

# INDEPENDENT EVALUATOR

## Annual Implementation Report for Wildfire Mitigation Plan Implementation Year 2025

July 01, 2026

**HORIZONWEST**  
**TRANSMISSION™**



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## DISCLAIMER

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This report has been compiled through the process of observation and review of documents provided by the Electrical Corporation named herein. The Office of Energy Infrastructure Safety (“Energy Safety”) instituted the requirement for an independent evaluation of Electric Corporation’s Wildfire Mitigation Plans (“WMP”). Bureau Veritas is not the designer, implementer, or owner of the WMP and is not responsible for its content, implementation and/or any liabilities, obligations or responsibilities arising therefrom.

The report reflects only those conditions and practices which could be ascertained through observation at the time of evaluation. This report is limited to those items specifically identified herein. The report is not intended to validate that dangers, hazards and/or exposures are or are not present. Bureau Veritas shall only be responsible for the performance of the services identified or defined in their specific scope of services.

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# 1. EXECUTIVE SUMMARY

## Background

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The devastating wildfires of the past and present have taught us valuable lessons about safeguarding California's lands, particularly in areas where electrical infrastructure coexists with wildland environments. In response to these challenges, the California Public Utilities Commission (CPUC) initiated Rulemaking 18-10-007 to provide guidance on Wildfire Mitigation Plans (WMPs) for Investor-Owned Utilities (IOUs), now referred to as Electrical Corporations (ECs). These WMPs are designed to cover a three-year period, with the first cycle of independent evaluations beginning in 2020.

The 2025 WMP is part of the second three-year planning cycle. In the first and second evaluation cycles, Horizon West Transmission (HWT) completed all initiatives outlined for implementation in 2023 and 2024, respectively. HWT continues these initiatives and other wildfire risk reduction activities into 2025 as part of its wildfire risk reduction program.

This Independent Evaluator (IE) Annual Implementation Report (AIR) assesses HWT's WMP commitments for implementation year 2025. The IE AIR reviews the WMP initiatives as outlined for 2025 and evaluates HWT's performance in meeting their committed objective targets, verification of QA/QC program implementation, processes, and results, as well as the distribution of funding to mitigation efforts described within the WMP. Due to the limited number of initiatives, the IE also elected to review general mitigation activities outlined in the WMP.

Pursuant to Public Utilities Code Section 8386.3(c)(2)(B)(i), (ii), (iii), and (iv), Bureau Veritas North America, Inc. (BVNA) has been selected as the IE to review and assess HWT's 2025 WMP in its entirety. This IE AIR will present BVNA's findings and results for review. BVNA was included in the Office of Energy Infrastructure and Safety (Energy Safety) Independent Evaluator List for 2025 WMPs, dated December 18, 2025, in accordance with Public Utilities Code section 8386.3(c)(2)(A).

In compliance with Energy Safety's requirements, HWT has contracted BVNA to provide the IE assessment. This assessment includes the IE responsibilities outlined in Public Utilities Code section 8386.3(c)(5)(C), which involve performing the following tasks:

- Task 1: Consult with Energy Safety on implementation assurance auditing that will be performed
- Task 2: Perform implementation assurance auditing, including field inspections
- Task 3: Draft and provide Energy Safety a report on audit findings, including deficiencies of underfunded WMP activities
- Task 4: Draft and provide Energy Safety a report on deficiencies of electrical corporations
- Task 5: Track and report deficiencies of audit findings

The evaluation process began with an Energy Safety kick-off meeting, which served as an introduction between HWT representatives, BVNA staff, and assigned Energy Safety personnel. This introductory meeting established key elements, including communication and documentation protocols, as well as the identification of individuals responsible for receiving requests from the

IE. Following this meeting, the IE initiated a review of HWT's 2025 WMP and related publicly available documents, as listed in Section 7. This review aimed to identify HWT's stated goals within the 2025 WMP.

To evaluate activities described in the WMP that were not available in public records, BVNA's team of evaluators submitted data requests and conducted interviews with Subject Matter Experts (SMEs). These steps helped verify activities stated within the 2023-2025 WMP (see Section 7 for a list of Data Requests/SME Interviews). In addition to document analysis, data requests, and SME interviews, the IE conducted an on-site inspection of the Suncrest Substation. This inspection allowed the IE to collect photographic evidence and evaluate implementation of the 2025 activities identified during the initial review. Detailed analysis and key findings for each respective category are presented in the following sections of this report.

The IE has classified each activity as "Validated," "Not Validated", or "Not Applicable." "Validated" indicates that the EC has clearly demonstrated meeting the stated WMP target for the review year or continues to implement the activity as outlined. "Not Validated" means the EC either failed to provide sufficient documentation to support their claim of implementation or did not meet the WMP target, the individual reviews will elaborate and make the distinction. "Not Applicable" signifies that the EC has determined the activity is not relevant to the current review period.

### **Introduction to Horizon West Transmission**

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HWT is a transmission-only utility that began operations on February 29, 2020. Its first facility, the Suncrest Static VAR Compensator (SVC), is situated on privately-owned lands in the south-central portion of San Diego County, California, approximately 3.8 miles southwest of Descanso and 3.4 miles southeast of Alpine. The facility comprises the SVC and a 230 kV underground transmission line that connects to the San Diego Gas & Electric (SDG&E) owned Suncrest Substation. [REDACTED] The project site is located within the northwest quarter of Section 3, Township 16 South, Range 3 East, on the U.S. Geographical Survey (USGS) 7.5-minute Viejas Mountain, California quadrangle map. HWT's facility includes an access road, an on-site fire water storage tank, a perimeter concrete wall, and related infrastructure for the SVC facility. The site is classified as a Tier 3 High Fire-Threat District (HFTD) by CALFIRE in San Diego County. Fire hazard designations are determined by factors such as topography, fuel moisture content, vegetation/fuel profile, and weather, with more hazardous sites characterized by steep terrain, unmaintained fuels/vegetation, and wildland-urban interface (WUI) locations.

The surrounding area of HWT's facility consists of semi-rural residential developed lands and open space, both in private and federal land holdings. The facility is situated on privately owned lands within the administrative boundary of the United States Forest Service-Cleveland National Forest. SDG&E's privately owned lands, including the Suncrest Substation, are located within one mile of the facility's west side, while the Cleveland National Forest lands lie to the north. Individual and private ownerships are found to the east and south of the project site. HWT's fire prevention performance metrics aim to reduce the potential for on-site ignitions that may spread outside of the facilities perimeter concrete-wall to off-site vegetation, a philosophy that has proven successful

to date. The 2025 WMP outlines established performance metrics that demonstrate an approach to preventing ignition events by identifying, documenting, tracking, and monitoring high-risk ignition sources that may result in flames, sparks, arcs, uncontrolled fires, loss of molten/heated material, or similar ignition vulnerabilities. As a transmission-only utility without distribution customers, HWT is not subject to the items outlined in PUC section §8386 and the WMP Guidelines relevant to customer communication, and no reference to Public Safety Power Shutoff (PSPS) is made.

**Initiatives Completed Within 5% of the WMP Targets: 2 (100%)**

**Table 1: Initiatives with Absolute % Budget Differences > 10%**

| Initiative Number, WMP Section Number, and Name | Total Budget | Total Expenditure     | Total Variance Between Budget and Expenditure |
|-------------------------------------------------|--------------|-----------------------|-----------------------------------------------|
| 001, 8.1.3.1, Asset Inspections                 | Not Provided | \$432,953             | \$432,953<br>(100%)                           |
| 002, 8.2.2.1, Vegetation Inspections            | \$17,000     | \$23,895 <sup>1</sup> | \$6,895<br>(40.6%)                            |

**Site Visit**

On Monday, March 9, 2026, HWT representatives Eric Pavlowski and Alexandre Veilleux escorted BVNA representative Lisa M. Beaver, PE, to conduct an assessment of the Suncrest Substation. Access to the substation is provided via a single paved secure access roadway approximately 16 feet in width. Heavy vegetation encroaches onto the roadway margins, effectively reducing its usable width. Although this roadway is not owned by HWT, it serves as the sole means of access to the facility.

A 12,278-gallon fire water tank with fire department connection is located at the substation's west gate entrance. The exterior perimeter is protected by fuel breaks on all sides. The west and south perimeters feature approximately 30-foot-wide fuel breaks with gravel beds, while the east perimeter includes a gravel fuel break and retaining wall that separates the substation from elevated vegetation on the eastern slope. All fuel break areas were observed to be free of vegetation. Beyond these fuel breaks, the surrounding environment consists of dense vegetation with varying fuel heights.

The Suncrest Substation interior is well-maintained. No vegetation is present within the concrete perimeter wall boundary. All interior surfaces consist of concrete or gravel and are completely free of vegetation. Facility monitoring is provided by high-definition interior cameras and 360-degree exterior cameras that provide continuous situational awareness.

Inside the perimeter, transformer isolator pads and line loops are properly installed to allow differential movement during seismic events. The spacing between transformers, buildings,

<sup>1</sup> \$12,926 of displayed expenditure is attributable to vegetation management work performed in late 2024 that was not invoiced until 2025.

control equipment, and firewall/blast walls was observed to be adequate and in good condition. All materials within the 10-foot concrete perimeter wall are non-combustible, except for wood pallets used for material delivery currently stored on-site.

Emergency response and fire protection support is provided through multiple coordinated resources: San Diego County Fire Authority Descanso Fire Station 45, Cal Fire (due to proximity to Cleveland National Forest), and a contracted private firefighting service, Capstone Fire and Safety Management. The private brigade maintains a Class B industrial foam firefighting trailer and is trained to deploy foam for electrical and oil fires.

The site visit confirmed that HWT has implemented consistent fire protective measures within the substation perimeter. However, one vulnerability was identified: the primary access route, [REDACTED], experiences reduced roadway width due to encroaching vegetation. Although the roadway is well-constructed and designed to accommodate heavy utility equipment, standard vehicles, and large fire apparatus, the vegetation encroachment on this sole access route presents a potential constraint for emergency response operations.

### Key Findings

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HWT successfully implemented all committed WMP initiatives for 2025, achieving 100% completion of monthly inspections across both Initiative 001 (Asset Inspections) and Initiative 002 (Vegetation Inspections). The utility demonstrated thorough operational practices through integrated inspection protocols that assess asset condition and wildfire risk, supported by formalized peer review quality assurance processes conducted annually by field engineers. Real-time monitoring capabilities provide comprehensive situational awareness, including Partial Discharge monitoring for underground cables, transformer oil gas analysis with dual-pathway data transmission, Hitachi MACH system oversight for Static VAR Compensator operations, and on-site weather station integration with Wildfire Risk Index assessments.

The [REDACTED], serving as the sole access route to the facility, experiences reduced usable width due to vegetation encroachment on the roadway margins, presenting a potential constraint for emergency response operations despite being well-constructed for heavy utility equipment and fire apparatus, though notably this roadway is not owned by HWT. Documentation gaps were identified in the Emergency Operations Plan, last updated March 2024, and the Black Start Restoration Plan, last reviewed May 2023, with no documented annual review process even when substantive changes are not required. The WMP contains language inconsistencies regarding vegetation management, describing "bimonthly contractor inspections" and seasonal weed abatement when actual practice involves monthly HWT staff inspections with annual weed control plus up to four supplemental treatments based on observed growth conditions.

Budget variance analysis revealed Initiative 001 expenditures of \$432,953 against zero planned budget due to revised internal cost allocation methodology capturing a larger portion of labor hours under asset management billing codes, though this variance resulted from accounting changes rather than program expansion and did not impact implementation. Initiative 002 showed 41% budget overrun (\$23,895 actual versus \$17,000 planned) attributable to variable treatment frequency dependent on vegetation conditions and late 2024 invoicing processed in 2025. Emergency preparedness activities reflected \$174,100 actual expenditure against zero planned

budget for fire brigade services due to contract renewal uncertainty at projection time, with the prior five-year contract expiring February 2025 and new contract execution occurring during the implementation year. Despite these financial variances, no funding deficiencies impacted program implementation or prevented HWT from meeting committed WMP targets.

## Recommendations

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Two opportunities for enhanced transparency and recordkeeping were identified: implementing documented annual review processes for both the Emergency Operations Plan and Black Start Restoration Plan, even when no substantive changes are required, would provide clear evidence of ongoing plan evaluation and create a transparent audit trail demonstrating continuous oversight. Additionally, updating WMP language to accurately reflect current vegetation management practices would eliminate confusion and ensure alignment between documented commitments and operational execution.

Preplanning for emergency conditions is crucial for reducing the impact of fire to a facility of this nature. During the site visit, it was discussed that the facility has never conducted a coordination meeting on-site between all responding agencies. It is recommended that HWT conduct a coordination meeting between San Diego County Fire Authority, Cal Fire, and Capstone Fire and Safety Management. This permits preplanning between the agencies regarding emergency response and ensures a clear understanding of roles, responsibilities, and equipment capabilities.

Relocate the foam firefighting trailer from off-site storage under Capstone Fire and Safety Management control to on-site storage in a weatherproof enclosure at the Suncrest facility. Current operational status requires approximately two hours for Capstone to retrieve the trailer from storage and transport it to the facility depending on resource availability, creating a significant delay in foam firefighting capability deployment during critical initial response periods. On-site storage would provide immediate availability for facility personnel and first-arriving fire apparatus, enable rapid deployment of Class B industrial foam for electrical and oil fires, protect specialized equipment from environmental degradation during storage, and eliminate dependency on contractor mobilization timelines during emergency conditions when response speed is critical to preventing fire escalation.

Coordinate with roadway owner and responsible agencies to address vegetation encroachment on the [REDACTED] to restore full usable roadway width and ensure unimpeded emergency response access to the Suncrest Facility. Although this roadway is not owned by HWT, the utility should take proactive steps to address this vulnerability given its direct impact on facility emergency preparedness and operational continuity by initiating coordination with the roadway owner, San Diego County Fire Authority, Cal Fire, and relevant land management agencies to establish a vegetation management agreement or memorandum of understanding that defines maintenance responsibilities, establishes clearance standards appropriate for emergency vehicle passage, and creates a regular maintenance schedule to prevent future encroachment.

Update Wildfire Mitigation Plan vegetation management language to accurately reflect current operational practices and eliminate confusion between documented commitments and actual execution. The 2025 WMP describes "bimonthly contractor inspections" and seasonal weed

abatement occurring bimonthly during winter and spring and quarterly during summer and fall, while actual practice involves monthly HWT staff inspections integrated into asset condition and wildfire condition assessment forms, with annual weed control supplemented by up to four additional treatments based on vegetation conditions observed during monthly inspections. This updated approach is consistent with HWT's Substation Maintenance Practices accepted by CAISO in Q3 2024, and bimonthly contractor vegetation inspections are not part of the current program structure. Aligning the WMP with operational reality would ensure regulatory transparency, eliminate potential compliance questions arising from language discrepancies, accurately represent the more frequent inspection program actually implemented, and provide stakeholders with correct information about vegetation management protocols supporting wildfire risk reduction.

HWT did not establish quantified initiative-specific risk reduction targets for initiatives, representing a limitation in the WMP's ability to measure wildfire risk mitigation effectiveness. The IE's validation methodology confirmed HWT's claims in the 2025 EC AIR; however, the absence of quantified risk reduction targets for individual initiatives limits the ability to assess risk reduction achieved within the category against projected reductions. Future WMP cycles would benefit from explicit risk reduction modeling or projections tied to specific initiatives, enabling more rigorous evaluation of category-level risk mitigation effectiveness.

## 2. FOCUS INITIATIVES AND DISCUSSION

Given HWT's limited scope as a transmission-only utility with only two total initiatives, all initiatives were designated as Focus Initiatives, as per Energy Safety guidance, which states that when an electrical corporation has fewer than 10 initiatives, each initiative should be considered a Focus Initiative, as shown in Table 2.

**Table 2: List of Focus Initiatives**

| No. | Initiative Number, WMP Section Number, and Name |
|-----|-------------------------------------------------|
| 1   | 001 – 8.1.3.1 – Asset Inspections               |
| 2   | 002 – 8.2.2.1 – Vegetation Inspections          |

## 3. SITE AND SAMPLE SELECTION AND DISCUSSION

HWT has a single operating facility, the Suncrest Substation, described in the Executive Summary. Due to HWT having only two (2) WMP initiatives for 2025, the IE performed a comprehensive audit of HWT's initiative and general wildfire activities. Data was gathered through an onsite inspection on March 9, 2026, and supporting document review.

BVNA employed random sampling for HWT utilizing a simplified version of Cochran's Sample Size Formula. Utilization of this formula helps determine the appropriate sample size required to achieve a desired level of precision and confidence in the results – this ensures that the sample is representative of the larger population. By specifying a confidence level for the EC's individual initiatives based upon historical trends and data, mainly previous year's validation rates, the conclusions drawn from the sample data have a higher degree of statistical confidence. This confidence rate ranged from 85% and 95%, and if the previous year's validation rate fell outside of this range, the low or high end was utilized. For example, if the prior year sample validation rate was 96%, then 95% was used, if the previous year sample validation rate was 84%, then 85% was used. If no information on the prior year's sample validation rate exists, then 90% was used, unless other factors influenced that determination.

Whether or not an initiative was classified as Focus or non-Focus also affected the number of samples required for a given initiative. For Focus Initiatives, the margin of error (MOE) was set at 5% and for non-Focus Initiatives, the MOE was set at 10%. Although there is only a 5% difference between these two MOEs, the difference in sample size produced when utilizing these two MOE values is quite significant. As the margin of error *increases*, the required sample size decreases because a larger margin of error allows for *more* variability in the sample, requiring fewer samples to achieve the desired level of precision. As the margin of error *decreases*, the opposite happens because a smaller margin of error allows for *less* variability in the sample, requiring more samples to achieve the desired level of precision. Therefore, Focus Initiatives require more sampling than non-Focus Initiatives.

Once the total number of samples was calculated for each initiative, the IE determined how many samples should come from non-HFTD, HFTD Tier 2, and HFTD Tier 3 areas. Due to HFTD-Tier 3 areas posing the most significant threat to wildfire ignition risk, it was determined that 70% of the sampling would occur in these areas, while 20% of sampling would occur in HFTD Tier 2

areas, and the remaining 10% would occur in non-HFTD areas. If a certain initiative did not reside within a HFTD Tier 3 area, then the sampling number would be drawn from a HFTD Tier 2 area; if an initiative did not reside within either a HFTD Tier 3 or 2 area, then all samples were drawn from the non-HFTD area. An additional 25% of samples were identified to be used in the case that any of the primary samples were unusable or inaccessible.

## 4. REVIEW OF INITIATIVES ACROSS WMP CATEGORIES: IMPLEMENTATION AND FUNDING

To verify implementation, the IE employed a comprehensive approach that included reviewing and assessing multiple WMP activities through data requests, examining publicly available documents, and conducting an on-site facility assessment to document and validate the items outlined in Horizon West Transmission's 2025 WMP.

At the outset of the evaluation, the IE initiated the assessment by thoroughly reviewing HWT's 2025 WMP to identify HWT's stated 2025 WMP goals. For WMP activities described in the 2025 WMP but not provided within the publicly available records, the IE submitted data requests to verify these activities (see Attachment 7.2). In addition to the document analysis and data requests, the IE conducted a site visit on March 9, 2026, to HWT's sole facility, Suncrest Substation, to collect images and evaluate implementation with the 2025 WMP activities or initiatives identified during the initial review (see Attachment 7.5).

The IE's analysis and synthesis of findings for each respective section are detailed further within the subsections of Section 4, "Review of Initiatives Across WMP Categories: Implementation and Funding," of this report. This section provides an in-depth examination of HWT's implementation of the 2025 WMP based on information gathered through document review, data requests, and on-site facility assessments.

The IE evaluated HWT's 2025 WMP initiatives across the standard five WMP categories. Given HWT's focused operational scope as a transmission-only utility, initiatives were concentrated within Grid Design, Operations and Maintenance, and Vegetation Management and Inspections, which directly support wildfire risk mitigation as shown in Table 3. Due to the Electrical Utility's size and the limited number of WMP initiatives, BVNA elected to review non-initiative WMP elements as well.

**Table 3: WMP Initiative Category Initiative Summary**

| WMP Initiative Category                | No. of Focus & Field Verifiable Initiatives | No. of Focus & Non-Field Verifiable Initiatives | No. of Non-Focus & Field Verifiable Initiatives | No. of Non-Focus & Non-Field Verifiable Initiatives |
|----------------------------------------|---------------------------------------------|-------------------------------------------------|-------------------------------------------------|-----------------------------------------------------|
| Grid Design, Operations, & Maintenance | 0                                           | 1                                               | 0                                               | 0                                                   |
| Vegetation Management & Inspections    | 0                                           | 1                                               | 0                                               | 0                                                   |
| Situational Awareness & Forecasting    | 0                                           | 0                                               | 0                                               | 0                                                   |
| Emergency Preparedness                 | 0                                           | 0                                               | 0                                               | 0                                                   |
| Community Outreach & Engagement        | 0                                           | 0                                               | 0                                               | 0                                                   |

## Funding Evaluation Methodology

The IE employed a comprehensive approach to evaluate funding compliance for each initiative in the WMP. The funding methodology approach included the following:

- **Budget Baseline Establishment:** Reviewed WMP planned budgets from HWT's 2025 WMP filing to establish planned expenditure baselines and cross-referenced reported expenditures against accounting records and EOY 2025 QDR Table 11 which took precedence if any discrepancies were noted.
- **Actual Expenditure Verification:** Compared actual expenditures reported in HWT's April 2026 AIR against WMP budgets.
- **Variance Analysis:** Calculated absolute percent differences for all initiatives.
- **Threshold Application:** Applied a 10% threshold to identify initiatives requiring detailed explanation.
- **Supporting Documentation Review:** Requested and reviewed supporting documentation for all variances exceeding 10% if not already self-reported by HWT.

Using the above methodology and approach, Table 4 below summarizes the overall expenditures by Category, as detailed in HWT's April 2026 AIR, with additional details and synthesis for each initiative shown within Sections 4.1, 4.2, and 4.4 herein.

**Table 4: WMP Initiative Category Initiative Summary**

| WMP Category                             | 2025<br>Planned <sup>2</sup> | 2025<br>Actual <sup>3</sup> | 2025<br>Variance |
|------------------------------------------|------------------------------|-----------------------------|------------------|
| Grid Design, Operations, and Maintenance | \$0                          | \$432,953                   | \$432,953        |
| Vegetation Management & Inspections      | \$17,000                     | \$23,895 <sup>4</sup>       | \$6,895          |
| Situational Awareness & Forecasting      | \$0                          | \$0                         | \$0              |
| Emergency Preparedness                   | \$0                          | \$174,100 <sup>5</sup>      | \$174,100        |
| Community Outreach and Engagement        | \$0                          | \$0                         | \$0              |
| <b>Total</b>                             | <b>\$17,000</b>              | <b>\$630,948</b>            | <b>\$613,948</b> |

<sup>2</sup> Planned data as shown in HWT's Projected Financial Documentation provided with the Frontload Data.

<sup>3</sup> Actual data as shown in HWT's AIR dated April 2026 unless otherwise noted.

<sup>4</sup> \$12,926 of displayed expenditure is attributable to vegetation management work performed in late 2024 that was not invoiced until 2025.

<sup>5</sup> Actual data as shown in HWT's EOY Report posted to Energy Safety Docket on February 4, 2026.

4.1 GRID DESIGN, OPERATIONS, AND MAINTENANCE

4.1.1 Initiative Summary Table

Table 5: Initiative Summary Table (Spend in Thousand \$)

| Initiative Number, WMP Section Number, and Name | WMP – Initiative Target | EC-Claimed Progress | EC-Claimed Initiative Status | Sample Size | Sample Validation Rate (%) <sup>6</sup> | Verification Method                                                                                                                                                           | IE Finding on Initiative (Initiative Validation Rate) <sup>7, 8</sup> | WMP – Planned Spend (\$) | EC-Claimed Actual Spend (\$ and % from budget) | Satisfied Risk Reduction Goal? |
|-------------------------------------------------|-------------------------|---------------------|------------------------------|-------------|-----------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------|--------------------------|------------------------------------------------|--------------------------------|
| 001, 8.1.3.1, Asset Inspections                 | Monthly Inspections     | 12                  | Completed                    | 12          | 100%                                    | Monthly Asset Condition Reports (DR002)<br>Monthly Wildfire Condition Reports (DR002)<br>HWT Written Response (DR002.b)<br>AMP Export of Resolved Maintenance Issue (DR002.c) | 100%                                                                  | \$0                      | \$432,953 (100%)                               | N/A                            |

<sup>6</sup> The Sample Validation Rate is determined by taking the number of samples validated by the IE and dividing it by the total sampling request.  
<sup>7</sup> The Initiative Validation Rate is determined by taking the Sample Validation Rate (%) times the EC-claimed amount and then divided by the WMP Initiative Target.  
<sup>8</sup> Energy Safety’s Implementation Year 2025 IE AIR Outline establishes an Initiative Validation Rate of ≥95%.



## 4.1.2 Written Detail for Initiatives

HWT only has one Grid Design, Operations, and Maintenance initiative in the 2025 WMP for implementation review. Therefore, the findings in this section pertain to both initiative 001 and non-initiative activities described in the WMP. The review of these non-initiative activities is not an audit; as such, validation or invalidation of the activities is not performed. Rather, the IE performed a review to understand whether the activity is being maintained and/or carried out.

### 4.1.2.1 Initiative Review – Findings & Method

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#### 001 – 8.1.3.1 – Asset Inspections – Focus and Non-Field Verifiable

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As described in the 2025 WMP, HWT detailed that their inspection program is conducted in accordance with manufacturer's specifications and applicable maintenance procedures and completed monthly. In the 2025 Q4 QDR and 2025 EC AIR, HWT claimed to have completed an inspection each month for 2025.

In response to DR002, HWT provided two types of reports: Monthly Asset Condition Report and Monthly Wildfire Condition Report. A total of 11 Asset and 11 Wildfire Condition Reports were provided; however, no reports were submitted for the month of November. A subsequent data request (DR002.b) requested an explanation for the missing November inspections. HWT responded that their inspection procedures allow for a maximum of one additional month to accommodate operational and scheduling factors. The November Asset Condition and Wildfire Condition Report was completed on December 4, 2025, within the allowable extension period. The prior October inspection was conducted on October 29, 2025. The IE confirms that the December 4 inspection is within the allowable timeframe, as the November inspection deadline was November 29, 2025, with a maximum extension deadline of December 29, 2025. The inspection conducted on December 4, 2025, accounted for both the makeup November inspection and the December inspection.

A review of the monthly condition reports identified one issue in the January asset condition report: the spare transformer TA2 desiccant breather was in alarm, stuck on "initializing" and required attention. In response to DR002.c, HWT stated that the alarm cleared itself on February 17, 2025. HWT provided a screenshot of the AMP Export showing Work Task No. "TSK4740668" with a completion date of February 17, 2025, and a remark stating, "alarm cleared by itself." The IE inquired with HWT regarding whether a root cause analysis was performed, the continued performance of the transformer, and any correlation between the alarm and transformer fire risk. In response to DR002.d, HWT stated that no formal root cause analysis was conducted following the alarm clearing of the desiccant breather. The utility identified multiple variables that could account for the alarm condition, with the most probable cause being that the internal battery of the desiccant breather fell at or below its minimum threshold voltage prior to recharging, thus triggering the "initializing" state. All subsequent inspections indicate that no alarms were present on the active monitor and that the spare transformer has continued to perform normally following alarm clearance.

Regarding the correlation between alarm type and transformer fire risk, HWT stated that there is no direct or established correlation between an ABB desiccant breather alarm and transformer fire risk. A desiccant breather alarm in isolation does not indicate transformer fire risk, and HWT considers the fire risk associated with this alarm condition to be nominal

All monthly asset condition reports were provided and reviewed, demonstrating thorough documentation practices. Reports included detailed checklists covering various areas of the SVC, including the following:

- Control House Checks, Batteries, Protection and Control
- Animal and Vegetation Checks at Substation and Pole Locations
- Switches – General Checks
- Motor and Hand Operators
- Transformers
- Insulators and Bushings at Substation and Transmission Poles
- Transmission Breakers – General Checks
- Station Service
- CCVT, CT, and PT
- Structural and Foundations Assessment at Substation and Pole Locations
- Static Wire Assessment
- Fence and Gate Assessment
- Dynamic Reactive Devices
- Splice Vault
- Water Tank

All monthly wildfire condition reports were provided and reviewed. Reports included detailed checklists covering various areas of the SVC and riser pole pertaining directly to wildfire prevention measures, including the following:

- General Equipment Failure Creating Spark/Heat/Flame
- Extreme Weather Conditions
- Wildlife or Vegetation Interference
- Failure to Follow Operations or Maintenance Procedures
- Vegetation as a Fuel Source
- Earthquake or Natural Disaster
- Inability to Adequately Respond to Fire on Property
- Vandalism

Per the 2025 WMP, HWT has no risk reduction goal identified for this initiative and has indicated risk reduction as N/A within the WMP. Based upon this analysis and the documentation reviewed, the IE has validated this initiative.

**Table 6: Detailed Inspections of Transmission Electric Lines and Equipment Summary**

| 2025 Target         | 2025 AIR                     | 2025 Q4 QDR            | Frontload Data & DR002.b/.c Response                                                                                                             | Summary |
|---------------------|------------------------------|------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------|---------|
| Monthly Inspections | Monthly Inspections Complete | 12 Monthly Inspections | 11 Monthly Asset & Wildfire Condition Reports (22 total)<br>HWT Written Response (DR002.b)<br>AMP Export of Resolved Maintenance Issue (DR002.c) | 100%    |

### Transformer Seismic Resiliency Enhancements

HWT installed seismic improvements by positioning all site transformers on base isolators. This positioning enhances the transformer's ability to resist derangement during a seismic event and reduce the likelihood of a transformer fire.

In FR001, the IE requested any available 2025 maintenance records for this equipment. HWT provided a written response stating that the manufacturer's recommendations state the isolators require no routine maintenance and that inspection and associated services is recommended every five (5) years. HWT also provided a copy of the relevant paragraph from the manufacturer's report. The seismic isolators were initially installed in 2021 and are scheduled for their first inspection 2026.

Based on this analysis and the documentation reviewed, the IE has reasonable assurance that HWT is maintaining the transformer base isolators per the manufacturer's recommendations.

### Underground Cable Monitoring

HWT's operational assets are limited to the Suncrest Facility, which is equipped with a megavar (MVar) Static VAR Compensator (SVC) connected to approximately one mile of underground cable. The cable is monitored in real-time for Partial Discharge (PD) activity.

HWT provided a copy of the Partial Discharge Technical Report documenting PD monitoring conducted from October 1, 2025 to December 31, 2025. Electrical signals were acquired and processed through a Prysmian PRY-CAM Grids measuring system, which enables partial discharge measurements without galvanic connection to the system. The report concluded that the substation showed no critical PD activities on any phase. The report included signatures and dates from personnel who prepared, reviewed, and approved the document, all dated January 29, 2026.

Based on this analysis and the documentation reviewed, the IE has reasonable assurance that HWT is actively monitoring and maintaining the cable monitoring system.

### Asset Inspection Report QAQC

HWT requires field engineers to annually conduct a QA/QC review of at least one month's inspection report that they did not originate. This review confirms accuracy in accordance with HWT's applicable operations procedures. HWT provided a screenshot of their work task database,

AMP-PROD, displaying task “TSK4560247 – Conduct QA/QC review of at least 1 month’s inspection report...” The task was completed on July 29, 2025.

Based on this analysis and the documentation reviewed, the IE has reasonable assurance that HWT is maintaining their asset inspection report QAQC program.

#### **4.1.2.2 Funding Verification – Findings**

The 2025 WMP, Planned Financial Spending Documentation, and 2025 EC AIR reported no planned budget for initiative 001; however, HWT reported actual expenditures totaling \$432,953 in the 2025 EC AIR, reflecting a significant variance. In response to DR003, HWT explained that revisions were made to how internal personnel engage in HWT asset management and inspection activities, specifically regarding the allocation and recording of their time. Due to this change, 2025 captured a larger portion of labor hours under the billing code associated with asset management and inspection (001). As 2025 was the first year operating under the revised billing protocol, HWT did not have a reliable basis to project expenditures for this initiative, resulting in no projected budget. HWT stated that the underlying level of asset management and inspection activity was consistent with prior periods and the variance resulted from the change in cost allocation methodology rather than an expansion of program scope or activity.

Despite this variance, funding did not negatively impact the progression of the initiative. The IE verified that HWT consistently completed all planned monthly inspections, fully satisfying the implementation of the 001 target for 2025. Although the 2025 WMP did not define a risk reduction goal for this initiative, the IE acknowledges that all inspections were executed and well-documented, supporting effective operational practices and oversight.

### **4.1.3 Synthesis of Findings**

#### **4.1.3.1 Initiative Review**

HWT demonstrated consistent and thorough implementation of initiatives and maintenance of programs across all grid design, operations, and maintenance activities within this category. The IE has reasonable assurance that HWT is actively maintaining described activities, and all associated initiatives were validated.

#### **4.1.3.2 Funding Verification**

HWT reported expenditures for only one initiative; therefore, no synthesis is necessary as Section 4.1.2.2 Funding Verification – Findings provides all relevant details pertaining to category funding.

4.2 VEGETATION MANAGEMENT AND INSPECTIONS

4.2.1 Initiative Summary Table

Table 7: Initiative Summary Table

| Initiative Number, WMP Section Number, and Name | WMP – Initiative Target | EC-Claimed Progress | EC-Claimed Initiative Status | Sample Size | Sample Validation Rate (%) <sup>9</sup> | Verification Method                                                                                                                               | IE Finding on Initiative (Initiative Validation Rate) <sup>10, 11</sup> | WMP – Planned Spend (\$) | EC-Claimed Actual Spend (\$ and % from budget) | Satisfied Risk Reduction Goal? |
|-------------------------------------------------|-------------------------|---------------------|------------------------------|-------------|-----------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------|--------------------------|------------------------------------------------|--------------------------------|
| 002, 8.2.2.1, Vegetation Inspections            | Monthly Inspections     | 12                  | Completed                    | 12          | 100%                                    | AECOM Proposal (DR001)<br>Monthly Asset Condition Reports (DR002)<br>Monthly Wildfire Condition Reports (DR002)<br>HWT Written Response (DR001.b) | 100%                                                                    | \$17,000                 | \$23,895 (40.6%)                               | N/A                            |

<sup>9</sup> The Sample Validation Rate is determined by taking the number of samples validated by the IE and dividing it by the total sampling request.  
<sup>10</sup> The Initiative Validation Rate is determined by taking the Sample Validation Rate (%) times the EC-claimed amount and then divided by the WMP Initiative Target.  
<sup>11</sup> Energy Safety’s Implementation Year 2025 IE AIR Outline establishes an Initiative Validation Rate of ≥95%.



## 4.2.2 Written Detail for Initiatives

### 4.2.2.1 Initiative Review – Findings & Method

#### 002 – 8.2.2.1 – Vegetation Inspections – Focus and Non-Field Verifiable

As described in the 2025 WMP, HWT stated that the vegetation immediately around the SVC is limited by the hardscaped defensible space. HWT implements weed abatement on a bimonthly basis during winter and spring and quarterly during summer and fall, and an associated vegetation inspection is conducted during these abatement activities. HWT staff also conduct monthly vegetation inspections. In the 2025 Q4 QDR and 2025 EC AIR, HWT claimed to have completed an inspection each month and three weed abatement treatments for 2025.

Monthly inspection reports were provided in response to the Frontload Data Request and are incorporated into the Asset Condition Assessment and Wildfire Condition Assessment forms described in Section 4.1, initiative 001. The Asset form includes Section 2.0 "Animal/Vegetation Checks at Substation and Transmission Pole Locations as Applicable," and the Wildfire Condition form includes two vegetation-related questions: "Wildlife or vegetation interference" and "Vegetation as a fuel source." A review of all monthly condition reports identified no vegetation issues, and all forms were properly completed. As described in initiative 001, the November inspection took place in December and is accounted for within the allowable extension period.

In response to DR001.b, HWT acknowledged outdated language in the WMP regarding vegetation management activities. The WMP states that bimonthly contractor vegetation inspections are conducted and that weed abatement occurs bimonthly or quarterly depending on the season. HWT's DR001.b response detailed the updated vegetation management activity, which consists of weed control once per year with up to four supplemental treatments based on observed growth during monthly inspections. HWT stated that this updated approach is consistent with their Substation Maintenance Practices accepted by CAISO in Q3 2024. Bimonthly contractor vegetation inspections are not part of the updated program structure; therefore, no contracted vegetation inspection reports were generated for 2025. The contracted vegetation vendor performed work as detailed in the contractor proposal provided with the frontload data.

Per the 2025 WMP, HWT has no risk reduction goal identified for this initiative and has indicated risk reduction as N/A within the WMP. Based upon this analysis and the documentation reviewed, the IE has validated this initiative.

**Table 8: Vegetation Inspections Summary**

| 2025 Target         | 2025 AIR                     | 2025 Q4 QDR            | Frontload Data & DR001.b Response                                                                            | Summary |
|---------------------|------------------------------|------------------------|--------------------------------------------------------------------------------------------------------------|---------|
| Monthly Inspections | Monthly Inspections Complete | 12 Monthly Inspections | AECOM Proposal<br>11 Monthly Asset & Wildfire Condition Reports (22 total)<br>HWT Written Response (DR001.b) | 100%    |

#### **4.2.2.2 Funding Verification – Findings**

The Planned Financial Spending Documentation reported a planned budget for initiative 002 of \$17,000. HWT reported actual expenditures totaling \$23,895 in the 2025 EC AIR, reflecting an overrun of 41%. In response to DR003, HWT stated the vegetation management activity consists of weed control occurring once per year with supplemental treatments up to four times per year. The planned budget represents a reasonable projection based on anticipated treatment frequency while the actual number of treatments required is variable and dependent on vegetation conditions observed during monthly inspections. HWT also detailed that the 2025 actual expenditure reflects invoicing for vegetation management work performed in late 2024 that was not invoiced until 2025, contributing to the higher recorded expenditure. In response to DR003.b, HWT stated that of the \$23,895 2025 expenditure, \$12,926 is attributable to vegetation management work performed in late 2024 that was not invoiced until 2025. The remaining \$10,969 reflects vegetation management work performed in 2025. For auditing and recordkeeping purposes, when feasible, HWT should strive to close out work invoices in the year that the work was performed to ensure accurate accounting records.

Despite this variance, funding did not negatively impact the progression of the initiative. The IE verified that HWT consistently completed all planned monthly inspections, fully satisfying the implementation of the 002 target for 2025. Although the 2025 WMP did not define a risk reduction goal for this initiative, the IE acknowledges that all inspections were executed and well-documented, supporting effective operational practices and oversight.

### **4.2.3 Synthesis of Findings**

#### **4.2.3.1 Initiative Review**

HWT demonstrated consistent and thorough implementation of vegetation management and inspection initiatives; the IE has validated initiative 002.

#### **4.2.3.2 Funding Verification**

HWT reported expenditures for only one initiative; therefore, no synthesis is necessary as Section 4.2.2.2 Funding Verification – Findings provides all relevant details pertaining to category funding.

## 4.3 SITUATIONAL AWARENESS AND FORECASTING

### 4.3.1 Initiative Summary Table

Due to having no Situational Awareness and Forecasting initiatives, the Initiative Summary Table is not included for this section.

### 4.3.2 Written Detail for Initiatives

HWT does not have any Situational Awareness and Forecasting initiatives in the 2025 WMP for implementation review. Therefore, the findings in this section pertain to non-initiative activities described in the WMP. The review of these activities is not an audit; as such, validation or invalidation of the activities is not performed. Rather, the IE performed a review to understand whether the activity is being maintained and/or carried out.

#### 4.3.2.1 Initiative Review – Findings & Method

##### Weather Station & Wildfire Risk Index

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HWT installed a weather station to enhance monitoring of local weather conditions. The weather station measures temperature, wind speed and direction, soil moisture and temperature, and air quality index. This data is provided in real-time, enabling localized data validation. HWT also has access to the Firecaster Wildfire Risk Index (WRI), which uses multiple data sources to assess the risk of wildfires.

HWT provided documentation for both the weather station and the WRI. The weather station report included the date and time of data capture, a map displaying the southern region of California with the SVC marked, and detailed weather parameters including daily maximum and minimum temperatures, wind speed and direction with daily maximum values, barometric pressure, and precipitation data. The WRI documentation included a table for the week of December 22 through December 29, with each day assigned a risk level; in this example, all days were rated "low." The WRI map displayed the SVC facility with a color-coded wildfire risk overlay: green indicating low risk, yellow indicating moderate risk, orange indicating elevated risk, and red indicating high risk.

It should be noted that the sample WRI documentation was provided for a week that falls out of the fire season range. The IE inquired with HWT how the utility utilizes the WRI during peak wildfire season. In response to DR005, HWT stated that the utility receives a daily email from the Optos/Firecaster system that details a rolling 7-day WRI forecast. Days that are rated elevated or higher are noted for situational awareness by HWT field personnel. HWT uses the WRI in conjunction with the utility's proprietary wildfire spread model. The threshold for escalation to senior operations management is the detection of an actual or potential fire within approximately 15 miles of HWT's assets. HWT notes that the documentation provided in response to the frontload request is an example of a wildfire spread alert model run received by HWT field personnel.

Based on this analysis and the documentation reviewed, the IE has reasonable assurance that HWT actively utilizes real-time and localized weather and wildfire risk data in their operations.

## **Transformer Oil Gas Monitoring**

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HWT utilizes a transformer monitoring system with real-time oil analysis to detect internal transformer faults. HWT provided an in-depth explanation on the system during a SME interview conducted on March 31, 2026.

The dissolved gas analysis (DGA) monitoring system is designed to track transformer oil conditions across multiple power infrastructure assets. The system monitors two transformers, a primary unit (TA1) and a backup unit (TA2), using DGA services provided by Severon, a subsidiary of Qualitrol, with data communications facilitated through the same provider. Merlin is a back-office system based in the Florida Power and light (FPL) division that measures the dissolved gas.

The data collection and transmission architecture employs a dual-pathway approach to ensure both reliability and appropriate prioritization. Critical data flows through Supervisory Control and Data Acquisition (SCADA) to three primary recipients: HWT in Austin, Texas; the Lonestar Transmission (LST) operator; and the Transformer Fleet Team based in Florida. Non-critical data follows an alternative route via eDNA (electronic Data Network Application) to the same recipient entities, with provisions for rerouting if logical decision criteria are not met. This redundancy ensures that stakeholders receive timely information regardless of data classification.

The escalation protocol is clearly defined and straightforward: both critical and non-critical data indicating potential issues trigger contact with ABB (now operating as Hitachi) and Qualitrol for equipment and service provider expertise. The Transformer Fleet Team in Florida serves as the central analysis hub, providing technical assessment and recommendations. The system integrates field equipment data through SCADA, distributes it simultaneously to multiple stakeholders, and maintains a transparent escalation pathway for urgent situations.

Based on this analysis and the documentation reviewed, the IE has reasonable assurance that HWT is maintaining and actively monitoring the oil levels and conditions of their transformers.

## **Hitachi MACH System**

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The Hitachi Modular Advanced Control for HVDC (MACH) is a control platform deployed at the Suncrest Substation to manage Static Var Compensation (SVC) operations. As detailed by HWT during a SME interview conducted on March 31, 2026, the system operates on a Flexible AC Transmission System (FACTS) block architecture and is housed at the SVC station within an industrial PC environment equipped with specialized circuit boards and I/O racks connected through standard field buses.

The system's technical foundation relies on voltage and current transformers that provide real-time feedback to the control architecture, which then directs fast-acting thyristor-based switches located in dedicated SCR (Silicon Controlled Rectifier) and TSC (Thyristor Switched Capacitor) rooms. This enables rapid response to grid conditions. The MACH system integrates seamlessly into operational workflows through either direct access via an Operator Workstation (OWS) or remote access through SCADA systems, ensuring accessibility for authorized personnel across multiple locations.

The monitoring and measurement capabilities are extensive, encompassing AC electrical voltage and current, reactive power measurements in megavars, AC waveforms and harmonics analysis, ambient temperature monitoring, and continuous automatic frequency monitoring. The station itself is configured to deliver +300 megavars of capacitive compensation and -100 megavars of inductive compensation. Functionally, the MACH system performs static var compensation control and protection, records sequences of events, manages overall system control, and implements Transient Fault Recording (TFR) and alarming protocols.

Based on this analysis, the documentation reviewed, and SME interview, the IE has reasonable assurance that HWT is actively monitoring and maintaining the Hitachi MACH System.

### **FMEA Process – Potential Failure**

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HWT uses the Failure Mode and Effects Analysis (FMEA) process to inform its wildfire hardening initiatives. The FMEA evaluates potential failures in facility components, assesses associated risks, and identifies mitigation strategies. HWT updates its FMEA annually to ensure existing controls and processes function as intended, evaluate any newly added or modified equipment, and identify new risk reduction opportunities based on emerging technologies, industry best practices, and lessons learned from affiliates.

In response to FR012, HWT provided a copy of the FMEA. The document included columns for process step, potential failure mode, failure effects, potential causes, current controls, recommended actions, and responsibility assignment. It also included values for severity, occurrence, and detection, which are multiplied to calculate the risk priority number (RPN). Changes are highlighted in red text, and the document is dated December of 2025.

Based on this analysis and the documentation reviewed, the IE has reasonable assurance that HWT is maintaining and updating the FMEA annually.

#### **4.3.2.2 Funding Verification – Findings**

As HWT did not have any Situational Awareness and Forecasting WMP initiatives for 2025, no planned or actual spending was reported, as verified through the 2025 EC AIR. Accordingly, funding verification is not applicable to this section.

### **4.3.3 Synthesis of Findings**

#### **4.3.3.1 Initiative Review**

HWT demonstrated consistent and thorough maintenance of programs across all situational awareness and forecasting activities within this category. The IE has reasonable assurance that HWT is actively maintaining described activities.

#### **4.3.3.2 Funding Verification**

As HWT did not have any Situational Awareness and Forecasting WMP initiatives for 2025, no planned or actual spending was reported, as verified through the 2025 EC AIR. Accordingly, funding verification is not applicable to this section.

## 4.4 EMERGENCY PREPAREDNESS

### 4.4.1 Initiative Summary Table

Due to having no Emergency Preparedness initiatives, the Initiative Summary Table is not included in this section.

### 4.4.2 Written Detail for Initiatives

HWT does not have any Emergency Preparedness initiatives in the 2025 WMP for implementation review. Therefore, the findings in this section pertain to non-initiative activities described in the WMP. The review of these activities is not an audit; as such, validation or invalidation of the activities is not performed. Rather, the IE performed a review to understand whether the activity is being maintained and/or carried out.

#### 4.4.2.1 Initiative Review – Findings & Method

##### Private Fire Brigade

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HWT contracts a private fire brigade to provide firefighting services to the Suncrest Facility in the event of a fire. This brigade has access to HWT's class B foam firefighting trailer and water tank.

HWT provided a copy of the private fire brigade proposal titled "IFB Annual Retainer." The document includes a company overview, proposed services with start and end dates, scope of work, and appropriate signatures and dates from necessary parties. HWT also provided an executed purchase order with the fire brigade service, showing the same start and end date as the proposal. HWT included a calendar invitation for on-site training and associated photos.

Based on this analysis and the documentation reviewed, the IE has reasonable assurance that HWT is maintaining service with the private fire brigade.

##### Emergency Operations Plan & Black Start Restoration Plan

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HWT maintains an Emergency Operations Plan (EOP) that includes PSPS protocols. As detailed in the WMP, the EOP establishes procedures for emergency response and coordination with first responders at the Suncrest Facility to mitigate operational risks. The EOP provides protocols for three event types: facility events, facility fire events, and non-facility events.

HWT provided a copy of the HWT-EOP, initially published in February 2020 and last updated in March 2024. The document outlines the roles and responsibilities of HWT personnel, including the HWT-Suncrest SVC Operations Engineer and various Lone Star and NEET roles, in the event of an emergency. It contains procedural information for three emergency categories: Suncrest Dynamic Power Support Substation Event, Suncrest Dynamic Power Support Substation Fire Event, and non-Suncrest Dynamic Power Support Substation Event. Each category includes steps for HWT personnel to follow and communication protocols with entities such as the Reliability Coordinator, CAISO, and SDG&E. The document also includes protocols pertaining to PSPS events, both SDG&E-initiated and HWT-initiated. The EOP was reviewed during the Annual Wildfire Simulation Exercise on August 8, 2025.

HWT also provided a copy of the Black Start Restoration Plan, which provides guidelines for coordination and communication during restoration of the HWT Suncrest Facility during a major system disturbance. The plan is designed to support the SDG&E, CAISO, and Reliability Coordinator restoration plans. HWT states that the document undergoes annual review, with the most recent effective date of May 1, 2023. However, HWT did not provide documentation demonstrating an annual review since 2023. Without documented evidence of annual reviews since 2023, HWT cannot demonstrate compliance with its stated review protocol. This documentation gap prevents verification that the Black Star Restoration Plan remains current and aligned with system conditions and regulatory requirements.

Based on this analysis and the documentation reviewed, the IE has reasonable assurance that HWT is maintaining both the EOP and Black Start Restoration Plan protocols and procedures. For increased transparency and recordkeeping, HWT should consider performing an annual review of both documents and documenting the review in the revision history, even if no updates are made. This approach provides a documented record that both plans undergo annual review.

### **Annual Wildfire Simulation**

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In spring and early summer, ahead of increased frequency of Red Flag Warning (RFW) days, HWT conducts an annual wildfire simulation to refresh its wildfire mitigation procedures. This simulation ensures that emergency operating procedures, protocols, and roles and responsibilities are current prior to wildfire season. HWT continues to monitor the effectiveness of its implemented processes, procedures, and capabilities.

In response to FR014, HWT provided the following documentation: Annual Fire Simulation – Fire Event Scenarios, 2025 Fire Simulation Meeting Notes, and a calendar invitation for the Fire Simulation Drill conducted on August 8, 2025. The Fire Scenario documentation included four (4) scenarios: two (2) addressing situations where the System Operator becomes aware of a fire inside or outside the substation, and two (2) addressing situations where HWT Operations Engineers on-site become aware of a fire inside or outside the substation. The Meeting Notes outlined the following meeting objectives: review and revise action plan, involvement of CALFIRE/SDFCA, and discussion around private fire brigade visiting Suncrest to align with HWT's WMP commitments.

Although HWT documented completion of the Annual Fire Simulation, the August execution date does not align with the WMP requirement for spring or early summer scheduling. Given that California's fire season spans April through October, conducting the drill in August provides inadequate time for personnel to integrate refresher training before the peak fire risk period begins. HWT should advance the drill schedule to the spring months (March–May) to ensure personnel readiness prior to fire season commencement.

Based on this analysis and the documentation reviewed, the IE has reasonable assurance that HWT actively participates in the Annual Wildfire Simulation.

## **Coordination with San Diego County Fire Authority**

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The WMP states that if any incident impacted the Suncrest Facility, HWT would contact and coordinate with the San Diego County Fire Authority. The IE requested documentation verifying HWT's preparedness for coordination with local fire authorities.

In response to FR015, HWT provided a Fire Protection Plan (FPP) prepared by an outside consultant in June 2016. Although the document covers essential topics, emergency services adequacy, emergency response capabilities, access roads, water supply, and defensible space, the plan has not been updated in over ten years. Given the dynamic nature of facility operations and evolving fire risk conditions, HWT should consider commissioning a revised Fire Protection Plan to verify that current conditions and mitigation strategies remain appropriate and aligned with current industry standards.

HWT also provided a list of local fire stations including distance from Suncrest, response time in minutes, station address, and contact information. HWT provided documentation for an on-site meeting with Cal Fire Station #45 (Descanso Fire Station) held on April 24, 2025, at the Suncrest Facility. The meeting agenda included: introductions, opening Q&A, facility walkthrough, Riser Pole & Solar Panel visit, what-if scenario discussions (equipment failure inside perimeter wall and vegetation fire outside perimeter wall), and closing Q&A.

Based on this analysis and the documentation reviewed, the IE has reasonable assurance that HWT maintains coordination with local fire authorities.

### **4.4.2.2 Funding Verification – Findings**

HWT does not have any Emergency Preparedness WMP initiatives for 2025. In the 2025 EC AIR, no planned or actual spending was reported for this category. However, in the 2025 End of Year (EOY) Report, HWT reported a line item under the Emergency Preparedness and Recovery Plan category for "dedicated fire brigade service" with actual spending of \$174,100 for 2025. In response to DR003, HWT stated that no planned budget for the fire service was provided due to uncertainty surrounding the services at the time the Q4 2024 report was prepared. While the service was identified in the 2023-2025 WMP, the prior 5-year contract expired in February 2025. At the time the Q4 2024 projections were developed, HWT did not have sufficient information to determine whether renewal with the incumbent vendor would be possible or whether an alternative provider would need to be engaged. A new contract was executed in 2025, resulting in the reported \$174,100 expenditure for the implementation year.

## **4.4.3 Synthesis of Findings**

### **4.4.3.1 Initiative Review**

HWT demonstrated consistent and thorough maintenance of programs across all emergency preparedness activities within this category. The IE has reasonable assurance that HWT is actively maintaining described activities.

#### **4.4.3.2 Funding Verification**

HWT reported expenditures for only one WMP activity; therefore, no synthesis is necessary as Section 4.4.2.2 Funding Verification – Findings provides all relevant details pertaining to category funding.

## 4.5 COMMUNITY OUTREACH AND ENGAGEMENT

HWT's operation differs from traditional utilities as it does not serve end-use customers, maintain a service territory, or operate a distribution system. Given the limited scale and scope of the Suncrest Facility, HWT anticipates that PSPS events will be rare or unnecessary, with SDG&E serving as the primary PSPS decision-maker for the facility's region. Consequently, HWT does not foresee a need for community outreach and engagement initiatives during emergencies. The utility commits to reassessing this position if operational changes warrant customer engagement or outreach.

Initiatives for Community Outreach and Engagement are not present in HWT's 2025 WMP. Therefore, this section is not applicable to or covered in this report.

## 5. EVALUATION OF QA/QC PROGRAMS

Quality Assurance and Quality Control (QA/QC) are essential in ensuring the thoroughness and reliability of an EC's operations. This section presents a comprehensive assessment of Horizon West Transmission's QA/QC program, utilizing a structured approach based on five key dimensions:

- Roles and Responsibilities
- Quality Culture
- Quality Management System (QMS)
- Quality Inspections and Audits
- QA/QC Technology Adoption

By examining these critical areas, the IE aims to provide a holistic view of the EC's quality practices, highlighting areas of strength, identifying industry-leading best practices, and pinpointing opportunities for enhancement. Each category was scored on a scale ranging from 0-4 and the score demonstrated the EC's maturity in QA/QC implementation: 0 – Not Implemented; 1 – Initiated; 2 – Applied; 3 – Routine; 4 – Mastered. The evaluation framework allows a thorough analysis of how quality is integrated into the EC's structure, culture, systems, and processes.

### **HWT – QA/QC Introduction**

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HWT operates as a transmission-only utility with a single facility, the Suncrest Facility, and no distribution assets, no overhead lines in high fire-threat districts, and no end-user customers. HWT's wildfire exposure is minimal, limited to facility-level fire prevention measures at this single substation location. Due to this limited operational scope and minimal wildfire risk profile, HWT has not established formal QA/QC structures, dedicated personnel, or technology platforms specifically for QA/QC implementation, instead relying on integrated operational oversight processes embedded within existing roles through its asset management program and monthly inspection procedures. The following assessment evaluates HWT's current practices against the five-dimension maturity framework, recognizing that the appropriateness and proportionality of formalized QA/QC structures must be weighed against the operational reality of a transmission-only facility with significantly lower wildfire risk exposure than distribution utilities operating extensive overhead networks in high-risk terrain.

### **Roles and Responsibilities – 1 Initiated**

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HWT's approach to QA/QC roles and responsibilities reflects Level 1 (Initiated) maturity, with basic awareness of QA/QC tasks but no formally documented roles specific to WMP implementation. Quality oversight responsibilities are embedded within existing operational positions: HWT's two field engineers conduct monthly inspections of the Suncrest Facility, document findings, initiate corrective actions in the asset management program, and annually conduct peer reviews of at least one month's inspection reports. Issues requiring further mitigation are discussed with the appropriate subject matter expert or supervisor, with escalation to the Director Operations, Senior Director Operations, and Vice President Operations as warranted. This structure demonstrates rudimentary accountability but lacks documented role definitions, formal

responsibility matrices, performance metrics tied to QA/QC objectives, or structured communication protocols characteristic of Level 2 (Applied). Leadership support is demonstrated through active supervisory oversight and the formalized peer review process reflecting deliberate organizational commitment to inspection quality, but this has not translated into formal QA/QC program structures, dedicated positions, or explicit integration of QA/QC objectives within the organizational hierarchy, placing HWT firmly at the Initiated level where basic definitions exist but are not yet standardized or fully integrated.

### **Quality Culture – 1 Initiated**

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HWT's quality culture reflects Level 1 (Initiated) maturity, with employees possessing working familiarity with operational expectations and awareness of quality impacts through direct oversight rather than structured training programs. HWT has not established formal QA/QC onboarding or refresher training for employees or contractors, relying instead on on-the-job learning under supervisory oversight, with executive oversight by the Director Operations, Senior Director Operations, and Vice President Operations. HWT demonstrates positive cultural elements through alignment with NextEra Energy's corporate guiding principles including "See something, Say something, Do something" and "Have a Questioning Attitude," which encourage personnel to report concerns without fear, supported by anonymous reporting channels (FOCUS1440) and express prohibitions against retaliation. However, the absence of formal feedback mechanisms for quality suggestions, structured processes for acknowledging employee contributions, documented examples of employee-driven improvements, utility-specific quality objectives translating corporate values to operational levels, or formal feedback loops incorporating lessons learned into training programs prevents progression beyond Level 1, where quality awareness exists but proactive engagement and continuous improvement culture characteristic of higher levels have not been established.

### **Quality Management Systems (QMS) – 0 Not Implemented**

Horizon West Transmission's Quality Management System reflects level 0 (Not Implemented) maturity, as the utility does not utilize a formal QMS and relies entirely on manual, paper-based documentation processes. Inspection findings are recorded manually in monthly inspection reports, and while work tasks are tracked in an in-house asset management system where asset management and inspection tasks are tracked and reported as complete, this system is not configured or utilized as a quality management platform and does not provide standardized templates, centralized data repositories, document control, version management, or analytical capabilities. Process compliance is ensured exclusively through manual review processes, specifically, through the monthly inspection process whereby field engineers review results of monthly equipment inspections and discuss identified issues with the appropriate subject matter expert or supervisor as required. The absence of a QMS platform eliminates analytical and continuous improvement capabilities, preventing HWT from generating quality performance metrics, identifying non-conformance trends, tracking inspection completion rates in real-time, monitoring corrective action status through dashboards, or conducting predictive analytics, and the utility lacks built-in CAPA workflows, root cause analysis tools, or improvement tracking mechanisms beyond basic work task processes in the asset management program, firmly

establishing HWT at Level 0 though this approach remains proportionate to the utility's transmission-only operational model and minimal wildfire exposure profile.

### **Quality Inspections and Audits – 1 Initiated**

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HWT's inspection and audit practices reflect Level 1 (Initiated) maturity, characterized by minimum-frequency inspections conducted on a fixed monthly schedule without risk-based prioritization or systematic use of results for process improvement. HWT conducts monthly inspections of the Suncrest Facility representing 100% coverage of its operational footprint, with asset management and inspection tasks tracked and reported as complete in the asset management program, but inspection frequency is not adjusted based on evolving risk profiles, historical failure patterns, or condition-based triggers. HWT's SME review frequency is conducted annually through a formalized peer review process whereby field engineers review at least one month's inspection reports they did not originate to confirm accuracy and compliance with HWT's applicable operations procedures, which satisfies the "annually" criterion but does not meet the "more than quarterly" frequency characteristic of Level 3 (Routine). HWT has not established a formal inspector qualification and certification program, instead relying on the operational experience and technical competency of its two field engineers, with subject matter experts and senior leadership consulted as resources when specialized technical knowledge is required. HWT's utilization of inspection results aligns with Level 1 characteristics where findings are "reviewed to make ad hoc corrections only," with the utility explicitly stating that "inspection and audit results are not systematically reviewed for trend analysis or process improvement purposes in a formalized manner" and "no material changes to WMP processes, procedures, or trainings were identified as necessary or implemented in 2025." While HWT's corrective action workflow includes field-level immediate remediation, work task documentation and tracking in the asset management program, consultation with appropriate subject matter experts or supervisors, and escalation protocols to the Director Operations, Senior Director Operations, and Vice President Operations for material impact issues, the absence of finding categorization and prioritization systems, root cause analysis requirements, effectiveness verification processes, or closure timeframes by severity level limits the process to ad hoc correction rather than systematic deficiency identification or continuous improvement characteristic of higher maturity levels.

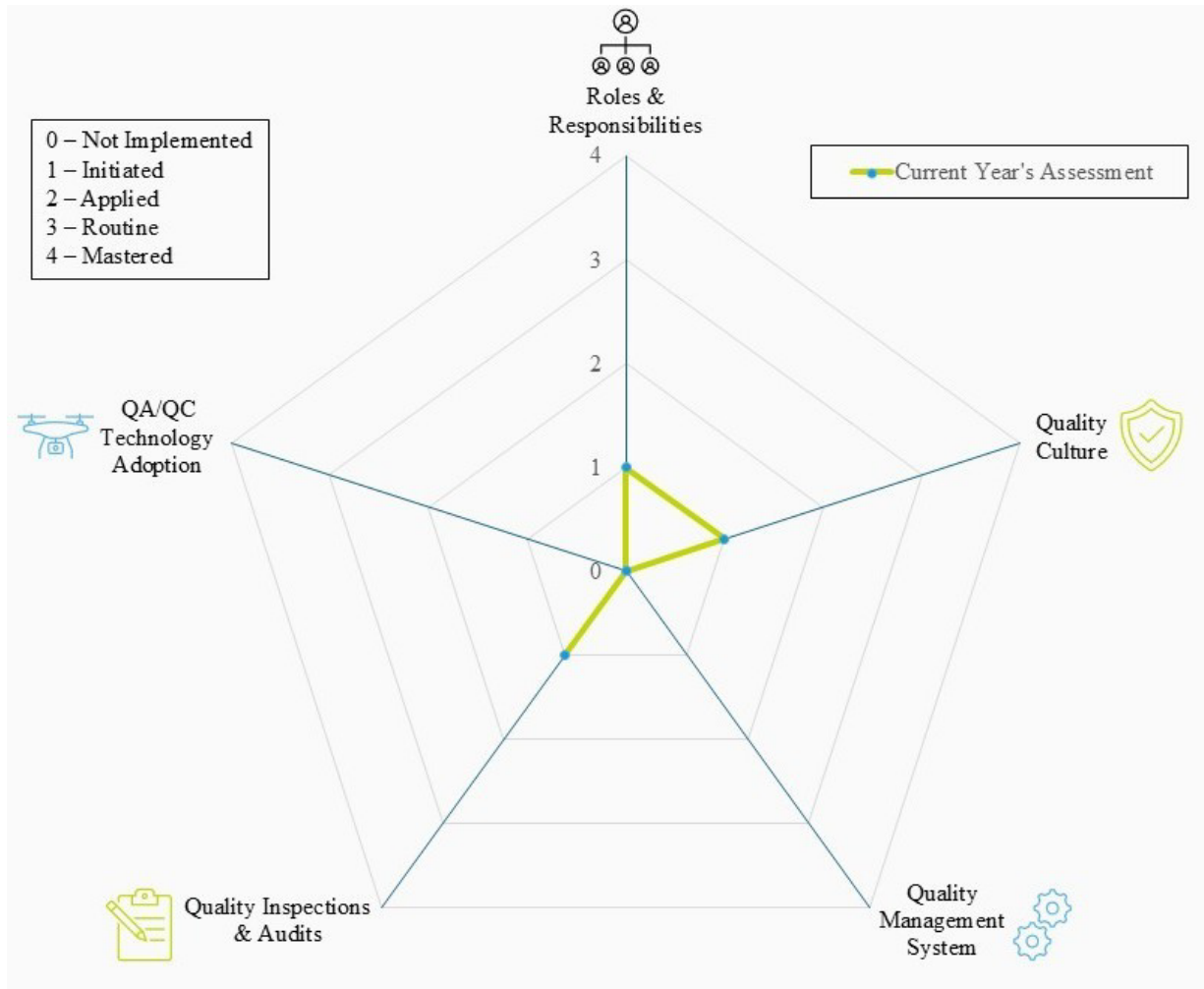
### **QA/QC Technology Adoption – 0 Not Implemented**

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HWT's technology adoption reflects Level 0 (Not Implemented) maturity, relying exclusively on manual, paper-based processes without digital field technologies, automated data collection tools, or advanced inspection systems. HWT does not utilize handheld devices, GPS tracking, digital cameras, drones, LiDAR, satellite sensors, AI/ML tools, or autonomous systems, with inspections conducted manually by two field engineers and findings documented by hand. This eliminates standardization benefits, automated data capture, and error reduction mechanisms characteristic of Level 1 and above. HWT has not quantified baseline metrics, established a technology adoption roadmap, allocated budget for QA/QC technology initiatives, or planned to pilot or implement technologies within the next 12-24 months. While members of HWT and/or its affiliates attend industry conferences to stay informed about emerging technologies, this awareness has not translated into QA/QC technology adoption planning, vendor partnerships, or proof-of-concept

initiatives, firmly establishing Level 0 maturity though reflecting the operational reality of a transmission-only facility where cost-benefit calculus may not justify investment given minimal wildfire exposure.

**Figure 1: QA/QC Maturity Sunburst Chart**



## 6. CONCLUSION

This Independent Evaluation assessed HWT's 2025 Wildfire Mitigation Plan (WMP) implementation across five operational categories: Grid Design, Operations, and Maintenance; Vegetation Management and Inspections; Situational Awareness and Forecasting; Emergency Preparedness; and Community Outreach and Engagement. HWT has one formal initiative under Grid Design, Operations, and Maintenance (Initiative 001 – Asset Inspections) and one under Vegetation Management and Inspections (Initiative 002 – Vegetation Inspections) for 2025. The evaluation also reviewed non-initiative activities described in the WMP to determine whether these activities are being actively maintained and carried out. Reviews of non-initiative activities were not conducted as audits; therefore, formal validation or invalidation was not performed.

HWT demonstrates a comprehensive and proactive approach to managing its Suncrest Facility operations and wildfire mitigation activities. The organization maintains oversight through integrated monthly inspections that simultaneously assess asset condition and wildfire risk, supported by advanced real-time monitoring systems for critical equipment including cable integrity, transformer health, and power compensation operations. Situational awareness is enhanced through onsite weather monitoring, wildfire risk assessment tools, and evaluation of potential failure modes to inform risk mitigation strategies.

Vegetation management is conducted through a program appropriate to the facility's limited footprint and hardscaped environment, with monthly inspections and responsive weed control treatments aligned with CAISO-accepted maintenance practices. All 2025 inspections were completed without identifying vegetation-related issues, though WMP documentation requires updating to reflect current operational practices.

Emergency preparedness is maintained through contracted fire brigade services, annual wildfire simulation exercises, and active coordination with local fire authorities and regulatory entities. These coordinated efforts ensure HWT maintains operational readiness and effective response capabilities throughout wildfire season.

Based on the review of documentation, SME interviews, and on-site inspection, the IE has validated both Initiative 001 and 002; and has reasonable assurance that HWT is actively maintaining and carrying out non-initiative activities described in its 2025 WMP across all five operational categories. Initiative 001 was fully implemented with all monthly inspections completed and properly documented, satisfying the 2025 target despite a significant budget variance resulting from revised internal cost allocation methodology rather than program expansion.

Two opportunities for enhanced transparency and recordkeeping were identified: implementing documented annual review processes for both the Emergency Operations Plan and Black Start Restoration Plan, even when no substantive changes are required, would provide clear evidence of ongoing plan evaluation and create a transparent audit trail demonstrating continuous oversight. Additionally, updating WMP language to accurately reflect current vegetation management

practices would eliminate confusion and ensure alignment between documented commitments and operational execution.

The Independent Evaluator concludes that HWT's initiatives and activities reviewed during this evaluation are being implemented, maintained, and carried out in a manner consistent with the commitments outlined in the 2025 Wildfire Mitigation Plan. HWT's implementation reflects a focused operational approach appropriate to its limited asset footprint, characterized by integrated inspection protocols, advanced real-time monitoring systems, comprehensive emergency preparedness, and effective coordination with regulatory entities and local fire authorities.

## **7. ATTACHMENTS**

### **7.1 CATALOG OF INITIATIVES**

### **7.2 DATA REQUESTS**

### **7.3 SME INTERVIEWS**

### **7.4 PICTURES OF NON-CONFORMANCE**