such, these mechanisms are not open for debate during this TWG meeting.
- This presentation and the TWG forum more broadly should not be used as a platform to advance positions or arguments regarding the appropriate methodologies for BCR calculations.
- Stakeholders will have a formal opportunity to raise such arguments in the upcoming Phase 1 Application proceeding, which is the appropriate venue for those discussions.

SB 884 Project List Data Template Updates: Safety Policy Division Presentation

2:10 pm – 2:40 pm

Summary of Changes

Original Data Guidelines	New Data Guidelines	
Cost benefit ratio and CBR	Benefit Cost Ratio or BCR	Document
Undergrounding_Alternative_Mitigations	Mitigation_Type	Document
Net_OM_Costs_PV	Incremental_OM_Costs Incremental_OM_Savings Total_OM_Costs_NBB Incremental_OM_Costs_PV Incremental_OM_Savings_PV Total_OM_Costs_NBB_PV	Table 1
	To report the lifecycle values of costs/savings	Table 7

Data Element Updates

- “Cost benefit ratio” and “CBR” have been replaced by “Benefit Cost Ratio” or “BCR”
 - Consistent with Risk-Based Decision-Making Framework (RDF) phase 4 Decision (D. 25-08-032) ([link](#)) and the Resolution SPD 37 ([link](#)).
- “Undergrounding_Alternative_Mitigations” field is renamed to “Mitigation_Type”
- The Net O&M Costs has been removed.
- Instead, its components Incremental O&M Savings and Incremental O&M Costs have been added as separate fields
- O&M Costs NBB field has been added

These changes are intended to increase flexibility in BCR calculations and improve data visibility and align Data Guidelines with Resolution SPD-37

Data Element Updates (Table 1)

Total_OM_Costs_NBB_PV	Present Value of the O&M Costs associated with operating and maintaining the existing structures assuming no new mitigation measures are implemented (No-Build Baseline)
Incremental_OM_Costs_PV	Present Value of the total incremental O&M Costs associated with operating and maintaining the Mitigation_Type program for the RRU (or Project) as compared to the No-Build Baseline
Incremental_OM_Savings_PV	Present Value of the total O&M Savings, defined as the No-Build Baseline O&M expenditures eliminated by the Mitigation_Type program for the RRU (or Project).

****Both Present values and Total nominal values are added to the Table 1, here for simplicity, only PV values are shown.***

Overview of Table 7

- Table 7 provides a lifecycle view of project costs and savings including a-capital costs incurred before the RRU (or Project) becomes used and useful, and b- O&M costs and savings incurred afterward, over the lifecycle of the asset.
- This breakdown is provided for each RRU and compares the proposed undergrounding RRU with the alternatives.
- The purpose of Table 7 is to illustrate how expenditures and cost savings evolve throughout the project lifecycle.
- Table 7 is linked to tables 1,2,3, and 4 via “RRU_ID”, “OEIS_Project_ID”, and “Mitigation_Type_NBB”*.

*** “Mitigation_Type_NBB” values must be identical to “Mitigation_Type” values from table 1-4 except it also includes the value of “No_Build_Baseline”**

Table 7 Data Elements

Mitigation_Type_NBB	<p>This field must provide a row for the Undergrounding Mitigation, and for each of the Alternative Mitigations that the utility has considered for this RRU (or Project). An additional row is required for the No-Build Baseline case. All the following incremental cost analyses for proposed and alternative mitigations are based on the No-Build case.</p> <p>This field enables comparing risk analyses of several alternative mitigations' options for the same RRU (or Project).</p> <p>This value must be identical with the Mitigation_Type field in Table 1 except it also includes the value of "No-Build Baseline".</p>
Costs_Type	<p>Each cost type will have its own row. This table provides a breakdown by the types of costs for the Mitigation_Type for the RRU (or Project). Costs_type entries include but are not limited to 1-CapEx, 2- Incremental_OM_Costs , 3-Incremental_OM_Savings , 4-OM_Costs_NBB .</p> <p>CapEx, Incremental_OM_Costs, and Incremental_OM_Savings must be calculated relative to the No-Build Baseline and are only used for proposed RRU/Project, not for the "No-Build Baseline" case. When the value of Mitigation_Type_NBB is "No-Build Baseline", the Costs_Type field must be set to OM_Costs_NBB, representing the baseline operating and maintenance costs in the absence of any new mitigation.</p>
Year_1	The year the Phase 2 application is approved to begin.
Annual_Costs_in_Year_i	Annual nominal Costs (or Savings) for the Costs_Type for the RRU (or Project) for the Undergrounding_Alternative Mitigations in year i; where i ranges from year_1 (i=1) to the last year of the asset life)

Table 7 Example

RRU_ID	Mitigation_Type_NBB	Costs_Type	Year_1	Annual_Costs_in_Year_1	Annual_Costs_in_Year_2	Annual_Costs_in_Year_3	Annual_Costs_in_Year_4	...
08W-RRU-A01	Undergrounding	CapEx	2028	\$ 1,000,000	\$ 1,500,000		\$ -	
08W-RRU-A01	Undergrounding	Incremental_OM_Costs	2028	\$ -		\$ 900	\$ 1,000	
08W-RRU-A01	Undergrounding	Incremental_OM_Savings	2028	\$ -		\$ 2,200	\$ 5,000	
08W-RRU-A01	No_Build_Baseline	OM_Costs_NBB	2028	\$ 12,000	\$ 12,000	\$ 13,000	\$ 13,500	
08W-RRU-A01	Covered Conductors	CapEx	2028	\$ 500,000	\$ 250,000		\$ -	
08W-RRU-A01	Covered Conductors	Incremental_OM_Costs	2028	\$ -		\$ 1,600	\$ 2,000	
08W-RRU-A01	Covered Conductors	Incremental_OM_Savings	2028	\$ -		\$ 1,100	\$ 3,000	
08W-RRU-A01	Covered Conductors+EPSS	CapEx	2028	\$ 600,000	\$ 400,000		\$ -	
08W-RRU-A01	Covered Conductors+EPSS	Incremental_OM_Costs	2028	\$ -		\$ 1,900	\$ 2,500	
08W-RRU-A01	Covered Conductors+EPSS	Incremental_OM_Savings	2028	\$ -		\$ 2,500	\$ 4,000	

Break

2:40 pm – 2:50 pm

PG&E Presentation

2:50 pm – 3:20 pm

CPUC TECHNICAL WORKING GROUP SB 884 PROJECT LIST DATA REQUIREMENTS

January 20, 2026

Introduction

PG&E appreciates the opportunity to participate in this Technical Working Group. We look forward to a productive discussion related to both the new information added to the SB 884 Project List Data Requirements as well as other related issues. To help facilitate a productive discussion PG&E has prepared slides outlining our positions on key issues shown in the table below.

Section	Topic
	<u>Comments Related to Current Redlines:</u>
1	Table 7 - Annual Costs (Capital and O&M) and O&M Savings Breakdown
2	Other Data Related Issues and Questions
	<u>Other Data Table Requirement Comments:</u>
3	Challenges Related to Certain SB 884 Data Table Requirements

Section 1: Table 7 - Annual Costs (Capital and O&M) and O&M Savings Breakdown

Table 7, Costs Type:

Types of Costs of the Undergrounding_Alternative_Mitigations for the RRU include but are not limited to 1- CapEx_Labor 2- CapEx_Materials 3- CapEx_Permits_Environmental 4- CapEx_Other_Costs 5- Total_CapEx 6- OM_Costs 7-OM_Savings

Requirement	PG&E's Recommendation
Providing cost type information for undergrounding.	<p>PG&E does not forecast costs for undergrounding in the specific cost type categories listed in the SB 884 data tables, for either projects or subprojects (RRUs), until after estimating is completed and prior to construction start. This information will not be initially available for "confirmed" projects.</p> <p><u>Recommendation</u></p> <ul style="list-style-type: none"> • Allow utilities to identify the cost types that align to how they track project costs in their respective accounting systems. • Allow utilities to only apply this requirement to projects after estimating is complete and prior to construction start. <ul style="list-style-type: none"> • If we are required to provide this for scoping, then we would provide forecasted cost type spend by the utilities cost categories using a historical average
Providing cost for cost type for alternative mitigations.	<p>PG&E does not scope alternative mitigations and does not have cost-types to this level of detail. Because PG&E does not create subprojects for alternative mitigations <i>we cannot do any analysis for alternative mitigations at the subproject level</i>. All data requested for alternative mitigations that are affected by difference in scope of work will have to be: (1) reported at the circuit segment level; and/or (2) report values identical to the data reported for the selected mitigation.</p> <p><u>Recommendation</u></p> <ul style="list-style-type: none"> • For alternative mitigations provide only total forecast total CapEx and total forecast O&M cost and O&M savings based on historic average unit costs. • Do not provide costs by cost type for alternative mitigations.
Providing O&M Costs and O&M Savings for undergrounding projects.	<p>PG&E can provide forecast O&M Costs and O&M Savings but cannot provide recorded O&M Costs or O&M Savings because it is not possible to track those costs on an individual project basis.</p> <p><u>Recommendation</u></p> <ul style="list-style-type: none"> • Eliminate the requirement to provide recorded O&M Costs and O&M Savings. • If we are required to provide recorded O&M, then we would apply the same assumptions used to developed the forecasted O&M Costs and Savings

Section 1: Table 7 - Annual Costs (Capital and O&M) and O&M Savings Breakdown

Table 7, Annual Costs in Year i

Annual nominal Costs (or Savings) for the Costs_Type for the RRU (or Project) for the Undergrounding_Alternative Mitigations in year i; where i ranges from year_1 (i=1) to Used_and_Useful_Date year

Requirement	PG&E's Recommendation
Providing annual nominal costs by cost type for undergrounding.	<p>PG&E does not forecast costs for undergrounding in the specific cost type categories listed in the SB 884 data tables, for either projects or subprojects (RRUs), until after estimating is completed and prior to construction start. This information will not be initially available for "confirmed" projects.</p> <p><u>Recommendation</u></p> <ul style="list-style-type: none"> • Allow utilities to identify the cost types that align to how they track project costs in their respective accounting systems. • Allow utilities to only apply this requirement to projects after estimating is complete and prior to construction start. <ul style="list-style-type: none"> • If we are required to provide this for scoping, then we would provide forecasted cost type spend by the utilities cost categories using a historical average
Providing annual nominal costs by cost type for alternative mitigations.	<p>PG&E does not scope alternative mitigations and would not have a method for determining spending by year.</p> <p><u>Recommendation</u></p> <ul style="list-style-type: none"> • Eliminate this requirement.
Providing annual nominal savings for undergrounding projects or for alternative mitigations.	<p>PG&E does not expect any savings during the mitigation implementation period.</p> <p><u>Recommendation</u></p> <ul style="list-style-type: none"> • Eliminate the requirement to provide annual nominal cost savings.
Providing O&M Costs and O&M Savings for undergrounding projects.	<p>O&M Costs and O&M Savings will not be incurred from year 1 to the used and useful date.</p> <p><u>Recommendation</u></p> <ul style="list-style-type: none"> • Eliminate the requirement to provide O&M Costs and O&M Savings for this period.

Section 1: Table 7 - Annual Costs (Capital and O&M) and O&M Savings Breakdown

Table 7, Annual Costs after UU in Year j

Annual nominal Costs (savings) for the Costs_Type for the RRU (or Project) for the Undergrounding_Alternative Mitigations after the project is used and useful in year j; where j ranges from Used_and_Useful_Date year (j=1) to the last year of the asset life)

Requirement	PG&E's Recommendation
Providing annual nominal costs by cost type for undergrounding from used and useful to the last year of the asset life.	<p>PG&E assumes that costs incurred after a project is used and useful would generally include O&M activities. PG&E cannot track O&M activities for individual undergrounding projects. For example, PG&E will incur costs for underground inspections in a given year, but those inspections do not align directly to the individual EUP projects. We cannot track O&M costs at the cost type level.</p> <p><u>Recommendation</u></p> <ul style="list-style-type: none"> Eliminate the requirement to provide annual nominal O&M activity costs for undergrounding for the life of the asset or allow utilities to provide a model-based estimate of O&M costs and O&M savings instead of recorded O&M costs and O&M savings.
Providing annual nominal savings by cost type for undergrounding from used and useful to the last year of the asset life.	<p>PG&E assumes that savings incurred after a project is used and useful would be avoided costs for undergrounding compared to a no-build baseline. PG&E cannot track O&M savings for individual undergrounding projects, and we cannot track savings at the cost type level. Moreover, it is not possible to track actual costs that did not occur.</p> <p><u>Recommendation</u></p> <ul style="list-style-type: none"> Eliminate the requirement to provide annual nominal savings for undergrounding for the life of the asset.
Providing annual nominal costs and/ savings by cost type for alternative mitigations.	<p>PG&E does not scope alternative mitigations and we would not track O&M costs or savings for projects we do not implement. PG&E would not have a method for determining O&M costs or savings.</p> <p><u>Recommendation</u></p> <ul style="list-style-type: none"> Eliminate this requirement.

Section 2: Other Data Related Issues and Questions

Previous: Associated Assets Total Mitigation Benefit (Table 4)

The Present Value of the Risk Reduction and possible Present Value of Net O&M Costs of the Undergrounding_Alternative_Mitigations for all of the Associated Assets that the utility plans to mitigate.

Current: Associated Assets Total Mitigation Benefit (Table 4)

The Present Value of the Risk Reduction and Potentially Present Value of O&M Savings of the Undergrounding_Alternative_Mitigations for all of the Associated Assets that the utility plans to mitigate.

PG&E's Recommendation

- Revise the definition for Associated_Assets_Total_Mitigation_Benefit as shown below by removing the present value of O&M Savings from the total mitigation benefit definition.

The Present Value of the Risk Reduction ~~and Potentially Present Value of O&M Savings~~ of the Undergrounding_Alternative_Mitigations for all of the Associated Assets that the utility plans to mitigate.

- Only risk reduction should be considered a benefit and included in the *numerator* of the BCR calculation. This is consistent with the RDF that states that for capital programs the costs in the denominator should include incremental expenses made necessary by the capital investment (D. 25-08-032, Row 25.)
- O&M costs and O&M savings belong in the *denominator* of the BCR calculation.
- PG&E does not attribute risk reduction to associated assets.

Section 2: Other Data Related Issues and Questions

Previous: Net OM Costs PV (Table 1)

Present Value of Operations and Maintenance (O&M) Costs Savings minus Present value of O&M New costs from the Undergrounding_Alterantive_Mitigations program the RRU (or Project). Utility may include Present Value of Net O&M Costs as part of the Total_Mitigaiton_Benefit in the BCR's numerator for the RRU (or Project). (Dollar Value)

Current: OM Costs (Table 1)

O&M Costs associated with operating and maintaining the Undergrounding_Alternative_Mitigations program for the RRU (or Project) as compared to the No-Build Baseline. (fn 41)

(fn 41) The BCR calculation shall only be based on the incremental difference between the proposed project and the No-Build Baseline, both in terms of benefits and costs (also O&M Costs and O&M Savings). No-Build Baseline represents a well-defined baseline scenario of the status quo that describes expected conditions in the absence of any new Project or RRU

PG&E's Recommendation

- Footnote 41 refers to “benefits and costs (also O&M Costs and O&M Savings).” It is unclear how O&M Costs and O&M Savings fit into the BCR calculation as described.
- O&M Costs and O&M Savings are part of the costs in the BCR calculation and are included in the *denominator* and benefits are defined only as risk reduction and are shown in the *numerator* of the BCR calculation.
- Revise footnote 41 as shown below.

The BCR calculation shall only be based on the incremental difference between the proposed project and the No-Build Baseline, ~~both~~ in terms of ~~benefits and costs (as defined in Table 7)(also O&M Costs and O&M Savings)~~. No-Build Baseline represents a well-defined baseline scenario if the status quo that describes expected conditions in the absence of any new Project or RRU.

Section 2: Other Data Related Issues and Questions

CBR Year 0

Resolution SPD 37: CBR Year Zero is defined as the year a project becomes “used and useful,” which serves as the reference year for discounting both costs and benefits.

PG&E’s Recommendation

- Establish CBR Year 0 as the year a utilities’ EUP becomes effective and should apply to all EUP projects.
- Defining CBR Year 0 as a single year—in this case the year a utilities’ EUP becomes effective—ensures consistency when comparing the BCRs for all the projects in a utilities’ EUP portfolio.
- Requiring utilities to have different CBR Year Zeros for every project and subproject based on operative year, will make comparison, prioritization, and aggregation of CBRs inconsistent. PG&E's recommendation will allow for an "apples to apples" comparison between projects.

Further Updates to the SB 884 Data Table Guidelines

We note that (1) the SB 884 Data Table Guidelines have not yet been used in any proceeding; and (2) during the 10-year EUP period it is likely that the Commission, utilities or other stakeholders may identify existing data fields that need to be modified or new data fields that need to be added as the 10-year EUP program progresses.

- Has the Commission considered how it will make any necessary future updates to the SB 884 Data Table Guidelines?

Section 3: Challenges Related to Certain SB 884 Data Table Requirements

Issue:

PG&E has identified 57 items in the SB 884 data tables that are either difficult to be provided (21 items) or cannot be provided (36 items).^{*} The types of items are shown in the table below. PG&E is sharing challenges in providing the data as written in the requirements and recommends these requirements be removed or changed as described below. However, if changes are not adopted, PG&E will outline assumptions used to satisfy these requirements.

Issue	Example, Approach and Discussion	PG&E's Recommendation
Providing risk modeling data at the subproject level	<ul style="list-style-type: none"> PG&E cannot calculate or report certain information at the subproject (RRU) level. PG&E to report risk information at the subproject level by applying a pro-rata spreading of the project-level underground as scoped risk to the subprojects. Risk information based on pro-rata spreading of project-level data will not be accurate and/or useful. Reporting at the project level aligns with the way PG&E makes mitigation decisions. Building the capability—where possible — to report this information would <i>significantly</i> delay PG&E's filing. 	<ul style="list-style-type: none"> Allow utilities to provide requested information only at the project level by adding the following to the SB 884 Project List Data Requirement Guidelines, Template and Tables Structure: <i>Utilities may provide information requested in Tables 1-7 at the project level even if work is performed at the RRU (subproject) level. Any RRU or subproject level information provided by the utility will be used for reporting purposes and will not impact cost recovery.</i>
Providing information about associated assets (secondaries and services)	<ul style="list-style-type: none"> To provide the present value costs and benefits for associated assets, PG&E would allocate them across each CPZ using a weighted average based on mileage. The information generated by this analysis would be inaccurate given that PG&E does not have a complete inventory of all its secondaries and services. 	<ul style="list-style-type: none"> Give utilities the option of providing the associated asset level data in Table 4 only if the associated assets will be a meaningful, targeted, part of the mitigation plan and not incidental work by adding the following to the SB 884 Project List Data Requirement Guidelines, Template and Tables Structure, Table 4 HFTD and Associated Asset <i>Utilities are not required to provide the associate asset level data in Table 4 as the associated assets are simply incidental to the undergrounding project or subproject.</i>
Tracking risk model changes at the RRU level	<ul style="list-style-type: none"> PG&E cannot provide current and previous asset system list information because of the constantly changing nature of the grid. We are only able to track changes in geometry due to merges/splits etc. following a risk model (WDRM) update because WDRM is our source for the Circuit Segment IDs. Therefore, we cannot provide change tracking in between WDRM updates. PG&E is working on being able to track changes such as merges and splits the CPZ level and track to the previous CPZ level. We will provide this to Energy Safety when we update our risk model approximately every four years. 	<ul style="list-style-type: none"> Eliminate the requirements to provide current and previous asset system list information at the RRU level. If necessary, align this requirement to the Energy Safety requirement to track changes at the CPZ level (the Circuit Segment Change Log Tracker, Table C.1.7) and provide the information only when the risk model is updated.[*] <p>[*]Energy Safety does not require this information at Progress Report 0 because there will not be any changes to report until Progress Report 1.</p>

^{*}PG&E described the difficulty in providing certain data in its comments the SB 884 Project List Data Requirements on June 24, 2025.

General Discussion: Stakeholder Feedback on SB 884 Project List Data Template Updates

3:20 pm – 4:00 pm

Thank you!

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