



February 9, 2026

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**Subject:      Enclosed is the Office of Energy Infrastructure Safety’s Decision for the  
Horizon West Transmission 2026-2028 Base Wildfire Mitigation Plan**

Mr. Hoffman:

Enclosed is the Decision of Office of Energy Infrastructure Safety approving the Horizon West Transmission’s (HWT) 2026-2028 Base Wildfire Mitigation Plan (2026-2028 Base WMP).

On November 21, 2025, Energy Safety published a draft of this Decision for public review and comment.

Opening comments on the draft Decision were due on December 15, 2025, and reply comments were due on December 26, 2025.

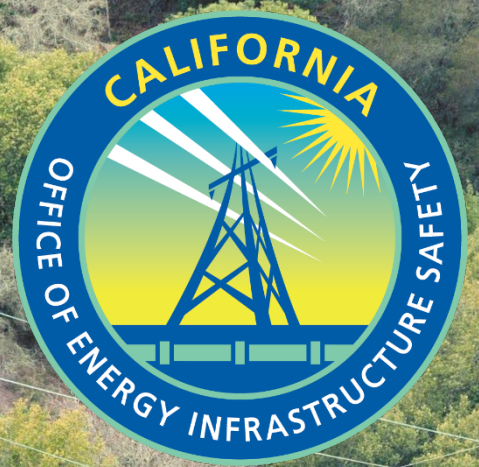
No stakeholder comments were received during either of these comment periods. Energy Safety made non-substantive changes to correct typographical errors in the text and one substantive change in Section 12.1 to incorporate references to asset management program transition timelines and milestones, as revised by HWT in its 2026-2028 Base WMP R2.

Sincerely,

/s/Tony Marino

Tony Marino  
Deputy Director | Electrical Infrastructure Directorate  
Office of Energy Infrastructure Safety





**OFFICE OF ENERGY INFRASTRUCTURE SAFETY**

**DECISION**

**HORIZON WEST TRANSMISSION**

**2026-2028 BASE WILDFIRE MITIGATION PLAN**

February 9, 2026



# 1. Executive Summary

The Horizon West Transmission (HWT) 2026-2028 Base Wildfire Mitigation Plan (WMP) is approved.

The Office of Energy Infrastructure Safety (Energy Safety) works to ensure electrical corporations construct, maintain, and operate electrical lines and equipment in a manner that will minimize the risk of catastrophic wildfire posed by those electrical lines and equipment. Pursuant to Public Utilities Code section 8386.3(a), this Decision serves as Energy Safety's assessment and approval of the HWT 2026-2028 Base WMP R2, dated December 9, 2025, which is inclusive of all changes resulting from the previously submitted errata.

HWT is an independent transmission owner. Independent transmission owners are transmission-only electrical corporations with no end-use customers. These electrical corporations have limited assets and footprints compared to the large investor-owned utilities and small and multi-jurisdictional investor-owned utilities in California.

In its 2026-2028 Base WMP, HWT demonstrated that it continues to improve and expand its asset inspection practices. HWT conducts monthly visual asset inspections of the Suncrest Facility, which now include aerial drone inspections in addition to on-the-ground inspections. The use of drones provides greater coverage and accuracy, strengthening a program that meets General Order 174 requirements and effectively supports wildfire mitigation.

Additionally, HWT also maintains accountability through its quality assurance processes. Inspection issues are tracked in its internal database, and field engineers are now required to review a sample of reports that they did not originate, helping ensure consistency and adherence to operational standards. This reflects a proactive step toward accountability and improving procedural discipline, supporting more reliable identification and resolution of potential risks.

HWT's consideration of an additional water tank reflects a proactive effort to enhance firefighting and emergency response capabilities, but HWT did not provide a clear evaluation process or timeline. HWT must provide further details in its next WMP Update on the evaluation or construction of an additional water tank, along with progress to date and decision-making criteria.

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## 2. Introduction

Energy Safety approves the HWT 2026-2028 Base Wildfire Mitigation Plan (2026-2028 Base WMP), R2, which includes revisions resulting from the previously submitted errata.

HWT submitted its revised 2026-2028 Base WMP R2 on December 9, 2025. This Base WMP covers a three-year period from 2026 through the end of 2028 (the WMP cycle). HWT prepared its Base WMP in accordance with the requirements set forth in the Energy Safety WMP Guidelines.

### 2.1 2026-2028 Base WMP Submission and Publication Summary

This section provides a list of the 2026-2028 Base WMP submissions and publications by HWT and Energy Safety. Information regarding the submission types can be found in the Energy Safety WMP Guidelines.

- 06/13/2025 - HWT submitted its 2026-2028 Base WMP Pre-Submission
- 06/27/2025 - Energy Safety issued the Pre-Submission Check Sufficiency Determination for the HWT 2026-2028 Base WMP Pre-Submission
- 07/25/2025 - HWT submitted its 2026-2028 Base WMP
- 07/29/2025 - HWT submitted its 2026 Maturity Survey
- 09/02/2025 - Energy Safety issued a Notice on Errata for HWT 2026-2028 Base WMP R0
- 09/16/2025 - HWT submitted its revised 2026-2028 Base WMP R1
- 11/21/2025 - Energy Safety issued a Notice on Errata for HWT 2026-2028 Base WMP R1
- 11/21/2025 - Energy Safety issued a Draft Decision for the HWT 2026-2028 Base WMP R1
- 12/9/2025 - HWT submitted its revised 2026-2028 Base WMP R2

### 2.2 Consultation with California Department of Forestry and Fire Protection

The Office of the State Fire Marshal is part of the California Department of Forestry and Fire Protection (CAL FIRE). Public Utilities Code section 8386.3(a) requires Energy Safety to consult with the Office of the State Fire Marshal in reviewing electrical corporation WMPs. The Office of the State Fire Marshal provided meaningful consultation and input on the evaluation, but this Decision is solely an action of Energy Safety and not the Office of the State Fire Marshal or CAL FIRE.

## 2.3 Public Comment

### 2.3.1 Comments on the HWT 2026-2028 Base WMP

Energy Safety did not receive any public comments on the HWT 2026-2028 Base WMP.

### 2.3.2 Comments on the Draft Energy Safety Decision for the HWT 2026-2028 Base WMP

Energy Safety did not receive any public comments on the Draft Decision for the HWT 2026-2028 Base WMP.

## 2.4 Environmental Compliance

An approved WMP shall not be construed as relieving any electrical corporation from complying with all applicable local, state, or federal environmental requirements. A list of selected examples of state environmental requirements is available on Energy Safety's website for reference.<sup>1</sup> Electrical corporations should reach out to the primary agency responsible for an environmental requirement for any additional information.

## 2.5 Area for Continued Improvement Reporting

Reporting of required progress for areas for continued improvement in this Decision fall into the categories of due by next WMP Update or next Base WMP. Areas for continued improvement that require progress by the next WMP Update will be due no sooner than a 2027 WMP Update. The timing and period covered by the next Base WMP have yet to be decided. The schedule for upcoming WMP submissions is pending development due to ongoing implementation of 2025 California Legislative Service Chapter 119 (Senate Bill 254, Becker) ("SB 254").

SB 254, which became law on September 19, 2025, impacts WMP cycles, submission schedules, and technical requirements, and imposes new and amended statutory requirements on the existing WMP process. Energy Safety is working to implement the changes from SB 254 and expects to hold at least one public workshop to gather feedback from electrical corporations and stakeholders on potential changes. Energy Safety plans to issue a WMP submission schedule and to revise its WMP Guidelines to reflect the changes and new requirements.

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<sup>1</sup> [Examples of State Environmental Requirements.](#)

### 3.      **Introductory Sections of the WMP**

HWT provided the required information for the following sections in accordance with Chapter III of the WMP Guidelines:

- Section 1: Executive Summary
- Section 2: Responsible Persons
- Section 3: Overview of the WMP (Primary Goal, Plan Objectives, Prioritized List of Wildfire Risks and Risk Drivers, Performance Metrics, Projected Expenditures, and Climate Change)
- Section 4: Overview of the Service Territory (Service Territory, Catastrophic Wildfire History, and Frequently Deenergized Circuits)



## 4. Projected Expenditures

HWT provided the required information<sup>2</sup> regarding projected expenditures in accordance with Chapter III, Section 3.6 of the WMP Guidelines. HWT provided additional information regarding projected expenditure in accordance with the Energy Safety Data Guidelines,<sup>3</sup> a summary of this information is presented below.

Table 4-1 presents the territory-wide expenditure per initiative category by ITOs. Table 4-2 provides ITOs' expenditures per initiative category by HFTD vs non-HFTD. Figure 4-1 shows HWT's vegetation management and inspection projected expenditures in the HFTD by year.

Table 4-1. HWT Projected Expenditure Comparison<sup>4</sup>

WMP Initiative Category	Trans Bay Cable		Horizon West		LS Power	
	Total Territory	% of Grand Total	Total Territory	% of Grand Total	Total Territory	% of Grand Total
Wildfire Mitigation Strategy	\$0	\$0	\$0	\$0	\$0.0	0.00%
Vegetation Management and Inspections	\$0	\$0	\$1.2M	61.9%	\$82.0K	11.04%
Situational Awareness and Forecasting	\$0	\$0	\$0	\$0	\$452.0K	60.8%
Risk Methodology and Assessment	\$0	\$0	\$0	\$0	\$0.0	0.00%
Grid Design, Operations, and Maintenance	\$0	\$0	\$0	\$0	\$137.0K	18.4%
Enterprise Systems	\$0	\$0	\$0	\$0	\$0.0	0.00%
Emergency Preparedness, Collaboration and Public Awareness	\$0	\$0	\$750.0K	38.1%	\$72.0K	9.7%
<b>Grand Total</b>	<b>\$0</b>	<b>0%</b>	<b>\$2.0M</b>	<b>100%</b>	<b>\$743.0K</b>	<b>100%</b>

<sup>2</sup> Energy Safety's WMP evaluation and decision on a WMP is not an approval of, or agreement with, costs listed in the WMP.

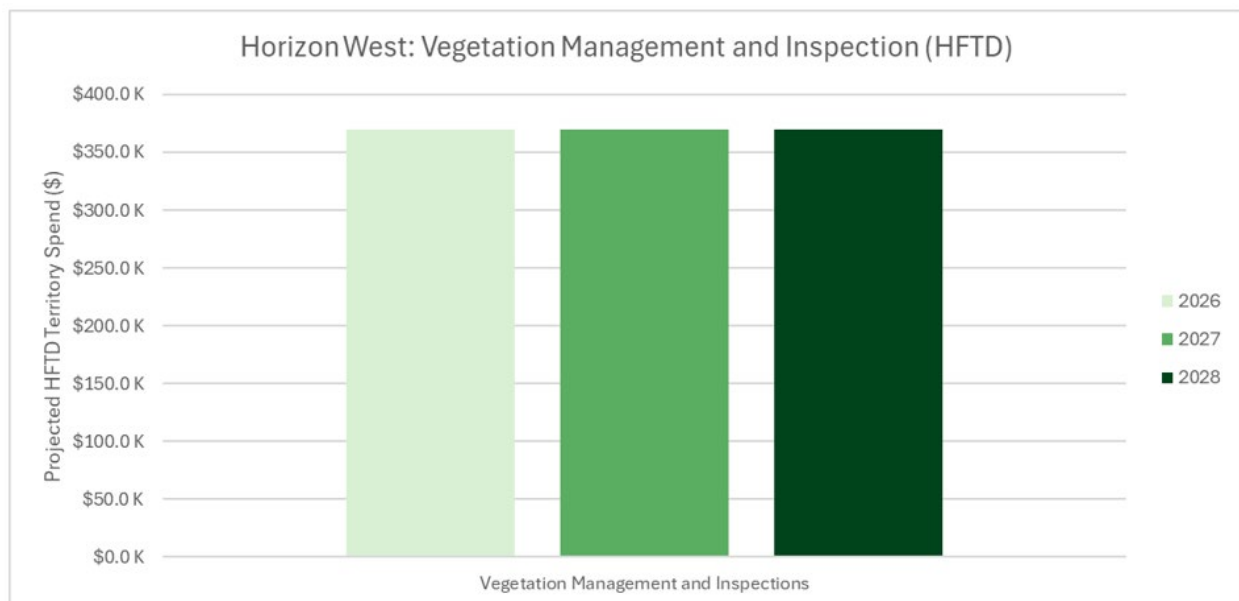
<sup>3</sup> Data Guidelines, pages 165-167.

<sup>4</sup> Trans Bay Cable reported "Not applicable" for all expenditure. Horizon West and LS Power reported "Not applicable" in categories where zero is reported here. Specifically, Trans Bay Cable, Horizon West, and LS Power reported no planned expenditure for covered conductor, undergrounding, asset inspections, or customer support in wildfire and PSPS emergencies.

Table 4-2. HWT Projected Expenditure Comparison HFTD vs Non-HFTD<sup>5</sup>

WMP Initiative Category	Trans Bay Cable			Horizon West			LS Power		
	HFTD	Non-HFTD	% Spend in HFTD	HFTD	Non-HFTD	% Spend in HFTD	HFTD	Non-HFTD	% Spend in HFTD
Wildfire Mitigation Strategy	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	0%
Vegetation Management and Inspections	\$0	\$0	\$0	\$1.2M	\$0.0	100%	\$0	\$82.0K	0%
Situational Awareness and Forecasting	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$452.0K	0%
Risk Methodology and Assessment	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	0%
Grid Design, Operations, and Maintenance	\$0	\$0	\$0	\$0	\$0	\$0	\$45.0K	\$92.0K	33%
Enterprise Systems	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	0%
Emergency Preparedness, Collaboration and Public Awareness	\$0	\$0	\$0	\$750.0K	\$0.0	100%	\$8.0K	\$64.0K	11%
<b>Grand Total</b>	<b>\$0</b>	<b>\$0</b>	<b>\$0</b>	<b>\$2.0M</b>	<b>\$0</b>	<b>100%</b>	<b>\$53.0K</b>	<b>\$690.0K</b>	<b>7.1%</b>

Figure 4-1. HWT Vegetation Management and Inspection in the HFTD by Year

<sup>5</sup> Only Horizon West reported planned expenditures for vegetation management and inspections in HFTD.

## 5. Risk Methodology and Assessment

Chapter III, Section 5 of the WMP Guidelines requires the electrical corporation to provide an overview of its risk methodology, key input data and assumptions, risk analysis, and risk presentation (i.e., the results of its assessment).<sup>6</sup> The HWT 2026-2028 Base WMP met the requirements of the WMP Guidelines for this section.

### 5.1 Discussion

This section discusses Energy Safety's evaluation of the risk methodology and assessment section of the HWT 2026-2028 Base WMP.

#### 5.1.1 Methodology

HWT's methodology allows HWT to understand the risk on its system and identify mitigation activities at an appropriate level.

HWT stated that it does not use risk modeling to assess wildfire risk given HWT's limited scope and scale of operations.<sup>7</sup> Instead, HWT reported it applied a failure modes and effects analysis (FMEA) methodology to evaluate wildfire risk.<sup>8</sup> HWT used this approach to identify potential equipment failure modes, assess the effectiveness of current processes and controls, and inform its selection of wildfire mitigation activities.<sup>9</sup> FMEA is a structured, qualitative approach that identifies potential equipment failure modes and evaluates their effects on system performance and safety. Unlike quantitative risk modeling, which estimates the probability and consequence of wildfire events through data-driven methods, FMEA focuses on process- and equipment-level vulnerabilities. Given that wildfire consequence for HWT is very low, and the design of the facility (further discussed in Section 9.1) already minimizes wildfire risk, FMEA provides a sufficient level of analysis that allows HWT to understand the risks on its system and to identify mitigation activities.

#### 5.1.2 Risk Analysis Framework

HWT reported that in its FMEA analysis, it identified and ranked risk drivers across these three dimensions: (1) the degree of impact once an event occurs; (2) the likelihood of an event

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<sup>6</sup> Pub. Util. Code §§ 8386(c)(3), (8), (12)-(13), (17)-(18).

<sup>7</sup> HWT, 2026-2028 Base WMP R2, page 38.

<sup>8</sup> HWT, 2026-2028 Base WMP R2, page 35.

<sup>9</sup> HWT, 2026-2028 Base WMP R2, page 35.

taking place; and (3) the ability to recognize when an event has occurred.<sup>10</sup> Given the limited scale of HWT's assets, these three factors provide a structured framework that aligns with HWT's risk profile and supports the evaluation of potential wildfire mitigation activities.

### **5.1.3 Risk Analysis Results and Presentation**

HWT reported that its FMEA analysis identified its two transformers and its riser pole, all of which are located at a hardscaped substation within Tier 3 HFTD, as the highest-risk components in its systems.<sup>11</sup> This outcome is consistent with the risk analysis findings of the other ITOs.

### **5.1.4 Quality Assurance and Quality Control**

HWT stated that its field engineers and senior leadership conducted an annual review of the FMEA process to consider potential improvements.<sup>12</sup> Given the low wildfire risk and the limited change in HWT's risk profile, the annual review provides a structured opportunity to evaluate whether the methodology continues to align with the utility's risk conditions.

### **5.1.5 Risk Assessment Improvement Plan**

HWT reported that it does not have any current risk assessment improvement plan.<sup>13</sup> Given that HWT's wildfire risk is very low, the FMEA analysis is sufficient for HWT to understand the risk on its system.

## **5.2 Areas for Continued Improvement**

Energy Safety identifies no previous or new areas for continued improvement in the Risk Methodology and Assessment section for the HWT 2026-2028 Base WMP.

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<sup>10</sup> HWT, 2026-2028 Base WMP R2, page 38.

<sup>11</sup> HWT, 2026-2028 Base WMP R2, page 39.

<sup>12</sup> HWT, 2026-2028 Base WMP R2, page 40.

<sup>13</sup> HWT, 2026-2028 Base WMP R2, page 41.



## 6. Wildfire Mitigation Strategy Development

Chapter III, Section 6 of the WMP Guidelines requires the electrical corporation to provide a high-level overview of the risk evaluation process that inform its selection of a portfolio of initiative activities, as well as its overall wildfire mitigation strategy.<sup>14</sup> The HWT 2026-2028 Base WMP met the requirements of the WMP Guidelines for this section.

### 6.1 Discussion

This section discusses Energy Safety's evaluation of the wildfire mitigation strategy development section of the HWT 2026-2028 Base WMP.

#### 6.1.1 Risk Evaluation

HWT's overall wildfire risk is low due to its system's limited scope and scale.

HWT identified the Suncrest Substation as its highest wildfire risk asset due to its location within a Tier 3 high fire threat district (HFTD).<sup>15</sup> HWT also noted that all aboveground transmission infrastructure at the Suncrest Substation is contained within a 10-foot wall. In addition, the entire substation is surrounded by a hardscaped fuel modification zone,<sup>16</sup> which may limit available fuel and potential wildfire spread.

#### 6.1.2 Wildfire Mitigation Strategy

HWT must provide additional information regarding its consideration of an additional water tank at the Suncrest Facility.

HWT reported that it had notional plans to add an additional water tank at the Suncrest Facility.<sup>17</sup> In a supplemental response to a data request, HWT stated that it will provide an update in its 2027 WMP Update to document any material progress or decision-making related to the additional water tank project.<sup>18</sup>

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<sup>14</sup> Pub. Util. Code §§ 8386(c)(3), (12)-(14).

<sup>15</sup> HWT, 2026-2028 Base WMP R2, page 44.

<sup>16</sup> HWT, 2026-2028 Base WMP R2, page 50.

<sup>17</sup> HWT, 2026-2028 Base WMP R2, page 62.

<sup>18</sup> HWT, Supplemental Response to DR-002, Question 2, page 1.

HWT's response and timeline lack clarity and details. Therefore, HWT must provide information on the evaluation or construction of an additional water tank in its next WMP Update.

See area for continued improvement HWT-26B-01 Additional Water Tank at Suncrest Facility in Section 6.2.

## 6.2 Previous Areas for Continued Improvement

Energy Safety identifies no previous areas for continued improvement in the Wildfire Mitigation Strategy Development section for the HWT 2026-2028 Base WMP.

## 6.3 Areas for Continued Improvement for Future WMP Submissions

As discussed above, Energy Safety has identified areas pertaining to wildfire mitigation strategy development where the electrical corporation must demonstrate improvement in a future, specified WMP submission. This section sets forth the requirements for improvement.

### 6.3.1 HWT-26B-01. Additional Water Tank at Suncrest Facility

Summary: HWT stated that it will provide an update in its 2027 WMP Update to document any material progress or decisions associated with its plan for an additional water tank near the Suncrest Substation.<sup>19</sup>

Requirements: In its next WMP Update, HWT must:

- Provide a narrative explanation on the status of its evaluation or construction of an additional water tank to include:
  - If HWT is evaluating the need for the additional water tank, this must include,
    - Timeline for when HWT will begin and conclude its evaluation; and
    - Criteria for how HWT will determine if it needs to construct an additional water tank.
  - If HWT has concluded its evaluation and is working to install the additional water tank, this must include,
    - A timeline and milestones for the construction of the additional water tank.
  - If HWT has concluded its evaluation and is not planning to install the additional water tank during the 2026-2028 base WMP cycle, this must include,

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<sup>19</sup> HWT, Supplemental Response to DR-002, Question 2, page 1.

- An explanation of this determination.
- Include the additional water tank as an initiative to *HWT Table 1-1 Utility Mitigation Activity Tracking IDs* of its 2026-2028 Base WMP to track the evaluation or construction of an additional water tank that is within the three-year cycle.

Discussed in: Section 6.1.2 Wildfire Mitigation Strategy

Appendix C provides a consolidated list of areas for continued improvement and requirements.

## 7. Public Safety Power Shutoffs

Chapter III, Section 7 of the WMP Guidelines requires the electrical corporation to provide an overview narrative of planned initiative actions to reduce the impacts of Public Safety Power Shutoff (PSPS) events.<sup>20</sup> The HWT 2026-2028 Base WMP met the requirements of the WMP Guidelines for this section.

### 7.1 Discussion

This section discusses Energy Safety's evaluation of the PSPS section of the HWT 2026-2028 Base WMP.

HWT highlighted that as an ITO without a service territory or end-use customers, it has not deenergized any circuits to mitigate wildfire risk and does not anticipate initiating a PSPS.<sup>21</sup> Any PSPS impacting the Suncrest Substation would be initiated by San Diego Gas and Electric company (SDG&E) and would automatically take HWT's facility offline.<sup>22</sup>

### 7.2 Areas for Continued Improvement

Energy Safety identifies no previous or new areas for continued improvement in the Public Safety Power Shutoffs section for the HWT 2026-2028 Base WMP.

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<sup>20</sup> Pub. Util. Code, § 8386(c)(8).

<sup>21</sup> HWT, 2026-2028 Base WMP R2, page 69.

<sup>22</sup> HWT, 2026-2028 Base WMP R2, page 69.



## 8. Grid Design, Operations, and Maintenance

Chapter III, Section 8 of the WMP Guidelines requires the electrical corporation to include plans for grid design, operations, and maintenance programmatic areas in its WMP.<sup>23</sup> The HWT 2026-2028 Base WMP met the requirements of the WMP Guidelines for this section.

### 8.1 Discussion

This section discusses Energy Safety's evaluation of the grid design, operations, and maintenance section of the HWT 2026-2028 Base WMP.

#### 8.1.1 Grid Design and System Hardening

HWT currently has no planned grid design or system hardening initiatives or activities. While HWT's Suncrest Facility is in HFTD Tier 3, the design of the facility (further discussed in Section 9.1) already minimizes wildfire risk, including through the undergrounding of its power transmission lines.

#### 8.1.2 Asset Inspections

Through incorporating lessons learned, HWT is improving its asset inspection protocols.

HWT stated that it will perform monthly visual inspections of the Suncrest Facility, which now include both on-the-ground inspections and aerial drone inspections by field personnel.<sup>24</sup> This meets regulatory requirements under General Order (GO) 174<sup>25</sup> and is aligned with the other ITOs. Energy safety considers this a satisfactory inspection interval to mitigate wildfire risk for HWT and that its inspection program effectively supports wildfire mitigation given HWT's limited footprint and the size and scope of its operations.

In addition, HWT stated it will perform additional inspections ahead of extreme weather conditions at the discretion of the operational personnel.<sup>26</sup> HWT adopted this practice based on lessons learned from the implementation of its 2020 and 2021 WMPs and from its

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<sup>23</sup> Pub. Util. Code §§ 8386(c)(3), (6), (10), (14)-(15).

<sup>24</sup> HWT, 2026-2028 Base WMP R2, page 84.

<sup>25</sup> CPUC, General Order 174.

<sup>26</sup> HWT, 2026-2028 Base WMP R2, page 84.

experience with the Valley Fire and Road Fire.<sup>27</sup> This is a positive proactive addition to HWT's inspection plan.

### 8.1.3 Equipment Maintenance and Repair

HWT's equipment maintenance schedules follow regulatory requirements, manufacturer recommendations, and industry best practices. This may mitigate wildfire risk.

### 8.1.4 Quality Assurance and Quality Control

HWT's plan for grid design, operations, and maintenance quality assurance and quality control is sufficient to manage wildfire risk given its scope of operations.

HWT stated that issues identified during monthly inspections are documented in HWT's internal database.<sup>28</sup> HWT reported no new planned changes to its quality assurance and quality control process for the 2026-2028 Base WMP cycle.

HWT explained it has already added a task item requiring field engineers to annually review at least one month's inspection reports that they did not originate, ensuring accuracy and consistency with HWT's operational procedures.<sup>29</sup> This demonstrates HWT's approach toward accountability to ensure the procedures and processes are followed.

HWT reported no quality assurance and quality control audit pass rate calculations because HWT will not implement any auditing of wildfire mitigation activities for grid design, asset inspection, and maintenance during 2026-2028 Base WMP cycle.<sup>30,31</sup> This lack of auditing is unlikely to increase wildfire risk given that the design of the Suncrest Facility already minimizes wildfire risk through features such as the undergrounding of transmission assets, a surrounding concrete wall, and the establishment of an ember-resistant hardscape and fuel modification zone.

### 8.1.5 Grid Operations and Procedures

HWT stated it monitors the Suncrest megavolt-amperes reactive (Mvar) Static Var Compensator (SVC) facility and associated transmission system in real time.<sup>32</sup> Any site anomalies are reported to the field engineers who manage and undertake corrective

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<sup>27</sup> HWT, 2026-2028 Base WMP R2, page 45.

<sup>28</sup> HWT, 2026-2028 Base WMP R2, page 96.

<sup>29</sup> HWT, 2026-2028 Base WMP R2, page 96.

<sup>30</sup> HWT, 2026-2028 Base WMP R2, page 97.

<sup>31</sup> HWT, 2026-2028 Base WMP R2, page 99.

<sup>32</sup> HWT, 2026-2028 Base WMP R2, page 104.

actions.<sup>33</sup> Given the limited scope and nature of its assets, HWT's monitoring and operational practices can be expected to effectively to mitigate wildfire risk.

### **8.1.6 Workforce Planning**

HWT stated it is not planning to expand or change its workforce.<sup>34</sup> This is reasonable given the nature of HWT's assets, as no additional staffing is required to maintain current operations.

## **8.2 Areas for Continued Improvement**

Energy Safety identifies no previous or new areas for continued improvement in the Grid Design, Operations, and Maintenance section for the HWT 2026-2028 Base WMP.

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<sup>33</sup> HWT, 2026-2028 Base WMP R2, page 104.

<sup>34</sup> HWT, 2026-2028 Base WMP R2, page 106.

## 9. Vegetation Management and Inspections

Chapter III, Section 9 of the WMP Guidelines requires the electrical corporation to include plans for vegetation management in its WMP.<sup>35</sup> The HWT 2026-2028 Base WMP met the requirements of the WMP Guidelines for this section.

### 9.1 Summary of Anticipated Risk Reduction

HWT's vegetation management program, supported by its ember-resistant facility design and sustained by its inspections and treatments, is sufficient to reduce wildfire risk at the Suncrest Facility.

HWT's Suncrest Facility consists of a substation surrounded by a 10-foot concrete wall, a riser pole just outside the perimeter wall, and approximately one mile of 230 kV underground transmission cable connecting the substation to SDG&E's infrastructure.<sup>36</sup>

Although the facility is entirely located in Tier 3 of the HFTD,<sup>37</sup> its design minimizes ignition risk. During the Suncrest Facility construction process, HWT installed a rock hardscape within the substation walls. Outside the substation walls, HWT removed vegetation and hardscaped to create an ember-resistant fuel modification zone that further reduces wildfire risk.<sup>38</sup>

HWT reported several maintenance activities that may reduce wildfire risk. For example, HWT stated it conducts monthly on-site inspections to monitor its assets and check for vegetation growth.<sup>39</sup> HWT also quality checks contracted vegetation work,<sup>40</sup> and it monitors its assets remotely through cameras and a drone.<sup>41</sup> These activities will increase awareness of the state of vegetation within and around HWT's Suncrest Facility and ensure it optimizes the timing of its weed abatement work.<sup>42</sup>

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<sup>35</sup> Pub. Util. Code §§ 8386(c)(3), (9).

<sup>36</sup> HWT, 2026-2028 Base WMP R2, page 78.

<sup>37</sup> HWT, 2026-2028 Base WMP R2, page 12.

<sup>38</sup> HWT, 2026-2028 Base WMP R2, pages 118-119.

<sup>39</sup> HWT, 2026-2028 Base WMP R2, page 113.

<sup>40</sup> HWT, 2026-2028 Base WMP R2, page 132.

<sup>41</sup> HWT, 2026-2028 Base WMP R2, page 124.

<sup>42</sup> HWT, 2026-2028 Base WMP R2, page 119.



## 9.2 Discussion

This section discusses Energy Safety's evaluation of the vegetation management and inspections section of the HWT 2026-2028 Base WMP.

### 9.2.1 Defensible Space

HWT has an efficient adaptive approach to maintain defensible space around its infrastructure.

During construction of the Suncrest Facility, HWT installed a rock hardscape within the substation's walls and established a fuel modification zone outside the walls,<sup>43</sup> serving as ember-resistant barriers. HWT stated its hardscape limits vegetation growth. Since the Suncrest Facility became operational, HWT's primary vegetation management activity has consisted of weed control.<sup>44</sup>

HWT reported that when the Suncrest Facility became operational in 2020, HWT initially planned to perform six annual weed abatement treatments.<sup>45</sup> After five years of monthly inspection data, HWT determined that one treatment per year with up to three additional treatments is sufficient to address the limited vegetative fuels in and around the facility.<sup>46</sup> HWT also noted that treatments will occur in the spring, prior to "peak fire risk months."<sup>47</sup> HWT plans to perform weed abatement at least once and up to four times a year as needed based on vegetation observed during monthly inspections.<sup>48</sup> Weed abatement methods include post-emergent herbicides and hand or mechanical removal.<sup>49</sup>

### 9.2.2 Activities Based on Weather Conditions

HWT demonstrates continued progress by remotely monitoring its Suncrest Facility, performing monthly inspections, and performing additional inspections in advance of heightened weather risk.

HWT stated it installed cameras in 2021, providing constant remote monitoring capabilities to its Suncrest Facility.<sup>50</sup> In 2025, HWT stationed a drone at the facility, which it can deploy to

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<sup>43</sup> HWT, 2026-2028 Base WMP R2, page 119.

<sup>44</sup> HWT, 2026-2028 Base WMP R2, page 119.

<sup>45</sup> HWT, Response to DR-001, Question 1, page 1.

<sup>46</sup> HWT, Response to DR-001, Question 1, page 1.

<sup>47</sup> HWT, Response to DR-001, Question 1, page 2.

<sup>48</sup> HWT, 2026-2028 Base WMP R2, page 119.

<sup>49</sup> HWT, 2026-2028 Base WMP R2, page 119.

<sup>50</sup> HWT, 2026-2028 Base WMP R2, page 124.

monitor both the Suncrest Facility and the immediate surroundings.<sup>51</sup> HWT also reported that it does not schedule any “hot work” and ceases all “non-critical” maintenance activities and its 24/7 Operations Center more closely monitors the Suncrest Facility during red flag warning (RFW) conditions.<sup>52</sup>

### 9.2.3 Quality Assurance and Quality Control

HWT’s quality assurance and quality control practices for vegetation management are appropriately tailored to its system size, providing reasonable oversight of contractor performance requiring. HWT reported it does not employ an extensive quality assurance and quality control process due to the limited size of its vegetation management program.<sup>53</sup> As such, HWT did not provide a target pass rate for its quality audit mitigation activity.<sup>54</sup> Since HWT’s substation population size is one, HWT cannot implement a quality audit sampling plan with “substation” as the sample unit because the sample size is identical to the population size.

HWT stated that HWT’s field engineers document quality audits and generate corrective actions to avoid recurring deficiencies.<sup>55</sup> Accordingly, HWT’s lack of a formal sampling plan is unlikely to increase wildfire risk, as these existing practices help ensure that HWT addresses inspection and maintenance issues in a timely manner.

HWT noted that its field engineers perform the quality audits of contracted third-party weed abatement work.<sup>56</sup> These audits are a part of HWT’s WMP Condition Assessment (WCA) which field engineers document in HWT’s asset management program (AMP).<sup>57</sup> Monthly audits during the WCA check vegetation management contractor work and capture any follow-up needs.<sup>58</sup> To demonstrate that it performs and tracks its audits, HWT provided two WCAs from its 2024 AMP records in response to a data request.<sup>59</sup>

This approach is sufficient given the limited scale of HWT’s assets. However, as its quality management practices continue to mature, Energy Safety recommends that HWT formalizes

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<sup>51</sup> HWT, 2026-2028 Base WMP R2, page 124.

<sup>52</sup> HWT, 2026-2028 Base WMP R2, page 124.

<sup>53</sup> HWT, 2026-2028 Base WMP R2, page 130.

<sup>54</sup> HWT, 2026-2028 Base WMP R2, page 130.

<sup>55</sup> HWT, 2026-2028 Base WMP R2, page 130.

<sup>56</sup> HWT, 2026-2028 Base WMP R2, page 134.

<sup>57</sup> HWT, Response to DR-001, Question 2, page 2.

<sup>58</sup> HWT, Response to DR-001, Question 2, page 2.

<sup>59</sup> HWT, Response to DR-001, Question 2, page 3.

its sampling plan by identifying a quality control sample unit, sample size, and annual target pass rate for each year of its next Base WMP.

### **9.3 Areas for Continued Improvement**

Energy Safety identifies no previous or new areas for continued improvement in the Vegetation Management and Inspections section for the HWT 2026-2028 Base WMP.

## 10. Situational Awareness and Forecasting

Chapter III, Section 10 of the WMP Guidelines requires the electrical corporation to include plans for situational awareness in its WMP.<sup>60, 61</sup> The HWT 2026-2028 Base WMP met the requirements of the WMP Guidelines for this section.

### 10.1 Discussion

This section discusses Energy Safety's evaluation of the situational awareness section of the HWT 2026-2028 Base WMP.

#### 10.1.1 Environmental Monitoring Systems

Overall, HWT's environmental monitoring systems effectively support wildfire mitigation given that the Suncrest Facility's design already minimizes wildfire risk through features such as the undergrounding of transmission assets, a surrounding concrete wall, and the establishment of an ember-resistant hardscape and fuel modification zone.

HWT reported that its operational assets are limited to the Suncrest Facility, which is connected to approximately one mile of underground cable.<sup>62</sup> The facility was designed with hardscaped defensible space to reduce the need for vegetation management and limit the contribution of surrounding vegetation as wildfire fuel. As a result of these design choices, environmental factors are not expected to significantly impact Suncrest Facility operations.<sup>63</sup>

Between 2020 and 2022, HWT implemented its environmental monitoring capabilities by installing high-definition cameras and a weather station, and by developing a proprietary fire risk index for its territory.<sup>64</sup> The index supplements third-party wildfire tracking tools, providing HWT with increased situational awareness and supporting operational decision-making during heightened fire risk periods.

In addition, HWT stated that it plans to utilize multiple applications provided by a third-party system to enhance its monitoring of surrounding areas.<sup>65</sup> The applications support daily

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<sup>60</sup> Pub. Util. Code §§ 8386(c)(2)-(5).

<sup>61</sup> WMP Guidelines, pages 125-139.

<sup>62</sup> HWT, 2026-2028 Base WMP R2, page 145.

<sup>63</sup> HWT, 2026-2028 Base WMP R2, page 145.

<sup>64</sup> HWT, 2026-2028 Base WMP R2, page 145.

<sup>65</sup> HWT, 2026-2028 Base WMP R2, page 150.



asset-based risk modeling and provide real-time wildfire spread modeling for areas surrounding HWT's infrastructure.<sup>66</sup> Using these applications will provide greater situational awareness of any wildfires near the facility.

### 10.1.2 Grid Monitoring Systems

HWT stated that in 2021, its one mile of underground cable employed a monitoring system designed to detect abnormal temperatures and partial electrical discharges at the cable joint and terminations, which can be early indicators of potential faults or failures.<sup>67</sup> HWT indicated that it does not have current plans for changes to its system monitoring capabilities.<sup>68</sup>

HWT's current monitoring system for its underground cable effectively supports wildfire mitigation given that the Suncrest Facility's design already minimizes wildfire risk through features such as the undergrounding of transmission assets, a surrounding concrete wall, and the establishment of an ember-resistant hardscape and fuel modification zone.

### 10.1.3 Ignition Detection Systems

HWT stated that its operations team monitors the Suncrest Facility and its surrounding area for wildfire threats through a combination of high-definition camera systems and a weather station.<sup>69</sup> In addition, HWT noted that it supplements these capabilities with third-party real-time wildfire tracking tools that use satellite data to monitor ignition events and fire propagation.<sup>70</sup> These tools enable HWT to evaluate proximity of wildfires to its assets and to inform timely operational responses if a wildfire were to directly threaten the facility.<sup>71</sup>

HWT's ignition detection systems effectively support wildfire mitigation given that the Suncrest Facility's design already minimizes wildfire risk through features such as the undergrounding of transmission assets, a surrounding concrete wall, and the establishment of an ember-resistant hardscape and fuel modification zone.

### 10.1.4 Weather Forecasting

HWT's weather forecasting approach effectively supports wildfire mitigation given that the Suncrest Facility's design already minimizes wildfire risk through features such as the

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<sup>66</sup> HWT, 2026-2028 Base WMP R2, page 150.

<sup>67</sup> HWT, 2026-2028 Base WMP R2, page 152.

<sup>68</sup> HWT, 2026-2028 Base WMP R2, page 155.

<sup>69</sup> HWT, 2026-2028 Base WMP R2, page 157.

<sup>70</sup> HWT, 2026-2028 Base WMP R2, page 157.

<sup>71</sup> HWT, 2026-2028 Base WMP R2, page 157.

undergrounding of transmission assets, a surrounding concrete wall, and the establishment of an ember-resistant hardscape and fuel modification zone.

HWT stated that it monitors weather conditions through weather stations to assess ignition probability and potential wildfire consequences by leveraging SDG&E's fire potential index and its associated weather data.<sup>72</sup>

### 10.1.5 Fire Potential Index

HWT stated it utilizes multiple data sources within a third-party Wildfire Risk Index (WRI) program to assess the relative risk of explosive wildfires near the Suncrest Facility.<sup>73</sup> The WRI provides a scale of low, elevated, high, and extreme risk of fire.<sup>74</sup> The automated model produces visualizations that can be used internally for validation, refinement, and customer question and answer.<sup>75</sup>

This approach effectively supports wildfire mitigation given that the Suncrest Facility's design already minimizes wildfire risk through features such as the undergrounding of transmission assets, a surrounding concrete wall, and the establishment of an ember-resistant hardscape and fuel modification zone.

## 10.2 Areas for Continued Improvement

Energy Safety identifies no previous or new areas for continued improvement in the Situational Awareness and Forecasting section for the HWT 2026-2028 Base WMP.

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<sup>72</sup> HWT, 2026-2028 Base WMP R2, page 162.

<sup>73</sup> HWT, 2026-2028 Base WMP R2, page 163.

<sup>74</sup> HWT, 2026-2028 Base WMP R2, page 163.

<sup>75</sup> HWT, 2026-2028 Base WMP R2, page 163.

# 11. Emergency Preparedness, Collaboration, and Community Outreach

Chapter III, Section 11 of the WMP Guidelines requires the electrical corporation to provide an overview of its emergency plan and describe its communication strategy with public safety partners, essential customers, and other stakeholder groups regarding wildfires, outages due to wildfires, and PSPS and service restoration.<sup>76</sup> The HWT 2026-2028 Base WMP met the requirements of the WMP Guidelines for this section. However, many of the specific requirements and subsections within this section are not applicable to ITOs, given the nature and scope of their operations.

## 11.1 Discussion

This section discusses Energy Safety's evaluation of the emergency preparedness, collaboration, and public awareness section of the HWT 2026-2028 Base WMP.

### 11.1.1 Emergency Preparedness and Recovery Plan

HWT stated that it has developed an emergency operations plan for only the Suncrest Facility.<sup>77</sup> Wildfire- and PSPS-specific strategies were incorporated into the plan because the Suncrest Facility is located in a Tier 3 TFTD.<sup>78</sup>

The Suncrest Facility is an unmanned site but it is monitored by 24/7 by a system operator.<sup>79</sup> Because HWT does not serve end-use customers and therefore has no direct communication with the public, its coordination efforts are focused on California Independent System Operator (CAISO).<sup>80</sup>

HWT reported it does not anticipate any material changes to its emergency preparedness or recovery plans for this cycle.<sup>81</sup> HWT's emergency preparedness and recovery plan is sufficient given the limited scope and scale of its operations.

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<sup>76</sup> Pub. Util. Code § 8386(c)(7), (11), (16), (19)-(21).

<sup>77</sup> HWT, 2026-2028 Base WMP R2, page 167.

<sup>78</sup> HWT, 2026-2028 Base WMP R2, page 167.

<sup>79</sup> HWT, 2026-2028 Base WMP R2, page 173.

<sup>80</sup> HWT, 2026-2028 Base WMP R2, page 172.

<sup>81</sup> HWT, 2026-2028 Base WMP R2, page 172.

### 11.1.2 External Collaboration and Coordination

HWT stated it does not serve end-use customers, and it does not operate a traditional service territory or distribution system.<sup>82</sup> HWT noted that its communication protocols are focused on coordination with California Independent System Operator (CAISO) and SDG&E, following CAISO protocols and North American Electric Reliability Corporation Communication (NERC COMM) standards for communication with neighboring entities.<sup>83</sup> HWT reported it does not plan to participate in specific wildfire and PSPS communication exercises.<sup>84</sup>

HWT's collaboration and coordination effectively supports wildfire mitigation given that the Suncrest Facility's design already minimizes wildfire risk through features such as the undergrounding of transmission assets, a surrounding concrete wall, and the establishment of an ember-resistant hardscape and fuel modification zone.

## 11.2 Previous Areas for Continued Improvement

In the Energy Safety Decision for the HWT 2025 WMP Update, Energy Safety identified areas related to emergency preparedness, collaboration, and public awareness where HWT must continue to improve its wildfire mitigation capabilities. This section summarizes the requirements imposed by those areas for continued improvement, HWT's response to those requirements, and Energy Safety's evaluation of the response.

### 11.2.1 HWT-23B-02. Documentation of Sharing Best Practices

For this area for continued improvement, Energy Safety required HWT to provide documented examples of its sharing of best practices in its 2026-2028 Base WMP.<sup>85</sup>

#### 11.2.1.1 HWT-23B-02. HWT Response Summary

In its 2026-2028 Base WMP, HWT reported that it joined two industry groups focused on wildfire mitigation.<sup>86</sup> Its representatives attended Pacific Gas and Electric company (PG&E) wildfire seminars in 2024 and 2025 and a wildfire seminar hosted by AEGIS insurance company in 2025.<sup>87</sup> While HWT's operations are limited in scope and scale, it participated in

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<sup>82</sup> HWT, 2026-2028 Base WMP R2, page 182.

<sup>83</sup> HWT, 2026-2028 Base WMP R2, page 177.

<sup>84</sup> HWT, 2026-2028 Base WMP R2, page 177.

<sup>85</sup> Decision for HWT 2025 WMP Update, page 22.

<sup>86</sup> HWT, 2026-2028 Base WMP R2, page 201.

<sup>87</sup> HWT, 2026-2028 Base WMP R2, page 201.

these groups to gain exposure to new systems, technology, and knowledge from companies with more extensive operational experience in wildfire mitigation.<sup>88</sup>

For example, through its attendance at a PG&E wildfire seminar, HWT learned about the benefits of third-party fire monitoring and notification applications as an additional source of information for ignition detection and real-time wildfire updates.<sup>89</sup> As a result, HWT field engineers now utilize a third-party application to receive notifications and monitor ignitions and wildfires near the Suncrest Substation.<sup>90</sup>

#### **11.2.1.2 HWT-23B-02. Energy Safety Evaluation**

HWT reported documented examples of sharing of best practices required by Energy Safety. By joining the seminars with industry groups focused on wildfire mitigation, HWT highlighted progress in this area by seeking opportunities to learn from and engage with industry experts.

As such, HWT sufficiently responded to this area for continued improvement. No further reporting is required for this area for continued improvement.

### **11.3 Areas for Continued Improvement for Future WMP Submissions**

Energy Safety identifies no new areas for continued improvement in the Emergency, Preparedness, Collaboration, and Community Outreach section for the HWT 2026-2028 Base WMP.

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<sup>88</sup> HWT, 2026-2028 Base WMP R2, page 201.

<sup>89</sup> HWT, 2026-2028 Base WMP R2, page 201.

<sup>90</sup> HWT, 2026-2028 Base WMP R2, page 201.

## 12. Enterprise Systems

Chapter III, Section 12 of the WMP Guidelines requires the electrical corporation to provide an overview of inputs to, operation of, and support for various enterprise systems it uses for vegetation management, asset management and inspection, grid monitoring, ignition detection, weather forecasting, and risk assessment initiatives.<sup>91</sup> The HWT 2026-2028 Base WMP met the requirements of the WMP Guidelines for this section.

### 12.1 Discussion

This section discusses Energy Safety's evaluation of the enterprise systems section of the HWT 2026-2028 Base WMP.

In *Table 12-1 Enterprise Systems Targets*, HWT provided one activity (ES-01), which is HWT's planned transition from its current asset management program (AMP) to Elements, the upgraded, in-house AMP, by July 2026.<sup>92</sup> HWT explained that, given its limited footprint with only one operational transmission asset, extensive enterprise systems would be outsized for its scope of operations.<sup>93</sup> Instead, HWT reported that it currently utilizes its own AMP and SharePoint for document storage.<sup>94</sup> HWT's AMP is a custom-built, in-house AMP managed at the corporate level of NextEra Energy's power delivery business unit and its dedicated information technology department.<sup>95</sup>

As part of the transition to Elements, HWT reported that assets, work tasks, and maintenance workflows are being verified in a test environment to ensure continuity of operations, with final validation, job aids, and staff training planned prior to full implementation.<sup>96</sup>

This approach effectively supports wildfire mitigation given that the Suncrest Facility's design already minimizes wildfire risk through features such as the undergrounding of transmission assets, a surrounding concrete wall, and the establishment of an ember-resistant hardscape and fuel modification zone.

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<sup>91</sup> Pub. Util. Code § 8386(c)(10), (14), (18).

<sup>92</sup> HWT, 2026-2028 Base WMP R2, page 195.

<sup>93</sup> HWT, 2026-2028 Base WMP R2, page 196.

<sup>94</sup> HWT, 2026-2028 Base WMP R2, page 196.

<sup>95</sup> HWT, 2026-2028 Base WMP R2, page 197.

<sup>96</sup> HWT, 2026-2028 Base WMP R2, page 197.

## 12.2 Areas for Continued Improvement

Energy Safety identifies no previous or new areas for continued in the Enterprise Systems section for the HWT 2026-2028 Base WMP.



## 13. Lessons Learned

Chapter III, Section 13 of the WMP Guidelines requires the electrical corporation to discuss the lessons learned it uses to drive continual improvement in its WMP.<sup>97</sup> The HWT 2026-2028 Base WMP met the requirements of the WMP Guidelines for this section.

### 13.1 Discussion

This section discusses Energy Safety's evaluation of the lessons learned section of the HWT 2026-2028 Base WMP.

HWT listed three lessons learned that may guide improvements to its wildfire mitigation practices. HWT may improve the effectiveness, standardization, and long-term maturity of its wildfire mitigation program from these lessons learned. For instance:

- HWT attended a wildfire seminar hosted by PG&E and identified value of leveraging the expertise of industry leaders in wildfire situational awareness, forecasting, and modeling to improve its internal capabilities to predict, observe, plan, and mitigate to ignitions and wildfires.<sup>98</sup> As a result, HWT will leverage a third-party application to support situational awareness, improve forecasting, and enhance real-time wildfire spread modeling for areas surrounding its facilities.<sup>99</sup> By incorporating this lesson, HWT may strengthen its ability to predict and respond to potential wildfire events.
- HWT attended a wildfire seminar hosted by PG&E and identified the value of third-party fire monitoring and notification applications as supplemental sources of information for ignition detection and real-time wildfire situation awareness.<sup>100</sup> As a result, HWT field engineers now utilize a third-party application to receive notifications and monitor ignitions and wildfires in the vicinity of the Suncrest Substation.<sup>101</sup> By incorporating this lesson, HWT may improve its ability to detect and respond quickly to potential ignition events.
- HWT attended wildfire seminars hosted by PG&E and AEGIS and found the importance of participating in industry groups to gain exposure to new systems, technologies, and operational practices.<sup>102</sup> Although HWT's operations are limited in scale, its engagement with industry experts enables the organization to learn from electrical

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<sup>97</sup> Pub. Util. Code §§ 8386(a) & (c)(5), (22).

<sup>98</sup> HWT, 2026-2028 Base WMP R2, page 201.

<sup>99</sup> HWT, 2026-2028 Base WMP R2, page 201.

<sup>100</sup> HWT, 2026-2028 Base WMP R2, page 201.

<sup>101</sup> HWT, 2026-2028 Base WMP R2, page 201.

<sup>102</sup> HWT, 2026-2028 Base WMP R2, page 201.

corporations with more extensive wildfire mitigation experiences, and this engagement supports continuous improvement of HWT's wildfire mitigation practices.<sup>103</sup> By incorporating this lesson, HWT could strengthen its organizational knowledge base and enhance the maturity of its wildfire program over time.

## 13.2 Areas for Continued Improvement

Energy Safety identifies no previous or new areas for continued in the Lessons Learned section for the HWT 2026-2028 Base WMP.

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<sup>103</sup> HWT, 2026-2028 Base WMP R2, page 201.

## 14. Conclusion

### 14.1 Discussion

Each electrical corporation must construct, maintain, and operate its electrical lines and equipment in a manner that will minimize the risk of catastrophic wildfire posed by those electrical lines and equipment. When Energy Safety approves a WMP, it does so with the aim of continued improvement and may list areas for continued improvement which the electrical corporation must address. Energy Safety's evaluation of HWT's 2026-2028 Base WMP identified both notable progress and areas that continue to require improvement.

HWT has strengthened its asset inspection practices through monthly visual inspections at the Suncrest Facility, now supplemented with aerial drone inspections. This expansion provides greater coverage and accuracy, reinforcing a program that aligns with General Order 174 requirements and enhances wildfire mitigation. HWT has also enhanced accountability through its quality assurance processes, including tracking inspection issues in its internal database and requiring field engineers to review reports they did not originate. These steps demonstrate proactive efforts to improve procedural discipline and support reliable identification and resolution of potential risks.

At the same time, Energy Safety identified one area for continued improvement for HWT. HWT's consideration of an additional water tank, while reflecting proactive planning for firefighting and emergency response, lacked a clear evaluation process and timeline. HWT must provide further details on the evaluation or construction of the additional water tank, including progress to date and decision-making criteria, in its next WMP Update.

At this point in HWT's maturity, Energy Safety expects HWT to be able to deliver plans that demonstrate forward-looking growth and address the areas for continued improvement identified by Energy Safety. Energy Safety will closely review HWT's progress on the area identified for continued improvement herein in its evaluation of HWT's 2026-2028 Base WMP and whether HWT has demonstrated continued progress and forward-looking growth between its prior WMPs and its next Base WMP.

### 14.2 Approval

The HWT 2026-2028 Wildfire Mitigation Plan is approved.

Catastrophic wildfires remain a serious threat to the health and safety of Californians. Electrical corporations, including HWT, must continue to make progress toward reducing wildfire risk.

Energy Safety expects HWT to effectively implement its wildfire mitigation activities to reduce wildfire and outage program risk.

HWT must meet the commitments in its approved WMP and address areas for continued improvement identified within this Decision to ensure it meaningfully reduces wildfire and outage program risk within its service territory over the plan cycle.

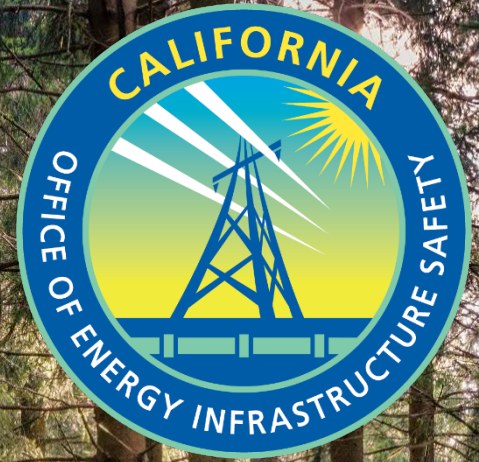
# DATA DRIVEN FORWARD-THINKING INNOVATIVE SAFETY FOCUSED



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# APPENDICES



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# Appendix A. References Table

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Examples of State Environmental Requirements	Office of Energy infrastructure Safety, <a href="https://energysafety.ca.gov/wp-content/uploads/2025/04//examples-of-state-environmental-requirements.pdf">Examples of State Environmental Requirements</a> , Accessed April 28, 2025, URL:( <a href="https://energysafety.ca.gov/wp-content/uploads/2025/04//examples-of-state-environmental-requirements.pdf">https://energysafety.ca.gov/wp-content/uploads/2025/04//examples-of-state-environmental-requirements.pdf</a> ).
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HWT, 2026- 2028 Base WMP R1	Horizon West Transmission, <a href="https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=59396&amp;shareable=true">HWT 2026-2028 Base WMP R1 Clean</a> , Published September 16, 2025, URL:( <a href="https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=59396&amp;shareable=true">https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=59396&amp;shareable=true</a> ).
HWT, 2026- 2028 Base WMP R2	Horizon West Transmission, <a href="https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=59855&amp;shareable=true">HWT 2026-2028 Base WMP R2 Clean</a> , Published December 9, 2025, URL:( <a href="https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=59855&amp;shareable=true">https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=59855&amp;shareable=true</a> ).
HWT, Response to DR-001	Horizon West Transmission, <a href="https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=59218&amp;shareable=true">Horizon West - Response to OEIS-P-WMP 2025-HWT-001 Q01-02</a> , Published August 22, 2025, URL:( <a href="https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=59218&amp;shareable=true">https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=59218&amp;shareable=true</a> ).

Citation	Reference
HWT, Supplemental Response to DR-002	Horizon West Transmission, <a href="#">HWT - Supplemental Response to OEIS-P-WMP 2025-HWT-002 Q02</a> , Published August 22, 2025, URL:( <a href="https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=59275&amp;shareable=true">https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=59275&amp;shareable=true</a> ).
CPUC, General Order 174	California Public Utilities Commission, <a href="#">General Order 174 Rules for Electric Utility Substations</a> , Published October 2012, URL:( <a href="https://ia.cpuc.ca.gov/gos/GO174/GO174_startup_page.html">https://ia.cpuc.ca.gov/gos/GO174/GO174_startup_page.html</a> ).
Decision for HWT 2025 WMP Update	Horizon West Transmission, <a href="#">Decision for HWT 2025 WMP Update</a> , Published August 22, 2025, URL:( <a href="https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57706&amp;shareable=true">https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57706&amp;shareable=true</a> ).

## Appendix B.

# Status of Previous Areas for Continued Improvement

Energy Safety Decision for the HWT 2025 WMP Update identified areas for continued improvement. Areas for continued improvement are areas in which HWT must continue to improve its WMP. As part of the 2026-2028 Base WMP evaluation, Energy Safety reviewed the progress reported by HWT in addressing previously identified areas for continued improvement.

Areas for continued improvement identified in Energy Safety Decisions for the HWT 2025 WMP Update and that required progress reporting in the HWT 2026-2028 Base WMP are listed in Table B-1. The status column indicates whether each has been fully addressed.

*Table B-1. HWT Previous Areas for Continued Improvement*

ID	Title	Status
<b>HWT-23B-02</b>	Documentation of Sharing Best Practices	HWT has sufficiently responded to this area for continued improvement. No further reporting is required for this area for continued improvement. See Section 11.2 for Energy Safety's evaluation of this area for continued improvement.

# Appendix C.

## Consolidated List of Areas for Continued Improvement and Requirements

The list below consolidates all HWT's areas for continued improvement and requirements that HWT must address in future WMPs.

### Wildfire Mitigation Strategy Development

#### **HWT-26B-01. Additional Water Tank at Suncrest Facility**

Summary: HWT stated that it will provide an update in its 2027 WMP Update to document any material progress or decisions associated with its plan for an additional water tank near the Suncrest Substation.<sup>1</sup>

Requirements: In its next WMP Update, HWT must:

- Provide a narrative explanation on the status of its evaluation or construction of an additional water tank.
  - If HWT is evaluating the need for the additional water tank, this must include,
    - Timeline for when HWT will begin and conclude its evaluation; and
    - Criteria for how HWT will determine if it needs to construct an additional water tank.
  - If HWT has concluded its evaluation and is working to install the additional water tank, this must include,
    - A timeline and milestones for the construction of the additional water tank.
  - If HWT has concluded its evaluation and is not planning to install the additional water tank during the 2026-2028 base WMP cycle, this must include,
    - An explanation of this determination.

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<sup>1</sup> HWT, Supplemental Response to DR-002, Question 2, page 1.

- Include the additional water tank as an initiative to *HWT Table 1-1 Utility Mitigation Activity Tracking IDs* of its 2026-2028 Base WMP to track the evaluation or construction of an additional water tank that is within the three-year cycle.

Discussed in: Section 6.1.2 Wildfire Mitigation Strategy



## Appendix D.

# Maturity Survey Results

The Energy Safety Electrical Corporation Wildfire Mitigation Maturity Model (Maturity Model) and 2025 Electrical Corporation Wildfire Mitigation Maturity Survey (Maturity Survey) together provide a quantitative method to assess electrical corporation wildfire risk mitigation capabilities and examine how electrical corporations propose to continuously improve in key areas of their WMP.

The Maturity Model consists of 38 individual capabilities, each relevant to an electrical corporation's ability to mitigate wildfire and PSPS risk within its service territory. Maturity levels range from 0 (below minimum requirements) to 4 (beyond best practice). The 38 capabilities are aggregated into seven categories. The seven categories are:

- A. Risk Assessment and Mitigation Strategy
- B. Situational Awareness and Forecasting
- C. Grid Design, Inspections, and Maintenance
- D. Vegetation Management and Inspections
- E. Grid Operations and Protocols
- F. Emergency Preparedness
- G. Community Outreach and Engagement

HWT's responses to the Maturity Survey, listed by category, are depicted in the figure below.

Figure D-1. HWT 2025 Responses to the Maturity Survey

		1. Capability				2. Capability				3. Capability				4. Capability				5. Capability				6. Capability					
		2025	2026	2027	2028	2025	2026	2027	2028	2025	2026	2027	2028	2025	2026	2027	2028	2025	2026	2027	2028	2025	2026	2027	2028		
A. Risk Assessment and Mitigation Strategy		1. Statistical weather, climate, and wildfire modeling				2. Calculation of wildfire and PSPS hazard and exposure to societal values				3. Calculation of community vulnerability to wildfire and PSPS				4. Calculation of risk and risk components				5. Risk event tracking and integration of lessons learned				6. Risk-informed wildfire mitigation strategy					
	Minimum of Sub-Cap.	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0			
	Average of Sub-Cap.	0.6	0.6	0.6	0.6	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	1.0	1.0	1.0	1.0	0.6	0.6	0.6	0.6		
B. Situational Awareness and Forecasting		7. Ignition likelihood estimation				8. Weather forecasting ability				9. Wildfire spread forecasting				10. Data collection for near-real-time conditions				11. Wildfire detection and alarm systems				12. Centralized monitoring of real-time conditions					
	Minimum of Sub-Cap.	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0			
	Average of Sub-Cap.	0.2	0.2	0.2	0.2	0.5	0.5	0.5	0.5	0.6	0.8	0.9	0.9	0.6	0.6	0.6	0.6	0.0	0.0	0.0	0.0	2.4	2.4	2.4	2.4		
C. Grid Design, Inspections, and Maintenance		13. Asset inventory and condition database				14. Asset inspections				15. Asset maintenance and repair				16. Grid design and resiliency				17. Asset and grid personnel training and quality									
	Minimum of Sub-Cap.	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	1.0	1.0	1.0	1.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0						
	Average of Sub-Cap.	1.0	1.0	1.0	1.0	1.3	1.3	1.3	1.3	1.3	1.3	1.3	1.3	0.0	0.0	0.0	0.0	1.3	1.3	1.5	1.5						
D. Vegetation Management and Inspections		18. Vegetation inventory				19. Vegetation inspections				20. Vegetation treatment				21. Vegetation personnel training and quality				22. Best Management Practices for Transmission Rights-Of-Ways (ROWs)									
	Minimum of Sub-Cap.	0.0	0.0	0.0	0.0	1.0	1.0	1.0	1.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0					0.0	0.0
	Average of Sub-Cap.	1.5	1.5	1.5	1.5	1.3	1.3	1.3	1.3	1.3	1.3	1.3	1.3	0.8	0.8	0.8	0.8	0.8	0.8	0.8	0.8						
E. Grid Operations and Protocols		23. Protective equipment and device settings				24. Incorporation of ignition risk factors in grid control				25. PSPS operating model				26. Protocols for PSPS re-energization				27. Ignition prevention and suppression									
	Minimum of Sub-Cap.	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	2.0	2.0	2.0	2.0							
	Average of Sub-Cap.	1.3	1.3	1.3	1.3	0.2	0.4	0.4	0.4	1.3	1.3	1.3	1.3	1.3	1.3	1.3	2.3	2.3	2.7	2.7							
F. Emergency Preparedness		28. Wildfire and PSPS emergency & disaster preparedness plan				29. Collaboration and coordination with public safety partners				30. Public emergency communication strategy				31. Preparedness and planning for service restoration				32. Customer support in wildfire and PSPS emergencies				33. Learning after wildfires and PSPS events					
	Minimum of Sub-Cap.	1.0	1.0	1.0	1.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0				
	Average of Sub-Cap.	1.0	1.0	1.0	1.0	0.0	0.0	0.0	0.0	0.6	0.6	0.6	0.6	1.8	1.8	1.8	1.8	0.0	0.0	0.0	0.0	0.5	0.5	0.5	0.5		
G. Community Outreach and Engagement		34. Public outreach and education awareness				35. Public engagement in electrical corporation wildfire mitigation planning				36. Engagement with AFN and socially vulnerable populations				37. Collaboration on local wildfire mitigation planning				38. Cooperation and best practice sharing with other electrical corporations									
	Minimum of Sub-Cap.	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	1.0	1.0	1.0	1.0							
	Average of Sub-Cap.	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	1.0	1.7	1.7	1.7							

# Appendix E. Definitions

Unless otherwise expressly stated, the following words and terms, for the purposes of this Decision, have the meanings shown in this chapter.

## Terms Defined in Other Codes

Where terms are not defined in this Decision and are defined in the Government Code, Public Utilities Code, or Public Resources Code, such terms have the meanings ascribed to them in those codes.

## Terms Not Defined

Where terms are not defined through the methods authorized by this section, such terms have ordinarily accepted meanings such as the context implies.

## Definition of Terms

Term	Definition
<b>Access and functional needs population (AFN)</b>	Individuals, including, but not limited to, those who have developmental or intellectual disabilities, physical disabilities, chronic conditions, or injuries; who have limited English proficiency or are non-English speaking; who are older adults, children, or people living in institutionalized settings; or who are low income, homeless, or transportation disadvantaged, including, but not limited to, those who are dependent on public transit or are pregnant. (Gov. Code, § 8593.3(f)(1).)
<b>Asset (utility)</b>	Electric lines, equipment, or supporting hardware.
<b>Benchmarking</b>	A comparison between one electrical corporation's protocols, technologies used, or mitigations implemented, and other electrical corporations' similar endeavors.
<b>Burn likelihood</b>	The likelihood that a wildfire with an ignition point will burn at a specific location within the service territory based on a probabilistic set of weather profiles, vegetation, and topography.

<b>Term</b>	<b>Definition</b>
<b>Catastrophic wildfire</b>	A fire that caused at least one death, damaged over 500 structures, or burned over 5,000 acres.
<b>Circuit miles</b>	The total length in miles of separate transmission and/or distribution circuits, regardless of the number of conductors used per circuit (i.e., different phases).
<b>Circuit segment</b>	A specific portion of an electrical circuit that can be separated or disconnected from the rest of the system without affecting the operation of other parts of the network. This isolation is typically achieved using switches, circuit breakers, or other control mechanisms.
<b>Consequence</b>	The adverse effects from an event, considering the hazard intensity, community exposure, and local vulnerability.
<b>Contact from object ignition likelihood</b>	The likelihood that a non-vegetative object (such as a balloon or vehicle) will contact utility-owned equipment and result in an ignition.
<b>Contact from vegetation likelihood of ignition</b>	The likelihood that vegetation will contact utility-owned equipment and result in an ignition.
<b>Contractor</b>	Any individual in the temporary and/or indirect employ of the electrical corporation whose limited hours and/or time-bound term of employment are not considered “full-time” for tax and/or any other purposes.
<b>Critical facilities and infrastructure</b>	<p>Facilities and infrastructure that are essential to public safety and that require additional assistance and advance planning to ensure resiliency during PSPS events. These include the following:</p> <p>Emergency services sector:</p> <ul style="list-style-type: none"> <li>• Police stations</li> <li>• Fire stations</li> <li>• Emergency operations centers</li> </ul>

Term	Definition
	<ul style="list-style-type: none"> <li>Public safety answering points (e.g., 9-1-1 emergency services)</li> </ul> <p>Government facilities sector:</p> <ul style="list-style-type: none"> <li>Schools</li> <li>Jails and prisons</li> </ul> <p>Health care and public health sector:</p> <ul style="list-style-type: none"> <li>Public health departments</li> <li>Medical facilities, including hospitals, skilled nursing facilities, nursing homes, blood banks, health care facilities, dialysis centers, and hospice facilities (excluding doctors' offices and other non-essential medical facilities)</li> </ul> <p>Energy sector:</p> <ul style="list-style-type: none"> <li>Public and private utility facilities vital to maintaining or restoring normal service, including, but not limited to, interconnected publicly owned electrical corporations and electric cooperatives</li> <li>Water and wastewater systems sector:</li> <li>Facilities associated with provision of drinking water or processing of wastewater, including facilities that pump, divert, transport, store, treat, and deliver water or wastewater</li> </ul> <p>Communications sector:</p> <ul style="list-style-type: none"> <li>Communication carrier infrastructure, including selective routers, central offices, head ends, cellular switches, remote terminals, and cellular sites</li> </ul> <p>Chemical sector:</p> <ul style="list-style-type: none"> <li>Facilities associated with manufacturing, maintaining, or distributing hazardous materials and chemicals (including Category N-Customers as defined in D.01-06-085)</li> </ul> <p>Transportation sector:</p>

Term	Definition
	<ul style="list-style-type: none"> <li>Facilities associated with transportation for civilian and military purposes: automotive, rail, aviation, maritime, or major public transportation</li> </ul> <p>(D.19-05-042 and D.20-05-051)</p>
<b>Customer hours</b>	Total number of customers, multiplied by average number of hours (e.g., of power outage).
<b>Dead fuel moisture</b>	The moisture content of dead organic fuels, expressed as a percentage of the oven dry weight of the sample, that is controlled entirely by exposure to environmental conditions.
<b>Detailed inspection</b>	In accordance with General Order (GO) 165, an inspection where individual pieces of equipment and structures are carefully examined, visually and through routine diagnostic testing, as appropriate, and (if practical and if useful information can be so gathered) opened, and the condition of each is rated and recorded.
<b>Disaster</b>	A serious disruption of the functioning of a community or a society at any scale due to hazardous events interacting with conditions of exposure, vulnerability, and capacity, leading to one or more of the following: human, material, economic, and environmental losses and impacts. The effect of the disaster can be immediate and localized but is often widespread and could last a long time. The effect may test or exceed the capacity of a community or society to cope using its own resources. Therefore, it may require assistance from external sources, which could include neighboring jurisdictions or those at the national or international levels. (United Nations Office for Disaster Risk Reduction [UNDRR].)
<b>Discussion-based exercise</b>	Exercise used to familiarize participants with current plans, policies, agreements, and procedures or to develop new plans, policies, agreements, and procedures. Often includes seminars, workshops, tabletop exercises, and games.
<b>Electrical corporation</b>	Every corporation or person owning, controlling, operating, or managing any electric plant for compensation within California,

<b>Term</b>	<b>Definition</b>
	except where the producer generates electricity on or distributes it through private property solely for its own use or the use of its tenants and not for sale or transmission to others.
<b>Emergency</b>	Any incident, whether natural, technological, or human caused, that requires responsive action to protect life or property but does not result in serious disruption of the functioning of a community or society. (FEMA/UNDRR.)
<b>Enhanced inspection</b>	Inspection whose frequency and thoroughness exceed the requirements of a detailed inspection, particularly if driven by risk calculations.
<b>Equipment caused ignition likelihood</b>	The likelihood that utility-owned equipment will cause an ignition through either normal operation (such as arcing) or failure.
<b>Exercise</b>	An instrument to train for, assess, practice, and improve performance in prevention, protection, response, and recovery capabilities in a risk-free environment. (FEMA.)
<b>Exposure</b>	The presence of people, infrastructure, livelihoods, environmental services and resources, and other high-value assets in places that could be adversely affected by a hazard.
<b>Fire hazard index</b>	A numerical rating for specific fuel types, indicating the relative probability of fires starting and spreading, and the probable degree of resistance to control; similar to burning index, but without effects of wind speed. <sup>2</sup>
<b>Fire potential index (FPI)</b>	Landscape scale index used as a proxy for assessing real-time risk of a wildfire under current and forecasted weather conditions.
<b>Fire season</b>	The time of year when wildfires are most likely for a given geographic region due to historical weather conditions, vegetative characteristics, and impacts of climate change. Each electrical corporation defines the fire season(s) across its service

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<sup>2</sup> Glossary of Wildland Fire.



<b>Term</b>	<b>Definition</b>
	territory based on a recognized fire agency definition for the specific region(s) in California.
<b>Fireline intensity</b>	The rate of heat release per unit time per unit length of fire front. Numerically, it is the product of the heat yield, the quantity of fuel consumed in the fire front, and the rate of spread. <sup>3</sup>
<b>Frequency</b>	The anticipated number of occurrences of an event or hazard over time.
<b>Frequent PSPS events</b>	Three or more PSPS events per calendar year per line circuit.
<b>Fuel continuity</b>	The degree or extent of continuous or uninterrupted distribution of fuel particles in a fuel bed thus affecting a fire's ability to sustain combustion and spread. This applies to aerial fuels as well as surface fuels. <sup>4</sup>
<b>Fuel density</b>	Mass of fuel (vegetation) per area that could combust in a wildfire.
<b>Fuel management</b>	Act or practice of controlling flammability and reducing resistance to control of wildland fuels through mechanical, chemical, biological, or manual means, or by fire, in support of land management objectives. <sup>5</sup>
<b>Fuel moisture content</b>	Amount of moisture in a given mass of fuel (vegetation), measured as a percentage of its dry weight.
<b>Full-time employee (FTE)</b>	Any individual in the ongoing and/or direct employ of the electrical corporation whose hours and/or term of employment are considered “full-time” for tax and/or any other purposes.
<b>GO 95 nonconformance</b>	Condition of a utility asset that does not meet standards established by GO 95.

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<sup>3</sup> Glossary of Wildland Fire.

<sup>4</sup> Glossary of Wildland Fire.

<sup>5</sup> Glossary of Wildland Fire.

Term	Definition
<b>Grid hardening</b>	Actions (such as equipment upgrades, maintenance, and planning for more resilient infrastructure) taken in response to the risk of undesirable events (such as outages) or undesirable conditions of the electrical system to reduce or mitigate those events and conditions, informed by an assessment of the relevant risk drivers or factors.
<b>Grid topology</b>	General design of an electric grid, whether looped or radial, with consequences for reliability and ability to support PSPS (e.g., ability to deliver electricity from an additional source).
<b>Hazard</b>	A condition, situation, or behavior that presents the potential for harm or damage to people, property, the environment, or other valued resources.
<b>Hazard tree</b>	A tree that is, or has portions that are, dead, dying, rotten, diseased, or otherwise has a structural defect that may fail in whole or in part and damage utility facilities should it fail
<b>High Fire Threat District (HFTD)</b>	Areas of the state designated by the CPUC as having elevated wildfire risk, where each utility must take additional action (per GO 95, GO 165, and GO 166) to mitigate wildfire risk. (D.17-01-009.)
<b>High Fire Risk Area (HFRA)</b>	Areas that the electrical corporation has deemed at high risk from wildfire, independent of HFTD designation.
<b>Highly rural region</b>	Area with a population of less than seven persons per square mile, as determined by the United States Bureau of the Census. For purposes of the WMP, “area” must be defined as a census tract.
<b>High-risk species</b>	Species of vegetation that (1) have a higher risk of either coming into contact with powerlines or causing an outage or ignition, or (2) are easily ignitable and within close proximity to potential arcing, sparks, and/or other utility equipment thermal failures. The status of species as “high-risk” must be a function of species-specific characteristics, including growth rate; failure rates of limbs, trunk, and/or roots (as compared to other species); height at maturity; flammability; and vulnerability to disease or insects.

Term	Definition
<b>High wind warning (HWW)</b>	Level of wind risk from weather conditions, as declared by the National Weather Service (NWS). For historical NWS data, refer to the Iowa State University archive of NWS watches/warnings.
<b>HWW overhead (OH) circuit mile day</b>	Sum of OH circuit miles of utility grid subject to a HWW each day within a given time period, calculated as the number of OH circuit miles under a HWW multiplied by the number of days those miles are under said HWW. For example, if 100 OH circuit miles are under a HWW for one day, and 10 of those miles are under the HWW for an additional day, then the total HWW OH circuit mile days would be 110.
<b>Ignition likelihood</b>	The total anticipated annualized number of ignitions resulting from electrical corporation-owned assets at each location in the electrical corporation's service territory. This considers probabilistic weather conditions, type and age of equipment, and potential contact of vegetation and other objects with electrical corporation assets. This should include the use of any method used to reduce the likelihood of ignition. For example, the use of protective equipment and device settings (PEDS) to reduce the likelihood of an ignition upon an initiating event.
<b>Incident command system (ICS)</b>	A standardized on-scene emergency management concept specifically designed to allow its user(s) to adopt an integrated organizational structure equal to the complexity and demands of single or multiple incidents, without being hindered by jurisdictional boundaries.
<b>Initiative activity</b>	See mitigation activity.
<b>Initiative construction standards</b>	The standard specifications, special provisions, standards of practice, standard material and construction specifications, construction protocols, and construction methods that an electrical corporation applies to activities undertaken by the electrical corporation pursuant to a WMP initiative in a given compliance period.
<b>Level 1 finding</b>	In accordance with GO 95, an immediate safety and/or reliability risk with high probability for significant impact.

<b>Term</b>	<b>Definition</b>
<b>Level 2 finding</b>	In accordance with GO 95, a variable safety and/or reliability risk (non-immediate and with high to low probability for significant impact).
<b>Level 3 finding</b>	In accordance with GO 95, an acceptable safety and/or reliability risk.
<b>Limited English proficiency (LEP) population</b>	Population with limited English working proficiency based on the International Language Roundtable scale.
<b>Line miles</b>	The number of miles of transmission and/or distribution conductors, including the length of each phase and parallel conductor segment.
<b>Live fuel moisture content</b>	Moisture content within living vegetation, which can retain water longer than dead fuel.
<b>Locally relevant</b>	In disaster risk management, generally understood as the cope at which disaster risk strategies and initiatives are considered the most effective at achieving desired outcomes. This tends to be the level closest to impacting residents and communities, reducing existing risks, and building capacity, knowledge, and normative support. Locally relevant scales, conditions, and perspectives depend on the context of application.
<b>Match-drop simulation</b>	Wildfire simulation method forecasting propagation and consequence/impact based on an arbitrary ignition.
<b>Memorandum of Agreement (MOA)</b>	A document of agreement between two or more agencies establishing reciprocal assistance to be provided upon request (and if available from the supplying agency) and laying out the guidelines under which this assistance will operate. It can also be a cooperative document in which parties agree to work together on an agreed-upon project or meet an agreed objective.
<b>Mitigation</b>	Undertakings to reduce the loss of life and property from natural and/or human-caused disasters by avoiding or lessening the impact of a disaster and providing value to the public by creating

<b>Term</b>	<b>Definition</b>
	safer communities. Encompasses mitigation categories, mitigation initiatives, and mitigation activities within the WMP.
<b>Mitigation activity</b>	A measure that contributes to or accomplishes a mitigation initiative designed to reduce the consequences and/or probability of wildfire or outage event. For example, covered conductor installation is a mitigation activity under the mitigation initiative of Grid Design and System Hardening.
<b>Mitigation category</b>	The highest subset in the WMP mitigation hierarchy. There are five Mitigation Categories in total: Grid Design, Operations, and Maintenance; Vegetation Management and Inspections; Situational Awareness and Forecasting; Emergency Preparedness; and Enterprise Systems. Contains mitigation initiatives and any subsequent mitigation activities.
<b>Mitigation initiative</b>	Efforts within a mitigation category either proposed or in process, designed to reduce the consequences and/or probability of wildfire or outage event. For example, Asset Inspection is a mitigation initiative under the mitigation category of Grid Design, Operations, and Maintenance.
<b>Model uncertainty</b>	The amount by which a calculated value might differ from the true value when the input parameters are known (i.e., limitation of the model itself based on assumptions). <sup>6</sup>
<b>Mutual aid</b>	Voluntary aid and assistance by the provision of services and facilities, including but not limited to electrical corporations, communication, and transportation. Mutual aid is intended to provide adequate resources, facilities, and other support to an electrical corporation whenever its own resources prove inadequate to cope with a given situation.
<b>National Incident Management System (NIMS)</b>	A systematic, proactive approach to guide all levels of government, nongovernment organizations, and the private sector to work together to prevent, protect against, mitigate, respond to, and recover from the effects of incidents. NIMS

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<sup>6</sup>Adapted from: Substantiating a Fire Model for a Given Application.

Term	Definition
	provides stakeholders across the whole community with the shared vocabulary, systems, and processes to successfully deliver the capabilities described in the National Preparedness System. NIMS provides a consistent foundation for dealing with all incidents, ranging from daily occurrences to incidents requiring a coordinated federal response.
<b>Operations-based exercise</b>	Type of exercise that validates plans, policies, agreements, and procedures; clarifies roles and responsibilities; and identifies resource gaps in an operational environment. Often includes drills, functional exercises (FEs), and full-scale exercises (FSEs).
<b>Outage program risk</b>	The measure of reliability impacts from wildfire mitigation related outages at a given location.
<b>Overall utility risk</b>	The comprehensive risk due to both wildfire and PSPS incidents across a utility's territory; the aggregate potential of adverse impacts to people, property, critical infrastructure, or other valued assets in society.
<b>Overall utility risk, PSPS risk</b>	See Outage program risk.
<b>Parameter uncertainty</b>	The amount by which a calculated value might differ from the true value based on unknown input parameters. (Adapted from Society of Fire Protection Engineers [SFPE] guidance.)
<b>Patrol inspection</b>	In accordance with GO 165, a simple visual inspection of applicable utility equipment and structures designed to identify obvious structural problems and hazards. Patrol inspections may be carried out in the course of other company business.
<b>Performance metric</b>	A quantifiable measurement that is used by an electrical corporation to indicate the extent to which its WMP is driving performance outcomes.
<b>Population density</b>	Population density is calculated using the American Community Survey (ACS) one-year estimate for the corresponding year or, for

<b>Term</b>	<b>Definition</b>
	years with no such ACS estimate available, the estimate for the immediately preceding year.
<b>Preparedness</b>	A continuous cycle of planning, organizing, training, equipping, exercising, evaluating, and taking corrective action in an effort to ensure effective coordination during incident response. Within the NIMS, preparedness focuses on planning, procedures and protocols, training and exercises, personnel qualification and certification, and equipment certification.
<b>Priority essential services</b>	Critical first responders, public safety partners, critical facilities and infrastructure, operators of telecommunications infrastructure, and water electrical corporations/agencies.
<b>Property</b>	Private and public property, buildings and structures, infrastructure, and other items of value that may be destroyed by wildfire, including both third-party property and utility assets.
<b>Protective equipment and device settings (PEDS)</b>	The electrical corporation's procedures for adjusting the sensitivity of grid elements to reduce wildfire risk, other than automatic reclosers (such as circuit breakers, switches, etc.). For example, PG&E's "Enhanced Powerline Safety Settings" (EPSS).
<b>PEDS outage consequence</b>	The total anticipated adverse effects from an outage occurring while increased sensitivity settings on a protective device are enabled at a specific location, including reliability and associated safety impacts.
<b>PEDS outage exposure potential</b>	The potential physical, social, or economic impact of an outage occurring when PEDS are enabled on people, property, critical infrastructure, livelihoods, health, local economies, and other high-value assets.
<b>PEDS outage likelihood</b>	The likelihood of an outage occurring while increased sensitivity settings on a protective device are enabled at a specific location given a probabilistic set of environmental conditions.
<b>PEDS outage risk</b>	The total expected annualized impacts from PEDS enablement at a specific location.

<b>Term</b>	<b>Definition</b>
<b>PEDS outage vulnerability</b>	The susceptibility of people or a community to adverse effects of an outage occurring when PEDS are enabled, including all characteristics that influence their capacity to anticipate, cope with, resist, and recover from the related adverse effects (e.g., high AFN population, poor energy resiliency, low socioeconomics).
<b>PSPS consequence</b>	The total anticipated adverse effects of a PSPS for a community. This considers the PSPS exposure potential and inherent PSPS vulnerabilities of communities at risk.
<b>PSPS event</b>	The period from notification of the first public safety partner of a planned public safety PSPS to re-energization of the final customer.
<b>PSPS exposure potential</b>	The potential physical, social, or economic impact of a PSPS event on people, property, critical infrastructure, livelihoods, health, local economies, and other high-value assets.
<b>PSPS likelihood</b>	The likelihood of an electrical corporation requiring a PSPS given a probabilistic set of environmental conditions.
<b>PSPS risk</b>	The total expected annualized impacts from PSPS at a specific location. This considers two factors: (1) the likelihood a PSPS will be required due to environmental conditions exceeding design conditions, and (2) the potential consequences of the PSPS for each affected community, considering exposure potential and vulnerability.
<b>PSPS vulnerability</b>	The susceptibility of people or a community to adverse effects of a PSPS event, including all characteristics that influence their capacity to anticipate, cope with, resist, and recover from the adverse effects of a PSPS event (e.g., high AFN population, poor energy resiliency, low socioeconomics).
<b>Public safety partners</b>	First/emergency responders at the local, state, and federal levels; water, wastewater, and communication service providers; community choice aggregators (CCAs); affected publicly owned electrical corporations/electrical cooperatives; tribal



<b>Term</b>	<b>Definition</b>
	governments; Energy Safety; the Commission; the California Office of Emergency Services; and CAL FIRE.
<b>Qualitative target</b>	Specific, measurable, achievable, realistic, and timely outcomes for the overall WMP strategy, or mitigation initiatives and activities that a utility can implement to satisfy the primary goals and subgoals of the WMP program.
<b>Quantitative target</b>	A forward-looking, quantifiable measurement of work to which an electrical corporation commits to in its WMP. Electrical corporations will show progress toward completing targets in subsequent reports, including data submissions and WMP Updates.
<b>RFW OH circuit mile day</b>	Sum of OH circuit miles of utility grid subject to RFW each day within a given time period, calculated as the number of OH circuit miles under RFW multiplied by the number of days those miles are under said RFW. For example, if 100 OH circuit miles are under RFW for one day, and 10 of those miles are under RFW for an additional day, then the total RFW OH circuit mile days would be 110.
<b>Risk</b>	A measure of the anticipated adverse effects from a hazard considering the consequences and frequency of the hazard occurring. <sup>7</sup>
<b>Risk component</b>	A part of an electric corporation's risk analysis framework used to determine overall utility risk.
<b>Risk evaluation</b>	The process of comparing the results of a risk analysis with risk criteria to determine whether the risk and/or its magnitude is acceptable or tolerable. (ISO 31000:2009.)

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<sup>7</sup> Adapted from: Introduction to International Disaster Management.

Term	Definition
<b>Risk event</b>	<p>An event with probability of ignition, such as wire down, contact with objects, line slap, event with evidence of heat generation, or other event that causes sparking or has the potential to cause ignition. The following all qualify as risk events:</p> <ul style="list-style-type: none"> <li>• Ignitions</li> <li>• Outages not caused by vegetation</li> <li>• Outages caused by vegetation</li> <li>• Wire-down events</li> <li>• Faults</li> <li>• Other events with potential to cause ignition</li> </ul>
<b>Risk management</b>	<p>Systematic application of management policies, procedures, and practices to the tasks of communication, consultation, establishment of context, and identification, analysis, evaluation, treatment, monitoring, and review of risk. (ISO 31000.)</p>
<b>Rule</b>	<p>Section of Public Utilities Code requiring a particular activity or establishing a particular threshold.</p>
<b>Rural region</b>	<p>In accordance with GO 165, area with a population of less than 1,000 persons per square mile, as determined by the U.S. Bureau of the Census. For purposes of the WMP, “area” must be defined as a census tract.</p>
<b>Seminar</b>	<p>An informal discussion, designed to orient participants to new or updated plans, policies, or procedures (e.g., to review a new external communications standard operating procedure).</p>
<b>Sensitivity analysis</b>	<p>Process used to determine the relationships between the uncertainty in the independent variables (“input”) used in an analysis and the uncertainty in the resultant dependent variables (“output”). (SFPE guidance.)</p>

<b>Term</b>	<b>Definition</b>
<b>Situational Awareness</b>	An on-going process of gathering information by observation and by communication with others. This information is integrated to create an individual's perception of a given situation. <sup>8</sup>
<b>Slash</b>	Branches or limbs less than four inches in diameter, and bark and split products debris left on the ground as a result of utility vegetation management. <sup>9</sup>
<b>Span</b>	The space between adjacent supporting poles or structures on a circuit consisting of electric lines and equipment. "Span level" refers to asset-scale granularity.
<b>Tabletop exercise (TTX)</b>	A discussion-based exercise intended to stimulate discussion of various issues regarding a hypothetical situation. Tabletop exercises can be used to assess plans, policies, and procedures or to assess types of systems needed to guide the prevention of response to, or recovery from a defined incident.
<b>Trees with strike potential</b>	Trees that could either, in whole or in part, "fall in" to a power line or have portions detach and "fly in" to contact a power line in high-wind conditions.
<b>Uncertainty</b>	The amount by which an observed or calculated value might differ from the true value. For an observed value, the difference is "experimental uncertainty"; for a calculated value, it is "model" or "parameter uncertainty." (Adapted from SFPE guidance.)
<b>Urban region</b>	In accordance with GO 165, area with a population of more than 1,000 persons per square mile, as determined by the U.S. Bureau of the Census. For purposes of the WMP, "area" must be defined as a census tract.

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<sup>8</sup> Glossary of Wildland Fire.

<sup>9</sup> Pub. Res. Code § 4525.7.

<b>Term</b>	<b>Definition</b>
<b>Utility-related ignition</b>	An event that meets the criteria for a reportable event subject to fire-related reporting requirements. <sup>10</sup>
<b>Validation</b>	Process of determining the degree to which a calculation method accurately represents the real world from the perspective of the intended uses of the calculation method without modifying input parameters based on observations in a specific scenario. (Adapted from ASTM E 1355.)
<b>Vegetation management (VM)</b>	The assessment, intervention, and management of vegetation, including pruning and removal of trees and other vegetation around electrical infrastructure for safety, reliability, and risk reduction.
<b>Verification</b>	Process to ensure that a model is working as designed, that is, that the equations are being properly solved. Verification is essentially a check of the mathematics. (SFPE guidance.)
<b>Vulnerability</b>	The propensity or predisposition of a community to be adversely affected by a hazard, including the characteristics of a person, group, or service and their situation that influences their capacity to anticipate, cope with, resist, and recover from the adverse effects of a hazard.
<b>Wildfire consequence</b>	The total anticipated adverse effects from a wildfire on a community that is reached. This considers the wildfire hazard intensity, the wildfire exposure potential, and the inherent wildfire vulnerabilities of communities at risk.
<b>Wildfire exposure potential</b>	The potential physical, social, or economic impact of wildfire on people, property, critical infrastructure, livelihoods, health, environmental services, local economies, cultural/historical resources, and other high-value assets. This may include direct or indirect impacts, as well as short- and long-term impacts.

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<sup>10</sup> D.14-02-015, page C-3.

Term	Definition
<b>Wildfire hazard intensity</b>	The potential intensity of a wildfire at a specific location within the service territory given a probabilistic set of weather profiles, vegetation, and topography.
<b>Wildfire likelihood</b>	The total anticipated annualized number of fires reaching each spatial location resulting from utility-related ignitions at each location in the electrical corporation service territory. This considers the ignition likelihood and the likelihood that an ignition will transition into a wildfire based on the probabilistic weather conditions in the area.
<b>Wildfire mitigation strategy</b>	Overview of the key mitigation initiatives at enterprise level and component level across the electrical corporation's service territory, including interim strategies where long-term mitigation initiatives have long implementation timelines. This includes a description of the enterprise-level monitoring and evaluation strategy for assessing overall effectiveness of the WMP.
<b>Wildfire risk</b>	The total expected annualized impacts from ignitions at a specific location. This considers the likelihood that an ignition will occur, the likelihood the ignition will transition into a wildfire, and the potential consequences—considering hazard intensity, exposure potential, and vulnerability—the wildfire will have for each community it reaches.
<b>Wildfire spread likelihood</b>	The likelihood that a fire with a nearby but unknown ignition point will transition into a wildfire and will spread to a location in the service territory based on a probabilistic set of weather profiles, vegetation, and topography.
<b>Wildfire vulnerability</b>	The susceptibility of people or a community to adverse effects of a wildfire, including all characteristics that influence their capacity to anticipate, cope with, resist, and recover from the adverse effects of a wildfire (e.g., AFN customers, Social Vulnerability Index, age of structures, firefighting capacities).
<b>Wildland-urban interface (WUI)</b>	The line, area, or zone where structures and other human development meet or intermingle with undeveloped wildland or vegetation fuels (National Wildfire Coordinating Group).

Term	Definition
<b>Wire down</b>	Instance where an electric transmission or distribution conductor is broken and falls from its intended position to rest on the ground or a foreign object.
<b>Work order</b>	A prescription for asset or vegetation management activities resulting from asset or vegetation management inspection findings.
<b>Workshop</b>	Discussion that resembles a seminar but is employed to build specific products, such as a draft plan or policy (e.g., a multi-year training and exercise plan).