



April 3, 2026

Dear Stakeholders,

Enclosed is the Office of Energy Infrastructure Safety's (Energy Safety's) Annual Performance Report regarding Trans Bay Cable's execution of its 2024 Wildfire Mitigation Plan.

This Annual Performance Report is published as of the date of this letter. Trans Bay Cable may, if it wishes to do so, file a public response to this Annual Performance Report within 14 calendar days of the date of publication. Comments must be submitted to the Energy Safety's E-Filing system in the 2024 Annual Performance Report docket.¹

Sincerely,

/s/ Patrick Doherty

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¹ Submit responses to the 2024-[APR](https://efiling.energysafety.ca.gov/EFiling/DocketInformation.aspx?docketnumber=2024-APR) docket via the Office of Energy Infrastructure Safety's E-Filing system here: <https://efiling.energysafety.ca.gov/EFiling/DocketInformation.aspx?docketnumber=2024-APR> .



OFFICE OF ENERGY INFRASTRUCTURE SAFETY
2024 ANNUAL PERFORMANCE
REPORT
TRANS BAY CABLE

April 2026

TABLE OF CONTENTS

Executive Summary	1
1. Introduction	2
2. Performance Assessment Process	2
3. Trans Bay Cable 2024 Wildfire Mitigation Plan	3
4. Trans Bay Cable Annual Report on Compliance.....	4
5. Independent Evaluator ARC for TBC.....	4
6. WMP Initiative Attainment Performance	7
6.1 TBC 2024 WMP Expenditure Analysis	7
6.1.1 2024 WMP Proposed vs. Actual Expenditure	7
7. Ignition Risk Performance	8
8. Public Safety Power Shutoff Event Performance.....	8
9. Outcome Metric Performance	8
10. Reporting Accuracy and Completeness Performance.....	8
10.1 QDR as compared to EC ARC	9
10.2 VM Audit Report Identified Issues.....	9
10.3 IE ARC Evaluation	9
10.4 Comparison of Spatial and Tabular QDR Data	9
10.5 Field Inspection Issues Identified	9
10.6 Data Accuracy and Completeness Conclusions	10
11. Conclusion.....	10
12. References.....	11

LIST OF TABLES

Table 1. References for Citations.....	11
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LIST OF FIGURES

Figure 1. Spider Chart of QA/QC Maturity Model for TBC from IE ARC 6

Executive Summary

Energy Safety's primary objective is to ensure that electrical corporations reduce wildfire risk and adhere to their approved Wildfire Mitigation Plans (WMPs),¹ which are annually filed pursuant to Public Utilities Code section 8385 *et seq.* Energy Safety's annual performance evaluation of Trans Bay Cable (TBC) is a comprehensive look at the implementation of its 2024 WMP and its catastrophic wildfire risk reduction initiatives.

TBC did not have WMP initiative work planned for 2024 and therefore did not have a proposed budget. However, TBC spent approximately \$35,800 for carryover costs for 2023 WMP work. The 2023 WMP work referenced was TBC's initiative to install a fire suppression system in its spare parts building.

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

Notably, the IE ARC assigned relatively low scores to the maturity of TBC's quality assurance and quality control programs. This suggests that TBC should continue efforts to mature these programs in the future.

¹ Government Code section 15475.1(a).

1. Introduction

This Annual Performance Report (APR) presents the Office of Energy Infrastructure Safety's (Energy Safety's) statutorily mandated assessment of Trans Bay Cable's (TBC's) performance with its 2024 targets for initiatives and objectives in its 2023-2025 Base Wildfire Mitigation Plan (2023-2025 Base WMP). While the 2023-2025 Base WMP considers activities over a three- and 10-year horizon, this report only addresses targets established for initiatives and objectives to be executed in 2024. Therefore, this report uses the term "2024 WMP" to refer to portions of the 2023-2025 Base WMP addressed by this report.

In the sections that follow, Energy Safety describes the statutory and regulatory basis for its reporting, the 2024 WMP, and the information supplied by TBC, the independent evaluation conducted by a third-party independent evaluator that examined TBC's implementation of its 2024 WMP, and how TBC's infrastructure performed in 2024 relative to four additional dimensions of wildfire risk. Finally, Energy Safety provides its conclusions and recommendations for further actions by TBC.

2. Performance Assessment Process

The statutory objective of electrical corporation wildfire mitigation planning efforts is to ensure that electrical corporations are constructing, maintaining, and operating their infrastructure in a manner that will minimize the risk of catastrophic wildfire.²

Government Code section 15475(b)(2) directs Energy Safety to develop performance metrics to achieve maximum feasible risk reduction to be used to develop the wildfire mitigation plan and evaluate an electrical corporation's performance relative to the implementation of that plan.

In this report, Energy Safety considers the totality of all performance assessments completed with respect to TBC's 2024 WMP. This includes all inspection, audit, investigation, and data analysis work performed by Energy Safety, as well as separate electrical corporation and independent third-party evaluations of implementation.

The following is an overview of the five dimensions of performance assessed by Energy Safety:

1. Energy Safety assessed *2024 WMP attainment performance* by determining whether the electrical corporation met the 2024 WMP targets for initiatives and objectives,

² Pub. Util. Code section 8386(a).

looking specifically at whether the electrical corporation funded and performed the work stated for each initiative, and by performing field inspections of WMP work claimed to be completed by TBC, and

2. Energy Safety assessed *ignition risk performance* by tracking ignition rates, wire down rates, and unplanned outage rates – all indicators of ignition risk,
3. Energy Safety assessed *Public Safety Power Shut-off (PSPS) performance* by tracking the frequency, scope, duration and impact of PSPS events,
4. Energy Safety assessed *outcome metric performance* by tracking the number of acres burned, number of buildings damaged or destroyed, number of fatalities or injuries, and total value of assets lost due to wildfires ignited by TBC’s equipment, and
5. Energy Safety assessed *data accuracy and completeness performance* by crosschecking data from various utility reporting mechanisms, assessing the accuracy of data submitted by TBC of its WMP work, reviewing multiple reports, reviewing a formal quality assurance and quality control evaluation, and identifying issues encountered during the performance assessment process.

3. Trans Bay Cable 2024 Wildfire Mitigation Plan

TBC submitted a comprehensive WMP in 2023 covering a three-year term from 2023 through the end of 2025.³

Energy Safety approved TBC’s 2023-2025 Base WMP on January 30, 2024.⁴ For the purpose of this report, Energy Safety refers to the Base 2023-2025 WMP, as well as the 2024 targets and initiatives, collectively as 2024 WMP.

TBC’s 2024 WMP highlighted past efforts to address wildfire risk, including having completed its two planned grid hardening initiatives in 2023 at its Pittsburg converter station. Due to its limited scope of operations and work completed in 2023, TBC did not plan any initiatives for 2024.⁵

³ 2023-2025 Base WMP.

⁴ 2023-2025 Base WMP Approval.

⁵ 2023-2025 Base WMP, page 29-31.

4. Trans Bay Cable Annual Report on Compliance

Public Utilities Code section 8386.3(b)(1) directs electrical corporations to file a self-evaluation report addressing the electrical corporation's implementation of its approved plan during the prior calendar year. This document is known as the Electrical Corporation Annual Report on Compliance (EC ARC).

Energy Safety's Compliance Guidelines outlined the requirements for an EC ARC prepared to address the 2024 calendar year and filed by the electrical corporation in early 2025. The EC ARC was required to detail the electrical corporation's self-assessment of its performance with the 2024 WMP during 2024.⁶

TBC submitted its EC ARC to Energy Safety on March 8, 2025.⁷ In summary, the EC ARC reported that TBC did not have any planned wildfire mitigations for 2024 but did incur minor carryover costs related to closing out the spare parts building fire suppression system, completed in 2023.⁸

The EC ARC was considered by Energy Safety as well as by the independent evaluator in its assessment of TBC's WMP performance.

5. Independent Evaluator ARC for TBC

Energy Safety, in consultation with the Office of the State Fire Marshal, annually publishes a list of entities qualified to serve as independent evaluators of WMP compliance.⁹ Each electrical corporation is then required to hire an independent evaluator (IE) from the list to perform an annual independent WMP compliance evaluation.¹⁰

The IE reviews and evaluates the electrical corporation's compliance with its approved WMP. As part of its evaluation, the IE must investigate instances of large deviation in actual expenditure as compared to the proposed expenditure amount in the associated WMP.

The 2024 Independent Evaluator Annual Report on Compliance (IE ARC) for TBC was prepared by Bureau Veritas. Due to TBC not outlining any initiative targets for 2024, the IE reviewed

⁶ 2024 Compliance Guidelines.

⁷ EC ARC.

⁸ EC ARC, page 3.

⁹ Pub. Util. Code Section 8386.3(b)(2)(A).

¹⁰ Pub. Util. Code Section 8386.3(b)(2)(B)(i).

general mitigation efforts outlined in the WMP, verification of Quality Assurance/Quality Control (QA/QC) program implementation, processes, and results, as well as the distribution of funding to initiatives.

The IE ARC identified that TBC had completed all work associated with its two initiatives from 2023. The IE noted that TBC did have carry over expenditure in 2024 related to closing out the initiative for a fire suppression system in TBC's spare parts building.

The IE concluded that TBC, "has met the initiatives, processes and protocols as outlined in the 2024 WMP... TBC has successfully met their intent to reduce or eliminate the impact of a potential fire."¹¹ Additionally, the IE stated that TBC's approach to identifying opportunities for improvement by utilizing the Failure Mode and Effects Analysis (FMEA) methodology, "enables TBC to pinpoint potential failure points and mitigate wildfire risks associated with its transmission infrastructure."¹²

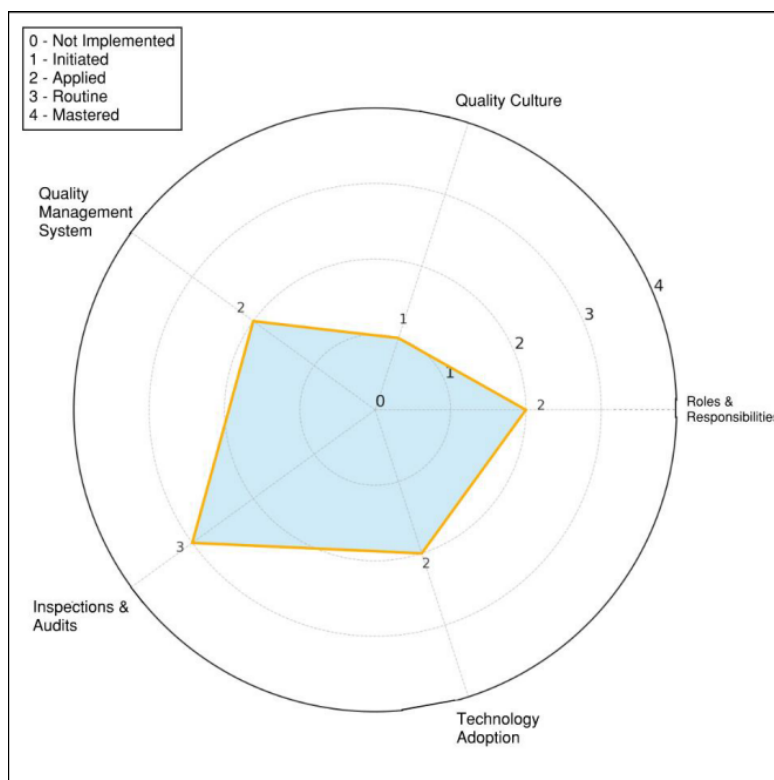
Finally, the IE reviewed TBC's QA/QC processes, assigning scores from 0 to 4 for five QA/QC Maturity Model metrics (Figure 1). For a full description of the QA/QC Maturity Model, see the IE ARC Outline and the IE ARC.^{13, 14}

¹¹ IE ARC, page 25.

¹² IE ARC, page 25.

¹³ IE ARC Outline, page 14.

¹⁴ IE ARC, page 24-25.

Figure 1. Spider Chart of QA/QC Maturity Model for TBC from IE ARC¹⁵

In the IE ARC, the IE concluded that TBC had a developed and documented a QA/QC process for WMP initiative completion. TBC scored the highest in the metric pertaining to Inspections and Audits; scored modestly in the metrics for Quality Management System(s), Roles and Responsibilities, and Technology Adoption; and scored the lowest in the Quality Culture metric. The IE noted that “broader cultural indicators like QA/QC onboarding and QA incentives were not identified.”¹⁶

The IE stated, “[b]ased on SME interviews and supporting documentation, TBC’s QA/QC program is implemented and actively maintained. Inspection frequency, Supervisory Control and Data Acquisition (SCADA) oversight, and corrective action tracking are consistent with the utility’s WMP and industry expectations. Initiative field verification and QA documentation align with maturity scoring targets for this review cycle.”¹⁷

However, the IE also noted some areas where TBC’s QA/QC program could mature further, even if current performance is adequate by industry standards. For example, with respect to real time system monitoring, the IE noted that TBC’s system is effective but that “it is not

¹⁵ IE ARC, page 25.

¹⁶ IE ARC, page 24.

¹⁷ IE ARC, page 24.

deeply integrated into QA documentation or analytics platforms - no predictive tools are used.”¹⁸

6. WMP Initiative Attainment Performance

As TBC did not have WMP initiatives planned for 2024, Energy Safety did not conduct a standard assessment of TBC’s WMP initiative performance in 2024.

The subsections below further describe Energy Safety’s adapted assessment of TBC’s execution of its 2024 WMP.¹⁹

Section 6.1 provides an overview of the 2024 WMP proposed expenditures and compares them to the actual expenditures. Altogether, Section 6 characterizes TBC’s performance with respect to its 2024 WMP initiative attainment. Additional performance assessments appear in Sections 7 through 10.

6.1 TBC 2024 WMP Expenditure Analysis

Energy Safety conducted an expenditure analysis to estimate TBC’s spending alignment with its 2024 WMP. Unlike the assessment of the impact of initiatives with missed targets on proposed expenditures, this analysis considers all WMP initiatives, focusing on the gap between proposed and actual spending, as stated in the WMP. In addition, Energy Safety’s analysis identifies material deviations and provides detailed explanations of their primary causes.

6.1.1 2024 WMP Proposed vs. Actual Expenditure

Proposed and actual expenditures differed across the EC ARC, IE ARC, and Energy Safety’s analysis.²⁰ The EC ARC reported \$35,800 spent compared to \$0 proposed. The IE ARC and Q4 2024 Quarterly Data Report (QDR) reported \$35,800 (131%) spent compared to \$27,200 proposed. Energy Safety’s analysis ultimately concluded that \$35,800 was spent compared to \$0 proposed. This actual expenditure was the result of carryover expenditure for 2023 WMP initiative work.

¹⁸ IE ARC, page 25.

¹⁹ A standard assessment of performance for ECs with 2024 initiatives plans also includes: initiative attainment, vegetation management, wildfires ignited, audit report findings, field inspection activities, and missed initiative targets.

²⁰ EC ARC, page 3; IE ARC, page 15.

7. Ignition Risk Performance

Due to the limited size and scale of TBC's operations, combined with the inherent hardening against wildfire risk as a function of its infrastructure being newly constructed and mostly underwater, Energy Safety did not conduct an ignition risk analysis for TBC in 2024. Energy Safety reviewed TBC's data and found that no ignitions occurred on TBC's infrastructure in 2024.

8. Public Safety Power Shutoff Event Performance

Due to the limited size and scale of TBC's operations, combined with the inherent hardening against wildfire risk as a function of its infrastructure being newly constructed and mostly underwater, Energy Safety did not conduct a PSPS risk analysis for TBC in 2024. Energy Safety reviewed TBC's data and found that no PSPS events occurred on TBC's infrastructure in 2024.

9. Outcome Metric Performance

Energy Safety reviewed TBC's data and found that no ignitions, wire down events, or unplanned caused outages occurred on TBC's infrastructure in 2024.

10. Reporting Accuracy and Completeness Performance

This section considers whether TBC exhibited issues related to its documentation of its implementation of its 2024 WMP. To accomplish this, Energy Safety holistically assessed all relevant information sources and assessments for any systemic failings that may have hindered TBC's ability to record and report on its progress toward meeting its 2024 WMP target.

This issue is relevant to an electrical corporation's overall performance as the electrical corporation's awareness of the condition of its system, including the changes made to the system in the course of completing WMP work, impacts the situational awareness that the electrical corporation can attain. If an electrical corporation cannot accurately track WMP work and report on progress toward its WMP targets, this calls into question the ability of an electrical corporation to understand the actual risk posed by its equipment. In this section of

the report, five dimensions of Reporting Accuracy and Completeness are combined to provide an assessment overall. The five dimensions are:

1. The consistency of data reporting between the QDR and the EC ARC is assessed for issues beyond routine data value updates,
2. Vegetation Management (VM) Audit Reports are reviewed for issues identified,
3. Findings from the IE ARC QA/QC program maturity model evaluations are summarized along with other IE ARC data issues observed,
4. Consistency between QDR tabular and QDR spatial reporting is reviewed, and
5. Data accuracy issues identified by the inspections team are reviewed.

10.1 QDR as compared to EC ARC

Although TBC's WMP and EC ARC did not include any proposed expenditure for 2024, TBC included a proposed expenditure in its Q4 QDR for 2023 carryover expenditure (See Section 6.1.1 above).

10.2 VM Audit Report Identified Issues

TBC did not have vegetation management targets or goals for 2024; therefore, Energy Safety did not conduct a vegetation management (VM) Audit of TBC for the 2024 compliance year.

10.3 IE ARC Evaluation

The IE noted that TBC's QA/QC processes could mature further, but that they were nonetheless functional and effective for the scale of its operations.²¹

10.4 Comparison of Spatial and Tabular QDR Data

Pursuant to Energy Safety's Data Guidelines, electrical corporations must submit quarterly data reports in both spatial and non-spatial (i.e., tabular) formats. Each of these quarterly reports must contain accurate information about the progress in meeting WMP targets throughout a compliance period.²²

Due to TBC not planning or conducting WMP work in 2024, QDR data submissions for 2024 did not contain relevant updates to infrastructure or risk events for this analysis.

10.5 Field Inspection Issues Identified

For the 2024 compliance period, Energy Safety did not conduct inspection activities of TBC's facilities due to the lack of WMP work conducted during this period.

²¹ IE ARC pages 24-25.

²² Data Guidelines.

10.6 Data Accuracy and Completeness Conclusions

Although Energy Safety found that TBC's documentation and reporting in 2024 on proposed and actual expenditure were reported inconsistently, it was not a material cause for concern for TBC to have 2023 carryover expenditure.

Taken together, this analysis shows that TBC's performance was satisfactory. TBC should continue to improve the accuracy of its WMP implementation documentation.

11. Conclusion

Energy Safety conducted its performance review processes through a variety of means including analysis of data submitted by TBC to Energy Safety. Energy Safety additionally reviewed TBC's self-assessment in its EC ARC and the findings of the IE ARC.

TBC did not have WMP initiative work planned for 2024 and therefore did not have a proposed budget. However, TBC spent approximately \$35,800 due to carryover costs for 2023 WMP work.

With respect to the ignition, PSPS, and outcome metric performance of TBC's system in 2024, there was no activity to report.

In addition to the conflicting reporting regarding proposed expenditure, the IE ARC assigned relatively low maturity scores to some aspects of TBC's quality assurance and quality control program. This suggests that TBC should continue efforts to mature this program in the future.

Energy Safety will continue to monitor TBC's implementation of its ongoing wildfire mitigation activities and seek to improve TBC's ability to eliminate utility-caused catastrophic wildfires in California.

12. References

Table 1. References for Citations

Citation	Reference
2023-2025 Base WMP	Trans Bay Cable, “ 2023-2025 Base Wildfire Mitigation Plan ,” Published May 8, 2023, URL:(https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53815&shareable=true)
2023-2025 WMP Approval	Office of Energy Infrastructure Safety, “ Trans Bay Cable 2023-2025 WMP Decision and Cover Letter ,” Published January 30, 2024, URL:(https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56223&shareable=true)
2024 IE ARC Outline	Energy Safety, “ Independent Evaluator Outline ,” Published December 12, 2024, URL: (https://caleprocure.ca.gov/event/3355/0000033680).
2024 Q4 QDR	Trans Bay Cable, “ TBC2024 Q4 Tables 1-15 RQ ,” Published February 3, 2025, URL:(https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57917&shareable=true)
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CPUC HFTD Designation	California Public Utilities Commission, “ Fire-Threat Maps and Fire-Safety Rulemaking ,” Accessed July 28, 2025, URL: (https://www.cpuc.ca.gov/industries-and-topics/wildfires/fire-threat-maps-and-fire-safety-rulemaking).
Data Guidelines	Office of Energy Infrastructure Safety, “ Data Guidelines v3.2 ,” URL: (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56226&shareable=true).

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Pub. Util. Code	Public Utilities Code, URL: (https://leginfo.legislature.ca.gov/faces/codesTOCSelected.xhtml?tocCode=PUC&tocTitle=+Public+Utilities+Code+-+PUC).