



August 14, 2024

To: Horizon West Transmission
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SUBJECT: Office of Energy Infrastructure Safety's Audit and Report on Horizon West Transmission's 2022 Vegetation Management Work

Pursuant to the requirements of California Public Utilities Code section 8386.3(c)(5)(C), the Office of Energy Infrastructure Safety (Energy Safety) completed its audit on Horizon West Transmission's 2022 vegetation management work pursuant to its 2022 Wildfire Mitigation Plan Update. Energy Safety found that Horizon West Transmission substantially complied with the substantial portion of its vegetation management requirements as it completed all the work required for the five applicable initiatives. Consequently, no further response or corrective action is required. If you have any questions concerning this audit and report, please e-mail Marisa Salazar at Marisa.Salazar@energysafety.ca.gov or Alec Latuszek at Alec.Latuszek@energysafety.ca.gov and provide a copy to environmentalsciencedivision@energysafety.ca.gov.

Sincerely,

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

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OFFICE OF ENERGY INFRASTRUCTURE SAFETY
2022 SUBSTANTIAL VEGETATION
MANAGEMENT AUDIT AND REPORT
HORIZON WEST TRANSMISSION

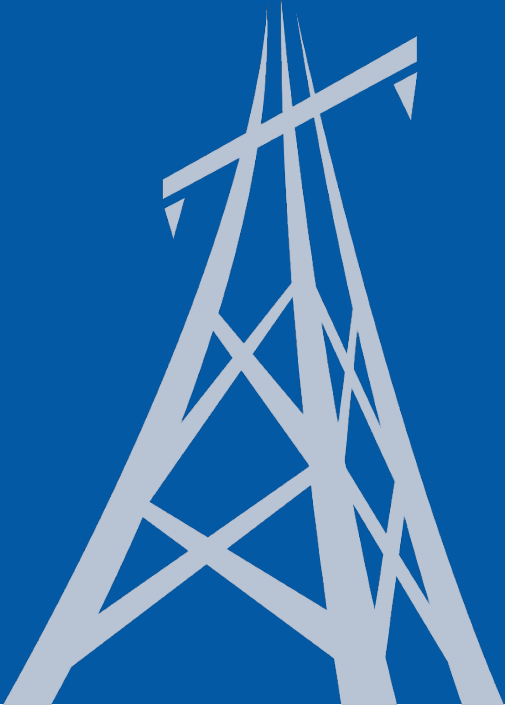
August 2024

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1. OVERVIEW

Pursuant to Public Utilities Code section 8386.3(c)(5), the Office of Energy Infrastructure Safety (Energy Safety) must, on an annual basis, audit the vegetation management work performed by an electrical corporation upon notification that the electrical corporation has completed a substantial portion of the vegetation management requirements in its Wildfire Mitigation Plan (WMP).¹ In each audit, Energy Safety must specify any failure of the electrical corporation to fully comply with the vegetation management requirements in the WMP.

Horizon West Transmission (HWT) submitted its substantial vegetation management (SVM) 2022 completion notification on April 18, 2023. As a result, Energy Safety has completed its SVM audit of HWT's vegetation management program activities for 2022. The 2022 WMP Update Guidelines included 21 vegetation management initiatives. HWT is a transmission-only utility with no end-use customers. HWT's Suncrest Facility supports the San Diego Gas & Electric Company Substation. HWT's vegetation management program is limited to the removal of all vegetation from within the perimeter fenced area of its Suncrest Facility, and placement of rock and treatments with herbicide, as necessary. Accordingly, HWT's 2022 WMP Update included five applicable vegetation management initiatives.²

As part of the SVM audit process, Energy Safety identified vegetation management verifiable statements (e.g., training of personnel) from the HWT 2022 WMP Update. Energy Safety then compared vegetation management commitments and statements from HWT's 2022 WMP Update to the vegetation management work performed by HWT in 2022. Table 1 of this report includes a list of all vegetation management activities and Energy Safety's determination of whether HWT completed all required work for 2022. The detailed analysis, supporting documents and data, and findings for each of the vegetation management initiatives from HWT's 2022 WMP Update are included in Appendix A.

¹ Pub. Util. Code section 8386.3(c)(5).

² [Horizon West Transmission's 2022 Wildfire Mitigation Plan \(May 2022\) \(hereafter HWT's 2022 WMP Update\)](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=52415&shareable=true) (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=52415&shareable=true, accessed July 1, 2024).

2. AUDIT FINDINGS

The audit findings for the HWT 2022 WMP Update vegetation management initiatives are listed in [Table 1](#) and detailed in the Appendix.

Table 1. HWT 2022 SVM Audit Findings

2022 Vegetation Management Initiative	Audit Finding
7.3.5.1 Additional Efforts to Manage Community and Environmental Impacts	Not Applicable
7.3.5.2 Detailed Inspections and Management Practices or Vegetation Clearances around Distribution Electrical Lines and Equipment	Not Applicable
7.3.5.3 Detailed Inspections and Management Practices for Vegetation Clearances Around Transmission Electric Lines and Equipment	Performed Required Work
7.3.5.4 Emergency Response Vegetation Management due to Red Flag Warning or Other Urgent Climate conditions	Not Applicable
7.3.5.5 Fuels Management (Including All Wood Management) and Reduction of “Slash” from Vegetation Management Activities	Not Applicable
7.3.5.6 Improvement of Inspections	Not Applicable
7.3.5.7 Remote Sensing Inspections of Vegetation Around Distribution Electric Lines and Equipment	Not Applicable
7.3.5.8 Remote Sensing Inspections of Vegetation Around Transmission Electric Lines and Equipment	Not Applicable
7.3.5.9 Other Discretionary Inspections of Vegetation Around Distribution Electric Lines and Equipment, Beyond Inspections Mandated by Rules and Regulations	Not Applicable
7.3.5.10 Other Discretionary Inspections of Vegetation	Not Applicable

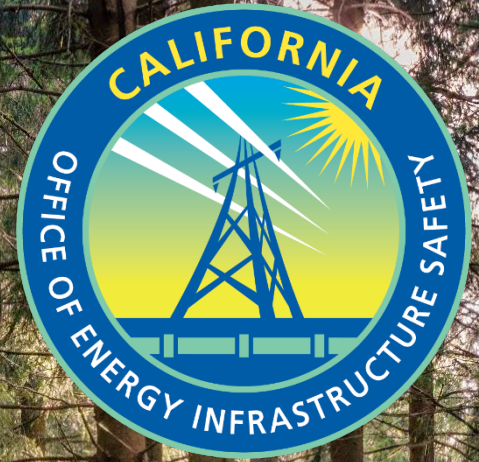
Around Transmission Electric Lines and Equipment, Beyond Inspections Mandated by Rules and Regulations	
7.3.5.11 Patrol Inspections of Vegetation Around Distribution Electric Lines and Equipment	Not Applicable
7.3.5.12 Patrol Inspections of Vegetation Around Transmission Electric Lines and Equipment	Not Applicable
7.3.5.13 Quality Assurance / Quality Control of Vegetation Management	Performed Required Work
7.3.5.14 Recruiting and Training of Vegetation Management Personnel	Not Applicable
7.3.5.15 Identification and Remediation of “At-Risk Species”	Not Applicable
7.3.5.16 Removal and Remediation of Trees with Strike Potential to Electric Lines and Equipment	Not Applicable
7.3.5.17 Substation Inspections	Refer to 7.3.5.3 and 7.3.5.13
7.3.5.18 Substation Vegetation Management	Performed Required Work
7.3.5.19 Vegetation Management System	Not Applicable
7.3.5.20 Vegetation Management to Achieve Clearances Around Electric Lines and Equipment	Refer to 7.3.5.18
7.3.5.21 Vegetation Management Activities Post-Fire	Not Applicable

3. 2022 SVM AUDIT AND REPORT CONCLUSION

The 2022 WMP Update Guidelines included 21 vegetation management initiatives. However, due to the limited geographical area and singularly applicable facility, only five of the 21 initiatives are applicable to HWT per the approved 2022 WMP Update. Energy Safety reviewed the five applicable vegetation management initiatives detailed in HWT's 2022 WMP Update and found that HWT performed all the work specified. For that reason, no corrective actions are required. As a result, Energy Safety finds that HWT substantially complied with the substantial portion of the vegetation management requirements in its 2022 WMP Update.

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APPENDIX ANALYSIS, AND SUPPORTING DOCUMENTATION

Appendix A

Each vegetation management initiative listed in Horizon West Transmission's (HWT) 2022 Wildfire Mitigation Plan (WMP) was analyzed by the Office of Energy Safety (Energy Safety) as part of this audit by identifying the WMP numeric commitment or qualitative statement and comparing that commitment or statement to the work performed by HWT in 2022. HWT's WMP Update included five vegetation applicable management initiatives. Energy Safety conducted an audit of all commitments and/or statements for each initiative; therefore, determination of whether all work was complete for each initiative was based on verification that all WMP numeric commitments or qualitative statements were completed for each initiative.

As shown in Table 1, Energy Safety determined that HWT performed all work identified for the five vegetation management initiatives in its 2022 WMP Update. Below is a summary of each WMP vegetation management initiative commitment or statement, the data or supporting documentation used to verify the commitment or statement, and the associated finding.

A.1 Initiative 7.3.5.3 Detailed Inspections and Management Practices for Vegetation Clearances Around Transmission Electric Lines and Equipment

The purpose of this initiative is the “Careful visual inspections and maintenance of vegetation around the transmission right-of-way, where individual trees are carefully examined, visually, and the condition of each rated and recorded.”³

Statements, Supporting Information and Analysis, and Conclusions

Statement 1

Statement: “Per HWT’s 2020 and 2021 CPUC-approved WMP, HWT has been conducting regular monthly inspections of the Suncrest Facility in addition to extra inspections ahead of RFW conditions in the area of the Facility. HWT plans to continue its cadence of asset inspections.”⁴

Supporting Information and Analysis: HWT provided a vegetation inspection schedule for its Suncrest Facility. The schedule included completion dates specifying that inspections occurred approximately once per month (avg.: 29 days; min.: 21 days; max.: 36 days) at the Suncrest Facility.⁵ HWT did not provide documentation of additional inspections prior to red flag warning (RFW) days because, “there were no red flag warning days within HWT’s territory during 2022.”⁶

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

³ [Attachment 2: 2022 Wildfire Mitigation Plan Update Guidelines Template \(Dec. 2021\) \(hereafter Update Guidelines\)](#), p. 92

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=51912&shareable=true>, accessed July 1, 2024).

⁴ [HWT’s 2022 WMP Update](#), p. 76

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=52415&shareable=true>, accessed July 1, 2024).

⁵ Response to DR-244, question 1; attachment “AMP Monthly Checks 2022.xlsx.”

⁶ Response to DR-244, question 2; “HWT Responses to Energy Safety-DR-244_2024.06.28,” p. 2.

Finding

HWT provided information consistent with the completion of work identified in Initiative 7.3.5.3: Detailed Inspections and Management Practices for Vegetation Clearances Around Transmission Electric Lines and Equipment.

A.2 Initiative 7.3.5.13 Quality Assurance / Quality Control of Vegetation Management⁷

The purpose of this initiative is the “Establishment and function of audit process to manage and oversee the work completed by employees or contractors, including packaging QA/QC information for input to decision-making and workforce management processes. This includes identification of the percentage of vegetation inspections that are audited annually, as a program target in Table 5.3-1.”⁸

Statements, Supporting Information and Analysis, and Conclusions

Statement 2

Statement: “HWT Director of Operations works with HWT’s field operations personnel to review results of monthly equipment inspections and identify any gaps or issues that need to be addressed to mitigate problems and reduce risk of utility-caused ignitions.”⁹

Supporting Information and Analysis: HWT provided two inspection forms which it used to assess vegetation and electrical equipment conditions at the Suncrest Facility.¹⁰ Additionally, HWT shared a screen capture of a monthly reoccurring meeting between the Director of

⁷ In Horizon West Transmission’s 2022 WMP, Horizon West Transmission incorrectly titled initiative 7.3.5.13 as, “Quality assurance / quality control of inspections”. For consistency with the 2022 WMP Guidelines and other audits, Energy Safety has correctly labeled the initiatives in this audit.

⁸ [Update Guidelines](#), pp. 93-94

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=51912&shareable=true>, accessed July 1, 2024).

⁹ [HWT’s 2022 WMP Update](#), p. 77

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=52415&shareable=true>, accessed July 1, 2024).

¹⁰ Response to DR-244, question 3; attachments “HWT_Condition_Assessment_221221-with highlights.pdf” and “HWT_Wildfire_Condition_Assessment_220627-signed.pdf.”

Operations and the Field Engineer who completed the two inspection forms.¹¹ No gaps or issues were discovered in any 2022 inspections.¹²

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

Finding

HWT provided information consistent with the completion of work identified in Initiative 7.3.5.13: Quality Assurance/Quality Control of Vegetation Management.

A.3 Initiative 7.3.5.17 Substation Inspections

The purpose of this initiative is to inspect “vegetation surrounding substations.”¹³

Statements, Supporting Information and Analysis, and Conclusions

Initiative 7.3.5.17 was duplicative of 7.3.5.3 and 7.3.5.13, therefore, Energy Safety did not conduct a separate analysis of the work performed for this initiative.

Finding

See the finding for 7.3.5.3 and 7.3.5.13.

¹¹ Response to DR-244, question 4; attachment “Monthly HWT WMP Compliance Review.pdf.”

¹² Response to DR-244, question 5; “HWT Responses to Energy Safety-DR-244_2024.06.28.pdf.”

¹³ [Update Guidelines](#), attachment 2, p. 94

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=51912&shareable=true>, accessed May 10, 2024).

A.4 Initiative 7.3.5.18 Substation Vegetation Management

The purpose of this initiative is to take actions “to reduce the ignition probability and wildfire consequences attributable to contact from vegetation to substation equipment.”¹⁴

Statements, Supporting Information and Analysis, and Conclusions

Statement 3

Statement: “Per HWT’s 2020 and 2021 CPUC-approved WMP, HWT has engaged a third party to perform vegetation management and remove any vegetation that could come in contact with electric equipment.”¹⁵

Supporting Information and Analysis: HWT provided two third-party vegetation management invoices from March and July of 2022. The invoices list the vegetation management work the third party completed inside and outside of the substation’s perimeter wall. Abatement included herbicide treatments, clearing vegetation around a solar panel riser pole and an area within 25 feet of the outside of the perimeter wall, and focusing on four areas within the substation’s perimeter wall.

HWT included two screenshots from their Work Task Management System—HWT’s record-keeping software—showing that the third-party completed work in both March and July of 2022.¹⁶

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

Statement 4

Statement: “HWT performs vegetation management as needed per its 2020 WMP to

¹⁴ [Update Guidelines](#), pp. 94

¹⁵ [HWT’s 2022 WMP Update](#), p. 79
(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=52415&shareable=true>, accessed July 1, 2024).

¹⁶ Response to DR-244, question 6; attachments “AMP Screenshot March 2022 Vegetation Works.pdf,” and “AMP Screenshot July 2022 Vegetation Works.pdf.”

remove any vegetation around the Suncrest [Facility], including inside the concrete perimeter wall and within a defensible space outside the facility to minimize any potential for contact of vegetation with electric equipment, which could contribute to a fire hazard.”¹⁷

Supporting Information and Analysis: HWT provided an invoice from March 2022 from a third-party contractor, as well as a screenshot of AMP, HWT’s internal record keeping system. The invoice and screenshot demonstrated that vegetation management occurred within the substation’s perimeter walls.¹⁸ There were also two instances of vegetation management that occurred outside of the substation’s perimeter walls, which HWT provided an additional invoice and screenshot of AMP for.¹⁹

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

Finding

HWT provided information consistent with the completion of work identified in Initiative 7.3.5.18: Substation Vegetation Management.

A.5 Initiative 7.3.5.20 Vegetation Management to Achieve Clearances Around Electric Lines and Equipment

The purpose of this initiative is that “Actions taken to ensure that vegetation does not encroach upon the minimum clearances set forth in Table 1 of GO 95, measured between line conductors and vegetation, such as trimming adjacent or overhanging tree limbs.”²⁰

Statements, Supporting Information and Analysis, and Conclusions

¹⁷ [HWT’s 2022 WMP Update](#), p. 78

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=52415&shareable=true>, accessed July 1, 2024).

¹⁸ Response to DR-244, question 6; attachments “Utility Tree Service Invoice 3.8.22.pdf.”

¹⁹ Response to DR-244, question 8, “HWT Responses to Energy Safety-DR-244_2024.06.28.pdf.”

²⁰ [Update Guidelines](#), attachment 2, p. 95

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=51912&shareable=true>, accessed May 10, 2024).

Initiative 7.3.5.20 was duplicative of 7.3.5.18, therefore, Energy Safety did not conduct a separate analysis of the work performed for this initiative.

Finding

See the finding for 7.3.5.18.