

May 8, 2023

By E-Filing Docket #2023-2025-WMPs

Lucy Morgans
Program Manager, Electric Safety Policy Division
Office of Energy Infrastructure Safety
715 P Street, 20th Fl.
Sacramento, CA 95814

Subject: Horizon West Transmission, LLC (U222-E) 2023-2025 Wildfire Mitigation Plan Submission

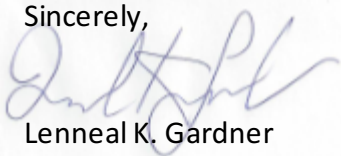
Dear Program Manager Morgans:

Trans Bay Cable (HWT) provided its 2023-2025 Wildfire Mitigation Plan (WMP) Pre-Submission to the Office of Energy Infrastructure Safety (Energy Safety) on March 6, 2023. Energy Safety reviewed HWT's WMP Pre-Submission for completeness in accordance with Section 4.1 of the 2023-2025 Wildfire Mitigation Plan Process and Evaluation Guidelines and in accordance with Energy Safety's Independent Transmission Operator Supplement for 2023-2025 WMP Guidelines.

On March 27, 2023. Energy Safety issued a determination letter stating that HWT's WMP Pre-Submission did not satisfy the completeness check. HWT has addressed the completeness check items (as shown in Appendix A). HWT has also made additional corrections to fix non-substantive errors (as shown in Appendix B).

If you have any questions, please contact me at [lenneal.gardner@nexteraenergy.com](mailto: lenneal.gardner@nexteraenergy.com).

Sincerely,



Lenneal K. Gardner
Regulatory and Business Manager

Appendix A – Completeness Checklist

Section of HWT's WMP Pre-Submission	WMP pre-submission PDF page number	Information to Make Complete	HWT's Actions to Make Complete
5.3.4.2 Climate Change Phenomena and Trends	37-39	Provide a narrative for the local impacts of anticipated climate change phenomena and trends across the service territory or provide a narrative of why it does not apply to HWT. Provide a graph/chart illustrating: 1) Mean annual temperature, 2) Mean annual precipitation, and 3) Projected changes in minimum and maximum daily temperatures or provide explanation on why a graph/chart is not provided. Provide the indicated projected extreme fire danger days for both winter/spring and summer/fall throughout the service territory or provide explanation on why it is not provided.	HWT revised its response to Section 5.3.4.2 and included associated figures.
8.1.1.2 Targets, Table: grid design, operations, and maintenance targets	60	HWT intentionally left Table 8-4 blank. However, within its WMP, HWT describes various inspections performed, such as its monthly asset inspections and Red Flag Warning inspections. HWT must revise Table 8-4 to reflect all asset-related inspections.	HWT revised Table 8-4 with the requested information.
8.1.3 Asset Inspections, Table of asset inspection programs	65	Table 8-6 only includes substation inspections. However, HWT discusses extra inspections ahead of Red Flag Warning conditions. HWT must revise Table 8-6 to include all asset-related inspections performed by HWT.	HWT revised Table 8-6 with the requested information.
8.1.7 Open Work Orders, Provide an aging report for work orders past due	72	HWT intentionally left Table 8-8 blank given that it does not have any past due asset work orders. HWT must revise Table 8-8 to reflect HWT's lack of work orders by filling in with zeros as applicable, as opposed to leaving the table blank.	HWT revised Table 8-8 with the requested information.

8.2.1.1 Objectives, Table: 3-years objectives table, Table: 10-years objectives table	80	HWT states that "Tables 8-12 and 8-13 are intentionally left blank." However, immediately above, in the same paragraph, HWT describes its vegetation management activities for which it could provide objectives. HWT must revise Tables 8-12 and 8-13 to include vegetation management objectives.	HWT revised Table 8-12 and Table 8-13 with the requested information.
8.2.1.2 Targets, Table: vegetation management imitative targets, Table: vegetation inspection targets	82	HWT states that "Tables 8-14 and 8-15 are intentionally left blank." However, immediately above, in the same paragraph, HWT describes its vegetation management activities for which it could provide quantitative targets. HWT must revise Tables 8-14 and 8-15 to include vegetation management targets.	HWT revised Table 8-14 and Table 8-15 with the requested information.
8.2.2 Vegetation Management Inspections, Narrative (subsection) describing each vegetation inspection program	88	HWT must provide any "accomplishments, roadblocks, and updates" for its vegetation inspection program. If HWT does not have any, it must explain why this is the case.	HWT revised its response to Section 8.2.2 with the requested information.
8.2.5 Quality Assurance and Quality Control (QA/QC), Tabular information that includes: sample sizes, type of QA/QC performed, resulting pass rates, yearly target pass rate	96	HWT provides a narrative of its QA/QC program; however, it must also provide tabular information. If HWT does not have pass rates or a target pass rate, it must explain why that is so.	HWT revised its response to Section 8.2.5 with the requested information.
8.3.1.1 Objectives, Table: 3-years objectives table	100	HWT intentionally left Table 8-21 blank. HWT must provide 3-year objectives in Table 8-21 for situational awareness and forecasting.	HWT provided additional information and revised Table 8-21.
8.3.1.1 Objectives,	101	HWT intentionally left Table 8-22 blank. HWT must provide 10-year objectives in	HWT provided a table with the required information.

Table: 10-years objectives table		Table 8-22 for situational awareness and forecasting.	
8.3.6 Fire Potential Index, Existing Calculation Approach and Use	122-123	HWT provides a narrative that it uses San Diego Gas and Electric's Fire Potential Index (FPI) but does not include the calculation of that FPI. HWT must provide in Table 8-32 the fire potential features that are included in the FPI it uses.	HWT revised its response to Section 8.3.6 with the requested information.
8.4.2.1 Overview of Wildfire and PSPS Emergency Preparedness	133-134	HWT's overview of its wildfire- and Public Safety Power Shutoff (PSPS) specific emergency preparedness plan must include: <ul style="list-style-type: none"> • An overview of protocols, policies, and procedures for responding to and recovering from an emergency event. Provide the relevant portions of its Emergency Operations Plan (EOP) that describe such, including an operational flow diagram. • The qualifications and training of its key personnel. • Drills, simulations, and tabletop exercises. 	HWT revised its response to Section 8.4.2.1 with the requested information.
8.4.2.2 Key Personnel, Qualifications, and Training	143-144	HWT must complete Table 8-38 by filling in all "qualification" fields as it relates to emergency preparedness. HWT did not provide Table 8-39, as required by the 2023-2025 WMP Technical Guidelines. Provide a completed table for, "Horizon West Personnel Training Program." HWT did not provide Table 8-40, as required by the Guidelines. Provide a completed table for, "HWT Contractor Training Program."	HWT revised its response to Section 8.4.2.2 with the requested information as it pertains to HWT's operations.
8.4.3.1 Emergency Planning	152-153	HWT did not indicate if its coordination efforts follow California's Standardized Emergency Management Systems (SEMS). Expand its response to include such. Complete Table 8-44 with HWT's relevant state, city, county, and tribal agencies within its service territory (e.g.,	HWT revised Table 8-44 with the requested information as it pertains to HWT's operations.

		its primary stakeholders and local emergency service providers). For the contact information required in Table 8-44, please include email addresses, and submit confidentially if needed.	
8.4.3.2 Communication Strategy with Public Safety Partners	156	HWT states that it does not serve end-use customers, and that it does not anticipate engaging with the public during an emergency. Section 8.4.3.2 is requesting information on "public safety" partners. Complete Table 8-46 with information on its communication strategy to inform all external public safety partners and other interconnected partners of wildfire, PSPS, and re-energization events, including partner agencies or organizations. For the contact information required in Table 8-44, please include email addresses, and submit confidentially if needed.	HWT revised Table 8-46 with the requested information as it pertains to HWT's operations.
8.4.5.1 Overview of Service Restoration Plan	163	Section 8.4.5.1 requires that HWT provide an overview of its plan to restore service after an outage due to a wildfire or PSPS event. HWT states it, "post-fire service restoration would be similar to its power restoration procedures detailed in HWT's Emergency Operations Plan." Energy Safety reviewed HWT's Emergency Operations Plan and found it does not address "recovery." HWT must provide an overview of its plan to restore service after an outage due to a wildfire or PSPS event.	HWT revised its response to Section 8.4.5.1 with the requested information as it pertains to HWT's operations.
8.4.5.2 Planning and Allocation of Resources	164	HWT must provide an overview of its resource planning, its allocation of those resources to assure public safety during restoration, and its contingency measures to respond to an increased number of reports concerning unsafe conditions. Its brief narrative must include how it:	HWT revised its response to Section 8.4.5.2 with the requested information as it pertains to HWT's operations.

		<ul style="list-style-type: none"> • Uses weather reports to pre-position manpower and equipment before anticipated severe weather that could result in an outage • Sets priorities • Facilitates internal and external communications • Restores service 	
8.5.4 Collaboration on Local Wildfire Mitigation Planning	182	HWT states that it has a protocol for communication and coordination with its primary stakeholders, which include local fire agencies, but does not list any of these in Table 8-61. HWT must update this table with the applicable information. HWT must also update Table 8-62 to list any key gaps or limitations in these collaboration efforts.	HWT provided additional information and revised Table 8-61 and Table 8-62 with the requested information as it pertains to HWT's operations.
8.5.5 Best Practice Sharing with Other Electrical Corporations	184-185	HWT describes best practice sharing with Trans Bay Cable (HWT) and states that it, "reviews and shares fire risk reduction best practices and information with its affiliates." However, HWT's Table 8-63 is blank. HWT must list these best practices and corresponding information in the table as required by the Guidelines.	HWT revised its response to Section 8.5.5 with the requested information as it pertains to HWT's operations.
9.2 Protocols on PSPS, Method used to compare and evaluate the relative consequences of PPS and wildfires	194	HWT does not discuss the method it uses to compare and evaluate the relative consequence of PPS and wildfire. HWT must include a discussion on this topic.	HWT revised its response to Section 9.2 with the requested information as it pertains to HWT's operations.
9.4 Key Personnel, Qualifications, and Training for PPS	196	The discussion in this section appears to be the same text as Section 9.3, which covers communication strategy for PPS, and does not touch on key personnel for PPS implementation. HWT must update this section to discuss key personnel for PPS implementation or cross-reference to the section in the WMP that discusses this topic.	HWT revised its response to Section 9.4 with the requested information as it pertains to HWT's operations.

Appendix B – Non-Substantive Errors

HWT identified a limited number of non-substantive omissions since submitting the WMP on March 6, 2023. The table below summarizes the revisions made by HWT.¹

Section/Table/Figure	Page	Nature of Change
Section 5.1	36-37	Images added to reflect locations as described in the text
Section 5.3.1	44	Images added to reflect locations as described in the text
Section 7	69	Images added to reflect items described in the text
Section 8.1.2	80-81	Images added to reflect items described in the text
Section 8.3.2.1	124	Images added to reflect items described in the text
Tables	Throughout	Tables previously intentional left blank to meaning not applicable are not marked “N/A” meaning “Not Applicable”
Figure Numbering	Throughout	Revised to more accurately represent location within the WMP.

¹ Note this list does not include edits due to formatting, grammar, spelling or typographical errors.