



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, 20<sup>th</sup> Fl.  
Sacramento, CA 95814

**Subject: Trans Bay Cable LLC (U934-E) 2023-2025 Wildfire Mitigation Plan Submission**

Dear Program Manager Morgans:

Trans Bay Cable (TBC) 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 TBC'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 TBC's WMP Pre-Submission did not satisfy the completeness check. TBC has addressed the completeness check items (as shown in Appendix A). TBC 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@transbaycable.com](mailto: lenneal.gardner@transbaycable.com).

Sincerely,

A handwritten signature in blue ink, appearing to read "Lenneal K. Gardner", is placed over a light blue rectangular background.

Lenneal K. Gardner  
Regulatory and Business Manager

## Appendix A – Completeness Checklist

Section of TBC's WMP Pre-Submission	WMP pre-submission PDF page number	Information to Make Complete	TBC'S Actions to Make Complete
<b>1 Executive Summary</b>	10	Trans Bay Cable (TBC) did not provide information in this section. TBC must provide an Executive Summary that includes a summary of the 2023-2025 Base Wildfire Mitigation Plan (WMP); including the primary goal, plan objectives, and framework for its WMP 3-year cycle.	TBC provided an executive summary section.
<b>2 Responsible Persons</b>	11-13	TBC lists managers from Horizon West Transmission as their Responsible Persons. TBC must update these pages with the correct information for Responsible Persons with TBC.	TBC corrected its response to Section 2.
<b>3 Statutory Requirements Checklist</b>	15-19	TBC's Table 2- 2 Statutory Compliance Matrix contains reference/bookmark errors. TBC must revise the table to be complete	TBC corrected its response to Section 3 and Table 2-2 is now identified as Table 3-1.
<b>5.3.4.2 Climate Change Phenomena and Trends</b>	36-40	Provide a narrative for the local impacts of anticipated climate change phenomena and trends across the service territory or provide narrative of why it does not apply to TBC. Provide 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 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.	TBC revised its response to Section 5.3.4.2 and included associated figures.
<b>8.1.1.1 Objectives, Table: 3-years objectives table,</b>	54-55	Table 8-1 is missing references to where in its WMP each objective is discussed (e.g., missing section and page numbers). TBC must revise Table 8-1 to	TBC revised Table 8-1 and Table 8-2 with the requested information.

<b>Table: 10-years objectives table</b>		include this information. Additionally, TBC intentionally left Table 8-2 blank; however, it must provide 10-year objectives in Table 8-2 for its grid design, operations, and maintenance.	
<b>8.1.1.2 Targets, Table: grid design, operations, and maintenance targets, Table: asset inspections targets</b>	57	TBC lists "NA" for many values in Table 8-3. TBC must revise Table 8-3 to either include this information, or explain each use of "NA." TBC intentionally left Table 8-4 blank. However, within the WMP, TBC describes various inspections it performs, such as its weekly asset inspections. TBC must revise Table 8-4 to reflect all asset-related inspections.	TBC revised Table 8-3 and Table 8-4 with the requested information.
<b>8.1.3 Asset Inspections, Table of asset inspection programs</b>	63	Table 8-6 only includes substation inspections. However, TBC discusses inspections of its transmission assets in the following narrative for Section 8.1.3.1. TBC must revise Table 8-6 to include all asset-related inspections it performs.	TBC revised Table 8-6 with the requested information.
<b>8.1.7 Open Work Orders, Graph open work orders over time as reported in QDRs</b>	69	TBC intentionally left Table 8-8 blank given that it does not have any past due asset work orders. TBC must revise Table 8-8 to reflect TBC's lack of work orders by filling in with zeros as applicable, opposed to leaving the table blank.	TBC revised Table 8-8 with the requested information.
<b>8.3.1.1 Objectives, Table: 3-years objectives table, Table: 10-years objectives table</b>	98-99	TBC intentionally left Table 8-21 blank. TBC must provide 3-year objectives in its Table 8-21 for situational awareness and forecasting. TBC intentionally left Table 8-22 blank. TBC must provide 10-year objectives in its Table 8-22 for situational awareness and forecasting.	TBC provided additional information and revised Table 8-21 and Table 8-22 with the requested information.
<b>8.3.3.1 Existing Systems, Technologies, and Procedures</b>	108-110	TBC must provide a table with existing grid monitoring technologies that are used in alignment with the narrative provided regarding cable monitoring system, transformer oil control system, etc.	TBC provided a table with the required information.

<b>8.3.6.1 Existing Calculation Approach and Use</b>	120	TBC must describe whether it uses a Fire Potential Index (FPI) and if so, TBC must provide its existing calculation approach and how its FPI is used in its operation. If TBC does not use an FPI, it must state that and explain why in Section 8.3.6.1.	TBC revised its response to Section 8.3.6.1 with the requested information.
<b>8.4.2.1 Overview of Wildfire and PSPS Emergency Preparedness</b>	131-133	In addition to the overview of its emergency preparedness plan, TBC must also provide an operational flow diagram for responding to and recovering from a wildfire event.	TBC revised its response to Section 8.4.2.1 with the requested information.
<b>8.4.2.2 Key Personnel, Qualifications, and Training</b>	143-144	TBC must complete Table 8-38 by completing filling in all "qualification" fields as it relates to emergency preparedness. TBC must provide Table 8-39 as required by the 2023-2025 WMP Technical Guidelines. TBC must provide Table 8-40 as required by the Guidelines.	TBC revised its response to Section 8.4.2.2 with the requested information as it pertains to TBC's operations.
<b>8.4.3.1 Emergency Planning</b>	153	TBC must indicate if its coordination efforts follow California's Standardized Emergency Management Systems. Complete Table 8-44 with information on all "critical stakeholders" (e.g., CAISO, PG&E, local emergency officials, etc.) within TBC's service territory and key point(s) of contact with associated contact information. For the contact information required in Table 8-44, please include email addresses, and submit confidentially if needed.	TBC revised Table 8-44 with the requested information as it pertains to TBC's operations.
<b>8.4.3.2 Communication Strategy with Public Safety Partners</b>	157-158	Complete Table 8-46 with information on TBC's communication strategy to inform all external public safety partners and other interconnected partners of wildfire, PSPS, and re-energization events. For the contact information required in Table 8-46, please include email addresses, and submit confidentially if needed.	TBC revised Table 8-46 with the requested information as it pertains to TBC's operations.

<p><b>8.4.5.1 Overview of Service Restoration Plan</b></p>	<p>164-165</p>	<p>TBC must provide an overview of its plan to restore service after an outage due to a wildfire. The overview must include:</p> <ul style="list-style-type: none"> <li>• Protocols, policies, and procedures for service restoration. If this information is found in TBC’s "TBC-OP-004 Emergency Operations and TBC-HS-200 Emergency Action plan provide clear guidance regarding required responses, communications, staff responsibilities," TBC must provide an overview of this plan or relevant sections. TBC must also revise this section to include an operational flow diagram of service restoration.</li> <li>• Drills, simulations, and tabletop exercises.</li> </ul>	<p>TBC revised its response to Section 8.4.5.1 with the requested information as it pertains to TBC’s operations.</p>
<p><b>8.4.5.2 Planning and Allocation of Resources</b></p>	<p>166</p>	<p>TBC must briefly describe its methods for planning and allocating resources to assure public safety during service restoration. In addition, it must provide an overview of its contingency measures regarding the resources required to respond to an increased number of reports concerning unsafe conditions and expedite a response to a wildfire- or PSPS-related power outage. TBC must include a brief narrative on how it:</p> <ul style="list-style-type: none"> <li>• Uses weather reports to pre-position manpower and equipment before anticipated severe weather that could result in an outage</li> <li>• Sets priorities</li> <li>• Facilitates internal and external communications</li> <li>• Restores service</li> </ul>	<p>TBC revised its response to Section 8.4.5.2 with the requested information as it pertains to TBC’s operations.</p>
<p><b>8.5.4 Collaboration on Local Wildfire Mitigation Planning, List of entities within service territory</b></p>	<p>185-186</p>	<p>TBC mentions it has a protocol for communication and coordination with its primary stakeholders, which includes local fire agencies, but does not list any of these in Table 8-61. TBC must update this table with the applicable information. TBC must also update Table</p>	<p>TBC provided additional information and revised Table 8-61 and Table 8-62 with the requested information as it pertains to TBC’s operations.</p>

<b>for collaboration (table)</b>		8-62 to list any key gaps or limitations in these collaboration efforts.	
<b>8.5.5 Best Practice Sharing with Other Electrical Corporations, List of entities for collaboration (table)</b>	188	TBC describes best practice sharing with Horizon West Transmission and states that it, "reviews and shares fire risk reduction best practices and information with its affiliates." However, TBC's Table 8-63 is blank. TBC must list these best practices and corresponding information in the table as required by the 2023-2025 WMP Technical Guidelines.	TBC revised its response to Section 8.5.5 with the requested information as it pertains to TBC's operations.
<b>9.2 Protocols on PSPS, Method used to compare and evaluate the relative consequences of PSPS and wildfires</b>	189	TBC does not discuss the method it uses to compare and evaluate the relative consequence of PSPS and wildfire. TBC must include a discussion on this topic.	TBC revised its response to Section 9.2 with the requested information as it pertains to TBC's operations.
<b>9.4 Key Personnel, Qualifications, and Training for PSPS</b>	199	The discussion in this section appears to be the same text as Section 9.3, which covers communication strategy for PSPS, and does not touch on key personnel for PSPS implementation. TBC must update this section to discuss key personnel for PSPS implementation or cross-reference to the section in the WMP that discusses this topic.	TBC revised its response to Section 9.4 with the requested information as it pertains to TBC's operations.

**Appendix B – Non-Substantive Errors**

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

<b>Section/Table/Figure</b>	<b>Page</b>	<b>Nature of Change</b>
<b>Section 5.1</b>	36-40	Images added to reflect locations as described in the text
<b>Section 5.3.1</b>	44	Images added to reflect locations as described in the text
<b>Section 5.4.3.2</b>	61	Images added to reflect locations as described in the text
<b>Section 5.4.3.3</b>	62	Images added to reflect locations as described in the text
<b>Section 8.1.2</b>	80-82	Images added to reflect items described in the text
<b>Section 8.1.8</b>	93	Images added to reflect items described in the text
<b>Section 8.3.2.1</b>	80-82	Images added to reflect items described in the text
<b>Section 10</b>	236	Images added to reflect items described in the text
<b>Tables</b>	Throughout	Tables previously intentional left blank to meaning not applicable are not marked “N/A” meaning “Not Applicable”
<b>Figure Numbering</b>	Throughout	Revised to more accurately represent location within the WMP.

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