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IOU Workstream Project Update

May 7, 2021

System Hardening Workstream

Project Status

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- The working team worked together started by **identifying barriers** and current project schedules
- Next, the working team identified which Agencies to prioritize focus and the solution approaches to address the barriers and established working groups to develop initiatives
- Recently, the working group identified **initiatives to institute process and statutory changes / clarifications** subject to review with Steering Committee and the Agencies
- The working groups are estimating the **expected timeline impact** from the initiatives

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Appendix – System Hardening Workstream DRAFT

Initiatives working list



- **Revise project review process** starting with **upfront conceptual design review** followed by weekly status
- CPUC (OEIS) or designated Task Force to assert single jurisdiction control compliance with WMP. Examples include:
 - **Ensure state / local consistency with PERP** (Portable Equipment Registration Program) instituted by CARR for temporary use of certain equipment for emergency work to assist in hardening project execution
 - **Coastal Commission and agencies with Local Coastal Programs consistently adopts and interprets Coastal Act Section 30610 and specifically California Coastal Act CCR Section a.(2)(B), 1978 Utility Exemptions**
- **Ensure enforcement of all state and local agencies to adopt CEQA 14 CCR Section 15269 EXEMPTION FOR EMERGENCY WORK** into their various processes, procedures, and requirements (where appropriate)
- Pass AB Bill 448 which allows electric utilities to go on private property and abate strike trees
- Develop statewide "Right Tree Right Place" policy to clarify where trees can be planted so that at full maturity they do not contact with electrical conductors at full maturity (ex: 2019 unpassed bill – AB 1516)
- Pass SB 396 which clarifies that electric utilities are not a harvesting company and do not need a utility exemption (ex: CalFire Santa Cruz division)
- **Extend Caltrans Design Standard Decision Document (DSD) exemption through June 30, 2025**
- Engage with Agencies to **determine number of dedicated resources to expedite permit processing**
- Enforce GO 95 Section 9 to require other utilities to underground their lines as part of an electric utility underground project
- Expand [CA EPA] rule to allow utilities to use PHOS-CHECK fire suppressant both in emergency and in advance
- **List under review and adjustment (e.g., National Forest Service, Railroad Commission)**

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Project Status



- Several meetings conducted with team leads and working group
 - Team Leads identified Barriers, Initiative Categories, and which Agencies to focus on
 - Working Groups are developing initiatives at the Agency level (many are common across multiple Agencies)
- **Goal is to have an initial set of initiatives and project timeline impact by mid-May**
- **Desired end state: achieve concurrence through collaboration with Agencies on prioritized set of initiatives and estimated project timeline impact driven by process and legislative changes**
- The following slides contain the draft set of initiatives

Appendix – System Hardening Workstream DRAFT
 Draft Initiatives (1 of 3)



	Hardening Initiative 1 <i>Revise project review process starting with upfront review followed by weekly status</i>	Hardening Initiative 2 <i>Establish clarity of operating procedures that are consistently applied across all districts</i>
Situation	The cycle time for permit review is too long where information does not seem to be provided timely to the Agencies	There seems to be jurisdictional overlap between various agencies, so that several Agencies have authority/control over the same thing, resulting in conflicting or sometimes contradictory directives
Complication	The Agencies noted the desire to get more upfront information (ex: preliminary design) while the IOUs (and potentially the Agencies) do not have a consistent process for ongoing dialogue on status to jointly resolve key issues.	Legislation enacted in 2018 by CEQA may not be consistently applied across the Agencies
Question	What process changes can be made to expedite the cycle time?	What actions are needed to clarify each Agency's purview?
Answer	Revise the project review process to start with the upfront review of the preliminary design to enable the Agency to advise on key issues and establish a protocol for periodic review of open permits (ex: weekly meeting)	Pending legal review, determine whether the CEQA exemption can be consistently applied across the Agencies with potential supporting executive order

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 Draft Initiatives (2 of 3)



	Hardening Initiative 3 <i>Ensure prioritization and exemption for WMP/hardening work</i>	Hardening Initiative 4 <i>Establish clear timeline requirements for permit issuance from receipt of application</i>
Situation	Much WMP work is being performed under temporary orders which will expire soon	Inconsistent encroachment permitting process.
Complication	<ul style="list-style-type: none"> • CalTrans requires a PE stamp for certain WMP projects • Only PG&E has agency-specific agreements (CA State Parks) enabling certain WMP work 	Long lead times for priority wildfire mitigation work in some Districts. Now and confusing requirements and varied enforcement across Districts.
Question	How to ensure clarity on WMP legal frameworks?	How to ensure/establish appropriate turnaround times?
Answer	<ol style="list-style-type: none"> 1. Extend CalTrans DSDD (Design Standard Decision Document) for 4 years (set to expire June 30, 2021) 2. CA State Parks to execute similar agreement with SCE and SDG&E (similar to PG&E agreement) 	Ensure Agency central offices act consistently with local offices (ex: local Air Resource Boards do not enact rules contrary to PERP)

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 Draft Initiatives (3 of 3)



	Hardening Initiative 5 <i>Add dedicated resources to expedite permit processing</i>	Hardening Initiative 6 <i>Undertake the digitization of data necessary to expedite permits, requests for information, and other tasks</i>
Situation	The target timelines are not being met due to Agency understaffing in certain districts	Agencies seem to be operating less effectively in a remote environment
Complication	Agencies are inconsistently trained due to local requirements	Agency procedures were facilitated by in person interaction (ex: provide 6 hard copies of permit application and supporting documents)
Question	How to ensure the target timelines are met?	What steps should be taken for digitization?
Answer	Engage with Agencies to determine number of additional dedicated staff by District	Digitize data and provide technology tools to facilitate remote review

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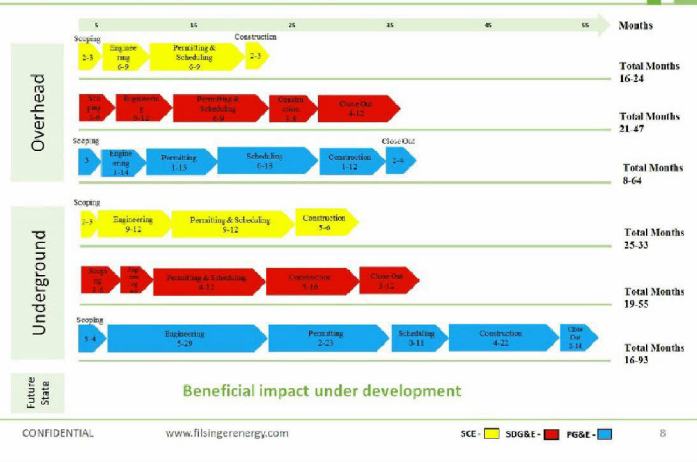
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Appendix – System Hardening Workstream

Timeline impact from initiatives

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Appendix – System Hardening Workstream Adjusted Timelines

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 Prioritization of Initiatives



		Initiative Prioritization Matrix	
Timing of Impact	Long Term		<p>Hardening Initiative 4 Establish clear timeline requirements for permit issuance from receipt of application</p> <p>Hardening Initiative 2 Establish clarity of operating procedures that are consistently applied across all districts</p> <p>Hardening Initiative 5 Add dedicated resources to expedite permit processing</p>
	Short Term	<p>Hardening Initiative 6 Undertake the digitization of data necessary to expedite permits, requests for information, and other tasks</p>	<p>Hardening Initiative 1 Revise project review process starting with upfront review followed by weekly status</p> <p>Hardening Initiative 3 Ensure prioritization and exemption for WMP/hardening work</p>
		Low	High
		Degree of Impact	
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