

INDEPENDENT EVALUATOR

Annual Implementation Report for Wildfire Mitigation Plan Implementation Year 2025

July 01, 2026



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DISCLAIMER

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.

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1. EXECUTIVE SUMMARY

Background

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 evaluation cycle (ending in 2023), Trans Bay Cable (TBC) completed all initiatives outlined in the 2023-2025 WMP. In the second evaluation (ending in 2024), TBC demonstrated implementation of wildfire risk reduction activities not formally designated as WMP initiatives but functioning as supplementary mitigation measures. TBC continues these activities into 2025 as part of its wildfire risk reduction program.

This Independent Evaluator (IE) Annual Implementation Report (AIR) assesses TBC's WMP commitments for implementation year 2025. The IE AIR typically reviews the WMP initiatives as outlined for 2025 and would evaluate TBC's performance in meeting their committed objective targets. However, due to not outlining any initiative targets for 2025, the IE AIR reviews activities as outlined in the 2023-2025 WMP and evaluates TBC's performance in maintaining and carrying out these activities, and implementing QA/QC programs.

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 TBC'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, TBC 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 TBC 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 TBC's 2025 WMP and related publicly available documents, as listed in Section 7. This review aimed to identify TBC'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 Pittsburg converter station. 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.

TBC does not outline any initiatives in the 2025 WMP for implementation review. Therefore, the findings in this report 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 obtain reasonable assurance that the activities are being maintained and/or carried out.

Introduction to Trans Bay Cable



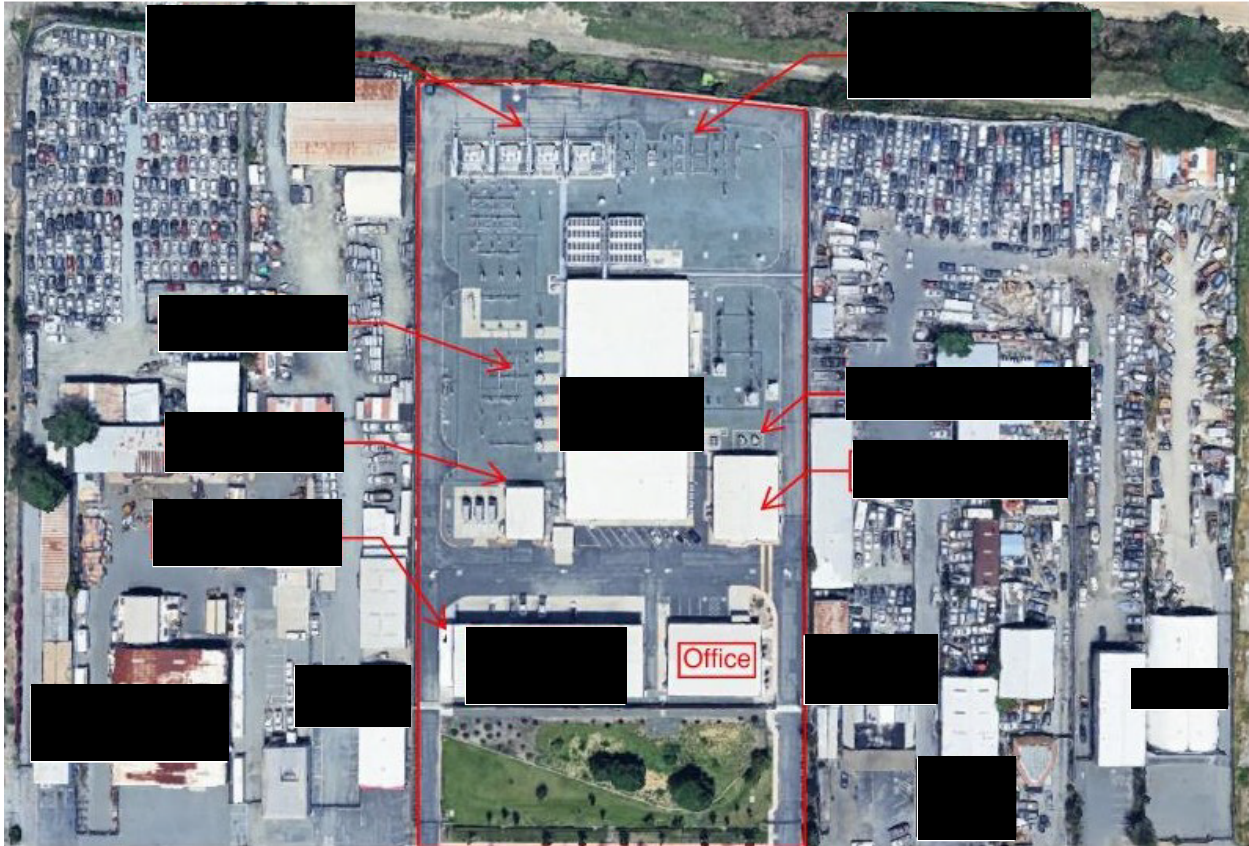
TBC (Figure 1) is a transmission-only utility with no retail customers, operating a 53-mile, high-voltage direct-current (HVDC) submarine transmission cable buried at varying depths beneath the San Francisco Bay. The Trans Bay System consist of two AC/DC converter stations: the Pittsburg station in Pittsburg, CA, and the Potrero station in San Francisco, CA. TBC interconnects with Pacific Gas and Electric (PG&E) substations at each

location via underground AC transmission cables. All above-ground transmission infrastructure is contained within the converter station structures (Figure 3).

The Pittsburg converter station is located in an urban setting, approximately 3 miles north of an area designated as Tier 2 High Fire-Threat District (HFTD) per the California Public Utility Commission's (CPUC) fire-threat map (Figure 2). The San Francisco Potrero converter station is situated in a fully urbanized environment with minimal fire-threat risk. The submarine cable itself, being fully submerged, presents no fire risk.



TBC has operated since November 2010 with no changes to its asset footprint. The system is substantially hardened against wildfire and can transport up to 400 megawatts between the two PG&E substations. The Pittsburg facility is operated 24 hours a day by a team of operations, engineering, and maintenance staff and serves as a Participating Transmission Operator on the California Independent System Operator Grid.



Key Findings

Upon review of the documents provided, SME interviews conducted, and site visit conducted at the Pittsburg, CA converter station on April 6, 2026, TBC is implementing the activities outlined in the 2025 WMP.

Recommendations

Two opportunities for enhanced transparency and recordkeeping were identified: implementing documented annual review processes for both the Emergency Operating Procedure and Facility Startup and Shutdown 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. These enhancements represent incremental improvements to documentation practices rather than deficiencies in operational execution.

The IE identified that the documentation provided for the Admin-MP Building and Converter Hall Building AES 21: Dry Chemical Pre-Engineered Fire Extinguishing System was incorrect. The inspection reports indicate that a Dry Chemical System is present in both locations. However, both

the Siemens Sinorix 227 and FENWAL 9300 FM-200 systems are clean agent systems, not dry chemical systems as identified. It is recommended that the proper inspection report be used for the correct system type for enhanced recordkeeping and auditing purposes.

2. FOCUS INITIATIVES AND DISCUSSION

Due to the Electrical Utility's size and the limited number of already completed WMP initiatives, there are no initiatives to review for 2025. BVNA therefore elected to review non-initiative WMP elements to obtain reasonable assurance that the activities are being maintained and/or carried out. The Review of Initiatives Across WMP Categories section provides additional detail.

3. SITE AND SAMPLE SELECTION AND DISCUSSION

TBC has a single operating facility, the Pittsburgh Converter Station, described in the Executive Summary. Due to TBC having no WMP initiatives for 2025, sampling methodology is not applicable. The IE therefore performed a comprehensive audit of TBC's non-initiative WMP elements. Data was gathered through an onsite inspection on April 6, 2026, and supporting document review.

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

Table 1: WMP Activities

WMP Activity Category	No. of WMP Activities
Grid Design, Operations, and Maintenance	7
Vegetation Management and Inspections	3
Situational Awareness and Forecasting	4
Emergency Preparedness	4
Community Outreach and Engagement	Not Applicable

Activities Maintained/Carried Out: 55 Total Number of Activities (100%)

All initiatives outlined in the 2023-2025 WMP were completed during 2023 and 2024; therefore, no active initiatives apply to implementation year 2025. The WMP outlines activities to mitigate ignition risk, with TBC's primary strategy focused on infrastructure hardening and monitoring. TBC's transmission infrastructure is inherently protected from wildfire risk as it is entirely underground or submerged, with no above-ground transmission equipment or lines in wildland or wildland-urban interface (WUI) areas.

TBC's fire protection activities serve broader facility safety and fire prevention goals informed by industry wildfire mitigation practices. Due to TBC's infrastructure design and limited operational scale, the utility maintains no programs, dedicated staff, specialized equipment, or infrastructure exclusively for wildfire mitigation.

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

The IE typically evaluates 2025 WMP initiatives across the standard five WMP categories, however, TBC had no initiative targets for implementation year 2025. Given TBC's focused operational scope as a transmission-only utility and due to the Electrical Utility's size and having no WMP initiatives, BVNA elected to review non-initiative WMP elements.

Funding Evaluation Methodology

TBC listed no WMP initiatives for 2025 and therefore had no associated planned or actual expenditures pertaining to WMP initiatives, as verified by TBC's 2025 Electrical Corporation Annual Implementation Report (EC AIR) filed to Energy Safety on April 1, 2026. Due to the absence of WMP initiative spending, the IE notes all funding review in this report as not applicable (N/A).

4.1 GRID DESIGN, OPERATIONS, AND MAINTENANCE

4.1.1 Initiative Summary Table

Due to having no Grid Design, Operations, and Maintenance initiatives, the Initiative Summary Table is not included for this section.

4.1.2 Written Detail for Initiatives

TBC does not have any Grid Design, Operations, and Maintenance 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 obtain reasonable assurance that the activity is being maintained and/or carried out.

4.1.2.1 Initiative Review – Findings & Method

Weekly & Monthly Inspections

The 2023-2025 WMP states that TBC operations staff conduct weekly and monthly inspections of the Pittsburg Converter station. Weekly inspections use a formal checklist that addresses the visual examination of the fire suppression systems operating condition, high-voltage equipment condition, and general facility condition. Monthly inspections use a formal checklist that addresses cable integrity.

In response to Frontload Request (FR) 001, TBC provided twelve (12) PDF inspection reports for the Pittsburg Monthly Substation Inspections. Each inspection form listed items by “Equipment #” with a brief description of what to inspect on the item. TBC personnel provided entries in the “Checks and Notes” column, with additional space at the end of the report for “Notes and Findings.” The final page included two signature boxes: one for “Inspection of Watch Performed By” and one for “Reviewed By.” Review of the monthly inspection reports indicated no abnormalities or discrepancies, and all reports were fully completed and signed on the appropriate date. TBC informed the IE that weekly inspections are no longer performed and only monthly inspections are conducted. TBC stated that this updated approach is consistent with their Substation Maintenance Practices accepted by CAISO in Q4 2024.

Based on this analysis and the documentation reviewed, the IE has reasonable assurance that TBC is maintaining the monthly inspection program.

Cable Monitoring

Operations staff continually monitor the cable via a real-time cable monitoring system. In FR002, BVNA requested documentation detailing this monitoring system with the option to schedule an SME interview to convey the information requested.

An SME interview was scheduled for March 18, 2026, with BVNA and TBC to discuss the cable monitoring system. TBC system operators utilize tracking software in the Control Center that displays the full route of the cable from the Pittsburgh substation through the bay to the Potrero substation in San Francisco. The monitoring software uses heat-mapped seabed condition data

from the most recent survey, displayed in red for lost coverage and blue for gained coverage. As operators move along the cable route, the bottom right corner displays GPS location and cable burial depth. The cable incorporates a digital acoustic sensing system into its fiber optics to measure deflection of glass cores. If a kinetic event occurs, the system measures and plots it on the software map to alert the operators and enable assessment.

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

Seismic Improvements to Transformers

TBC 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 FR003, the IE requested any available 2025 maintenance records for this equipment. TBC provided a written response stating that, per the manufacturer's engineering reports, the isolators require no routine maintenance and that service is only required in the event of an incident which TBC has not experienced. TBC also provided a copy of the relevant paragraph from the manufacturer's report. During the onsite inspection on April 6, 2026, TBC informed BVNA that they perform visual inspections every two (2) years and full diagnostics every five (5) years on the entire transformer system, including the seismic isolators.

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

Monitoring, Detection, Alarm and Suppression System Maintenance & Inspections

The Pittsburg substation is equipped with monitoring, detection, alarm, and suppression systems that TBC has periodically inspected to ensure compliance with applicable codes and statutes.

In FR004, the IE requested the most recent inspection report(s) for these systems. TBC provided six (6) reports in response, all dated June of 2025, as detailed in the table below:

Building Name	Form Type/Title		
Admin-MP Building	AES 21: Dry Chemical Pre-Engineered Fire Extinguishing System	AES 2.1: Wet Pipe Fire Sprinkler System	AES 2.5: Pre-Action Fire Sprinkler System
Control Operations Building		AES 2.1: Wet Pipe Fire Sprinkler System	
Converter Hall Building	AES 21: Dry Chemical Pre-Engineered Fire Extinguishing System		
Warehouse Building		AES 2.1: Wet Pipe Fire Sprinkler System	

The three report types vary only in the system being inspected. All reports include property information, owner information, system information, inspection and testing findings, maintenance records, an area for deficiencies and comments, and inspector signature and date. Across all six

reports, inspection items were marked either "P" for passing or "N/A" for not applicable; no items were marked "F" for fail, and no deficiencies or comments were noted

Based on this analysis and the documentation reviewed, the IE has reasonable assurance that TBC is maintaining and actively inspecting the existing Fire and Life Safety systems.

The IE identified that the documentation provided for the Admin-MP Building and Converter Hall Building AES 21: Dry Chemical Pre-Engineered Fire Extinguishing System was incorrect. The inspection reports indicate that a Dry Chemical System is present in both locations. However, both the Siemens Sinorix 227 and FENWAL 9300 FM-200 systems are clean agent systems, not dry chemical systems as identified. It is recommended that the proper inspection report be used for the correct system type.

HVDC Siemens Plus Control and WinCC Platform

The HVDC Modular Multilevel Voltage Source converter utilizing Siemens PLUS controls can implement protective "blocking" within microseconds of a fault and will initiate a trip offline within milliseconds.

During an SME interview conducted on March 18, 2026, TBC provided an overview of the Siemens HVDC Plus Voltage Source converter and associated operator interface, WinCC. The converter has a 400MW rating and operates under coordinated dispatch from California ISO for active power management and PG&E for reactive power and voltage control. The system has a guaranteed operating point of 400MW real power and ± 170 megavars of reactive support. Its advanced control architecture automatically adjusts reactive power output to maintain voltage stability across varying load conditions, with full reactive capability available at lower power levels to support system needs. Built-in protection and self-preservation features ensure system resilience during grid disturbances. Automatic safeguards respond to fault conditions within milliseconds, including automatic blocking under specific conditions: under-voltage lasting 850 milliseconds, subsynchronous resonance, or 40 Hertz phase oscillations exceeding 3 seconds. Persistent AC system faults trigger disconnection at both stations after 1.5 seconds. Reactive power management systems actively prevent voltage degradation, minimizing operational disruptions and maintaining grid reliability. Real-time monitoring through an interactive operator interface provides complete visibility into system performance and status, enabling proactive management and rapid response to changing grid conditions. Maintenance documentation, manufacturer support, and coordination protocols with California ISO, and PG&E are readily available for TBC operators.

Based on this analysis, the documentation reviewed, and SME interview, the IE has reasonable assurance that TBC is actively monitoring and maintaining the HVDC Siemens Plus Control and WinCC Platform.

Class B Foam Firefighting Trailer

TBC owns and operates a Class B foam firefighting trailer with primary responsibility for its operation resting with the local fire department. Class B firefighting foam is designed to combat fire typically involving flammable and combustible liquids such as insulating oils found in

transformers and other hydrocarbons found at a converter station. The application of foam forms a blanket over the liquid fuel, sealing vapors, terminating active burning of vapors, and preventing reignition by confining vapors and removing oxygen from the fires chemical reaction.

In response to FR006, TBC stated that they receive operational and maintenance guidance and training from the vendor where the trailer was purchased. The trailer is inspected regularly, and TBC conducts hands-on firefighting training for internal personnel every other year. The most recent training was conducted on June 23, 2025.

Based on this analysis and the documentation reviewed, the IE has reasonable assurance that TBC is maintaining and actively inspecting the Class B Foam Firefighting Trailer.

Perimeter Concrete Wall & Hardscaping

The Pittsburg Converter Station is a secure facility enclosed by a 12-foot-high concrete masonry unit (CMU) perimeter wall. Access is controlled through a two-gate system (outer and inner gates) at each access point. At the southeast exit driveway, adjacent to public thoroughfare, a wrought iron vehicle gate with intercom and keypad serves as the outer gate, followed by a second inner gate positioned to the north. This configuration is replicated at the eastern and western access/egress driveways. All ground surfaces within the perimeter are hardscape (concrete or asphalt) or gravel, with no hazardous vegetation present. Maintenance of the concrete wall and hardscaping was visually confirmed during the onsite visit conducted April 6, 2026.

Based on this analysis and the visual inspection, the IE has reasonable assurance that TBC is maintaining and actively inspecting the Perimeter Concrete Wall and Hardscaping.

4.1.2.2 Funding Verification – Findings

As TBC did not have any 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 TBC's 2025 WMP implementation.

4.1.3 Synthesis of Findings

4.1.3.1 Initiative Review

TBC demonstrated consistent and thorough maintenance of programs across all grid design, operations, and maintenance activities within this category. The IE has reasonable assurance that TBC is actively maintaining described activities, and all inspections were conducted on schedule with complete documentation.

4.1.3.2 Funding Verification

As TBC did not have any 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 TBC's 2025 WMP implementation.

4.2 VEGETATION MANAGEMENT AND INSPECTIONS

4.2.1 Initiative Summary Table

Due to having no Vegetation Management and Inspections initiatives, the Initiative Summary Table is not included for this section.

4.2.2 Written Detail for Initiatives

TBC does not have any Vegetation Management and Inspections 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 obtain reasonable assurance that the activity is being maintained and/or carried out.

4.2.2.1 Initiative Review – Findings & Method

Weed Abatement

TBC utilizes a subcontractor to perform weed abatement on its converter stations; this cost is incorporated into landscape maintenance. In response to FR008, TBC provided receipts verifying that weed abatement had been performed for 2025. The receipts were dated May 23, 2025 and August 21, 2025.

Based on this analysis and the documentation reviewed, the IE has reasonable assurance that TBC is actively engaging a subcontractor to perform weed abatement at the facility.

Inspections for Weed Growth

TBC performs quarterly visual inspections for vegetation or weed growth around the converter station. In response to FR009, TBC provided four (4) inspection reports dated:

- January 24, 2025
- May 5, 2025
- August 4, 2025
- October 22, 2025

Each report contained a list of items to inspect around the facility, an area for comments, and signature lines for completion and review. All reports were properly completed, signed, and dated with no deficiencies noted. The January report documented removal of three palm sprouts from the yard; the August report noted that the yard was scheduled for spraying later that month; and the October report documented removal of small weeds.

Based on this analysis and the documentation reviewed, the IE has reasonable assurance that TBC is maintaining and actively inspecting the facility for weed growth.

Western Electricity Coordinating Council (WECC) Quarterly Reports

TBC's system utilizes no overhead transmission lines and therefore does not have a Vegetation Management Plan (VMP) and is not required to maintain one under NERC Reliability Standards

or CAISO maintenance requirements. TBC files quarterly reports with the Western Electricity Coordinating Council (WECC) confirming that the utility has no VMP requirements.

In FR010, the IE requested a copy of the quarterly reports that TBC files with WECC. TBC provided a written response explaining that NERC/WECC addresses exceptions to the applicability of reliability standards through an attestation process. TBC provided a copy of its most recent attestation on file for 2025. The attestation included the following information: attestation ID, TBC's registration information, submission and review dates, applicable NERC Reliability Standard (FAC-003-4), and status. All information was properly detailed, and no discrepancies were noted.

Based on this analysis and the documentation reviewed, the IE has reasonable assurance that TBC is regularly providing reports to WECC to maintain the VMP requirements exemption.

4.2.2.2 Funding Verification – Findings

As TBC did not have any 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 TBC's 2025 WMP implementation.

4.2.3 Synthesis of Findings

4.2.3.1 Initiative Review

TBC demonstrated consistent and thorough maintenance of programs across all vegetation management and inspection activities. The IE has reasonable assurance that TBC is actively maintaining the described activities, and all inspections were conducted on schedule with complete documentation.

4.2.3.2 Funding Verification

As TBC did not have any 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 TBC's 2025 WMP implementation.

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

TBC 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 obtain reasonable assurance that the activity is being maintained and/or carried out.

4.3.2.1 Initiative Review – Findings & Method

Transformer Oil Control System

TBC utilizes a transformer monitoring system with real-time oil analysis to detect internal transformer faults. Samples are taken and analyzed every four (4) hours, with monitoring conducted continuously in the control room.

The dissolved gas analysis (DGA) monitoring system is designed to track transformer oil conditions across multiple power infrastructure assets, 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. Critical and non-critical data is received in real-time by the TBC on site personnel in the control room.

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 stakeholders, and maintains a transparent escalation pathway for urgent situations.

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

FMEA Process

TBC 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. TBC 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 FR016, TBC 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 12, 2025.

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

Weather Station & Wildfire Risk Index

In 2022, TBC 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. TBC also has access to the Firecaster Wildfire Risk Index (WRI), which uses multiple data sources to assess the risk of wildfires.

In response to FR014, TBC 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 both substations with their respective temperatures, 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 24 through December 31, with each day assigned a risk level; in this example, all days were rated "low." The WRI map displayed both substations and the submerged cable route with a color-coded wildfire risk overlay: green indicating low risk, yellow indicating moderate risk, orange indicating elevated risk, and red indicating high risk.

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

System Operators Training

System operators are trained in potential weather impacts on system operability and fire risks. In response to FR015, TBC provided an itemized spreadsheet listing personnel who received training. The training was conducted in December of 2024 via an online class. TBC provided a copy of the course description, including the version and source. A sample of an employee's user portal was also provided, showing completion date and course status.

Based on this analysis and the documentation reviewed, the IE has reasonable assurance that TBC maintains training for system operators.

4.3.2.2 Funding Verification – Findings

As TBC did not have any 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 TBC's 2025 WMP implementation.

4.3.3 Synthesis of Findings

4.3.3.1 Initiative Review

TBC demonstrated consistent and thorough maintenance of programs across all situational awareness and forecasting activities. The IE has reasonable assurance that TBC is actively maintaining the described activities and complete documentation was provided.

4.3.3.2 Funding Verification

As TBC did not have any 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 TBC's 2025 WMP implementation.

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

TBC 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 obtain reasonable assurance that the activity is being maintained and/or carried out.

4.4.2.1 Initiative Review – Findings & Method

Emergency Operating Procedure (EOP) & Emergency Action Plan (EAP) Maintenance

TBC maintains an Emergency Operating Procedure (EOP) and an Emergency Action Plan (EAP). The EOP describes emergency plans that personnel should follow during a Bulk Electric System (BES) Emergency, Facility Emergency, or loss of Control Center Functionality. The EAP provides TBC employees with an action plan for facility emergencies, focusing on the protection of personnel and mitigation of facility damage. BVNA requested copies of both plans, and TBC provided the EOP (TBC-OP-004) and EAP (TBC-HS-200).

TBC-HS-200 was initially published in February 2010 and last updated in December 2020. The document outlines the organization structure, responsibilities, and procedures for TBC employees and the Emergency Response Team in the event of a facility emergency. It covers emergency notification and evacuation, alarm systems, emergency reporting, critical plant operations, and procedures for specific scenarios including fire, earthquake, injury, active shooter, and bomb threats. The EAP is designed to comply with applicable regulations and provide guidance to protect personnel and minimize facility damage during emergencies.

TBC-OP-004 was initially published in November 2009 and last updated in May 2024. The document outlines the roles and responsibilities of TBC personnel, including the TBC Operator and On-Call Operator, in the event of an emergency. It contains procedural information for different emergency types: BES Emergency, Restricted Maintenance Operations, Facility Emergency, Load Shedding, and Reliability Impacts due to Extreme Weather Conditions. Each category includes steps for TBC personnel to follow and communication protocols with entities such as the Reliability Coordinator, CAISO, and PG&E.

Based on this analysis and the documentation reviewed, the IE has reasonable assurance that TBC is maintaining both the EOP and EAP protocols and procedures. For increased transparency and recordkeeping, TBC 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.

FSS & SR Plan Protocols

TBC utilizes two plans for system restoration following an outage: the Facility Startup and Shutdown Plan (FSS) (TBC-OP-007) and the System Restoration Plan (SR) (TBC-OP-008). The FSS Plan is the standard startup procedure and is followed in most scenarios. The SR Plan is reserved for major system disturbances, such as a system-wide blackout.

TBC-OP-007 was initially published in April 2014 and last updated in April 2021. The document provides a repeatable procedure for safe startup of the Trans Bay System, outlining both facility startup and shutdown procedures. Since the system operates under CAISO control and is interconnected to PG&E at both ends, the plan details coordination efforts with both entities.

TBC-OP-008 was initially published in July 2016 and last updated in April 2025 without revision. The document outlines the procedure for restoring the TBC facility during a major system disturbance and covers two restoration options: Normal Restoration and System Recovery Ancillary Service (SRAS) Restoration. The document specifies the minimum requirements for each restoration option, the coordination and communication protocols with the Reliability Coordinator, Balancing Authority, and Transmission Owner, and the training requirements for TBC system operators regarding restoration procedures.

Based on this analysis and the documentation reviewed, the IE has reasonable assurance that TBC is maintaining both the FSS and SR protocols and procedures. For increased transparency and recordkeeping, TBC should consider performing an annual review of the FSS and documenting the review in the revision history, even if no updates are made. This approach provides a documented record that the plan undergoes annual review.

Annual CAISO Restoration Drill Participation

TBC does not conduct drills specific to wildfire and Public Safety Power Shutoff (PSPS) events due to its limited operational scope and scale. However, TBC operations staff participate in CAISO's annual System Restoration Drill, a simulation of the CAISO-managed transmission network recovery following a system-wide disruption

BVNA requested documentation verifying TBC's participation in the CAISO restoration drill. TBC provided a calendar invitation for the "RC West: System Restoration Drill" and NERC Continuous Education Hours (CEH) documentation. The calendar invitation included an agenda beginning at 6:30 AM with an introduction, followed by the drill from 7:30 AM to 4:00 PM. The invitation also included training materials and appropriate contact information for the drill. A screenshot documented "CAISO_001_25 RC West Restoration Area C BA and TOP_Morning & Afternoon Exercise" with eight CEH credits awarded: four for the morning session and four for the afternoon session. The credits were earned on February 27, 2025.

Based on this analysis and the documentation reviewed, the IE has reasonable assurance that TBC actively participates in the Annual CAISO Restoration Drill.

Fire Emergency Drill

An annual fire emergency drill is conducted to maintain staff familiarity with wildfire emergency processes and procedures. Systems Operators and the Operations Manager are required to participate, while non-operations employees participate in an observer capacity without active roles in system shutdown. In response to FR019, TBC provided a calendar invitation for the annual fire drill, which took place on May 28, 2025.

Based on this analysis and the documentation reviewed, the IE has reasonable assurance that TBC implements an annual fire emergency drill.

4.4.2.2 Funding Verification – Findings

As TBC did not have any 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 TBC's 2025 WMP implementation.

4.4.3 Synthesis of Findings

4.4.3.1 Initiative Review

TBC demonstrated consistent and thorough maintenance of programs across all emergency preparedness activities. The IE has reasonable assurance that TBC is actively maintaining the described activities and complete documentation was provided.

TBC should consider implementing an annual document review process for all emergency plans (EOP, EAP, FSS, and SR) with revision history entries noting either no changes required or documenting specific updates made. If TBC already performs an annual review of these documents, the utility should record the review by including it in the revision history. This improvement would provide evidence that the emergency plans undergo regular evaluation for continued accuracy and relevance, even when no substantive changes are required.

4.4.3.2 Funding Verification

As TBC did not have any 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 TBC's 2025 WMP implementation.

4.5 COMMUNITY OUTREACH AND ENGAGEMENT

Initiatives for Community Outreach and Engagement are not present in TBC'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 Trans Bay Cable'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.

TBC – QA/QC Introduction

TBC operates as a transmission-only utility and unlike traditional investor-owned utilities, TBC has no distribution assets, no overhead lines in high fire-threat districts, no end-user customers, and wildfire exposure is limited to a single substation facility with minimal vegetation management obligations. Due to this limited operational scope and minimal wildfire risk profile, TBC 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 and conducted through manual inspection and documentation methods. The following assessment evaluates TBC'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 underwater infrastructure and significantly lower wildfire risk exposure than distribution utilities operating extensive overhead networks in high-risk terrain.

Roles and Responsibilities – 1 Initiated

TBC'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: the O&M technician conducts monthly Inspections of the Watch (IOW), documents findings, and initiates corrective actions, while the Operations Manager reviews completed IOWs and oversees work order tracking under the Director of Operations' supervision. This structure demonstrates rudimentary accountability but lacks the 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 participation in the IOW review process and resource allocation for corrective actions, 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 TBC firmly at the Initiated level where basic definitions exist but are not yet standardized or fully integrated.

Quality Culture – 1 Initiated

TBC's quality culture reflects Level 1 (Initiated) maturity, with employees possessing working familiarity with operational expectations and awareness of quality impacts through direct supervision rather than structured training programs. The utility has not established formal QA/QC onboarding or refresher training for employees or contractors, relying instead on review of documented materials and on-the-job learning under direct supervision by the Operations Manager and Director of Operations. TBC 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

TBC'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 the monthly IOW document, and while work orders are tracked in an in-house asset management system, 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, specifically, the Operations Manager's review of completed IOWs, rather than through automated enforcement, structured audits, or systematic compliance verification. The absence of a QMS platform eliminates analytical and continuous improvement capabilities, preventing TBC 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 order processes, firmly establishing TBC 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

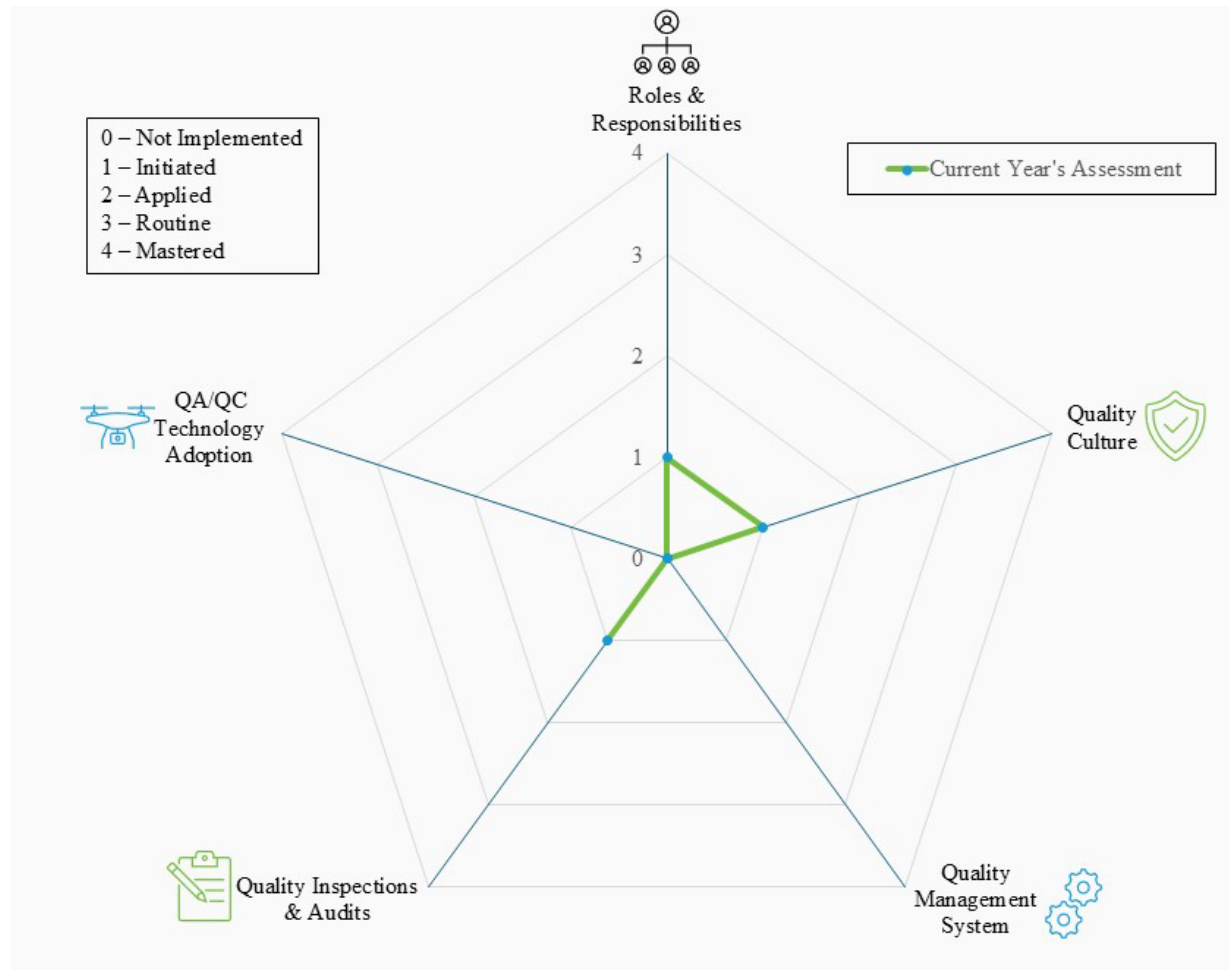
TBC's inspection and audit practices reflect Level 1 (Initiated) maturity, characterized by minimum-frequency inspections conducted on fixed schedules without risk-based prioritization or systematic use of results for process improvement. The utility conducts monthly inspections of the Pittsburgh substation and quarterly vegetation inspections for weed abatement, meeting minimum requirements but without dynamic risk assessment, predictive modeling, or condition-based triggers that would characterize higher maturity levels. While monthly inspection reports are reviewed by the Operations Manager or delegate, exceeding the "more than quarterly" SME review frequency satisfying Level 3 criteria, this review serves primarily as a completeness check and corrective action trigger rather than systematic quality assessment of inspection methodology or inspector performance. TBC has not established a formal inspector qualification and certification program, instead relying on operational experience and technical competency, and utilization of inspection results aligns with Level 1 where findings are "reviewed to make ad hoc corrections only" rather than systematically analyzed for deficiency patterns, root causes, or process improvement opportunities. The utility explicitly states 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," and the absence of internal audit programs, root cause analysis, trend categorization, effectiveness verification, or formal CAPA structures limits the process to ad hoc correction rather than the systematic deficiency identification and continuous improvement characteristic of higher maturity levels.

QA/QC Technology Adoption – 0 Not Implemented

TBC's technology adoption for QA/QC activities reflects Level 0 (Not Implemented) maturity, as the utility relies exclusively on manual, paper-based processes without deployment of digital field technologies, automated data collection tools, or advanced inspection systems. TBC does not utilize handheld devices, GPS tracking, digital cameras, drones, LiDAR, satellite sensors, AI/ML-powered inspection tools, or autonomous inspection systems, with inspection activities conducted manually by O&M technicians during monthly facility walkthroughs and findings documented by hand in the IOW paper form. This approach places TBC firmly at Level 0 where "QA/QC processes are manual and do not leverage technology to improve efficiency" with corresponding "high potential for human error and inconsistencies," and the absence of digital field tools eliminates standardization benefits, automated data capture, and error reduction mechanisms characterizing Level 1 and above. The utility's manual processes preclude efficiency gains, accuracy improvements, and coverage enhancements enabled by technology adoption at higher maturity levels, and TBC has not quantified baseline metrics, established a technology adoption roadmap, allocated budget for QA/QC technology initiatives, or planned to pilot or implement any WMP QA/QC technologies within the next 12-24 months. While members of TBC and/or its affiliates attend industry conferences to stay informed about emerging technologies, this awareness has not translated into technology adoption planning, vendor partnerships, proof-of-concept initiatives, or research collaborations, firmly establishing Level 0 maturity though this reflects the operational reality of a transmission-only facility where the cost-benefit calculus of advanced

technology deployment may not justify investment given minimal wildfire exposure and limited inspection scope.

Figure 1: QA/QC Maturity Sunburst Chart



6. CONCLUSION

This Independent Evaluation assessed TBC'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. As TBC does not have formal initiatives within these categories for 2025, the evaluation focused on non-initiative activities described in the WMP to determine whether these activities are being actively maintained and carried out. This review was not conducted as an audit; therefore, formal validation or invalidation of activities was not performed.

TBC demonstrates a comprehensive and systematic approach to maintaining its critical infrastructure and operational capabilities at the Pittsburg Converter Station. The utility conducts regular inspections across all facility systems, employs advanced real-time monitoring technologies for both equipment and environmental conditions, and maintains all safety and security systems in accordance with applicable standards and manufacturer recommendations. Documentation review and onsite inspection confirmed that all maintenance activities are properly executed, recorded, and free of significant deficiencies.

Despite having no overhead transmission lines and no regulatory requirement for a formal Vegetation Management Plan, TBC maintains an active vegetation management program through subcontracted weed abatement services and quarterly visual inspections. The organization maintains its exemption from VMP requirements through proper attestation with NERC/WECC.

TBC has established situational awareness capabilities through multiple monitoring systems, including transformer oil analysis, weather monitoring, wildfire risk assessment tools, and an annually updated Failure Mode and Effects Analysis (FMEA). System operators receive regular training on weather impacts and fire risks to ensure operational readiness.

Emergency preparedness is addressed through planning documentation and regular drill participation. TBC maintains current Emergency Operating Procedures, Emergency Action Plans, and System Restoration Plans that outline response protocols for various scenarios and coordination with regulatory entities. Operational staff actively participate in both external CAISO restoration drills and internal fire emergency drills to maintain preparedness.

Based on the review of documentation, SME interviews, and onsite inspection conducted on April 6, 2026, the Independent Evaluator has reasonable assurance that TBC is actively maintaining and carrying out the non-initiative activities described in its 2025 Wildfire Mitigation Plan across all four operational categories. TBC demonstrates a systematic approach to infrastructure maintenance, real-time monitoring, risk assessment, and emergency preparedness, with documentation that is generally complete, properly executed, and maintained in accordance with manufacturer recommendations, industry standards, and regulatory requirements.

Two opportunities for enhanced transparency and recordkeeping were identified: implementing documented annual review processes for both the Emergency Operating Procedure and Facility Startup and Shutdown 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. These enhancements represent incremental improvements to documentation practices rather than deficiencies in operational execution.

The Independent Evaluator concludes that TBC's non-initiative activities reviewed during this evaluation are being maintained and carried out in a manner consistent with the commitments outlined in the 2025 Wildfire Mitigation Plan.

7. ATTACHMENTS

7.1 CATALOG OF INITIATIVES

7.2 DATA REQUESTS

7.3 SME INTERVIEWS

7.4 PICTURES OF NON-CONFORMANCE