



August 12, 2025

Dear Stakeholders,

Enclosed is the Office of Energy Infrastructure Safety's (Energy Safety's) Annual Report on Compliance regarding Trans Bay Cable's execution of its 2023 Wildfire Mitigation Plan.

This Annual Report on Compliance is published as of the date of this letter. Trans Bay Cable 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 E-Filing system in the 2023 Annual Report on Compliance docket.<sup>1</sup>

Sincerely,

Patrick Doherty  
Program Manager | Compliance Assurance Division  
Electrical Infrastructure Directorate  
Office of Energy Infrastructure Safety

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<sup>1</sup> 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**

**TRANS BAY CABLE**

August 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 Trans Bay Cable's (TBC's) execution of its 2023 WMP is a comprehensive look at whether TBC's execution of its 2023 WMP reduced the risk of TBC equipment igniting a catastrophic wildfire.

Energy Safety's evaluation found that Trans Bay Cable (TBC) completed two of two (or 100%) of its 2023 targets for initiative activities and objectives in its 2023-2025 Base WMP (2023 WMP). These two targets were originally established for the 2022 WMP Update compliance period, however TBC included them in its 2023 WMP as targets to be achieved in 2023.

In general, TBC spent below the planned amounts on its 2023 WMP initiatives by approximately \$78,000. This is due to the fact that most of the work on the 2023 WMP initiatives was carried out in calendar year 2022.

Energy Safety conducted its compliance review process through a variety of means including analysis of data submitted by TBC to Energy Safety. Energy Safety additionally reviewed TBC'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 TBC undertook efforts to reduce its wildfire risk, and achieved its WMP initiative activity targets.

On balance, TBC 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 TBC's compliance with its 2023 targets for initiatives and objectives in its 2023-2025 Base Wildfire Mitigation Plan (2023 WMP).<sup>1</sup> While the 2023-2025 Base WMP considers activities over a three- and ten-year horizon, this report only addresses targets established for initiatives and objectives 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 TBC's execution of its 2023 WMP. Finally, Energy Safety provides its conclusions, observations, and recommendations for further actions by TBC.

## 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.<sup>2</sup>

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 TBC'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.<sup>3</sup>

Energy Safety evaluated whether the electrical corporation met the 2023 WMP targets for initiatives and objectives, looking specifically at whether the electrical corporation funded and performed the work stated for each initiative.<sup>4</sup>

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<sup>1</sup> 2023 WMP.

<sup>2</sup> Pub. Util. Code § 8386(a).

<sup>3</sup> Compliance Process, page 8.

<sup>4</sup> Compliance Process, page. 8.

## 2. Trans Bay Cable 2023 Wildfire Mitigation Plan

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

Energy Safety approved TBC's 2023 WMP on January 30, 2024.<sup>5</sup>

TBC's 2023 WMP included a total of two activities:

1. Installation of a fire suppression system in its spare parts building, and
2. Relocation of gas cylinders housed in its spare parts building, and construction of outside protected housing for those cylinders.<sup>6</sup>

Descriptions of the activities and objectives of the programs and initiatives contained in TBC's 2023 WMP are listed in the table in Appendix A.

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<sup>5</sup> 2023 WMP Decision.

<sup>6</sup> 2023 WMP, page 30.

### 3. Trans Bay Cable 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.<sup>7</sup>

TBC submitted its EC ARC to Energy Safety on March 29, 2024.<sup>8</sup> The following is a narrative summary of the EC ARC.

In general, TBC asserted that it had met the risk reduction goals outlined in its 2023 WMP. According to TBC's 2023 EC ARC, TBC implemented and tracked the progress of two different mitigations outlined in its 2023 WMP.<sup>9</sup>

#### 3.1 EC ARC Information on Initiative Completion

TBC maintained that it had met the risk reduction intent, as described in the 2023 WMP, for the two initiative activities, highlighting its key accomplishment in 2023 of completing of all its proposed mitigation objectives.

TBC reported "[t]he gas cylinder enclosure was completed in April 2023, and the fire suppression system was fully installed and operational in October 2023."<sup>10</sup>

#### 3.2 EC ARC Information on Initiative Funding

In general, TBC spent below the planned amounts on its 2023 WMP initiatives by approximately \$78,000 in aggregate.<sup>11</sup> This was due to the fact that most of the work to complete the 2023 initiative activity targets was carried out in 2022.

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<sup>7</sup> Compliance Process, page 8.

<sup>8</sup> EC ARC.

<sup>9</sup> EC ARC, page 3.

<sup>10</sup> EC ARC, page 3.

<sup>11</sup> EC ARC, page 4.

## 4. Independent Evaluator ARC for Trans Bay Cable

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.<sup>12</sup> Each electrical corporation is then required to hire an independent evaluator from the list to perform an independent WMP compliance assessment.<sup>13</sup>

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 1<sup>st</sup> of each year, the IE issues its Independent Evaluator Annual Report on Compliance (IE ARC) for a given electrical corporation.<sup>14</sup>

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

On May 7, 2024, the IE field-verified that TBC completed its initiative activities and objectives outlined in the approved TBC 2023 WMP.<sup>15</sup> The IE also evaluated TBC's funding of initiatives and determined that funding was met.<sup>16</sup> Finally, the IE concluded that TBC is applying and following its QA/QC processes.<sup>17</sup>

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<sup>12</sup> Pub. Util. Code § 8386.3(c)(2)(A).

<sup>13</sup> Pub. Util. Code § 8386.3(c)(2)(B)(i).

<sup>14</sup> Pub. Util. Code § 8386.3(c)(2)(B)(i).

<sup>15</sup> IE ARC, pages 5, 11.

<sup>16</sup> IE ARC, page 15.

<sup>17</sup> IE ARC, page 11.



## 5. Energy Safety Evaluation of WMP Initiative Completion

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

### 5.1 TBC 2023 WMP Initiative Activities Assessed by Energy Safety

Energy Safety assessed two wildfire mitigation initiatives from the 2023 WMP. The initiatives are grouped into one main category:

1. Grid Operations and Protocols with two initiative activities assessed and a funding budget of \$280,000. A complete list of initiatives appears in Appendix A, Table 2.

The initiative assessment process included comparing the actual initiative completion figures reported by TBC in the Quarterly Data Report (QDR), the EC ARC, and the IE ARC.<sup>18</sup> 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 Audit

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 requirements in its WMP.<sup>19</sup> Energy Safety refers to this audit as the Substantial Vegetation Management (SVM) Audit.

However, TBC did not have vegetation management targets or goals for 2023; therefore, Energy Safety did not conduct an SVM audit of TBC for the 2023 compliance year.

### 5.3 Energy Safety Field Inspection Analysis

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

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<sup>18</sup> IE ARC; EC ARC; 2023 Q4 QDR.

<sup>19</sup> Pub. Util. Code § 8386.3(c)(5).

## **5.4 Trans Bay Cable WMP Objective and Initiative Activity Attainment in 2023**

Energy Safety assessed two wildfire mitigation initiative activities from the 2023 WMP and found that all initiative activities were completed. Support for this assessment is reported in TBC's EC ARC, regarding completion of initiative activities between April and October 2023. This work was additionally field verified by TBC's IE, as reported in the IE ARC.

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

### **6.1 Ignition Risk and Outcomes Metrics**

Energy Safety did not conduct an ignition risk and outcome metric analysis for TBC in 2023. TBC does not foresee circumstances in which it would issue a Public Safety Power Shutoff (PSPS) event. Energy Safety reviewed TBC's data and found that no risk events (i.e., ignitions, wire-down events, PSPS events, and unplanned or vegetation caused outages) occurred on TBC's infrastructure in 2023.

### **6.2 Issues Related to TBC's Execution, Management, or Documentation of WMP Implementation**

Energy Safety did not find any systemic issues that hindered TBC's ability to adequately implement its WMP in 2023. However, an analysis of TBC's data submissions to Energy Safety revealed a discrepancy in the 2023 Q4 QDR, Table 11, where actual expenditure detail was not provided. TBC should ensure that its future data reporting to Energy Safety is complete.

## 7. Conclusion

TBC completed two of two (or 100%) of its 2023 targets for initiative activities and objectives in its 2023 WMP. These two targets were originally established for the 2022 WMP compliance period, however TBC included them in its 2023 WMP as targets to be achieved in 2023.

In general, TBC spent below the planned amounts on its 2023 WMP initiatives by approximately \$78,000. This is due to the fact that most of the work on the 2023 WMP initiatives was carried out in calendar year 2022.

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

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



## 8. References

Table 1. References

Citation	Reference
2022 Q3 QDR	Trans Bay Cable, “ <u>Trans Bay Cable QDR Non-Spatial Data for Q3 2022</u> ,” Published November 1, 2022, URL:( <a href="https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53158&amp;shareable=true">https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53158&amp;shareable=true</a> ).
2023 Q4 QDR	Trans Bay Cable, “ <u>Trans Bay Cable Tabular Wildfire Mitigation Data Tables 1-15 for Q4 2023</u> ,” Published May 1, 2024, URL:( <a href="https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56296&amp;shareable=true">https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56296&amp;shareable=true</a> ).
2023 WMP	Trans Bay Cable, “ <u>Wildfire Mitigation Plan</u> ,” Published May 9, 2023, URL:( <a href="https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53815&amp;shareable=true">https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53815&amp;shareable=true</a> ).
2023 WMP Decision	Office of Energy Infrastructure Safety, “ <u>Decision on Trans Bay Cable’s 2023-2025 Wildfire Mitigation Plan</u> ,” Published January 30, 2024, URL:( <a href="https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56223&amp;shareable=true">https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56223&amp;shareable=true</a> ).
Compliance Guidelines	Office of Energy Infrastructure Safety, “ <u>Compliance Guidelines</u> ,” Published September, 2023, URL:( <a href="https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55586&amp;shareable=true">https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55586&amp;shareable=true</a> ).
Compliance Operational Protocols	California Public Utilities Commission, “ <u>2021 Compliance Operational Protocols</u> ,” Published February 16, 2021, URL:( <a href="https://energysafety.ca.gov/wp-content/uploads/docs/misc/wsd/2021.02.16-compliance-operational-protocols.pdf">https://energysafety.ca.gov/wp-content/uploads/docs/misc/wsd/2021.02.16-compliance-operational-protocols.pdf</a> ).
Compliance Process	Office of Energy Infrastructure Safety, “ <u>Compliance Process</u> ,” Published September 2024, URL:( <a href="https://energysafety.ca.gov/wp-content/uploads/2024/12/2024-wmp-compliance-process.pdf">https://energysafety.ca.gov/wp-content/uploads/2024/12/2024-wmp-compliance-process.pdf</a> ).

Citation	Reference
EC ARC	Trans Bay Cable, “ <u>Trans Bay Cable's Annual Report on Compliance for 2023</u> ,” Published March, 2024, URL:( <a href="https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56436&amp;shareable=true">https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56436&amp;shareable=true</a> ).
IE ARC	Bureau Veritas, “ <u>Independent Evaluator Annual Report on Compliance for 2023</u> ,” Published July 1, 2024, URL:( <a href="https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57096&amp;shareable=true">https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57096&amp;shareable=true</a> ).
Pub. Util. Code § 8386	Public Utilities Code, section 8386, Effective January 1, 2022, URL: ( <a href="https://leginfo.legislature.ca.gov/faces/codes_displaySection.xhtml?lawCode=PUC&amp;sectionNum=8386">https://leginfo.legislature.ca.gov/faces/codes_displaySection.xhtml?lawCode=PUC&amp;sectionNum=8386</a> .)

# DATA DRIVEN FORWARD-THINKING INNOVATIVE SAFETY FOCUSED

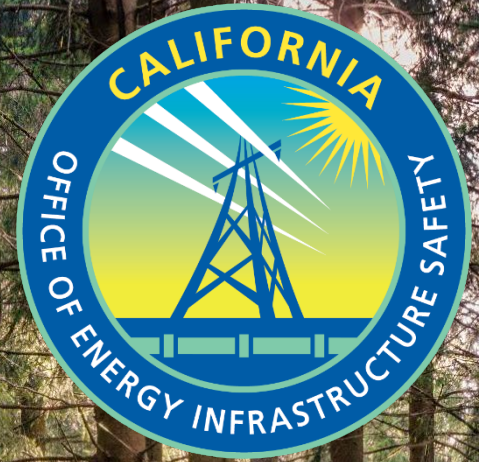


OFFICE OF ENERGY INFRASTRUCTURE SAFETY  
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# APPENDICES



## 9. Appendices

### Appendix A: TBC Information on WMP Initiative Activity Attainment

Each of TBC's two initiative activity targets from its 2023 WMP, and TBC's self-reporting on compliance contained in its QDR, its EC ARC, and the IE ARC are summarized in Table 2.<sup>20</sup>

Table 2. TBC WMP Initiative Activity Attainment Information<sup>21</sup>

2023 WMP Initiative/Objective	2023 WMP Activity Target	QDR	EC ARC	IE ARC	Attainment Status	Planned Expenditure	Actual Expenditure
8.1.2.12 Compressed gas cylinder housing (ID 002)	Installation of a compressed gas cylinder housing	Target: Installation of a compressed gas cylinder housing  Actual: Complete	Target: Installation of a compressed gas cylinder housing  Actual: Complete	Target: Installation of a compressed gas cylinder housing  Actual: Complete	Met	\$280,000 <sup>22</sup>	\$201,900

<sup>20</sup> 2023 Q4 QDR; EC ARC; IE ARC

<sup>21</sup> This table includes all initiative activities that had targets for the 2023 compliance year but does not include initiative activities for which TBC had planned or actual expenditures and no targets for the 2023 compliance year.

<sup>22</sup> TBC did not distinguish planned and actual expenditures by activity. Both activities combined had the planned expenditure of \$280,000 total and an actual expenditure of \$201,900.

2023 WMP Initiative/Objective	2023 WMP Activity Target	QDR	EC ARC	IE ARC	Attainment Status	Planned Expenditure	Actual Expenditure
8.1.2.12 Spare parts building suppression (ID 007)	Installation of a spare parts building suppression system	Target: Installation of a spare parts building suppression system  Actual: Complete	Target: Installation of a spare parts building suppression system  Actual: Complete	Target: Installation of a spare parts building suppression system  Actual: Complete	Met	\$280,000 <sup>23</sup>	\$201,900

<sup>23</sup> TBC did not distinguish planned and actual expenditures per activity. Both activities combined had the planned expenditure of \$280,000 total and an actual expenditure of \$201,900.