



April 20, 2026

Dear Stakeholders,

Enclosed is the Office of Energy Infrastructure Safety's (Energy Safety's) Annual Performance Report regarding Horizon West Transmission, LLC's execution of its 2024 Wildfire Mitigation Plan.

This Annual Performance Report is published as of the date of this letter. Horizon West Transmission, LLC may, if it wishes to do so, file a public response to this Annual 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

Patrick Doherty

Program Manager | Performance Assessment Division
Electrical Infrastructure Directorate
Office of Energy Infrastructure Safety

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
HORIZON WEST TRANSMISSION

April 2026

TABLE OF CONTENTS

Executive Summary	1
1. Introduction	2
2. Performance Assessment Process.....	2
3. Horizon West Transmission 2024 Wildfire Mitigation Plan.....	3
4. Horizon West Transmission Annual Report on Compliance	4
5. Independent Evaluator ARC for Horizon West Transmission.....	5
6. WMP Initiative Attainment Performance	7
6.1 Horizon West Transmission 2024 WMP Initiative Activities Assessed by Energy Safety	8
6.2 Energy Safety Vegetation Management Audit Report	8
6.3 Energy Safety Field Inspection Assessment.....	8
6.4 Horizon West Transmission WMP Objective and Initiative Activity Attainment in 2024	9
6.5 Horizon West Transmission 2024 WMP Expenditure Assessment.....	9
6.5.1 2024 WMP Proposed vs. Actual Expenditure.....	9
6.5.2 Initiative-specific Expenditure Deviations	9
7. Ignition Risk Performance	10
7.1 Ignitions Event Rates.....	10
7.2 Wire Down Event Rates	10
7.3 Outage Event Rates.....	11
8. Public Safety Power Shutoff Event Performance	11
9. Outcome Metric Performance	11
10. Reporting Accuracy and Completeness Performance.....	11
10.1 QDR as compared to EC ARC.....	12
10.2 VM Audit Report Identified Issues.....	12
10.3 IE ARC Evaluation	12
10.4 Comparison of Spatial and Tabular QDR Data.....	13

10.5 Data Accuracy and Completeness Assessment 13

11. Conclusion 13

12. References 15

13. Appendix - Horizon West Transmission WMP Initiative Activity Attainment 19

LIST OF TABLES

Table 1. 2024 WMP Initiatives with Material Expenditure Deviation 10

Table 2. References for Citations 15

Table 3. WMP Initiative Activity Attainment Information 19

LIST OF FIGURES

Figure 1. Radar Plot of QA/QC Maturity Model for HWT Reproduced from IE ARC 7

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 Horizon West Transmission, LLC (HWT) is a comprehensive assessment of the implementation of its 2024 WMP and its catastrophic wildfire risk reduction initiatives.

Energy Safety assessed HWT's performance using a five-dimensional metric; WMP initiative attainment performance, ignition risk performance, public safety power shutoff (PSPS) performance, outcome metrics performance, and data reporting accuracy and completeness performance.

As three of the performance dimensions are not applicable for HWT, only two are assessed: initiative attainment, and data accuracy and completeness.

For implementation of its 2024 WMP, Energy Safety found that HWT performed satisfactorily for initiative attainment and exemplary for data accuracy and completeness.

For initiative attainment, HWT completed three of three (or 100%) of its 2024 WMP initiatives. However, on the overall 2024 WMP budget, HWT spent above the proposed amounts of its 2024 WMP initiatives by \$149,000, (or by 198%). This was mostly due to HWT incurring costs significantly above proposed amounts for asset inspections. Energy Safety recommends that HWT focus on the root causes of this issue and make corrections to its budgeting for future WMP development and implementation.

For data accuracy and completeness, Energy Safety and the independent evaluator did not find any systemic issues that hindered HWT's ability to adequately implement its WMP in 2024. Energy Safety will continue to monitor documentation and reporting on targets and attainment to ensure that HWT remains consistent for future WMP cycles.

On balance, HWT was successful in executing its plan for wildfire risk mitigation. On the subject of budgeting and expenditures for asset inspections, there are still areas to improve upon and opportunities to continue learning.

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

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 Horizon West Transmission, LLC's (HWT'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, the information supplied by HWT, and the independent evaluation conducted by a third-party independent evaluator that examined HWT's implementation of its 2024 WMP. Finally, Energy Safety provides its conclusions and recommendations for further actions by HWT.

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 HWT's 2024 WMP. This includes all inspection, audit, investigation, and data assessment work performed by Energy Safety, as applicable, 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 generally for electrical corporations (ECs):

1. Energy Safety assesses *2024 WMP attainment performance* by determining whether the electrical corporation met the 2024 WMP targets for initiatives and objectives, looking specifically at whether the electrical corporation funded and performed the work

² Pub. Util. Code section 8386(a).

stated for each initiative, and by performing field inspections of WMP work claimed to be completed by the EC,

2. Energy Safety assesses *ignition risk performance* by tracking ignition rates, wire down rates, and unplanned outage rates – all indicators of ignition risk,
3. Energy Safety assesses *Public Safety Power Shut-off (PSPS) performance* by tracking the frequency, scope, duration and impact of PSPS events,
4. Energy Safety assesses *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 an EC's equipment, and
5. Energy Safety assesses *data accuracy and completeness performance* by crosschecking data from various utility reporting mechanisms, assessing the accuracy of data submitted by the EC 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.

HWT is a transmission-only utility that began operations on February 29, 2020. Its first facility, the Suncrest Static VAR Compensator (SVC), is situated on privately-owned lands in the south-central portion of San Diego County, California, approximately 3.8 miles southwest of Descanso and 3.4 miles southeast of Alpine. The facility comprises the SVC and a 230 kV underground transmission line that connects to the Suncrest Substation owned by San Diego Gas & Electric Company (SDG&E).

Due to these particular characteristics of HWT assets, three of the performance dimensions are not applicable for HWT, and only two are assessed in this 2024 performance report: initiative attainment, and data accuracy and completeness.

3. Horizon West Transmission 2024 Wildfire Mitigation Plan

HWT submitted a comprehensive WMP in 2023 covering a three-year term from 2023 through the end of 2025.³ Energy Safety approved HWT's 2023-2025 Base WMP on December 11, 2024.⁴ For the purpose of this report, Energy Safety refers to the Base 2023-2025 WMP, any approved Change Order Requests, as well as the 2024 targets and initiatives, collectively as 2024 WMP.

³ 2023-2025 Base WMP.

⁴ 2023-2025 Base WMP Approval.

WMP Initiatives

HWT's 2024 WMP highlighted past and ongoing efforts to address wildfire risk.⁵ The 2024 WMP described three initiatives with commitments or targets, which are divided up into three categories and summarized here:

1. Grid Design, Operations and Maintenance: One initiative to perform monthly asset safety inspections for its one facility.
2. Vegetation Management and Inspections: One initiative to perform monthly vegetation management inspections for its one facility.
3. Emergency Preparedness: In the 2024 WMP, HWT committed to maintaining a third-party contractor to provide fire brigade support and ensure all relevant HWT personnel, including the system operations team, are trained on HWT's emergency operations plan.

WMP Objectives

There are no three-year or 10-year objectives provided in HWT's 2023-2025 WMP cycle with targets for 2024.

Descriptions of the activities for the programs and initiatives contained in HWT's 2024 WMP are listed in the table of the appendix to this report.

4. Horizon West Transmission 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

HWT submitted its EC ARC to Energy Safety on March 31, 2025.⁷ In summary, the EC ARC reported that HWT completed initiatives in three areas: Grid Design, Operations and

⁵ 2023-2025 Base WMP, page 13.

⁶ 2024 Compliance Guidelines.

⁷ 2024 EC ARC.

Maintenance, Vegetation Management and Inspections, and Emergency Preparedness. In 2024, the EC ARC reported that HWT continued a cadence of monthly asset inspections and monitoring, hired a third-party vendor to provide vegetation management services which entailed weed abatement and management of the defensible space surrounding the Suncrest facility, and maintained third-party fire brigade support services at the Suncrest facility.

The EC ARC is considered by Energy Safety as well as by the independent evaluator in its assessment of HWT's WMP performance or evaluation of WMP implementation, respectively. For a summary of the EC ARC information on initiative completion and actual spending, see the table in the appendix to this report.

5. Independent Evaluator ARC for Horizon West Transmission

Energy Safety, in consultation with the Office of the State Fire Marshal, annually publishes a list of entities qualified to serve as independent evaluators of WMP compliance.⁸ Each electrical corporation is then required to hire an independent evaluator (IE) from the list to perform an annual independent WMP compliance evaluation.⁹

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 HWT was prepared by Bureau Veritas. The IE ARC included a review of the wildfire mitigation initiatives and activities implemented in 2024, and an accounting of whether HWT met its performance targets, deviated from its budget, and followed its quality assurance and quality control (QA/QC) processes.

The IE utilized a variety of techniques to analyze HWT's progress toward meeting its 2024 WMP commitments, such as inspecting a sample of HWT's field-verifiable 2024 WMP initiatives, performing desk reviews of non-field verifiable initiatives, interviewing selected utility staff, and reviewing the 2024 WMP and 2024 EC ARC.¹⁰ The IE evaluated a total of two initiatives with targets.¹¹ The IE ARC includes sample verification statistics, an opinion on initiative completions, and actual expenditures for each initiative.¹²

⁸ Pub. Util. Code Section 8386.3(b)(2)(A).

⁹ Pub. Util. Code Section 8386.3(b)(2)(B)(i).

¹⁰ IE ARC, page 9.

¹¹ IE ARC, page 10.

¹² IE ARC, page 12.

The IE ARC findings are summarized by initiative in the appendix to this report. The IE concluded that HWT was compliant with its 2024 WMP commitments. According to the IE ARC, all planned initiatives were executed with thorough documentation, detailed monthly reporting, and effective onsite practices.¹³

As a result of the evaluation conducted, the IE provided observations and recommendations for HWT in certain areas:

- **Budget Forecasting and Allocation Improvements:** According to the IE, HWT should enhance the accuracy of employee time allocation forecasting to avoid significant financial reclassification issues and refine carryover cost tracking to ensure clarity and accuracy between compliance periods.
- **QA/QC Technology Advancement:** According to the IE, HWT should explore opportunities for QA/QC technology adoption to advance from current maturity levels and continue refining the Asset Management Program (AMP) to integrate broader operational functions, improving data utilization for predictive analysis, and continuous improvement efforts.

In the IE's review of HWT's QA/QC processes, it assigned 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.^{14, 15}

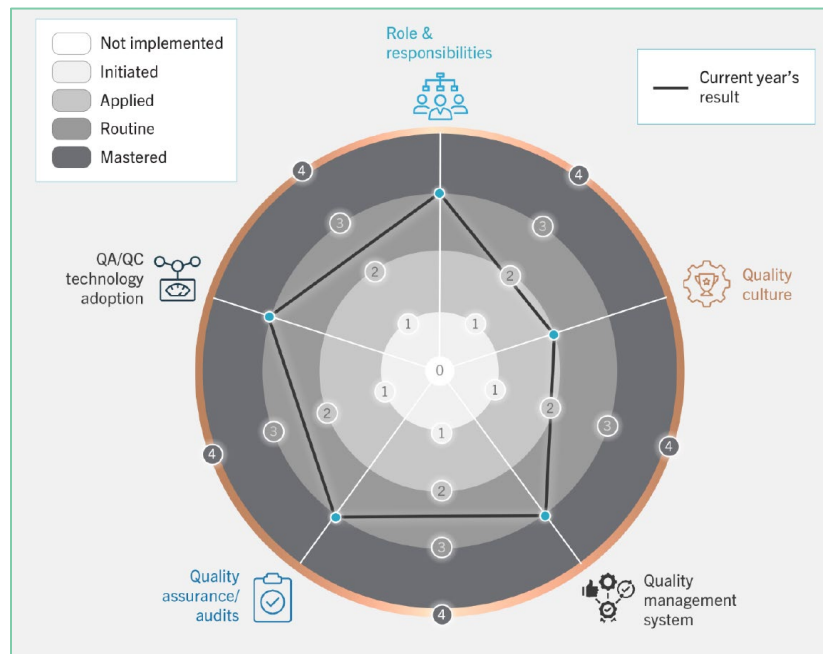
In the IE ARC, the IE concluded that HWT had a well-developed and documented QA/QC process for WMP initiative completion. HWT's current technological adoption primarily involves digital documentation through automated notifications. According to the IE, the system has streamlined inspection data collection, significantly reducing manual errors and enhancing data reliability. The IE ARC awarded HWT four scores of "3" and one score of "2" indicating that a mature QA/QC program is in place except for the Quality Culture dimension. However, not receiving scores of "4" in all dimensions indicate there is room for improvement.

¹³ IE ARC, pages 14-15.

¹⁴ IE ARC Outline, page 13.

¹⁵ IE ARC, pages 22-23.

Figure 1. Radar Plot of QA/QC Maturity Model for HWT Reproduced from IE ARC¹⁶



6. WMP Initiative Attainment Performance

Energy Safety's assessment of HWT's performance in 2024 indicates that HWT attained all three of its targets (100%) for its 2024 WMP initiative activities. The subsections below further describe Energy Safety's assessment of HWT's execution of its 2024 WMP.

Section 6.1 provides an overview of the 2024 WMP initiatives assessed for attainment by Energy Safety. Section 6.2 describes the vegetation management assessments performed by Energy Safety, if any. Section 6.3 provides an overview of Energy Safety's field inspection activities related to HWT's 2024 WMP work, including inaccuracies in HWT's data regarding completed WMP work. Section 6.4 summarizes the initiatives with missed targets, if any. Finally, Section 6.5 provides an overview of the 2024 WMP proposed expenditures and compares them to the actual expenditures. Altogether, Section 6 characterizes HWT's performance with respect to its 2024 WMP initiative attainment. Additional dimensions of performance assessment appear in Sections 7 through 10.

¹⁶ IE ARC, page 23.

6.1 Horizon West Transmission 2024 WMP Initiative Activities Assessed by Energy Safety

Energy Safety assessed WMP attainment performance on three wildfire mitigation initiatives from the 2024 WMP.¹⁷ The initiatives are grouped into three main categories:

1. Grid Design, Operation, and Maintenance with one initiative assessed and a proposed expenditure of \$66,000.
2. Vegetation Management and Inspection with one initiative assessed and a proposed expenditure of \$17,000.
3. Emergency Preparedness with one initiative assessed and a proposed expenditure of \$70,000.

A complete list of initiatives along with expenditure information appears in the table of the appendix to this report.

The initiative performance assessment process included comparing the actual initiative completion as reported to Energy Safety by HWT in its quarterly data report (QDR) and in its EC ARC, and as reported by the IE in the IE ARC.¹⁸ The information from each of these sources is summarized along with the final assessment of performance for each initiative in the table of the appendix to this report.

6.2 Energy Safety Vegetation Management Audit Report

Each year, Energy Safety may perform an audit of the work performed by, or on behalf of, an electrical corporation with respect to the vegetation management commitments in its WMP following the end of the performance year.¹⁹

Energy Safety did not conduct a vegetation management audit of HWT for the 2024 compliance period.

6.3 Energy Safety Field Inspection Assessment

Energy Safety did not conduct inspection activities of HWT's facilities for the 2024 compliance period.

¹⁷ 2023-2025 Base WMP, page 7.

¹⁸ 2024 Q4 QDR, page 12; EC ARC, page 3; and IE ARC, page 13.

¹⁹ Pub. Util. Code section 8386.3(b)(5)(A).

6.4 Horizon West Transmission WMP Objective and Initiative Activity Attainment in 2024

Energy Safety assessed three wildfire mitigation initiatives for 2024 WMP attainment performance and found that all initiative activity targets (100%) were met.

6.5 Horizon West Transmission 2024 WMP Expenditure Assessment

Energy Safety conducted an expenditure assessment to estimate HWT's spending alignment with its 2024 WMP. This assessment considers all WMP initiatives, focusing on the gap between WMP proposed and actual spending. In addition, Energy Safety's assessment identifies material deviations and provides explanations of their primary causes.

6.5.1 2024 WMP Proposed vs. Actual Expenditure

The EC ARC reported \$302,200 (198%) spent of the \$153,000 proposed. The IE ARC reported \$302,200 (198%) spent of the \$153,000 proposed. Consistent with the EC ARC and the IE ARC, Energy Safety's assessment concluded that \$302,200 (198%) was spent of the \$153,000 proposed.

6.5.2 Initiative-specific Expenditure Deviations

Energy Safety assessed HWT's expenditures on three wildfire mitigation initiatives from the 2024 WMP and found that the actual expenditure of two initiative activities (66.3%) deviated more than 10% from their proposed expenditure (Table 6). In the table are additional context for the expenditure deviation that resulted from Energy Safety research.

While HWT was able to reduce expenditure on the Vegetation Inspections initiative compared to the proposed amount, it incurred higher than expected costs for the Asset Inspections initiative. Energy Safety recommends that HWT focus on the root causes of this issue and make corrections for future WMP development and implementation.

Table 1. 2024 WMP Initiatives with Material Expenditure Deviation

2024 WMP Initiative Name	Proposed Expenditure/Actual Expenditure ²⁰	Deviation (%)	Additional Context ²¹
Asset Inspection 8.1.3.1	\$66,000/\$225,900	242%	Costs were higher than planned due to reclassification of employee time spent on these activities. ²²
Vegetation Inspections 8.2.2.1	\$17,000/\$8,300	51%	Actual WMP spend is lower than planned spend primarily because of lower costs associated with vegetation management inspections.

7. Ignition Risk Performance

Due to the limited size and scale of HWT's operations, combined with the inherent hardening against wildfire risk as a function of its infrastructure being recently constructed and mostly underground, Energy Safety did not conduct an ignition risk performance assessment for HWT in 2024.

7.1 Ignitions Event Rates

Energy Safety reviewed HWT's data and found that no ignitions occurred on HWT's infrastructure in 2024.

7.2 Wire Down Event Rates

Energy Safety reviewed HWT's data and found that no wire down events occurred on HWT's infrastructure in 2024.

²⁰ EC ARC, page 3.

²¹ EC ARC, page 3.

²² Reclassification of employees was not defined in the EC ARC.

7.3 Outage Event Rates

Energy Safety reviewed HWT's data and found that no unplanned outages occurred on HWT's infrastructure in 2024.

8. Public Safety Power Shutoff Event Performance

Due to the limited size and scale of HWT's operations, and the fact that HWT does not have any retail customers, HWT does not have any circumstances in which it would issue a PSPS event. Energy Safety did not assess this dimension of performance as it does not apply to HWT.

9. Outcome Metric Performance

Energy Safety reviewed HWT's data and found that no outcome metrics (i.e., acres burned, structures damaged or destroyed, injuries or fatalities, and value of assets destroyed) occurred from HWT's infrastructure in 2024. Therefore, Energy Safety did not assess this dimension of performance for the 2024 compliance period.

10. Reporting Accuracy and Completeness Performance

This section considers whether HWT exhibited any documentation issues in its reporting on 2024 WMP implementation.

Reporting accuracy and completeness is relevant to an electrical corporation's overall performance. For if an electrical corporation cannot accurately track WMP work and report on progress toward its WMP targets, this calls into question 1) the validity of reporting WMP progress, and 2) the ability of an electrical corporation to achieve the WMP risk reduction goals through planned wildfire safety mitigation activities. In this section of the report, five dimensions of reporting accuracy and completeness are combined to provide an overall performance assessment. The five dimensions of performance for reporting and completeness, as applicable, are:

1. The consistency of data reporting between the QDR and the EC ARC is assessed for issues beyond routine data value updates,
2. 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

Energy Safety observed that there is complete agreement between the QDR and the EC ARC. HWT does not show any data inconsistencies in this performance dimension.

10.2 VM Audit Report Identified Issues

As Energy Safety did not issue a VM Audit Report for HWT for the year 2024, this performance dimension does not apply to HWT.

10.3 IE ARC Evaluation

The IE ARC commented that strides in data management and procedural automation were made through the implementation of the asset management program but did not otherwise identify any data accuracy and completeness issues.

The IE ARC also performed an evaluation of the HWT overall QA/QC implemented processes and procedures by following a maturity model metric. Results of a systemic QA/QC maturity evaluation reflects the integrity and validity of data processes internal to HWT and its reporting.

The IE ARC found that given HWT's limited operational scope as a transmission-only utility with a single facility, the Suncrest Substation, the QA/QC assessment provided reflects practices appropriate for its scale and operational complexity. The IE ARC acknowledges that while some advanced technological implementations and extensive audit processes applicable to larger utilities may not be practical for HWT, the existing QA/QC framework effectively supports current operations, compliance obligations, and risk mitigation objectives. Based on the IE's review of documentation, responses to data requests, and verification from HWT's previous QA/QC program evaluation, the IE ARC provided the following maturity ratings for each of the QA/QC dimensions:

- Roles & Responsibilities – Level 3 (Routine),
- Quality Culture – Level 2 (Applied),
- Quality Management System (QMS) – Level 3 (Routine),
- Quality Inspections and Audits – Level 3 (Routine), and
- QA/QC Technology Adoption – Level 3 (Routine).

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 (graphical information system) 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.²³

Energy Safety assessed the data submitted by HWT regarding the WMP work it completed in 2024, in both the spatial and tabular QDR submissions. Energy Safety found no inconsistencies between spatial and tabular QDR submissions.

10.5 Data Accuracy and Completeness Assessment

Energy Safety found that HWT's documentation and reporting in 2024 on targets and actual attainments was exemplary, finding no examples of cases where data on targets and actual attainments were reported inaccurately. Energy Safety's assessment of all the initiatives by data source can be found in the appendix.

Going forward, Energy Safety will continue to monitor HWT's reporting regarding the accuracy of HWT's documentation and tracking processes.

11. Conclusion

Energy Safety makes the following observations and recommendations regarding performance of HWT's 2024 WMP implementation.

Energy Safety generally assesses EC performance using a five-dimensional metric: WMP initiative attainment performance, ignition risk performance, public safety power shutoff (PSPS) performance, outcome metrics performance, and data reporting accuracy and completeness performance.

As three of the performance dimensions are not applicable for HWT, only two are assessed for HWT in this report: initiative attainment, and data accuracy and completeness.

For implementation of its 2024 WMP, Energy Safety finds that HWT has performed satisfactorily for initiative attainment and exemplary for data accuracy and completeness.

For initiative attainment, HWT completed three of three (or 100%) of its 2024 WMP initiatives. However, on the overall 2024 WMP budget, HWT spent above the proposed amounts of its 2024 WMP initiatives by \$149,000, (or by 198%). This was mostly due to HWT incurring costs

²³ Data Guidelines, pages 1, 47-105, and 151-156.

significantly above proposed amounts for asset inspections. Energy Safety recommends that HWT focus on the root causes of this issue and make corrections to its budgeting for future WMP development and implementation.

For data accuracy and completeness, Energy Safety and the independent evaluators did not find any systemic issues that hindered HWT's ability to adequately implement its WMP in 2024. Energy Safety will continue to monitor documentation and reporting on targets and attainment to ensure that HWT remains consistent for future WMP cycles.

On balance, HWT was successful in executing its plan for wildfire risk mitigation. On the subject of budgeting and expenditures for asset inspections, there are still areas to improve upon and opportunities to continue learning.

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

12. References

Table 2. References for Citations

Citation	Reference
2023-2025 Base WMP	Horizon West Transmission, Wildfire Mitigation Plan 2023 , Published July 8, 2024, URL: (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57001&shareable=true).
2023-2025 WMP Approval	Office of Energy Infrastructure Safety, Decision on 2023 – 2025 Wildfire Mitigation Plan Horizon West Transmission , Published January 30, 2024, URL: (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56224&shareable=true).
Compliance Guidelines	Office of Energy Infrastructure Safety, Compliance Guidelines , Published September 2023, URL: (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55586&shareable=true).
Compliance Process	Office of Energy Infrastructure Safety, Compliance Process , Published September 2024, URL: (https://energysafety.ca.gov/wp-content/uploads/2024/12//2024-wmp-compliance-process.pdf).
CPUC HFTD Designation	California Public Utilities Commission, Fire-Threat Maps and Fire-Safety Rulemaking , 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 , Published January 30, 2024, URL: (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56226&shareable=true).
2024 Q4 QDR	Horizon West Transmission, 2024 Q4 Quarterly Data Report , Published February 3, 2025, URL: (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57922&shareable=true).

Citation	Reference
EC ARC	Horizon West Transmission, Annual Report on Compliance for 2024 , Published March 31, 2025, URL: (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58188&shareable=true).
IE ARC	Bureau Veritas, Final Independent Evaluator 2025 Annual Report on Compliance , Published July 23, 2025, URL: (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58994&shareable=true).
IE ARC Outline	Office of Energy Infrastructure Safety, 2024 Independent Evaluator Outline , Published December 12, 2024, URL: (https://caleprocure.ca.gov/event/3355/0000033680).
Pub. Util. Code	Public Utilities Code, URL: (https://leginfo.legislature.ca.gov/faces/codesTOCSelected.xhtml?tocCode=PUC&tocTitle=+Public+Utilities+Code+-+PUC).

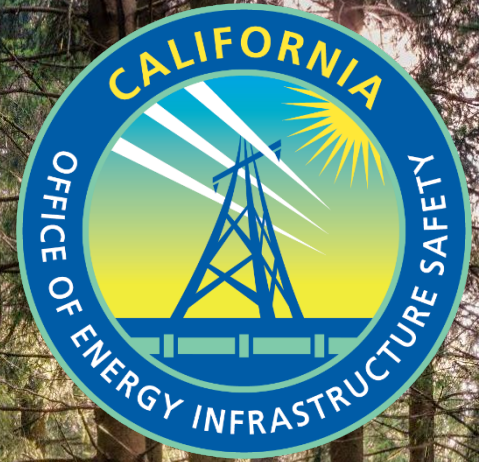
DATA DRIVEN FORWARD-THINKING INNOVATIVE SAFETY FOCUSED



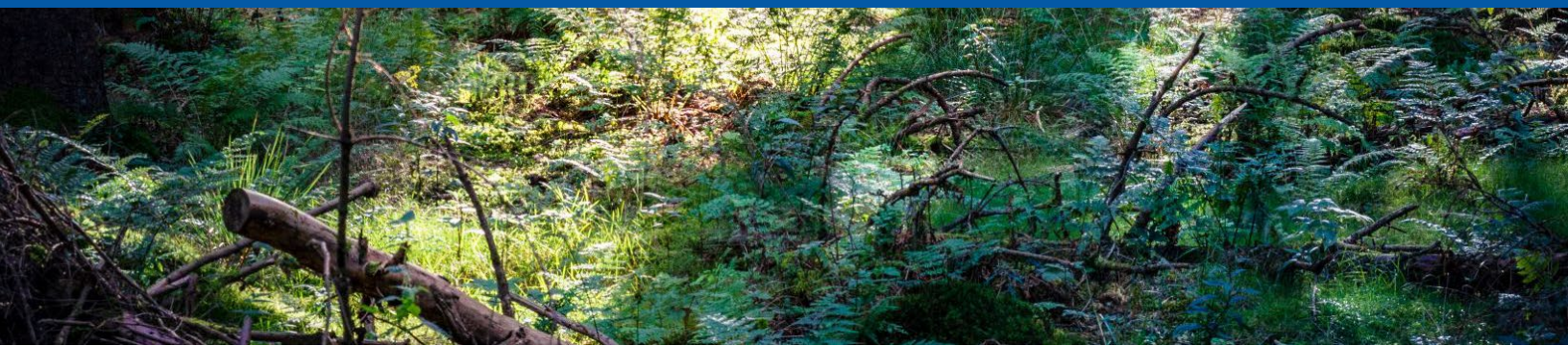
OFFICE OF ENERGY INFRASTRUCTURE SAFETY
A California Natural Resources Agency
www.energysafety.ca.gov

715 P Street, 15th Floor
Sacramento, CA 95814





APPENDIX



13. Appendix - Horizon West Transmission WMP Initiative Activity Attainment

Table 3 summarizes each of HWT's three initiative activity targets from its 2024 WMP, HWT's self-reporting on performance contained in its QDR, the EC ARC, and the IE ARC.²⁴

Table 3. WMP Initiative Activity Attainment Information

2024 WMP Initiative	2024 WMP Activity Target	QDR	EC ARC	IE ARC	Attainment Status	Proposed Expenditure	Actual Expenditure
Asset Inspections 8.1.3.1	Conduct monthly asset management and inspections.	Met Target: Monthly Actual: Monthly	Met Target: Monthly Actual: Monthly	Met Target: Monthly Actual: Monthly	Met	\$66,000	\$225,900 ²⁵

²⁴ 2024 Q4 QDR, EC ARC, and IE ARC.

²⁵ 2024 EC ARC, page 3 (“[c]osts were higher than plan due to reclassification of employee time spent on these activities”).

2024 WMP Initiative	2024 WMP Activity Target	QDR	EC ARC	IE ARC	Attainment Status	Proposed Expenditure	Actual Expenditure
Vegetation Management and Inspection 8.2.2.1	Maintain third-party to conduct monthly maintenance of substation defensible space.	Met Target: Monthly Actual: Monthly	Met Target: Monthly Actual: Monthly	Met Target: Monthly Actual: Monthly	Met	\$17,000	\$8,300 ²⁶
Emergency Preparedness 8.4	Maintain third-party fire brigade and training to support Suncrest facility.	Met Target: Not provided	Met Target: Not provided	Met Target: Not provided	Met	\$70,000	\$68,000

²⁶ 2024 EC ARC, page 3 (“[a]ctual WMP spend is lower than planned spend primarily because of lower costs associated with asset inspections and vegetation management/inspections”).