



**OFFICE OF ENERGY INFRASTRUCTURE SAFETY**  
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Caroline Thomas Jacobs, Director

March 19, 2025

To: Horizon West Transmission  
Lenneal Gardener  
Regulatory & Business Manager  
One California Street, Suite 1600  
San Francisco, CA 94111

**SUBJECT: Office of Energy Infrastructure Safety’s Audit and Report Horizon West Transmission’s 2023 Vegetation Management Work**

Pursuant to the requirements of California Public Utilities Code section 8386.3(c)(5)(C), the Office of Energy Infrastructure Safety (Energy Safety) completed its final audit and report on Horizon West Transmission’s (HWT) vegetation management work pursuant to its 2023-2025 Wildfire Mitigation Plan. Energy Safety finds that HWT substantially complied with the substantial portion of the vegetation management requirements in its 2023-2025 Wildfire Mitigation Plan. No further response or corrective action is required. If you have any questions concerning this audit and report, please e-mail Karen McLaughlin at [Karen.McLaughlin@energysafety.ca.gov](mailto:Karen.McLaughlin@energysafety.ca.gov) and provide a copy to [environmentalsciencedivision@energysafety.ca.gov](mailto:environmentalsciencedivision@energysafety.ca.gov).

A copy of this report is issued to HWT, published on Energy Safety’s 2023 SVM Docket,<sup>1</sup> and provided to the California Public Utilities Commission.

Sincerely,

A handwritten signature in cursive script that reads "Sheryl Bilbrey".

Sheryl Bilbrey

Program Manager | Environmental Science Division  
Office of Energy Infrastructure Safety

Cc:

Forest Kaser, CPUC

Leslie Palmer, CPUC

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<sup>1</sup> All documents related to BVES’s 2022 SVM audit are available on Energy Safety’s e-filing under the “[2023-SVM](#)” docket and available here: <https://efiling.energysafety.ca.gov/Lists/DocketLog.aspx?docketnumber=2023-SVM>



State of California – A Natural Resources Agency

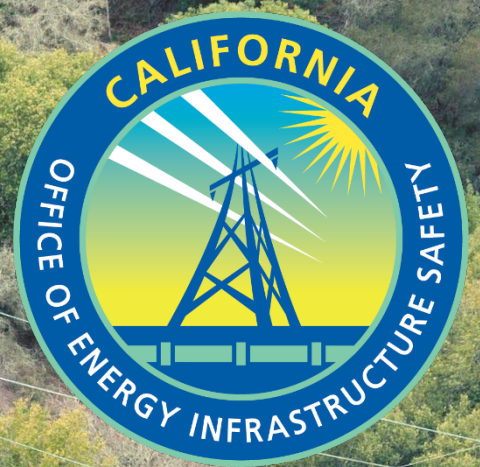
Gavin Newsom, Governor

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**OFFICE OF ENERGY INFRASTRUCTURE SAFETY**  
**2023 SUBSTANTIAL VEGETATION**  
**MANAGEMENT AUDIT AND REPORT**  
**HORIZON WEST TRANSMISSION, LLC**

March 2025

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## EXECUTIVE SUMMARY

The Office of Energy Infrastructure Safety (Energy Safety) completed an audit of Horizon West Transmission, LLC's (HWT) vegetation management commitments from its approved 2023-2025 Wildfire Mitigation Plan (WMP).<sup>1</sup> The Office of Energy Infrastructure Safety's (Energy Safety's) 2023-2024 Wildfire Mitigation Plan Technical Guidelines included 13 vegetation management initiatives.<sup>2</sup> However, given HWT's limited geographic area and single facility, only seven of the 13 initiatives were applicable to HWT. Energy Safety found that HWT provided information consistent with the completion of all targeted work for each of the seven applicable initiatives. For that reason, no corrective actions are required.

Energy Safety found that HWT substantially complied with a substantial portion of the vegetation management requirements in its 2023-2025 WMP for compliance year 2023.

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<sup>1</sup> [HWT's 2023-2025 WMP](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53813&shareable=true), p. 106

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53813&shareable=true>).

<sup>2</sup> [Energy Safety's 2023-2025 Wildfire Mitigation Plan Technical Guidelines](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true) (December 2022), p. A-24, (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true>).

# 1. OVERVIEW

Pursuant to Public Utilities Code section 8386.3(c)(5), Energy Safety must, on an annual basis, audit the vegetation management work performed by an electrical corporation upon notification that the electrical corporation has completed a substantial portion of the vegetation management requirements in its Wildfire Mitigation Plan (WMP). The vegetation management and inspections requirements audited in this document are in Section 8.2 of the WMP. Vegetation management and Inspections include the following programmatic areas:

- Vegetation inspections
- Vegetation and fuels management
- Vegetation management enterprise system
- Quality assurance / quality control
- Open work orders
- Workforce planning

The WMP identifies the electrical corporation's objectives in each of these programmatic areas as well as the initiatives that will achieve the stated objectives. Initiatives include one or more specific work commitments. These commitments include both quantitative targets (e.g., completion of a specified number of inspections) and verifiable narrative statements (e.g., implementation of personnel training programs). Work commitments for each initiative may include only quantitative targets, both quantitative targets and narrative statements, or only narrative statements. Energy Safety assessed completeness for all targets and statements.

The substantial vegetation management (SVM) audit includes Energy Safety's analysis of the electrical corporation's work products over the audit year and determines if the electrical corporation provided documentation sufficient to determine if all work commitments were completed for each initiative in its WMP. While the WMP lists the initiatives under programmatic headings, Energy Safety assessed work completion at the initiative level.

## 2023 Horizon West Transmission, LLC Substantial Vegetation Management Audit

Horizon West Transmission, LLC (HWT) submitted its SVM 2023 completion notification on January 31, 2024.<sup>3</sup>

Energy Safety has completed its SVM audit of HWT's vegetation management program activities for 2023. As part of the SVM audit process, Energy Safety identified both quantitative targets and verifiable statements from Section 8.2 of the HWT 2023-2025 WMP. Energy Safety then compared the WMP vegetation management targets and statements to the work performed by HWT in 2023 using Quarterly Data Reports (QDR), non-spatial data tables, and data request responses submitted by HWT.

HWT is a transmission-only utility with no end-use customers. HWT's Suncrest Facility supports the San Diego Gas & Electric Company Substation. HWT's vegetation management program is limited to the removal of all vegetation from within the perimeter fenced area of its Suncrest Facility, and placement of rock and treatments with herbicide, as necessary.<sup>4</sup> As such, not all of the 13 initiatives in section 8.2 of The Office of Energy Infrastructure Safety's (Energy Safety's) 2023-2024 Wildfire Mitigation Plan Technical Guidelines<sup>5</sup> are applicable to HWT's 2023 operations and HWT's 2023-2025 WMP included seven applicable vegetation management initiatives.

Table 1 of this report includes a list of the vegetation management initiatives and Energy Safety's findings of whether HWT completed all required work.

The appendix includes a summary of targets and/or narrative statements, supporting information and analysis, conclusions, and findings for each initiative.

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<sup>3</sup> [HWT's 2023 Notification of Completion of Substantial Vegetation Management Initiatives](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56238&shareable=true) (January 31, 2024) (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56238&shareable=true).

<sup>4</sup> [HWT's 2023-2025 WMP](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53813&shareable=true), p. 106 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53813&shareable=true).

<sup>5</sup> [2023-2024 Wildfire Mitigation Plan Technical Guidelines](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true) (December 6, 2022) (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true).

## 2. 2023 SVM AUDIT FINDINGS

The HWT 2023-2025 WMP had seven applicable vegetation management initiatives in four programmatic areas. Energy Safety's findings regarding completion of all work for each applicable initiative are in Table 1. Table 1 also includes the initiatives that were not applicable to HWT's 2023 operations. A detailed analysis of quantitative targets and narrative statements, supporting information, conclusions and findings for each initiative are included in the appendix.

**Table 1. HWT 2023 SVM Audit Findings Summary**

Programmatic Area	Vegetation Management Initiative	Audit Finding
8.2.2 Vegetation Management Inspections	8.2.2 Vegetation Management Inspections	Completed all work
8.2.3 Vegetation and Fuels Management	8.2.3.1 Pole Clearing	Not applicable
8.2.3 Vegetation and Fuels Management	8.2.3.2 Wood and Slash Management	Not applicable
8.2.3 Vegetation and Fuels Management	8.2.3.3 Clearance	Not applicable
8.2.3 Vegetation and Fuels Management	8.2.3.4 Fall-In Mitigation	Not applicable
8.2.3 Vegetation and Fuels Management	8.2.3.5 Substation Defensible Space	Completed all work
8.2.3 Vegetation and Fuels Management	8.2.3.6 High-Risk Species	Refer to 8.2.3.5 Substation Defensible Space
8.2.3 Vegetation and Fuels Management	8.2.3.7 Fire Resilient Right-of-Ways	Refer to 8.2.3.5 Substation Defensible Space
8.2.3 Vegetation and Fuels Management	8.2.3.8 Emergency Response Vegetation Management	Completed all work



8.2.4 Vegetation Management Enterprise System	8.2.4 Vegetation Management Enterprise System	Not applicable
8.2.5 Quality Assurance and Quality Control	8.2.5 Quality Assurance and Quality Control	Completed all work
8.2.6 Open Work Orders	8.2.6 Open Work Orders	Completed all work
8.2.7 Workforce Planning	8.2.7 Workforce Planning	Not applicable

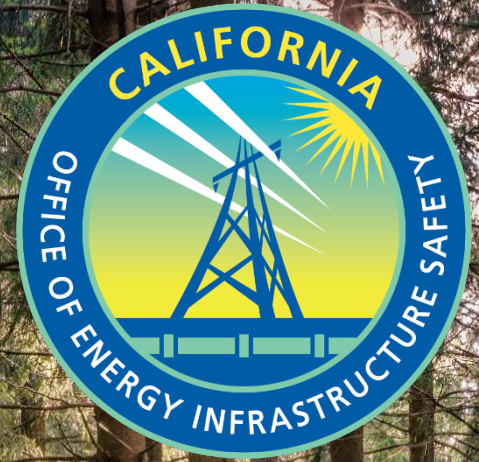
### **3. 2023 SVM AUDIT AND REPORT CONCLUSION**

Energy Safety reviewed the seven vegetation management initiatives detailed in HWT's 2023-2025 WMP and found that HWT submitted documentation or information consistent with the completion of all targeted work in each of the seven applicable initiatives. For that reason, no corrective actions are required. As a result, Energy Safety found that HWT substantially complied with the substantial portion of the vegetation management requirements in its 2023-2025 WMP.

This audit is not an assessment of the quality of HWT's execution of its vegetation management program.

**DATA DRIVEN**  
**FORWARD-THINKING**  
**INNOVATIVE**  
**SAFETY FOCUSED**





# APPENDIX

## WORK COMMITMENTS, SUPPORTING INFORMATION AND ANALYSIS, CONCLUSIONS, AND FINDINGS

## APPENDIX SUMMARY

Due to the limited geographical area and singularly applicable facility, only seven of the 13 vegetation management initiatives included in Energy Safety's 2023–2025 WMP Technical Guidelines<sup>6</sup> were applicable to Horizon West Transmission, LLC (HWT) per the approved 2023–2025 WMP.<sup>7</sup> Energy Safety analyzed each of the seven applicable vegetation management initiatives listed in HWT's 2023-2025 WMP as part of this audit. Energy Safety identified the vegetation management work commitments, including quantitative targets and narrative statements, relevant to each initiative and compared that to the work performed by HWT in 2023. Determination of whether all work was complete for each initiative was based on documentation submitted by HWT.

## INITIATIVE ANALYSIS

For each initiative in Section 8.2 (Vegetation Management and Inspections) of HWT'S 2023-2025 WMP, Energy Safety assessed completion of all quantitative targets as well as verifiable, narrative statements. For each target/statement, Energy Safety reviewed and analyzed the supporting information provided by HWT and reached a conclusion regarding completion of work described by the target/statement. Energy Safety then provided a finding for each initiative. A finding of "Completed all work" was given only if HWT provided sufficient documentation or supporting information demonstrating completion of all targets and/or statements within that initiative.

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<sup>6</sup> [Energy Safety's 2023-2025 Wildfire Mitigation Plan Technical Guidelines](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true) (December 2022), p. A-24, (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true).

<sup>7</sup> [HWT's 2023-2025 WMP](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53813&shareable=true), p. 106

(https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53813&shareable=true).

## 8.2.2.1 Vegetation Management Inspections

The purpose of this initiative was to describe the “Inspections of vegetation around and adjacent to electrical facilities and equipment that may be hazardous by growing, blowing, or falling into electrical facilities or equipment.”<sup>8</sup>

### Quantitative Targets or Commitments, Supporting Information & Analysis, and Conclusion

HWT included the following vegetation management inspections target in its 2023-2025 WMP.<sup>9</sup> For ease of comparison, the WMP target and work completed are summarized below:

Initiative Activity	HWT's 2023 Target	Actual Completed in 2023
Vegetation Management Inspections	6 inspections	11 inspections

Supporting Information and Analysis: HWT provided an Excel file containing records of all vegetation inspections completed in 2023. The file included the date of each inspection, method of inspection, and inspection results.<sup>10</sup> The Excel file indicated that HWT completed 11 vegetation inspections at its Suncrest Facility in 2023, exceeding its target.

Conclusion: HWT provided information consistent with the completion of work identified in this target.

### Finding

HWT provided information consistent with the completion of all work identified in Initiative 8.2.2.1 Vegetation Management Inspections.

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<sup>8</sup> [Energy Safety's 2023-2025 Wildfire Mitigation Plan Technical Guidelines](#) (Dec. 2022) (hereafter Technical Guidelines), p. A-24

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true>).

<sup>9</sup> [HWT's 2023-2025 WMP](#), p. 100

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53813&shareable=true>).

<sup>10</sup> Response to DR-262, question 1; attachment “AMP Tasks - Monthly Checks 2023.xlsx.”

## 8.2.3.5 Vegetation and Fuels Management-Substation Defensible Space

The purpose of this initiative was to take actions “to reduce ignition probability and wildfire consequence due to contact with substation equipment.”<sup>11</sup>

### Quantitative Target or Commitment, Supporting Information, and Analysis

HWT included the following vegetation management target in its 2023-2025 WMP.<sup>12</sup> For ease of comparison, the WMP target and work completed are summarized below:

Initiative Activity	HWT's 2023 Target	Actual Completed in 2023
Vegetation Management	6 site/area weed abatements	11 site/area weed abatement inspections; 2 activities needed

Supporting Information and Analysis: HWT provided a screenshot of its Asset Management Program, which listed all vegetation management work completed by its contractor in 2023.<sup>13</sup> The screenshot indicated that the contractor conducted a “station weed spray” at the facility twice in 2023, once in April and again in August.

HWT also provided an Excel file containing records of all vegetation inspections completed in 2023. The Excel file included inspection dates and inspection results which indicated if follow up vegetation management activities were needed.<sup>14</sup> The Excel file indicated that HWT inspected its Seacrest Substation Facility 11 times in 2023 on an approximately monthly basis. The Excel file also indicated that “Vegetation growth” was only observed during the March inspection and, following the weed spraying activities in April, no further growth was observed during the April inspection. All other 2023 inspections reported an inspection result of “no issues found.”<sup>15</sup>

<sup>11</sup> [Energy Safety's 2023-2025 Wildfire Mitigation Plan Technical Guidelines](#) (December 2022), p. A-25, (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true>).

<sup>12</sup> [HWT's 2023-2025 WMP](#), p. 99

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53813&shareable=true>).

<sup>13</sup> Response to DR-262, question 2; attachment “AMP Tasks - Vegetation Works.pdf.”

<sup>14</sup> Response to DR-262, question 1; attachment “AMP Tasks - Monthly Checks 2023.xlsx.”

<sup>15</sup> Response to DR-262, question 1; attachment “AMP Tasks - Monthly Checks 2023.xlsx.”

While the target table in HWT's WMP commits to 6 site/area weed abatements and documentation provided by HWT indicated that HWT completed two station weed sprayings in 2023, it inspected the facility to determine whether abatement activities were needed 11 times. The WMP states that "[t]here is very limited vegetation immediately around the Suncrest Facility, and the asset has landscaped defensible space by design to reduce the need for vegetation management and potential contribution of surrounding vegetation as fuel for wildfire" and that "[h]erbicide treatment and general weed and vegetation abatement occur as part of landscaping as necessary."<sup>16</sup> The documentation provided by HWT supported that weed spray was only needed twice in 2023. Given that HWT conducted monthly vegetation inspections and completed weed abatement activities in response to the inspections in which vegetation growth was observed, Energy Safety concluded that HWT met the intent of this target.

Conclusion: HWT provided information consistent with the completion of work identified in this target.

## Finding

HWT provided information consistent with the completion of work identified in initiative 8.2.3.5 Vegetation and Fuels Management- Substation Defensible Space.

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<sup>16</sup> [HWT's 2023-2025 WMP](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53813&shareable=true), p. 109  
(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53813&shareable=true>).



## 8.2.3.6 Vegetation and Fuels Management- High-Risk Species

The purpose of this initiative was to take actions “to reduce the ignition probability and wildfire consequence attributable to high-risk species of vegetation.”<sup>17</sup>

### Narrative Statements, Supporting Information & Analysis, and Conclusion

In HWT’s 2023-2025 WMP, Initiative 8.2.3.6 Vegetation and Fuels Management- High-Risk Species directs readers to Initiative 8.2.3.5 Vegetation and Fuels Management- Substation Defensible Space.<sup>18</sup> Therefore, Energy Safety did not conduct a separate analysis of the work performed for this initiative.

### Finding

See the finding for initiative 8.2.3.5 Vegetation and Fuels Management- Substation Defensible Space.

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<sup>17</sup> [Technical Guidelines](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true) (Dec. 2022),  
(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true>).

<sup>18</sup> [HWT's 2023-2025 WMP](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53813&shareable=true), p. 109  
(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53813&shareable=true>).

## 8.2.3.7 Vegetation and Fuels Management- Fire-Resilient Rights-of-Way

The purpose of this initiative was to take actions “to promote vegetation communications that are sustainable, fire-resilient, and compatible with the use of the land as an electrical corporation right-of-way.”<sup>19</sup>

### Narrative Statements, Supporting Information & Analysis, and Conclusion

In HWT’s 2023-2025 WMP, Initiative 8.2.3.7 Vegetation and Fuels Management- Fire-Resilient Rights-of-Way directs readers to Initiative 8.2.3.5 Vegetation and Fuels Management- Substation Defensible Space.<sup>20</sup> Therefore, Energy Safety did not conduct a separate analysis of the work performed for this initiative.

### Finding

See the finding for initiative 8.2.3.5 Vegetation and Fuels Management- Substation Defensible Space.

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<sup>19</sup> [Technical Guidelines](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true) (Dec. 2022),  
(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true>).

<sup>20</sup> [HWT's 2023-2025 WMP](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53813&shareable=true), p. 109  
(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53813&shareable=true>).

## 8.2.3.8 Vegetation and Fuels Management- Emergency Response Vegetation Management

The purpose of this initiative was the “planning and execution of vegetation activities in response to emergency situations including weather conditions that indicate an elevated fire threat and post-wildfire service restoration.”<sup>21</sup>

### **Narrative Statements, Supporting Information & Analysis, and Conclusion**

No Red Flag Warning events, High Wind Warning events, or other risk events such as contact between electrical conductors and vegetation were reported in HWT’s 2023 Wildfire Mitigation Data Tables submissions.<sup>22</sup> Consequently, Energy Safety did not assess HWT’s execution of vegetation activities in response to emergency situations in 2023.

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<sup>21</sup> [Energy Safety's 2023-2025 Wildfire Mitigation Plan Technical Guidelines](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true) (December 2022), p. A-25, (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true).

<sup>22</sup> [HWT's Tabular Wildfire Mitigation Data Tables, Q1 2023](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53769&shareable=true) (May 2, 2023), (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53769&shareable=true), [HWT's Tabular Wildfire Mitigation Data Tables, Q2 2023](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=54427&shareable=true) (August 3, 2023), (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=54427&shareable=true), [HWT's Tabular Wildfire Mitigation Data Tables, Q3, 2023](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55932&shareable=true) (November 3, 2023), (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55932&shareable=true), [HWT's Tabular Wildfire Mitigation Data Tables, Q4, 2023](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56295&shareable=true) (February 7, 2024), (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56295&shareable=true).

## 8.2.5 Quality Assurance / Quality Control

The purpose of this initiative was to describe the “Establishment and function of audit process to manage and confirm work completed by employees or contractors, including packaging QA/QC information for input to decision-making and related integrated workforce management processes.”<sup>23</sup>

### Statement 1

Statement: “Scheduled weed abatement and herbicide treatments are conducted by a third-party contractor and the sufficiency of the work is reviewed by HWT’s operations teams. Asset management and inspection tasks are tracked and reported as complete in HWT’s asset management program.”<sup>24</sup>

Supporting Information and Analysis: HWT provided a screenshot of its asset management program, listing all vegetation management work completed by its contractor in 2023. The screenshot included a work task number, name of the work task, status, and the completion date of the work. Work tasks included station checks, station weed sprays, and condition assessments.<sup>25</sup> The Excel file indicated that HWT utilized the asset management program to track and ensure the completion of these vegetation management activities performed in 2023.

Conclusion: HWT provided information consistent with the completion of work identified in this statement.

## Finding

HWT provided information consistent with the completion of all work identified in Initiative 8.2.5 Quality Assurance / Quality Control.

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<sup>23</sup> [Technical Guidelines](#), p. A-25

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true>, accessed September 27, 2024).

<sup>24</sup> [HWT's 2023-2025 WMP](#), p. 113

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53813&shareable=true>, accessed August 20, 2024).

<sup>25</sup> Response to DR-262, question 2; attachment “AMP Tasks - Vegetation Works.pdf.”

## 8.2.6 Open Work Orders

The purpose of this initiative was to describe the “Actions taken to manage the electrical corporation’s open work orders resulting from inspections that prescribe vegetation management activities.”<sup>26</sup>

### Statement 2

Statement: “Due [to] the limited scale and scope of HWT’s operation, work orders are addressed by HWT’s operations personnel’s engagement with the vegetation management contractor through the course of scheduled periodic inspections and work activities. HWT has no past due vegetation management work orders.”<sup>27</sup>

Supporting Information and Analysis: HWT provided an Excel file containing all vegetation management inspections completed in 2023. The file contained a column labeled ‘due dates’ which set a schedule for HWT to perform vegetation inspections at its Suncrest Facility on approximately a monthly basis.<sup>28</sup> The date of each inspection, method of inspection, and inspection result were also included. The Excel file indicated that HWT performed 11 vegetation inspections at its Suncrest Facility in 2023 in alignment with the monthly cadence and on schedule with all of the “due dates” listed in the file.

HWT also provided a screenshot of its Asset Management Program, which listed the due dates and completion dates for all weed abatement work in 2023.<sup>29</sup> The screenshot indicated that HWT scheduled and completed two weed abatement work orders before their respective due dates in 2023.

Conclusion: HWT provided information consistent with the completion of work identified in this statement.

## Finding

HWT provided information consistent with the completion of all work identified in Initiative 8.2.6 Open Work Orders.

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<sup>26</sup> [Technical Guidelines](#), p. A-25

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true>, accessed September 27, 2024).

<sup>27</sup> [HWT's 2023-2025 WMP](#), p. 114

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53813&shareable=true>, accessed August 20, 2024).

<sup>28</sup> Response to DR-262, question 7; attachment “AMP Tasks - Monthly Checks 2023.xlsx.”

<sup>29</sup> Response to DR-262, question 7; attachment “AMP Tasks - Vegetation Work 2023.pdf.”