



July 18, 2025

Dear Stakeholders,

Enclosed is the Office of Energy Infrastructure Safety's (Energy Safety's) Annual Report on Compliance regarding Horizon West Transmission, LLC's execution of its 2023 Wildfire Mitigation Plan.

This Annual Report on Compliance is published as of the date of this letter. Horizon West Transmission, LLC may, if it wishes to do so, file a public response to this Annual Report on Compliance within 14 calendar days of the date of publication. Comments must be submitted to the Energy Safety's E-Filing system in the 2023 Annual Report on Compliance docket.¹

Sincerely,

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Office of Energy Infrastructure Safety

¹ Submit responses to the [2023-ARC docket via the Office of Energy Infrastructure Safety's E-Filing system](https://efiling.energysafety.ca.gov/EFiling/DocketInformation.aspx?docketnumber=2023-ARC) here: <https://efiling.energysafety.ca.gov/EFiling/DocketInformation.aspx?docketnumber=2023-ARC>.



OFFICE OF ENERGY INFRASTRUCTURE SAFETY

**2023 ANNUAL REPORT ON
COMPLIANCE**

HORIZON WEST TRANSMISSION

July 2025

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Executive Summary

The Office of Energy Infrastructure Safety (Energy Safety) is tasked with evaluating and either approving or denying Wildfire Mitigation Plans (WMPs) annually filed by electrical corporations pursuant to Public Utilities Code section 8386 *et seq.* The law also directs Energy Safety to ensure that the electrical corporations have complied with their WMPs.

Pursuant to Government Code section 15475.1, Energy Safety's primary objective is to ensure that electrical corporations reduce wildfire risk and comply with energy infrastructure safety measures. Energy Safety's annual compliance evaluation of Horizon West Transmission's (HWT's) execution of its 2023 WMP is a comprehensive look at whether HWT's completion of its 2023 WMP initiatives reduced the risk of its equipment igniting a catastrophic wildfire.

Energy Safety's evaluation found that HWT completed nine of nine (100%) of its 2023 targets for initiative activities in its 2023-2025 Base WMP (2023 WMP).

In general, HWT spent below the planned amounts on its 2023 WMP initiatives by nearly \$33,000 in operating expenditure due to operating costs being lower than expected.

Energy Safety conducted its compliance review process through a variety of means including analysis of data submitted by Horizon West Transmission (HWT) to Energy Safety. Energy Safety additionally reviewed HWT's self-assessment in its Electrical Corporation Annual Report on Compliance (EC ARC) and the findings of its independent evaluator.

Energy Safety acknowledges that in 2023 HWT undertook efforts to reduce its wildfire risk, and achieved its WMP initiative activity targets.

On balance, HWT was successful in executing its plan for wildfire risk mitigation.

1. Introduction

This Annual Report on Compliance presents the Office of Energy Infrastructure Safety's (Energy Safety's) statutorily mandated assessment of Horizon West Transmission's (HWT's) compliance with its 2023 targets for initiatives in its 2023-2025 Base Wildfire Mitigation Plan (2023 WMP).¹ While the 2023-2025 Base WMP considers activities over a three-year horizon, this report only addresses targets established for initiatives for the 2023 compliance year. Therefore, this report uses the term "2023 WMP" to refer to portions of the 2023-2025 Base WMP addressed by this report.

In the sections that follow, Energy Safety describes the statutory and regulatory basis for its reporting, the information supplied by the electrical corporation, and the independent evaluation conducted by Energy Safety to examine HWT's execution of its 2023 WMP. Finally, Energy Safety provides its conclusions, observations, and recommendations for further actions by HWT.

1.1 Compliance Process

The statutory objective of electrical corporation wildfire mitigation planning efforts is to ensure that electrical corporations are constructing, maintaining, and operating their infrastructure in a manner that will minimize the risk of catastrophic wildfire.

Energy Safety's 2024 Compliance Process, as approved by the California Public Utilities Commission, establishes the parameters for this Annual Report on Compliance. Consistent with the 2024 Compliance Process, this report considers the totality of all compliance assessments completed with respect to HWT's 2023 WMP. This includes all inspection, audit, investigation, and data analysis work performed by Energy Safety, as well as separate electrical corporation and independent third-party evaluations of compliance.

Energy Safety assessed whether the electrical corporation met the 2023 WMP targets for initiatives, looking specifically at whether the electrical corporation funded and performed the work stated for each initiative.

¹ 2023 WMP.

2. Horizon West Transmission 2023 Wildfire Mitigation Plan

HWT submitted a comprehensive WMP in 2023 covering a three-year term from 2023 through the end of 2025.

Energy Safety approved HWT's 2023 WMP on December 11, 2024.² HWT's 2023 WMP included a total of nine initiatives:

1. Asset Inspections Program (8.1.3.1),
2. Personnel Work Procedures and Training in Conditions of Elevated Fire Risk (8.1.8.3),
3. Vegetation Management Inspection Program (8.2.2.1),
4. Substation Defensible Space (8.2.3.5),
5. High-Risk Species (8.2.3.6),
6. Fire Resilient Right-of-Ways (8.2.3.7),
7. Emergency Response Vegetation Management (8.2.3.8),
8. Quality Assurance and Quality Control of Vegetation Management (8.2.5), and
9. Open Work Orders (8.2.6).

Seven of the initiatives concerned vegetation management.³ The 2023 WMP's three-year objective related to vegetation management was to perform weed abatement activities on a bimonthly basis during winter and spring, and quarterly during summer and fall.⁴

Descriptions of the activities of the 2023 targets for the initiatives contained in HWT's 2023 WMP are listed in the table in Appendix A.

² 2023 WMP Decision.

³ 2023 WMP, page 96.

⁴ 2023 WMP, page 96.

3. Horizon West Transmission Annual Report on Compliance

Public Utilities Code section 8386.3(c)(1) directs electrical corporations to file a report addressing the electrical corporation's compliance with their WMP during a compliance year. This document is known as the Electrical Corporation Annual Report on Compliance (EC ARC).

Energy Safety's 2023 Compliance Guidelines outlined the requirements for an EC ARC prepared to address the 2023 compliance year and filed by the electrical corporation in early 2024. The EC ARC was required to detail the electrical corporation's self-assessment of its compliance with the 2023 WMP during the 2023 compliance period.⁵

HWT submitted its EC ARC to Energy Safety on March 29, 2024.⁶ The following is a narrative summary of the EC ARC.

In general, HWT asserted that it met or exceeded the risk reduction goals outlined in its 2023 WMP. According to HWT's 2023 EC ARC, HWT implemented and tracked the progress of three different mitigations outlined in its 2023 WMP, and progress on these mitigations was reported through three qualitative program metrics.⁷

3.1 EC ARC Information on Initiative Completion

HWT maintained that it met or exceeded the risk reduction intent, as described in the 2023 WMP, for nine program initiatives, including all nine qualitative programs. HWT highlighted the following as key accomplishments in 2023:

- HWT maintained third-party fire brigade support services for the Suncrest facility (as a part of the Personnel Work Procedures and Training in Conditions of Elevated Fire Risk initiative, 8.1.8.3).^{8,9}
- HWT continued its cadence of monthly asset inspections and monitoring, in addition to extra inspections in advance of adverse weather conditions (as a part of the Asset Inspections Program initiative, 8.1.3.1).¹⁰
- HWT engaged a third-party vendor to provide vegetation management services in 2023 which entails weed abatement and management of the defensible space

⁵ Compliance Guidelines.

⁶ HWT ARC.

⁷ HWT ARC.

⁸ HWT ARC, page 3.

⁹ The Suncrest facility is located east of San Diego and is a megavolt-ampere reactive static compensator facility that supports the San Diego Gas & Electric Company Suncrest Substation. EC ARC, page 2.

¹⁰ HWT ARC, page 3.

surrounding the Suncrest facility (as a part of the Vegetation Management Inspection Program initiative, 8.2.2.1).¹¹

3.2 EC ARC Information on Initiative Funding

In general, HWT spent below the planned amounts on its 2023 WMP initiatives by approximately \$30,000 in aggregate.¹² The actual amount spent was lower than planned due to lower than anticipated costs associated with the asset and vegetation inspections.¹³

¹¹ HWT ARC, page 3.

¹² HWT ARC, page 3.

¹³ HWT ARC, page 4.

4. Independent Evaluator ARC for Horizon West Transmission

Energy Safety, in consultation with the Office of the State Fire Marshal, annually publishes a list of entities qualified to serve as independent evaluators of WMP compliance.¹⁴ Each electrical corporation is then required to hire an independent evaluator from the list to perform an independent WMP compliance assessment.¹⁵

The independent evaluator (IE) reviews and assesses the electrical corporation's compliance with its approved WMP. As part of its evaluation, the IE must determine whether the electrical corporation failed to fund any activities included in its plan.

On July 1st of each year, the IE issues its Independent Evaluator Annual Report on Compliance (IE ARC) for a given electrical corporation.¹⁶

The 2023 IE ARC for HWT was prepared by Bureau Veritas North America, Inc.¹⁷ The IE ARC included a review of the wildfire mitigation initiatives and activities implemented in 2023, and an accounting of whether HWT met its performance targets, underfunded any of the initiatives, and followed its quality assurance and quality control (QA/QC) processes.

The two initiatives evaluated in the IE ARC are:

1. Asset Inspection (8.1.3.1) - detailed inspection of transmission electric lines and equipment, and
2. Vegetation Inspections (8.2.2.1) - detailed inspections of vegetation around transmission electric line and equipment.

The IE evaluated those two initiatives for HWT and determined that HWT substantially completed its initiative activities outlined in the approved 2023 WMP.¹⁸

The IE found \$30,000 of budgeted funds were not spent, primarily from three initiative categories: Emergency Preparedness; Grid Design, Operations, and Maintenance; and Vegetation Management and Inspection. These savings were due to overestimations in budgeting and invoices from HWT's contractor being for lesser amounts than expected. In all three categories that came under budget, the IE found that the targeted risk reduction was achieved.

¹⁴ Pub. Util. Code § 8386.3(c)(2)(A).

¹⁵ Pub. Util. Code § 8386.3(c)(2)(B)(i).

¹⁶ Pub. Util. Code § 8386.3(c)(2)(B)(i).

¹⁷ IE ARC.

¹⁸ IE ARC, page 5.

Finally, the IE verified that HWT is applying and following its QA/QC processes for electrical equipment inspections and vegetation management.¹⁹

¹⁹ IE ARC, pages 14-15.

5. Energy Safety Evaluation of WMP Initiative Completion

Energy Safety's assessment of HWT's performance in 2023 indicates that HWT attained nine of its nine targets (100%) for its 2023 WMP initiative activities. The subsections below describe Energy Safety's evaluation of HWT's execution of its 2023 WMP.

5.1 Horizon West Transmission 2023 WMP Initiative Activities Assessed by Energy Safety

Energy Safety assessed nine wildfire mitigation initiatives from HWT's 2023 WMP. The initiatives are grouped into three main categories:

1. Grid Design, Operations, and Maintenance with one initiative assessed and a funding budget of \$148,000.
2. Vegetation Management and Inspection with seven initiatives assessed and a funding budget of \$17,000 for the assessed initiatives. Of the seven initiatives assessed, six were assessed in the Substantial Vegetation Management (SVM) Audit and Report and the remaining initiative was assessed in this ARC.
3. Emergency Preparedness with one initiative assessed and a funding budget of \$75,000.

A complete list of initiatives appears in Appendix A, Table 2.

The initiative assessment process included comparing the actual initiative completion figures reported by HWT in the QDR, the EC ARC, and as reported by the IE in the IE ARC.²⁰ Finally, Energy Safety's SVM Audit and Report also contributed to Energy Safety's ARC assessment.²¹ The information from each of these sources are summarized along with the final assessment of compliance for each initiative in the table in Appendix A.

5.2 Energy Safety Analysis of Substantial Vegetation Management Audits

Public Utilities Code section 8386.3(c)(5) requires Energy Safety to perform an audit of the work performed by, or on behalf of, an EC with respect to the vegetation management

²⁰ 2023 Q4 QDR, EC ARC, IE ARC.

²¹ SVM Audit and Report.

requirements in its WMP.²² Energy Safety refers to this audit as the SVM Audit. Pursuant to section 8386.3(c)(5), Energy Safety conducted an audit of HWT's work with respect to its vegetation management requirements for the 2023 compliance year.

On March 19, 2025, Energy Safety issued its SVM Audit and Report for HWT.²³ In the SVM Audit and Report, Energy Safety reviewed seven vegetation management initiatives detailed in HWT's 2023 WMP and found that HWT performed all the work specified for seven of seven vegetation management initiatives.

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

The specific findings from Energy Safety's SVM Audit and Report are detailed in Appendix B, Table 3.

5.3 Energy Safety Field Inspection Analysis

For the 2023 compliance period, Energy Safety did not conduct inspection activities of HWT's facilities.

5.4 Horizon West Transmission WMP Initiative Activity Attainment in 2023

Energy Safety assessed nine wildfire mitigation initiative activities from the 2023 WMP and found that HWT completed nine out of nine initiatives, spent less than \$33,000 compared to budgeted amounts, and accomplished all the targeted risk reduction. Please refer to the table in Appendix A for more detail on the data assessed by Energy Safety.

Six of the vegetation initiatives were assessed and found complete in the SVM Audit and Report.²⁴ The remaining vegetation initiative, Vegetation Management Inspection Program (8.2.2.1) had a target of 12 site inspections, which was determined by Energy Safety to be met after analyzing data provided in the QDR, EC ARC, and IE ARC.

The two asset initiatives were determined by Energy Safety to be met after analyzing data provided in the QDR, EC ARC, and IE ARC. The two initiatives were: 1) Asset Inspections Program (8.1.3.1), with a target to conduct asset management and inspection and 2) Personnel Work Procedures and Training in Conditions of Elevated Fire Risk (8.1.8.3), with a target to contract a private fire brigade.

²² Pub. Util. Code § 8386.3(c)(5).

²³ SVM Audit and Report.

²⁴ SVM Audit and Report.

6. Wildfire Risk Reduction: Performance Metrics, and Overall WMP Execution

6.1 Ignition Risk and Outcomes Metrics

Due to the limited size and scale of HWT's operations, combined with the inherent hardening against wildfire risk as a function of its infrastructure being newly constructed and mostly underground, Energy Safety did not conduct an ignition risk and outcome metric analysis for HWT in 2023. HWT does not have any retail customers, and thus does not foresee circumstances in which it would issue a public safety power shutoff (PSPS) event.

Nevertheless, Energy Safety reviewed HWT's data and found that no risk events (i.e., ignitions, wire-down events, PSPS events, and unplanned or vegetation caused outages) occurred on HWT's infrastructure in 2023.

6.2 Issues Related to HWT's Execution, Management, or Documentation of its WMP Implementation

This section considers whether HWT exhibited issues related to its execution, management, or documentation in the implementation of its 2023 WMP. To accomplish this, Energy Safety undertook a holistic evaluation of all relevant information sources and assessments, including field verifications, for any systemic failings that may have hindered HWT's ability to reduce the risk of igniting a catastrophic wildfire.

Energy Safety did not find any systemic issues that hindered HWT's ability to adequately implement its WMP in 2023. An analysis of HWT's performance in 2023 revealed that HWT was successful in managing and documenting its data.

7. Conclusion

Overall, HWT had positive outcomes related to the implementation of its 2023 WMP. It met its targets for nine of the nine initiatives (100%) identified in its 2023 WMP, including all the initiatives with planned expenditure. A small amount of budgeted funds (\$33,000) was not used, but this did not impact the attainment of initiative activity targets or the planned risk reductions.

8. References

Table 1: Table of References

Citation	Reference
2023 Q4 QDR	Horizon West Transmission, 2023 Q4 Quarterly Data Report , Published April 15, 2024. URL: (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56492&shareable=true).
2023 WMP	Horizon West Transmission, Wildfire Mitigation Plan 2023 , Published July 8, 2024. URL: (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57001&shareable=true).
2023 WMP Decision	Office of Energy Infrastructure Safety, Decision on 2023 – 2025 Wildfire Mitigation Plan Horizon West Transmission , Published January 30, 2024. URL: (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56224&shareable=true).
Compliance Guidelines	Office of Energy Infrastructure Safety, Compliance Guidelines , Published September 2024. URL: (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57320&shareable=true).
Compliance Operational Protocols	California Public Utilities Commission, 2021 Compliance Operational Protocols , Published February 16, 2021. URL: (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=52615&shareable=true).
Compliance Process	Office of Energy Infrastructure Safety, 2024 Compliance Process , Published October, 2022. URL: (https://energysafety.ca.gov/wp-content/uploads/2024/12/2024-wmp-compliance-process.pdf).
EC ARC	Horizon West Transmission, Annual Report on Compliance for 2023 , Published March 29, 2024. URL: (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56437&shareable=true).

Citation	Reference
IE ARC	Bureau Veritas, Final Independent Evaluator 2024 Annual Report on Compliance ,” Published June 30, 2024. URL: (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57102&shareable=true).
Pub. Util. Code § 8386	California Public Utilities Commission, California Public Utilities Code Section 8386 , URL: (https://leginfo.legislature.ca.gov/faces/codesTOCSelected.xhtml?tocCode=PUC&tocTitle=+Public+Utilities+Code+-+PUC).
SVM Audit and Report	Office of Energy Infrastructure Safety, 2023 Substantial Vegetation Management Audit and Report Horizon West Transmission , Published March 19, 2025, 2023 URL: (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58113&shareable=true).

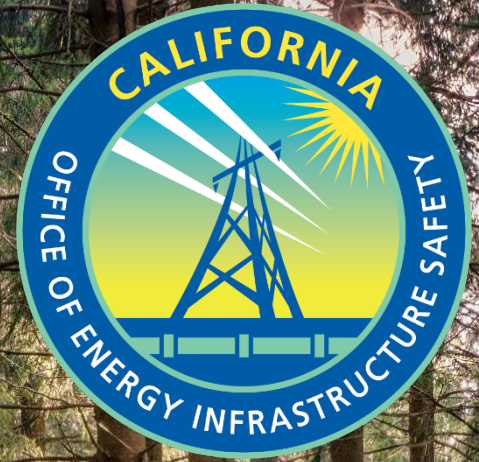
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APPENDICES

9. Appendices

Appendix A: HWT Information on WMP Initiative Activity Attainment

Each of HWT's nine initiative activity targets from its 2023 WMP, and HWT's self-reporting on compliance contained in its QDR, EC ARC, and IE ARC are summarized in Table 2.²⁵

Table 2: HWT Information on WMP Initiative Activity Attainment²⁶

WMP Initiative	WMP Target	QDR	EC ARC	IE ARC	Attainment Status	Planned Expenditure	Actual Expenditure
Asset Inspections Program (8.1.3.1)	Conduct asset management and inspections. Target: Monthly	Met	Met	Met	Met	\$148,000	\$127,000
Personnel Work Procedures and Training in Conditions of Elevated Fire Risk (8.1.8.3)	Contract private fire brigade.	Missing	Met	Met	Met	\$75,000	\$71,000

²⁵ 2023 Q4 QDR, EC ARC, IE ARC.

²⁶ This table includes all initiative activities that had targets for the 2023 compliance year but does not include initiative activities for which HWT had planned or actual expenditures and no targets for the 2023 compliance year.

WMP Initiative	WMP Target	QDR	EC ARC	IE ARC	Attainment Status	Planned Expenditure	Actual Expenditure
Vegetation Management Inspection Program (8.2.2.1)	12 site or area weed abatements. Target: Monthly	Met	Met	Met	Met	\$17,000	\$9,000
Substation Defensible Space (8.2.3.5)	Herbicide treatment and general weed and vegetation abatement as needed.	Missing	Missing	Missing	Met ²⁷	Refer to WMP Initiative 8.2.2.1	Refer to WMP Initiative 8.2.2.1
High-Risk Species (8.2.3.6)	N/A	Missing	Missing	Missing	Met ²⁸	Refer to WMP Initiative 8.2.2.1	Refer to WMP Initiative 8.2.2.1
Fire Resilient Right-of-Ways (8.2.3.7)	N/A	Missing	Missing	Missing	Met ²⁹	Refer to WMP Initiative 8.2.2.1	Refer to WMP Initiative 8.2.2.1

²⁷ SVM Audit and Report, page A-3 to A-4.

²⁸ SVM Audit and Report, page A-5.

²⁹ SVM Audit and Report, page A-6.

WMP Initiative	WMP Target	QDR	EC ARC	IE ARC	Attainment Status	Planned Expenditure	Actual Expenditure
Emergency Response Vegetation Management (8.2.3.8)	N/A	Missing	Missing	Missing	Met ³⁰	Refer to WMP Initiative 8.2.2.1	Refer to WMP Initiative 8.2.2.1
Quality Assurance and Quality Control of Vegetation Management (8.2.5)	Monthly review of reports.	Missing	Missing	Missing	Met ³¹	Refer to WMP Initiative 8.2.2.1	Refer to WMP Initiative 8.2.2.1
Open Work Orders (8.2.6)	N/A	Missing	Missing	Missing	Met ³²	Refer to WMP Initiative 8.2.2.1	Refer to WMP Initiative 8.2.2.1

³⁰ SVM Audit and Report, page A-7.

³¹ SVM Audit and Report, page A-8.

³² SVM Audit and Report, page A-9.

Appendix B: Substantial Vegetation Management Audit of HWT

On March 19, 2025, Energy Safety issued its 2023 SVM Audit and Report for HWT.³³ The purpose of the SVM Audit and Report is to assess whether HWT met its quantitative commitments and verifiable statements in its 2023 WMP related to vegetation management.

The findings from Energy Safety's SVM Audit and Report are summarized in Table 3 below, which is reproduced from the SVM Audit and Report for convenience. The table includes initiatives that were not applicable to HWT's 2023 operations.

Table 3: Substantial Vegetation Management Audit of HWT

Programmatic Area ³⁴	Vegetation Management Initiative	Audit Finding
8.2.2 Vegetation Management Inspections	8.2.2 Vegetation Management Inspections	Completed all work
8.2.3 Vegetation and Fuels Management	8.2.3.1 Pole Clearing	Not applicable
8.2.3 Vegetation and Fuels Management	8.2.3.2 Wood and Slash Management	Not applicable
8.2.3 Vegetation and Fuels Management	8.2.3.3 Clearance	Not applicable
8.2.3 Vegetation and Fuels Management	8.2.3.4 Fall-In Mitigation	Not applicable

³³ SVM Audit and Report.

³⁴ The initiative numbers listed in this table are from the SVM Audit and Report provided by Energy Safety. The initiative numbers referenced throughout the other sections of this document are derived from HWT's 2023 WMP.

Programmatic Area ³⁴	Vegetation Management Initiative	Audit Finding
8.2.3 Vegetation and Fuels Management	8.2.3.5 Substation Defensible Space	Completed all work
8.2.3 Vegetation and Fuels Management	8.2.3.6 High-Risk Species	Refer to 8.2.3.5 Substation Defensible Space
8.2.3 Vegetation and Fuels Management	8.2.3.7 Fire Resilient Right-of-Ways	Refer to 8.2.3.5 Substation Defensible Space
8.2.3 Vegetation and Fuels Management	8.2.3.8 Emergency Response Vegetation Management	Completed all work
8.2.4 Vegetation Management Enterprise System	8.2.4 Vegetation Management Enterprise System	Not applicable
8.2.5 Quality Assurance and Quality Control	8.2.5 Quality Assurance and Quality Control of Vegetation Management	Completed all work
8.2.6 Open Work Orders	8.2.6 Open Work Orders	Completed all work
8.2.7 Workforce Planning	8.2.7 Workforce Planning	Not applicable