

**Trans Bay Cable LLC
ANNUAL REPORT ON COMPLIANCE FOR 2022**

for Submittal to:

**CALIFORNIA OFFICE OF ENERGY
INFRASTRUCTURE SAFETY**

California Natural Resources Agency
715 P Street, 20th Floor
Sacramento, California 95814



P.O. Box 666
Pittsburg, California 94565

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Instructions:¹ *The Annual Report on Compliance submitted by each EC shall include a written narrative including:*

- a. *An assessment of whether the EC met the risk reduction intent by implementing all of their approved WMP initiatives, i.e., the degree to which initiative activities have reduced ignition probabilities;*
 - *If the EC fails to achieve the intended risk reduction, EC shall provide a detailed explanation of why and a reference to where associated corrective actions are incorporated into their most recently submitted WMP.*
- b. *A full and complete listing of all change orders and any other operational changes, such as initiative location changes, made to WMP initiatives, with an explanation of why the changes were necessary, and an assessment of whether the changes achieved the same risk reduction intent;*
- c. *Descriptions of all planned WMP initiative spend vs actual WMP initiative spend and an explanation of any differentials between the planned and actual spends;*
- d. *A description of whether the implementation of WMP initiatives changed the threshold(s) for triggering a PSPS event and/or reduced the frequency, scale, scope and duration of PSPS events;*
- e. *A summary of all defects identified by the WSD within the annual compliance period, the corrective actions taken and the completion and/or estimated completion date*

Trans Bay Cable LLC (U934-E) (Trans Bay) is a transmission-only utility with no retail/end-use customers. Trans Bay is the owner and operator of a 53-mile, approximately 400 MW, high voltage, direct-current (HVDC) submarine transmission cable buried at various depths beneath the San Francisco Bay Waters² (Bay Waters), with AC/DC converter stations (or substations) at each end (the Trans Bay System). The Trans Bay System's eastern converter station is located in Pittsburg, CA which is adjacent to an area designated as a Tier 2 (Elevated) Fire-Threat Area based on the California Public Utilities Commission's (CPUC or Commission) Fire-Threat Map. All other transmission elements are located fully outside and not adjacent to any Fire-Threat Area. Specifically, the transmission system is comprised of the Pittsburg converter station, 230kV High Voltage AC Underground Cable, 200kV High Voltage DC Underground Cable – Pittsburg Location, +/-200kV High Voltage DC Submarine Cable, +/-200kV High Voltage DC Underground Cable – San Francisco Location, Potrero converter station, and 115kV High Voltage AC Underground Cable. The Trans Bay System is connected to Pacific Gas & Electric (PG&E) substations in both San Francisco and Pittsburg, CA via underground AC cables. All aboveground transmission infrastructure is fully contained within the walls of the systems converter stations.

¹ Text in blue italics are instructions from the Wildfire Safety Division – Compliance Operational Protocols as issued by the WSD on February 16, 2021.

² San Francisco Bay Waters is defined as the continuous waterway that includes the San Francisco Bay, San Pablo Bay, Carquinez Strait, Suisan Bay and Sacramento River delta.

Due to the limited scale and scope of Trans Bay's operations, the substantial hardening of Trans Bay's transmission infrastructure to wildfire risks due to being underground or submerged and having no transmission infrastructure in wildlands or in a wildland urban interface (WUI), Trans Bay does not maintain a program specifically geared towards wildfire mitigation.

- a. Trans Bay projected to complete initiatives in the areas of Risk and Mapping and Grid Operations and Protocols in 2022. In Q4 of 2022, Trans Bay added an additional initiative in the category of Situational Awareness after it conducted a review of Energy Safety's Decision on Trans Bay's 2022 WMP. Both the Risk and Mapping and Situational Awareness initiatives were completed in 2022. Due to supply chain and contracting challenges, Trans Bay was unable to complete its two Grid Operations projects in 2022. However both projects are scheduled for completion in 2023.
 - **Risk and Mapping:** In 2020, Trans Bay engaged a third party to conduct a wildfire risk assessment of its Pittsburg Converter Station. The study afforded Trans Bay with recommendations for potential fire risk reduction initiatives. In Q1 2022, TBC contracted with another third-party to provide second level review of the 2020 study to verify the effectiveness and further prioritize fire mitigation initiatives. This assessment recommended TBC move forward with the two Grid Operations projects discussed below.
 - **Situational Awareness:** In its decision on Trans Bay's 2022 WMP, Energy Safety observed that TBC should evaluate adding a weather station to enhance its weather conditions monitoring capabilities. Although weather conditions do not have material impact on TBC's operations, TBC took the recommendation as an opportunity to enhance its situational awareness. As a result, in Q4 2022, Trans installed a weather station to enhance its weather forecasting and monitoring capabilities.
 - **Grid Operations and Protocols:** Trans Bay projected to complete two site improvement projects that were under proposal development in 2022. These projects were (i) fire suppression system to complement the fire detection system in the Spare Parts building and (ii) remove the gas cylinders and construct a protected housing for them outside the Spare Parts building. TBC did incur spend on both projects but challenges in availability of suitable vendors and supply chain issues delayed the completion date of both projects. Both projects are under construction and TBC currently forecasts completion of both projects in Q2 2023.
- b. Trans Bay did not have any applicable change orders to its 2022 WMP.
- c. As noted above, due to the limited scale and scope of Trans Bay's operations, the substantial hardening of Trans Bay's transmission infrastructure to wildfire risks due to being underground or submerged and having no transmission infrastructure in wildlands or in a wildland urban interface (WUI), Trans Bay does not maintain a program specifically geared towards wildfire mitigation. As a result, Trans Bay did not identify specific wildfire mitigation initiatives in its 2022 WMP, but did reference operational initiatives which had

the added effect of potentially mitigating wildfire risk. Considering this fact, Trans Bay identifies spend on operational initiatives which may not have been driven by specific wildfire risk mitigation, but nonetheless have the benefit of incorporating fire mitigation elements as described in its 2022 WMP. Table 1 below summarizes Trans Bay’s 2022 planned initiative spend vs. actual initiative spend. The actual 2022 spend is lower than planned spend primarily because spend Trans Bay was unable to complete its two site improvement projects in 2022 as discussed above.

Table 1 – Summary of WMP Expenditures by Category (Spend in thousand \$)

WMP Category	2022 WMP Planned	2022 Actual	Difference
Risk and Mapping	10	10	0
Situational Awareness	0	37.6	37.6
Grid Design and System Hardening	0	0	0
Asset Management and Inspections	0	0	0
Vegetation Management	0	0	0
Grid Operations	600	190.7	(409.3)
Data Governance	0	0	0
Resource Allocation	0	0	0
Emergency Planning	0	0	0
Stakeholder Cooperation and Community Engagement	0	0	0
Total	610	238.3	(371.7)

- d. Trans Bay has not issued a PSPS to date. Given that Trans Bay is a transmission-only utility that has no distribution system, no distribution or retail customers, and is already substantially hardened against wildfires, Trans Bay reasonably anticipates it will seldom, if ever, need to issue a PSPS. Trans Bay’s service territory is fully encompassed by PG&E service territory. As a result, Trans Bay expects that PG&E doctrine regarding PSPS that impacts the PG&E Pittsburg Substation would be the prevailing driver of any PSPS impacts on Trans Bay service territory. Any PSPS issued by PG&E that impacted the Pittsburg Substation to the extent that Trans Bay’s interconnection would be de-energized would take Trans Bay’s transmission system offline. Therefore, Trans Bay’s WMP initiatives are focused on fire hardening and reduction of utility-caused ignitions at Trans Bay’s facilities rather than PSPS mitigation.



- e. The WSD reviewed and approved Trans Bay's 2022 WMP without conditions (Full Approval) and did not identify any deficiencies or defects relevant to Trans Bay's WMP. As a result, Trans Bay has not undertaken any corrective actions to resolve any defects.