

FINAL INDEPENDENT EVALUATOR ANNUAL REPORT ON COMPLIANCE

JUNE 30, 2023

HORIZONWEST
TRANSMISSION.



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DISCLAIMER

This report has been compiled through the process of observation and review of documents provided by the electric service provider named herein. The Office of Energy Infrastructure Safety (“OEIS”) instituted the requirement for an independent evaluation of electric utility providers Wildfire Mitigation Plans (“WMP”). Bureau Veritas is not the designer, implementer, or owner of the WMP and is not responsible for its content, implementation and/or any liabilities, obligations or responsibilities arising therein.

The report reflects only those conditions and practices which could be ascertained through observation at the time of evaluation. This report is limited to those items specifically identified herein. The report is not intended to validate dangers, hazards and/or exposures that are or are not present. Bureau Veritas shall only be responsible for the performance of the services identified or defined in its specific scope of services.

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1. EXECUTIVE SUMMARY

Background

Derived from the devastating wildfires of 2016 and 2017, California Public Utilities Commission (CPUC) opened Rulemaking 18-10-0071 to provide guidance on the Investor-Owned Utilities' (IOU), Wildfire Mitigation Plans (WMP's). Moving forward, California Legislature passed several bills increasing the oversight for the investor-owned utilities (IOU's) as it related to mitigating wildfires associated with electrical corporation's infrastructure role in utility-related wildfires. This resulted in key legislative measures, Senate Bill 901 (2018), Assembly Bill 1054 (2019) and Assembly Bill 111 (2019), which led to the establishment of the Wildfire Safety Advisory Board (WSAB). Since the passing and ratification of this legislation, the Wildfire Safety Division (WSD) of the California Public Utilities Commission (CPUC) has transitioned to the Office of Energy Infrastructure Safety (OEIS). The wildfire mitigation process requires utilities to submit their annual Wildfire Mitigation Plan (WMP) in a 3-year cycle; the initial WMP is submitted in the first year (2020) and follows with annual updates occurring for years 2 (2021) and 3 (2022).

Pursuant to P.U. Code Section 8386.3(c)(2)(A), Bureau Veritas North America, Inc. (BVNA) has been selected as an Independent Evaluator (IE) to review and assess Horizon West Transmission's (HWT) 2022 Wildfire Mitigation Plan (WMP) and provide a report on July 1 of each year. BVNA has evaluated HWT's compliance with its 2022 WMP pursuant to Public Utilities Code Section 8386, validated HWT's quality assurance and quality control (QA/QC) programs outlined for support of WMP initiatives and reviewed its WMP funding activities.

Scope

Pursuant to the requirements of the Public Utilities Code (PU Code); BVNA, in partnership with C2 Group, has reviewed HWT's 2022 WMP issued on May 6, 2022, known as the "Wildfire Mitigation Plan 2022", Rulemaking 18-10-007, for initiative compliance verification for the execution of the WMP goals and targets. In addition, supplemental documents (see Appendix B) were also reviewed for verification of compliance, validation of quality assurance QA/QC programs, and assessment of the utility funding activities related to WMP.

Horizon West Transmission

As described within HWT's Annual Report on Compliance (ARC) dated March 2023, HWT is a transmission-only utility with no end-use customers. HWT is the [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] is in an area designated as Tier 3 Extreme Fire-Threat District (HFTD) in San Diego County.

Key Findings

As described in further detail within Section 3, the IE compliance review has found that the 2022 WMP and data found in supplemental documents (see Appendix B), along with confirmation of verifiable field goals, HWT is substantially in compliance with the 2022 WMP:

1. 2022 WMP activities are substantially completed.
2. WMP activities overall were overspent, as verified with the HWT ARC for 2022, dated March 2023. HWT provided the IE team with individual activity underfunding details on funding discrepancies as noted within Section 3.2.
3. Through the review of the Monthly Facility Inspection Reports provided through Data Request 002, and the QA/QC program developed and implemented by HWT, HWT was found to be in conformance with the 2022 WMP.

2. INTRODUCTION

A review of all documents supporting the implementation of the 2022 WMP strategic initiatives has been conducted. As a result, BVNA has provided the following IE evaluation report (Report) describing the technical review and findings. HWT is a transmission-only utility placed into operation on February 29, 2020. HWT's first facility, [REDACTED], is located in San Diego County, California, on privately owned lands in the south-central portion of San Diego County,

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

HWT's [REDACTED] [REDACTED]. The site is located in an area classified as a Tier 3 HFTD in San Diego County. Fire hazard designations are based on topography, vegetation, and weather, amongst other factors, with more hazardous sites including steep terrain, unmaintained fuels/vegetation, and wildland-urban interface (WUI) locations.

HWT's surrounding area consists of semi-rural residential developed lands and open space in both private and federal land holdings. The facility is located on privately owned lands within the administrative boundary of the United States Forest Service-Cleveland National Forest. [REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]

HWT's fire prevention performance metrics are focused on reducing the potential for on-site ignitions that may spread to off-site vegetation. This philosophy of fire prevention has proven to be successful to date. The established performance metrics outlined in the 2022 WMP demonstrate an approach to preventing an ignition event by identifying, documenting, tracking, and monitoring possible ignition sources that create the highest risk for resulting in flame, sparks, arcs, and uncontrolled fires loss of molten/heated material or similar ignition vulnerabilities. As HWT is a transmission-only utility, HWT does not have distribution customers. Therefore, those items outlined in PUC section §8386 and the WMP Guidelines relevant to customer communication do not apply, and no reference to Public Safety Power Shutoff (PSPS) is made. The report does include approach and methodology in evaluating the 2022 WMP's comprehensiveness, HWT's Plan elements and their fulfillment of initiatives and metrics which are included in the Quality Assessment and Quality Control provisions outlined within the Plan Determinations and results.

The BVNA team's review facilitated expertise in these critical elements to determine the comprehensiveness of HWT's 2022 WMP. While not all these strategies were necessary to confirm HWT's fulfillment of their WMP, due to facility size, location, and system or operational characteristics, BVNA's understanding of collected utility strategies demonstrated throughout the state are summarized below:

1. **Inspection and maintenance of distribution transmission and substation assets** including conducting system patrols and ground inspections using technological inspection tools, managing predictive and electrical preventative maintenance, conducting vegetation inspections and management, vulnerability detection such as Light Detection and Ranging (LiDAR) inspection, and geospatial and topography identification and geographic information system (GIS) mapping data. A key component is identifying collected data elements through each program and understanding how that data is used and shared to improve utility practices.
2. **Vegetation management** including routine preventative vegetation maintenance; corrective vegetation management and off-cycle tree work; emergency vegetation clearance, prioritized for portions of the service territory that lie in Tier 2 and 3 HFTD; quality control processes; and resource protection plan, including animal and avian mitigation programs.
3. **System hardening** that includes pole replacement, non-expulsion equipment, advanced fuses, less flammable transformer oil, covered wire and wire wrap, and undergrounding were cost beneficial.
4. **Operational practices** including communications and mustering plans under varying degrees of wildfire risk. Plans to deactivate automatic reclosers, de-energization of "at risk" area powerlines based on type of facility (overhead bare conduction, high voltage, etc.), tree and vegetation density, available dry fuel, and other factors that make certain locations vulnerable to wildfire risk.
5. **Situational awareness** includes obtaining information from devices and sensors on the actual system, weather and other wildfire conductivity conditions, and two-way communication with agencies and key personnel. Programs such as online feeds and websites like the National Fire Danger Rating System are utilized. Situational awareness should help achieve a shared understanding of actual conditions and improve collaborative planning and decision-making.
6. **De-Energization** actions triggered and prioritized by forecasted extreme fire weather conditions: imminent extreme fire weather conditions; validated extreme fire weather conditions; and plans for re-energization when weather subsides to safe levels. Manual or automatic capabilities exist for implementation.
7. **Advanced Technologies** including Distribution Fault Anticipation technology, tree growth regulators, pulse control fault interrupters, oblique and hyper-spectral imagery, advanced transformer fluids, advanced LiDAR and advanced Supervisory Control and Data

Acquisition (SCADA) to reduce electrical ignition while also helping to mitigate power outages and equipment damage.

8. **Emergency Preparedness, Outreach and Response communications** before, during, and after emergencies including but not limited to engaging with key stakeholders that include critical facilities and served customers, local governments, critical agencies such as the California Department Forestry and Fire Protection (CAL FIRE), local law enforcement agencies and other first responders, hospitals, local emergency planning committees, other utility providers, California Independent System Operators, and the utility's respective board. Coordination agreements such as Mutual Aid or Mutual Assistance should be leveraged. Community outreach plans should inform and engage first responders, local leaders, land managers, business owners and others.

3. INDEPENDENT EVALUATOR REVIEW OF COMPLIANCE

The overall approach to verify compliance included the review and assessment of the multiple WMP activities through data requests, review of publicly available documents, and conducting an onsite facility assessment that documented and validated those items outlined in HWT's 2022 WMP.

At the commencement of the evaluation, the IE initiated the assessment through a review of HWT's 2022 WMP, along with all publicly available documents as listed in Appendix B, to identify HWT's stated 2022 WMP goals. In addition, for 2022 WMP activities described in the WMP but not provided within the publicly available records, the IE submitted data requests to verify activities stated within the 2022 WMP (see Appendix C for Data Requests Submitted). Along with the document analysis and data requests, the IE conducted a site visit to the single HWT facility, known as the [REDACTED], to collect images and evaluate compliance with the 2022 WMP activities or initiatives identified during the IE initial review. The analysis and key findings for each respective section are detailed further within Section 3, Independent Evaluator Review of Compliance, within this report.

3.1 WMP Activity Completion

WMP activities set forth in HWT's 2022 WMP with specific quantifiable or qualitative performance goals/targets included the following items:

Table 1: 2022 WMP Initiatives

Large Volume (≥ 100 units), Quantifiable Goal/Target – Field Verifiable	
2022 WMP Initiative	
N/A	
Large Volume (≥ 100 units), Quantifiable Goal/Target – Not Field Verifiable	
2022 WMP Initiative	
N/A	
Small (less than 100 items) Volume Quantifiable Goal/Target	
2022 WMP Initiative	
7.3.2.23	<i>Grid Design and System Hardening</i> : Other corrective action
Qualitative Goal/Target WMP Activities	
2022 WMP Initiative	
7.3.2.7	<i>Situational Awareness and Forecasting</i> : Continuous monitoring sensors
7.3.2.9	<i>Situational Awareness and Forecasting</i> : Forecast of a fire risk index, fire potential index, or similar
7.3.2.30	<i>Asset Management and Inspections</i> : Detailed inspections of transmission electric lines and equipment
7.3.2.42	<i>Asset Management and Inspections</i> : Quality assurance/quality control of inspections

7.3.2.46	<i>Vegetation Management and Inspections:</i> Detailed inspections of vegetation around transmission electric lines and equipment
7.3.2.56	<i>Vegetation Management and Inspections:</i> Quality assurance/quality control of inspections
7.3.2.84	<i>Emergency Planning and Preparedness:</i> Protocols in place to learn from wildfire events

The performance of the above targets and activities is assessed in the following sections of this report. Completion of initiatives and adherence to applicable protocols and procedures is summarized in Section 4, Conclusion.

3.1.1 Sampling Methodology and Discussion

During our field visit to HWT’s [REDACTED], our goal was to observe, assess, and quantify all quantifiable items referenced within the year 2022 WMP. Items that are not field verifiable were verified through available public information, and data requests.

Sampling percentages do not apply for this facility as we observed the facility in its entirety. Onsite information was captured during the onsite field visit, which included a SME interview with facility personnel. Photos captured IE’s field visit findings.

3.1.2 Large Volume Quantifiable Goal/Target – Field Verifiable

3.1.2.1 Review of Initiatives

These activities are not present in the 2022 WMP activities. Therefore, this subject is not applicable to or covered in this report.

3.1.2.2 Trends and Themes

These activities are not present in the 2022 WMP activities. Therefore, this subject is not applicable to or covered in this report.

3.1.3 Large Volume Quantifiable Goal/Target – Not Field Verifiable

3.1.3.1 Review of Initiatives

These activities are not present in the 2022 WMP activities. Therefore, this subject is not applicable to or covered in this report.

3.1.3.2 Trends and Themes

These activities are not present in the 2022 WMP activities. Therefore, this subject is not applicable to or covered in this report.

3.1.4 Small (less than 100 times) Volume Quantifiable Goal/Target

3.1.4.1 Review of Initiatives

The IE identified WMP activities listed in HWT’s 2022 WMP that are classified as Small (Less than 100 times) Volume Quantifiable Goal/Target conducted in 2022. These 2022 WMP activities identified with the Small Volume list were assessed within this section and presented below by each initiative.

IE Field Visit

The IE team performed a field visit on Friday, May 12, 2023, from 10 a.m. to 1 p.m. Field site visit attendees included:

- [REDACTED]
- [REDACTED]
- [REDACTED]

C2 Group met with NextEra Energy’s [REDACTED] at the facility entrance gate and led by vehicle down the paved road [REDACTED]. C2 Group utilized the [REDACTED] [REDACTED] and participated in a general safety and fire briefing. [REDACTED] and the IE team started the field audit inside the fenced facility, then moved to the [REDACTED] [REDACTED] [REDACTED]

The following graphic represents the major components assessed for compliance with the WMP.

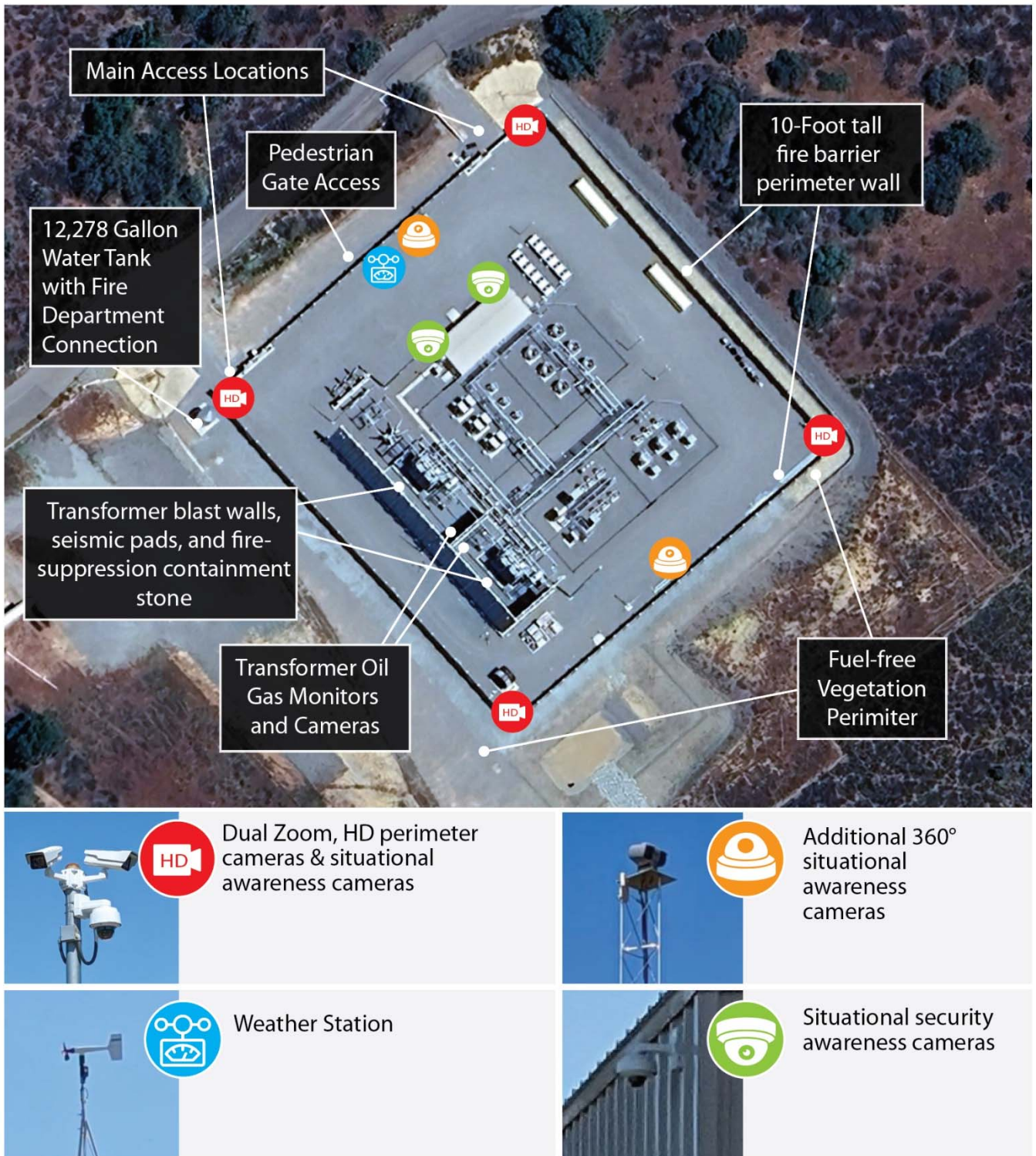


Figure 1: HWT [REDACTED] Main Components Audited for Compliance

Facility Audit, Inside Fence

Mr. Veilleux first led the IE team on a tour inside the fenced [REDACTED] and described the ongoing wildfire mitigation measures being taken by the HWT team. As described within the 2020 and 2021 WMPs, HWT had completed most of the [REDACTED] construction and wildfire mitigation measures, while 2022 saw HWT's installation of the oil gas monitors and camera (See HWT's Quarterly Report Table 11) for the transformers and completion of the seismic base isolators and flame suppressing stone. Additionally, HWT continues monitoring the facility through the cable monitoring system, detailed facility inspections, contracted firefighting services, weather condition monitoring, and facility vegetation management work, as described in HWT's 2022 WMP and reviewed herein. The IE team confirmed the existence of wildfire mitigation initiatives reported as implemented in HWT's WMP and ARC for 2022.

At the existing HWT [REDACTED], within the perimeter walls:

Transformer Oil Gas Monitors and Cameras: The transformer oil gas monitors and cameras with thermal that monitor HWT's overhead transmission line at [REDACTED] were installed. Cameras were mounted on both sides of the dividing transformer blast wall and directed toward the overhead transmission lines and existing transformers.

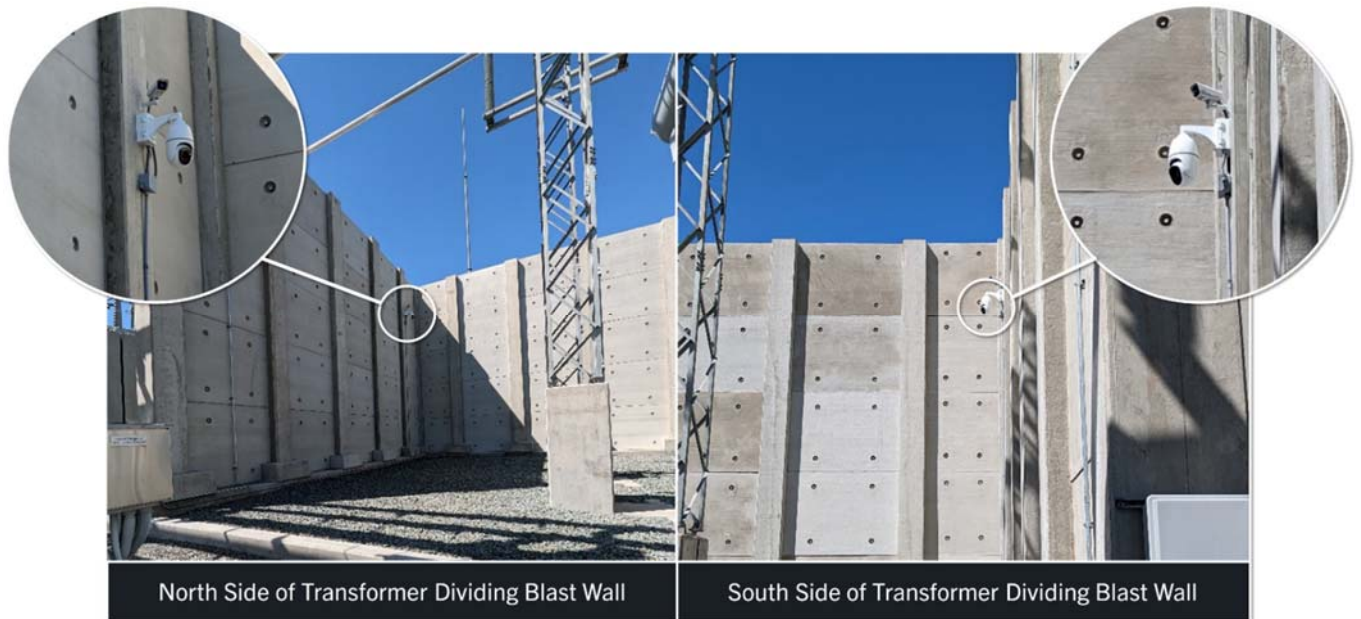


Figure 2: Situational Awareness Cameras with Thermal

Transformer Seismic Base Isolators and Flame-Suppressing Stone: The seismic base isolators and flame-suppressing stone was substantially completed in 2022. Alongside the IE's field verification, HWT provided as-builts showing details of the installed transformer seismic pads and flame suppressing stone provided by HWT in the Confidential Response Files to Data Request 002

in the documents “Horizon West - Response to C2 Group DR-002 Request No. 3”, Confidential “SUN-S1-0104.pdf”, and Confidential “SUN-S1-0116.pdf.”



Figure 3: Transformer Seismic Base Isolators and Flame-Suppressing Stone

Note: The inside of the facility is free of vegetation, with the surface composed of decomposed granite and crushed rock base.

Facility Audit, Outside Fence

At the existing HWT [REDACTED], outside the perimeter walls:

Ongoing Facility Vegetation Management, Fire Break Along Perimeter of the Facility: the 30-foot-wide crushed rock fire break adjacent to the perimeter wall is continually maintained to minimize risk of utility-caused ignition propagating outside of the [REDACTED] and igniting vegetation offsite.



Figure 4: HWT [REDACTED] Perimeter 30-ft Fire Rock Break

230 kV Transmission Line (Underground)

At the point of interconnection to [REDACTED], the HWT-owned 230kV overhead transmission line is fully underground with the 230kV cable pole, mast-mounted camera, ground-mounted solar panel, and control box.

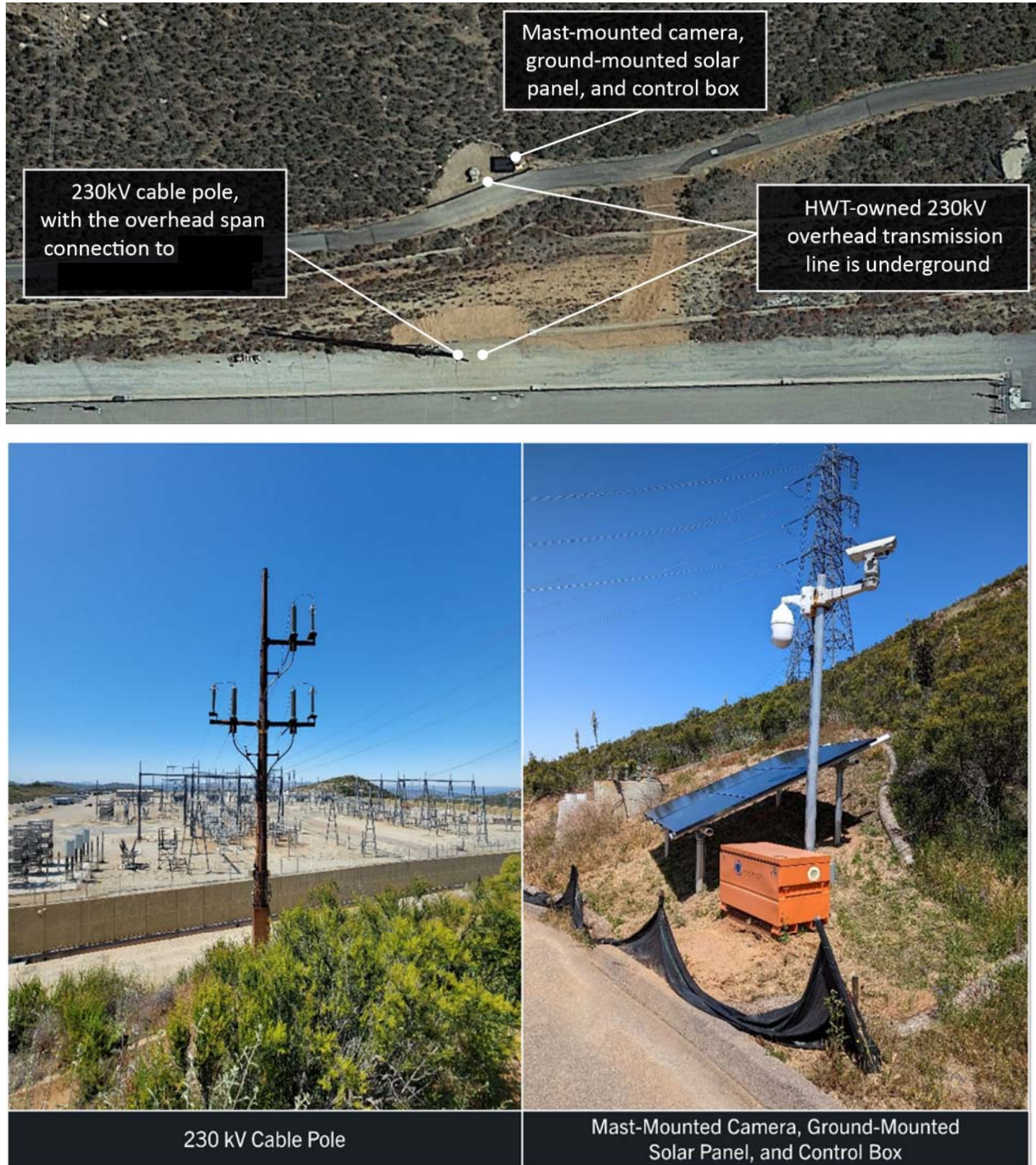


Figure 5: 230 kV Transmission Line Undergrounding Visual Overview

3.1.4.2 Trends and Themes

As observed during the field visit, HWT completed wildfire mitigation scope as outlined in this section and described in the HWT Fourth Quarterly report.

Table 2: Small (Less than 100 Items) Volume Quantifiable Goal/Target Summary Table

SOW Category	2022 Initiative Number	Initiative Name	Finding	Detail on Finding
WMP Activity Completion	7.3.2.23	Grid Design and System Hardening, Other Corrective Action	Activity Completed	Compliant with the 2022 WMP

3.1.5 Qualitative Goal/Target

3.1.5.1 Review of Initiatives

The IE identified WMP activities listed in HWT’s 2022 Wildfire Mitigation Plan classified as Qualitative Goal/Target that were conducted in 2022. These 2022 WMP activities were assessed in this section and presented below in tables grouped by the associated initiative category. The IE findings are defined as follows:

- Activity Validated – Qualitative work on the initiative began and ended in 2022.
- Activity In Progress – Qualitative work on the initiative began in 2022 and continues into 2023.
- Activity Ongoing – Qualitative work on the initiative is incorporated in operations to be repeated annually.

Table 3: Situational Awareness & Forecasting Summary Table

Initiative Name	Initiative Validation	Finding
7.3.2.7 Continuous Monitoring Sensors	<ul style="list-style-type: none"> ▪ Screenshots from HWT’s Cable Monitoring System showing status and operation of sensors provided by HWT in response to Data Request 002 in the documents “Horizon West - Response to C2 Group DR-002 Request No. 1.pdf.” 	Activity Ongoing
7.3.2.9 Forecast of Fire Risk Index, Fire Potential Index, or Similar	<ul style="list-style-type: none"> ▪ Detailed description and enhancements made to HWT’s Wildfire Risk Index (WRI), Firecaster, provided by HWT in Response to Data Request 002 in the documents “Horizon West - Response to C2 Group DR-002 Request No. 2.pdf” 	Activity Ongoing

Table 4: Asset Management & Inspections Summary Table

Initiative Name	Initiative Validation	Finding
7.3.2.30 Detailed Inspections of Transmission Electric Lines and Equipment	<ul style="list-style-type: none"> ▪ Monthly Detailed inspection reports provided by HWT in Confidential Response attachment Files to Data Request 002 in the Confidential documents 	Activity Ongoing

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	<p>“Horizon West - Response to C2 Group DR-002 Request Nos. 4-7.”</p> <ul style="list-style-type: none"> ▪ As noted in “Horizon West - Response to C2 Group DR-002 Request Nos. 4-7”, “There were no Red Flag Warning (RFWs) conditions within HWT’s operation area in 2022 as a result there were no extra inspections performed.” 	
7.3.2.42 Quality Assurance / Quality Control of Inspections	<ul style="list-style-type: none"> ▪ Monthly detailed inspection reports signed by HWT’s Operation Director’s Signature provided by HWT in Confidential Response attachment files to Data Request 002 in the Confidential documents “Horizon West - Response to C2 Group DR-002 Request Nos. 4-7” 	Activity Ongoing

Table 5: Vegetation Management and Inspection Summary Table

Initiative Name	Initiative Validation	Finding
7.3.2.46 Detailed Inspections of Vegetation around Transmission Electric Lines and Equipment	<ul style="list-style-type: none"> ▪ Monthly Vegetation inspection reports provided by HWT in Confidential Response attachment Files to Data Request 002 in the Confidential documents “Horizon West - Response to C2 Group DR-002 Request Nos. 4-7.” ▪ As noted in “Horizon West - Response to C2 Group DR-002 Request Nos. 4-7”, “There were no Red Flag Warning (RFWs) conditions within HWT’s operation area in 2022 as a result there were no extra inspections performed.” 	Activity Ongoing
7.3.2.56 Quality Assurance / Quality Control of Inspections	<ul style="list-style-type: none"> ▪ Monthly Vegetation inspection reports signed by HWT’s Operation Director’s Signature provided by HWT in Confidential Response attachment files to Data Request 002 in the Confidential documents “Horizon West - Response to C2 Group DR-002 Request Nos. 4-7” 	Activity Ongoing

Table 6: Emergency Planning & Preparedness Summary Table

Initiative Name	Initiative Validation	Finding
7.3.2.84 Protocols in Place to Learn from Wildfire Events	<ul style="list-style-type: none"> ▪ HWT confirmed in response to Data Request 002 that there were “No ‘After Action Reports for 2022.” 	Activity Ongoing

3.1.5.2 Trends and Themes

It is demonstrated through the data request responses that HWT consistently conducts equipment and vegetation inspections, continuously monitors the [REDACTED] for situational awareness, and annually assesses and evaluates facility wildfire risk, looking for areas to further fire harden and proactively reduce wildfire risk.

3.2 Verification of Funding

The IE requested clarification from HWT on one (1) WMP initiative categories that have shown funding to be less than 100 percent. The following are the 2022 WMP Expenditures by Category as reported in the 2022 WMP issued by HWT on May 6, 2022:

**Table 7: Summary of WMP Expenditures by Category
(Spend in thousand \$)**

WMP Category	2022 Planned ¹	2022 Actual ²	2022 Variance
Risk and Mapping	\$0	\$0	\$0
Situational Awareness	\$200	\$255	\$55
Grid Design and System Hardening	\$1,600	\$3,463	\$1,863
Asset Management and Inspections	\$50	\$48	\$(2)
Vegetation Management	\$0	\$17	\$17
Grid Operations	\$40	\$73	\$33
Data Governance	\$0	\$0	\$0
Resource Allocation	\$0	\$0	\$0
Emergency Planning	\$0	\$0	\$0
Stakeholder Cooperation and Community Engagement	\$0	\$0	\$0
Total	\$1,890	\$3,856	\$1,966

¹ 2022 Planned data as shown from Table 3.1.2: Summary of WMP Expenditures by Category (Spend in thousand \$), page 25, in the 2022 WMP.

² 2022 Actual data as shown in HWT ARC Report Dated March 2023.

**Table 8: 2022 WMP Funding Verification Summary
(Dollars Shown in Thousands)**

Initiative Category	2022 Initiative Number	Initiative Name	2022 WMP Page No.	Funding Discrepancy Amount	Detail on Funding Discrepancy
Asset Management and Inspections	7.3.2.30	Detailed inspections of transmission electric lines and equipment	74	\$2,000 was Reported as Underspend	Per Data Request 002 Response (Page 2), HWT noted “Internal costs associated with Asset Management and Inspections were slightly lower than original forecasts.”

*See Appendix D - 2022 WMP Funding Verification Summary (Spend in thousand \$) for detailed information and Actuals for CAPEX and OPEX reported by HWT in the WMP Quarterly Report - Table 11, Dated February 2023.

3.3 Verification of QA/QC Programs

As stated in the 2022 WMP Pages 75 and 77, HWT’s Director of Operations “works with HWT’s field operations personnel to review monthly inspection results and identify gaps or issues that need to be addressed to mitigate problems and reduce risk of utility-causing ignitions.” To verify the QA/QC programs, the IE reviewed Data Request 002 responses within multiple documents received pertaining to electrical equipment and vegetation management inspections. The IE team verified the QA/QC oversight of the [REDACTED]. The Director of Operations signed the monthly equipment and vegetation management reports and dated them with the list of meeting attendees.

4. CONCLUSION

Per the IE Findings in Table 9, HWT has completed and has ongoing operations for the WMP programs outlined in the HWT-approved 2022 WMP. Activities and initiatives and their findings are detailed below.

Table 9: IE Findings Summary

SOW Category	2022 Initiative Number	Initiative Name	Finding	Detail on finding
WMP Activity Completion	7.3.2.23	Other Corrective Action	Activity Completed	Compliant with 2022 WMP
WMP Activity Completion	7.3.2.7	Continuous Monitoring Sensors	Activity Completed	Compliant with 2022 WMP
WMP Activity Completion	7.3.2.9	Forecast of Fire Risk Index, Fire Potential Index, or Similar	Activity Completed	Compliant with 2022 WMP
WMP Activity Completion	7.3.2.30	Detailed Inspections of Transmission Electric Lines and Equipment	Activity Completed	Compliant with 2022 WMP
WMP Activity Completion	7.3.2.46	Detailed Inspections of Vegetation around Transmission Electric Lines and Equipment	Activity Completed	Compliant with 2022 WMP
WMP Activity Completion	7.3.2.84	Protocols in Place to Learn from Wildfire Events	Activity Completed	Compliant with 2022 WMP
Verification of QA/QC Programs	N/A	QA/QC of electrical equipment inspections and vegetation management inspections	Activity Completed	Compliant with 2022 WMP
Verification of Funding	7.3.2.30	Asset Management and Inspections	Expense Underspend: Variance Amount is \$2K	HWT did not spend \$2K out of the total amount of \$50K initially planned for this initiative category. See Appendix D - 2022 WMP Funding Verification Summary (Spend in thousand \$) for more details.



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Appendix A – List of 2022 WMP Activities

SOW Category	2022 WMP Activities	WMP Category	2022 Initiative No.	Initiative Activity
WMP Activity Completion	1. Large Volume/Field Verifiable	N/A	N/A	N/A
WMP Activity Completion	2. Large Volume Quantifiable Goal/Target - Not Field Verifiable	N/A	N/A	N/A
WMP Activity Completion	3. Small Volume	Grid Design and System Hardening	7.3.2.23	Other Corrective Action
WMP Activity Completion	4. Qualitative Goal	Situational Awareness and Forecasting	7.3.2.7	Continuous Monitoring Sensors
WMP Activity Completion	4. Qualitative Goal	Situational Awareness and Forecasting	7.3.2.9	Forecast of Fire Risk Index, Fire Potential Index, or Similar
WMP Activity Completion	4. Qualitative Goal	Asset Management and Inspections	7.3.2.30	Detailed Inspections of Transmission Electric Lines and Equipment
WMP Activity Completion	4. Qualitative Goal	Asset Management and Inspections	7.3.2.42	Quality Assurance / Quality Control of Inspections
WMP Activity Completion	4. Qualitative Goal	Vegetation Management and Inspections	7.3.2.46	Detailed Inspections of Vegetation around Transmission Electric Lines and Equipment
WMP Activity Completion	4. Qualitative Goal	Vegetation Management and Inspections	7.3.2.56	Quality Assurance / Quality Control of Inspections
WMP Activity Completion	4. Qualitative Goal	Emergency Planning and Preparedness	7.3.2.84	Protocols in Place to Learn from Wildfire Events
Verification of QA/QC Programs	QA/QC Programs	QA/QC of WMP Activities	All	Director of Operations Review of Monthly Inspections

Appendix B – List of Supplemental Documents Reviewed

Item No.	Documents Reviewed - Public	Document Date
1	HWT Wildfire Mitigation Plan Quarterly (Q1) Report-Non Spatial Data	15-Apr-22
2	HWT Wildfire Mitigation Plan 2022	6-May-22
3	OEIS Data Request OEIS-HWT-22-001	13-May-22
4	HWT Response to Data Request 22-001	13-May-22
5	OEIS Data Request OEIS-HWT-22-002	26-May-22
6	HWT Response to Data Request 22-002	1-Jun-22
7	OEIS Data Request OEIS-HWT-22-003	11-Jul-22
8	HWT Response to Data Request 22-003	14-Jul-22
9	HWT Response to Data Request 22-004app	25-Jul-22
10	HWT Q2 2022 Quarterly Initiative Update	1-Aug-22
11	HWT WMP Quarterly (Q2) Report-Non Spatial Data	1-Aug-22
12	HWT 2022 Q4 Tables1-15 R1	22-May-23
13	HWT 2022 Q4 Spatial Data Status Report	22-May-23
14	HWT 2022 Q4 Report R0	22-May-23
15	HWT 2022 ARC Report	23-Mar

Appendix C – Data Requests



DATA REQUEST

Data Request Number: 001

Data Request Date: 05/16/2023

Priority Definitions

Name: [REDACTED]
Company: [REDACTED]

Email: [REDACTED]
Phone #: [REDACTED]
Preferred Point of Contact: Email

High = Critical Path, Task Dependent. Need to receive this data response first before all others.

Medium = Task Driven Not Critical. Data responses can be received secondary.

Low = Not Task Driven, Not Critical, Informational Only. Data responses can be received without pressing demands.

Program Target	Units	Sections	Target	Actual	Method	Data Request	Priority Level
All WMP Sections	N/A	All WMP Sections	N/A	N/A	Document	Please provide HWT's Final 2022 WMP Quarter 4 (Q4) Reporting Documentation and Associated Excel Files that includes completed targets and financials for 2022.	High

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DATA REQUEST

Data Request Number: 002

Data Request Date: 05/24/2023

Priority Definitions

Name: [REDACTED]
Company: C2 Group

Email: [REDACTED]
Phone #: [REDACTED]
Preferred Point of Contact: Email

High = Critical Path, Task Dependent. Need to receive this data response first before all others.

Medium = Task Driven Not Critical. Data responses can be received secondary.

Low = Not Task Driven, Not Critical, Informational Only. Data responses can be received without pressing demands.

Program Target	Units	Sections	Target	Actual	Method	Data Request	Priority Level
Situational Awareness and Forecasting	N/A	7.3.2.7 Continuous Monitoring Sensors	N/A	N/A	Document	Please provide documentation (reports, output readings showing operation of monitoring) relating to the ongoing monitoring of installed cable monitors.	Medium
Situational Awareness and Forecasting	N/A	7.3.2.9 Forecast of Fire Risk Index, Fire Potential Index, or Similar	N/A	N/A	Document	Please provide a detailed description of the improvements made to the fire risk index; what data sets it used, the information it provides, and how it is being used to inform operational decisions.	Medium
Grid Design and System Hardening	N/A	7.3.2.23 Other Corrective Action	N/A	N/A	Document	Please provide the as-builts of the transformer seismic pads installed, and documentation of the flame suppressing stone type utilized.	Medium

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Program Target	Units	Sections	Target	Actual	Method	Data Request	Priority Level
Asset Management and Inspections	N/A	7.3.2.30 Detailed Inspections of Transmission Electric Lines and Equipment	N/A	N/A	Document	Please provide the 2022 monthly inspection reports and all reports from extra inspections performed ahead of Red Flag Warning conditions for the transmission line.	Medium
Asset Management and Inspections	N/A	7.3.2.42 Quality Assurance / Quality Control of Inspections	N/A	N/A	Document	Please provide evidence of the monthly Director of Operations review of results of monthly inspections.	Medium
Vegetation Management and Inspections	N/A	7.3.2.46 Detailed Inspections of Vegetation around Transmission Electric Lines and Equipment	N/A	N/A	Document	Please provide all 2022 monthly vegetation inspection reports and all reports from extra inspections performed ahead of Red Flag Warning conditions for the transmission line.	Medium
Vegetation Management and Inspections	N/A	7.3.2.56 Quality Assurance / Quality Control of Inspections	N/A	N/A	Document	Please provide evidence of the monthly Director of Operations review of results of monthly inspections.	Medium
Emergency Planning and Preparedness	N/A	7.3.2.84 Protocols in Place to Learn from Wildfire Events	N/A	N/A	Document	Please provide copies of any 2022 "After Action Reports."	Medium
All WMP	N/A	Funding	N/A	N/A	Document	Based on actual costs allocated in Q4 Table 11	Medium

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Program Target	Units	Sections	Target	Actual	Method	Data Request	Priority Level
Sections		Verification				<p>compared to the 2022 WMP Planned costs in Table 3.1-2 Summary of WMP Expenditures by Category, the "Asset Management and Inspections" and "Grid Operations" categories were shown to be underspent; however, it appears both these category costs may have been rolled into the "Grid Design and System Hardening" category based upon the initiatives indicated in the Q4 Tables 1 and Table 11. Please confirm and provide justification for the "Asset Management and Inspections" and "Grid Operations" WMP categories that were underspent in 2022.</p>	

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Appendix D – 2022 WMP Funding Verification Summary (Spend in thousand \$)

From ARC Report Dated March 2023					From WMP Quarterly Report - Table 11, Dated February 2023							IE Funding Verification Summary	
#	WMP Category	2022 Total Planned	2022 Total Actual	Difference	WMP Initiative #	Initiative Activity	Actual CAPEX	Actual OPEX	Total Actual	Difference from 2022 WMP Total Planned	HWT Comments	Funding Discrepancy Amount	Detail on Funding Discrepancy
1	Risk Assessment & Mapping (Summary)	N/A	N/A	N/A			N/A	N/A	N/A	N/A	N/A	N/A	N/A
2	Situational Awareness & Forecasting				7.3.2.7	Continuous monitoring sensors	\$1	\$ -	\$1		HWT has installed transformer oil gas monitors and a camera to monitor its overhead transmission line at the ██████████ located in Tier 3 Extreme wildfire area in compliance with its CPUC-approved 2020 WMP. HWT will also install cable monitors for its underground transmission line to monitor cable temperature and partial discharge and minimize risk of undetected equipment failure.		
2	Situational Awareness & Forecasting				7.3.2.9	Forecast of a fire risk index, fire potential index, or similar	\$254	\$ -	\$254		HWT developed a fire potential index to proactively understand fire risk given weather conditions and take relevant risk mitigation actions (e.g., equipment inspection, increased monitoring, etc.)		
2	Situational Awareness & Forecasting (Summary)	\$200	\$255	\$55			\$255	\$ -	\$255	\$55		N/A	N/A
3	Grid Design & System Hardening				7.3.2.23	Other corrective action	\$3,463	\$ -	\$3,463		HWT is implementing a number of wildfire hardening measures to reduce wildfire risk at its ██████████ in compliance with its CPUC-approved 2020 WMP. In addition to the wildfire hardening measures outlined in the Grid Design & System Hardening category, HWT is implementing the following initiatives: 1) Installation of concrete 10 ft tall perimeter wall around the ██████████, 2) installation of seismic pads under the transformers, 3) installation of transformer blast walls and 4) installation of flame-suppressing containment stone under the transformers		
3	Grid Design and System Hardening (Summary)	\$1,600	\$3,463	1,863			\$3,463	\$ -	\$3,463	\$1,863		N/A	N/A

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4	Asset Management and Inspections ¹				7.3.2.30	Detailed inspections of transmission electric lines and equipment	\$ -	\$48	\$48		HWT conducts monthly detailed inspections of transmission line and equipment, including vegetation inspection at its ██████████ in compliance with its CPUC-approved 2022 WMP		
4	Asset Management and Inspections (Summary)	\$50	\$48	\$(2)			\$ -	\$48	\$48	\$(2)		\$2 was reported as an underspend.	Per Data Request 002 Response, HWT noted "Internal costs associated with Asset Management and Inspections were slightly lower than original forecasts."
5	Vegetation Management & Inspections				7.3.2.61	Substation vegetation management	\$ -	\$17	\$17		HWT contracts with a service provider to regularly manage the vegetation around the immediate perimeter of its substation and weather station, including weed abatement		
5	Vegetation Management & Inspections (Summary)	\$ -	\$17	\$17			\$ -	\$17	\$17	\$17		N/A	N/A
6	Grid Operations & Operating Protocols ²				7.3.2.71	Stationed and on-call ignition prevention and suppression resources and services	\$ -	\$73	\$73		- HWT conducts detailed After Action Reviews after wildfire events in the proximity of HWT's ██████████ to learn from the events and improve HWT's protocols and procedures going forward. No specific cost is attributed to this task. -HWT maintains a contract for firefighting services in the event of a fire, the cost of which service is represented in the spend categories to the right.		
6	Grid Operations & Operating Protocols (Summary)	\$40	\$73	\$33			\$ -	\$73	\$73	\$33		N/A	N/A
7	Data Governance (Summary)	N/A	N/A	N/A			N/A	N/A	N/A	N/A	N/A	N/A	N/A
8	Resource Allocation Methodology (Summary)	N/A	N/A	N/A			N/A	N/A	N/A	N/A	N/A	N/A	N/A
9	Emergency Planning & Preparedness (Summary)	N/A	N/A	N/A			N/A	N/A	N/A	N/A	N/A	N/A	N/A

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10	Stakeholder Cooperation & Community Engagement (Summary)	N/A	N/A	N/A			N/A	N/A	N/A	N/A	N/A	N/A	N/A
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¹Per DR002 Response, Asset Management and Inspections was reported as Grid Design, Operations, and Maintenance in the Q4 2022 Report on Line 31 on Table 11.

²Per DR002 Response, Grid Operations was Reported as Emergency Preparedness in the Q4 2022 Report on Line 14 on Table 11.