



**Trans Bay Cable LLC
WILDFIRE MITIGATION PLAN UPDATE 2025**

for Submittal to:

**OFFICE OF ENERGY INFRASTRUCTURE SAFETY
WILDFIRE SAFETY DIVISION
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CONTENTS

	UPDATES TO RISK MODELS.....	3
	1.1 Significant Updates.....	3
	1.1.1 Top Risk-Contributing Circuit, Segments, or Spans.....	4
	1.1.2 Qualitative Updates.....	4
1	1.2 Plan Objectives.....	5
	CHANGES TO APPROVED TARGETS, OBJECTIVES, AND EXPENDITURES	7
	2.1 2025 Targets or Target Completion Dates	7
2	2.2 Initiative Objectives.....	7
	2.3 Expenditure Changes.....	8
	QUARTERLY INSPECTION TARGETS FOR 2025	9
3	NEW OR DISCONTINUED PROGRAMS	11
4	PROGRESS ON AREAS FOR CONTINUED IMPROVEMENT	12
5		

TABLE

Table 3- 1. Asset Inspections and Vegetation Management Targets for 2025	9
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ATTACHMENTS

- Attachment A (Confidential): TBC-MP-001: TBC Converter Maintenance Practices Section 4.1.4
- Attachment B (Confidential): TBC-MP-003: Weekly Inspection of the Watch
- Attachment C (Confidential): TBC Checklist Weekly Inspection of the Watch Pittsburg Form
- Attachment D (Confidential): TBC-MP-004: Monthly Inspection Of Watch
- Attachment E (Confidential): TBC Checklist Monthly Inspection of the Watch Pittsburg Form

UPDATES TO RISK MODELS

Instructions: The electrical corporation must report on updates to its risk models. The collective updates to risk models are categorized as either “significant” or “non-significant.” The electrical corporation must categorize the collective changes to its risk models as either significant updates or non-significant updates, not both. The proceeding subsections outline the thresholds to determine if updates to risk models are “significant” or “non-significant.”

When determining if updates to risk models are “significant” (Section 1.1.1) or “non-significant” (Section 1.1.2), the electrical corporation’s analysis must be independent of risk reduction resulting from deployed mitigations described in the approved 2023-2025 Base WMP. For example, if a circuit was undergrounded in late 2023, the analysis would not take that risk reduction into account and would evaluate the risk for that circuit consistent with the point in time represented by WMP Table 6-5¹ in the approved 2023-2025 Base WMP.

An electrical corporation must analyze its top 5 percent of highest risk circuits, segments, or spans² to determine whether updates to its risk models are significant. An electrical corporation’s top ignition risk circuits, segments, or spans are the top 5 percent of highest ignition risk circuits, segments, or spans when the circuits, segments or spans are ranked individually from highest to lowest circuit-mile-weighted ignition risk. An electrical corporation’s top Public Safety Power Shutoff (PSPS) risk circuits, segments or spans are the top 5 percent of highest PSPS risk circuits, segments, or spans when the circuits, segments or spans are ranked individually from highest to lowest circuit-mile-weighted PSPS risk.³

1.1 Significant Updates

Instructions: If an electrical corporation’s updates to its risk models are significant, it must:

- Discuss its updated methodology and models (e.g., using a new machine learning algorithm, changing how wildfire consequences are calculated, or changes to assumptions);
- Provide justification for the updates;
- Show how risk has shifted as a result of the updates; and
- Report any resulting changes to prioritization of mitigation initiatives and scheduling and workplans for the implementation of mitigation initiatives resulting from these updates.

¹ In accordance with the 2023-2025 WMP Technical Guidelines, Table 6-5 “Summary of Top-Risk Circuits, Segments, or Spans.”

² Electrical corporations must use the granularity – circuit, segment, or span – it used to report its “Top Risk-Contribution Circuits/Segments/Spans” in accordance with the 2023-2025 WMP Technical Guidelines, Section 6.4.2.

³ “Ignition risk” and “PSPS risk” are defined in the 2023-2025 WMP Technical Guidelines, Appendix A.

The electrical corporation must use the format established by Tables 1-1 and 1-2 of these 2025 WMP Update Guidelines to summarize the updated top 5 percent of highest-risk circuits, segments, or spans.⁴ If one or both tables are more than 20 lines, then an electrical corporation may submit a spreadsheet as an attachment to the 2025 WMP Update rather than a table to provide the information. Discussions of significant updates to risk models must be limited to 20 pages total. Figures and tables are excluded from the 20-page limit.

1.1.1 Top Risk-Contributing Circuit, Segments, or Spans

Instructions: Significant updates to risk models are defined as:

- Any change or combination of changes to a risk model that moves 10 percent or more of ignition risk into or out of the top ignition risk circuits, segments, or spans,⁵ and/or
- Any change or combination of changes to a risk model that moves 10 percent or more of PSPS risk into or out of the top PSPS risk circuits, segments, or spans.⁶

The electrical corporation must use the format established by Tables 1-1 and 1-2 of these 2025 WMP Update Guidelines to summarize the updated top 5 percent of highest risk circuits, segments, or spans. If one or both tables are more than 20 lines, then an electrical corporation may submit a spreadsheet as an attachment to the 2025 WMP Update rather than a table to provide the information. Discussions of significant updates to risk models must be limited to 20 pages. Figures and tables are excluded from the 20-page limit.

This section of the 2025 WMP Update is not applicable to Trans Bay Cable (TBC) as TBC did not make significant updates to its risk model.

1.1.2 Qualitative Updates

Instructions: Updates to risk models are also considered significant if any of the following qualitative updates are made:

- Introduction of a new model.
- Discontinuation of an existing model.

⁴ The updated list must be independent of risk reduction resulting from deployed mitigations described in the approved 2023-2025 Base WMP. For an updated list that is inclusive of all deployed mitigation, refer to electrical corporation submissions pursuant to Energy Safety’s Data Guidelines, Section 4.3.15.

⁵ Electrical corporations must use the granularity – circuit, segment, or span – it used to report its “Top Risk-Contribution Circuits/Segments/Spans” in accordance with the 2023-2025 WMP Technical Guidelines, Section 6.4.2.

⁶ Electrical corporations must use the granularity – circuit, segment, or span – it used to report its “Top Risk-Contribution Circuits/Segments/Spans” in accordance with the 2023-2025 WMP Technical Guidelines, Section 6.4.2.

- *Any change in existing model application or use-case. For example, newly applying an existing vegetation risk model to PSPS decision-making.*
- *Introduction of new data types. For example, incorporating additional risk drivers into newer versions of a model.*
- *Changes to data sources. For example, using a new source of data to measure vegetation moisture content.*
- *Changes to third-party vendors for risk modeling or inputs to risk modeling.*

Examples of qualitative updates that are not considered significant updates to risk models include, but are not limited to, the following:

- *Updating an existing dataset (e.g., augmenting ignition and outage data sets with 2023 data).*
- *Fixing code errors.*
- *Cleaning input data.*

This section of the 2025 WMP Update is not applicable to TBC as TBC did not make qualitative updates to its risk model.

1.2 Plan Objectives

Instructions: If an electrical corporation's updates to its risk models do not meet the "significant" criteria of Section 1.1.1, the electrical corporation must provide a tabulated summary of changes in risk ranking of the top 5 percent ignition risk and PSPS risk circuits, segments, or spans.

The electrical corporation must use the format established by Tables 1-1 and 1-2 of these 2025 WMP Update Guidelines to summarize the updated top 5 percent of highest risk circuits, segments, or spans.⁷ If one or both tables are more than 20 lines, then an electrical corporation may submit a spreadsheet as an attachment to the 2025 WMP Update rather than a table to provide the information.

Energy Safety defines a non-significant update as:

- *Any change or combination of changes to the risk model that moves less than 10 percent of ignition risk into or out of the top ignition risk circuits, segments, or spans and less than 10 percent PSPS risk into or out of the top PSPS risk circuits, segments, or spans; or*
- *Any change that only moves ignition and PSPS risk within the top risk segments.*

⁷ The updated list must be independent of risk reduction resulting from deployed mitigations described in the approved 2023-2025 Base WMP. For an updated list that is inclusive of all deployed mitigation, refer to electrical corporation submissions pursuant to Energy Safety's Data Guidelines, Section 4.3.15.

This section of the 2025 WMP Update is not applicable to TBC as TBC did not make non-significant updates to its risk model.

CHANGES TO APPROVED TARGETS, OBJECTIVES, AND EXPENDITURES

2 *Instructions:* The electrical corporation must report qualifying changes to targets, objectives, and expenditures from its approved 2023-2025 Base WMP. Each change must be justified by lessons learned,⁸ internal policy changes, new laws or regulations, corrective actions resulting from Energy Safety's compliance process,⁹ or other explanations for the change. Thresholds for qualifying changes to targets, objectives, and expenditures are set forth below.

2.1 2025 Targets or Target Completion Dates

Instructions: For large volume work (equal to or greater than 100 units), the electrical corporation must report changes of 10 percent or greater to a 2025 target from the electrical corporation's approved 2023-2025 Base WMP.

For small volume work (less than 100 units), the electrical corporation must report changes of 20 percent or greater to a 2025 target from the electrical corporation's approved 2023-2025 Base WMP.

This section of the 2025 WMP Update is not applicable to TBC as TBC did not make any reportable changes to any 2025 targets.

2.2 Initiative Objectives

Instructions: The electrical corporation must report any changes to forecasted initiative objective completion dates in its approved 2023-2025 Base WMP that shift an objective's completion to a different compliance period.¹⁰

The electrical corporation may not add or delete 3- and 10-year objectives set forth in its approved 2023-2025 Base WMPs.

TBC does not propose any changes to forecasted initiative objective completion dates in its approved 2023-2025 Base WMP that would shift an objective's completion to a different compliance period.

⁸ "Lessons learned" should be interpreted broadly and is not limited by any definitions, categorizations, or examples presented in the 2023-2025 WMP Technical Guidelines, Section 10: Lessons Learned.

⁹ Including, but not limited to, any compliance assessment, audit, determination, evaluation, investigation, notice, or report pursuant to Government Code sections 15475.1 et seq., Public Utilities Code section 8386.3, or other applicable law, regulation, or guidelines.

¹⁰ "Compliance period" is defined as January 1 to December 31 of each calendar year. Office of Energy Infrastructure Safety Compliance Guidelines, page 3 (<https://efiling.energy.ca.gov/eFiling/Getfile.aspx?fileid=55586&shareable=true>, accessed September 28, 2023).

2.3 Expenditure Changes

Instructions: The electrical corporation must report any changes to 2025 projected expenditures in its approved 2023-2025 Base WMP that result in an increase or decrease of more than \$10 million or constitute a greater than 20 percent change in an initiative's planned total expenditure in the 2025 compliance period.

TBC does not propose any changes to 2025 projected expenditures in its approved 2023-2025 Base WMP that result in an increase or decrease of more than \$10 million or constitute a greater than 20 percent change in an initiative's planned total expenditure in the 2025 compliance period.

QUARTERLY INSPECTION TARGETS FOR 2025

Instructions: The electrical corporation must define quarterly targets (end of Q2 and end of Q3) for 2025 asset and vegetation inspection targets established as end-of-year targets in its approved 2023-2025 Base WMP. The electrical corporation must use the format established by Table 3-1 to report these quarterly targets. Changes to end-of-year 2025 targets must be reported and explained pursuant to Section 2: Changes to Targets, Objectives, and Expenditures, above.

For its redlined and clean 2023-2025 Base WMP, the electrical corporation must add columns for end of Q2 2025 and end of Q3 2025 targets to its asset inspection and vegetation inspection target tables.¹¹

Table 3-1. Example of Asset Inspections and Vegetation Management Targets for 2025

<i>Initiative Activity</i>	<i>Tracking ID</i>	<i>Target End of Q2 2025 & Unit</i>	<i>Target End of Q3 2025 & Unit</i>	<i>End of Year Target 2025 & Unit</i>	<i>x% Risk Impact 2025</i>
<i>Discretionary patrols in High Fire Threat District</i>	<i>AI-02</i>	<i>300 circuit miles</i>	<i>500 circuit miles</i>	<i>700 circuit miles</i>	<i>3%</i>
<i>Hazard tree inspections</i>	<i>VM-04</i>	<i>100 circuit miles inspected</i>	<i>130 circuit miles inspected</i>	<i>200 circuit miles inspected</i>	<i>3%</i>

Table 3- 1. Asset Inspections and Vegetation Management Targets for 2025

Initiative Activity	Tracking ID	Target End of Q2 2025 & Unit	Target End of Q3 2025 & Unit	End of Year Target 2025 & Unit	x% Risk Impact 2025
N/A					
N/A					

¹¹ The tables populated in accordance with the 2023-2025 WMP Technical Guidelines, Tables 8-4 and 8-15.

TBC did not identify any applicable asset inspections or vegetation management targets in its 2023-2025 WMP and did not create any new targets and as such has no changes to its end-of-year 2025 targets.

NEW OR DISCONTINUED PROGRAMS

*Instructions: The electrical corporation must report on the creation of a new program or the discontinuance of a program described in its approved 2023-2025 Base WMP. Each change must be justified by lessons learned,¹² internal policy changes, new laws or regulations, corrective actions **4** resulting from Energy Safety’s compliance process,¹³ or other explanations for the change.*

An electrical corporation’s discussion on new or discontinued programs must be limited to 20 pages total. Figures and tables are excluded from the 20-page limit.

TBC did not create or discontinue any program described in its approved 2023-2025 Base WMP within the reporting time period.

¹² “Lessons learned” should be interpreted broadly and is not limited by any definitions, categorizations, or examples presented in the 2023-2025 WMP Technical Guidelines, Section 10: Lessons Learned.

¹³ Including, but not limited to, any compliance assessment, audit, determination, evaluation, investigation, notice, or report pursuant to Government Code sections 15475.1 et seq., Public Utilities Code section 8386.3, or other applicable law, regulation, or guidelines.

PROGRESS ON AREAS FOR CONTINUED IMPROVEMENT

The electrical corporation must report on progress required by the areas for continued improvement identified in Energy Safety's Decision on the electrical corporation's 2023-2025 WMP.¹⁴ The electrical corporation must provide narrative responses to each required progress that specified reporting in the 2025 WMP Update. This narrative response must include:

- Code and title of the area for continued improvement,
- Description of the area for continued improvement,
- Required progress, and
- The electrical corporation's response to the required progress.

The electrical corporation may refer to other sections of its 2025 WMP Update when reporting on areas for continued improvement if there is a duplication of reporting.

TBC-23-01. QA/QC Process Documentation

- *Description:* TBC states that it has procedures and checklists that provide additional detail about its QA/QC process and is evaluating changes to its QA/QC program as its operational experience grows. TBC does not provide the documents related to QA/QC or details on the QA/QC evaluation process.
- *Required Progress:*
 - In its 2025 Update, TBC must provide all documentation related to its QA/QC processes, including TBC-MP-001 section 4.1.4.
 - An analysis demonstrating the current QA/QC process effectively mitigates wildfire risk.

Required Progress Item No. 1: All documentation related to its QA/QC processes, including TBC-MP-001 section 4.1.4.

TBC identifies the following procedures and checklists which are provided as confidential attachments to this Plan Update.

- TBC-MP-001: TBC Converter Maintenance Practices Section 4.1.4
- TBC-MP-003: Weekly Inspection of the Watch
- TBC Checklist Weekly Inspection of the Watch Pittsburg Form
- TBC-MP-004: Monthly Inspection Of Watch
- TBC Checklist Monthly Inspection of the Watch Pittsburg Form

¹⁴ See 2023 – 2025 Wildfire Mitigation Plan Process and Evaluation Guidelines, Section 4.7: Decision.

Required Progress Item No. 2: An analysis demonstrating the current QA/QC process effectively mitigates wildfire risk.

Due to the limited scale and scope of TBC’s operation, QA/QC activities are not as extensive as those utilities with larger footprints. TBC has a small staff of 6 Operations and Maintenance Technicians¹⁵ (O&M technicians) who conduct the periodic asset inspections and perform or oversee maintenance work. Their work is overseen the Operations Manager¹⁶. All O&M technicians are trained on TBC’s maintenance procedures including TBC-MP-003 and TBC-MP-004, which are procedures for conducting the weekly and monthly Inspections of the Watch (IOWs), respectively. The aforementioned procedures provide thorough guidelines for assessing equipment condition and performance. The IOWs are utilized to document observed conditions and identify conditions that are off normal which require correction.

As the O&M technician performs their inspection of the facility, any issue is documented in the “Notes and Findings” section of the IOW. Any issue which can be immediately remedied, is corrected, with the remedial actions noted. In accordance with TBC-MP-001 Section 4.1.4, completed IOW are turned in to be reviewed by the Operations Manager or their delegate. The reviewer checks the IOW for completeness and for any item/s which have been found to be out of specified parameters or in an “*unsat[isfactory]*” condition. Issues that cannot be addressed immediately identified in the IOW and track as work orders to be addressed utilizing the appropriate corporate or contracted resources as required to achieve a resolution. Any issue that might have material impact to the operation of the system are immediately reported to the on-desk system operator and escalated to the Operations Manager for assessment and determination of required action(s) including forced or planned system outage. This review process, in conjunction, with the frequency of the weekly IOW and monthly IOW creates a continuous loop of asset inspection assessment that serves to identify issues early helping to ensure that equipment is in optimal operation condition which inherently reduces the risk of potential ignition.

TBC-23-02. Documentation of Sharing Best Practices

- *Description: TBC does not document instances of sharing best practices.*
- *Required Progress: In its 2026-2028 Base WMP, TBC must provide documented examples of its sharing of best practices to date (as of the 2026-2028 submission).*

Required Progress Item:

Not required until 2026-2028 Base WMP submission and therefore no information is submitted pursuant to 2025 WMP Update requirement to only update information relevant to 2025 calendar year.

¹⁵ TBC notes that its O&M Technicians also function as system operators.

¹⁶ The Operations Manager is also a qualified O&M Technician and system operator.