

## Trans Bay Cable (TBC)

**Data Request Number: DR- P-WMP\_2023-TBC\_001**

**Date Received: September 15, 2023**

**Date Responded: September 20, 2023**

- d. **Identify the personnel (employees, consultants, agents, etc.) who provided information responsive to each of the data requests below. As used in this context herein, “identify” means to provide the full name, business address, and title of each employee, consultant or agent who provided such information.**

Raj Prakash  
Director Operations  
Trans Bay Cable  
P.O. Box 666  
Pittsburg, CA 94565

Michael Blunt  
Manager Operations  
Trans Bay Cable  
P.O. Box 666  
Pittsburg, CA 94565

Lenneal Gardner  
Regulatory and Business Manager  
Trans Bay Cable  
P.O. Box 666  
Pittsburg, CA 94565

### **REQUEST**

#### ***Q01. Regarding Grid Hardening Projects***

- a. *In Table 8-1 of its WMP, TBC lists two grid hardening objectives: Compressed gas cylinder housing and spare parts building suppression system. Both list a completion date of 6/30/23.*
- i. *Were both projects completed by 6/30/23? If not, provide updated dates or estimated dates for completion.*

**Trans Bay Response:** Compressed gas cylinder housing was completed April 1, 2023. Spare parts building suppression system is installed and functional. However project is expected to be completed by year end pending installation of ancillary remote monitoring capabilities and final inspection.

## Trans Bay Cable (TBC)

**Data Request Number: DR- P-WMP\_2023-TBC\_001**

**Date Received: September 15, 2023**

**Date Responded: September 20, 2023**

### ***Q02. Regarding QA/QC Process***

- a. *Describe TBC's current documentation process for any QA/QC performed (including review of inspections).*

**Trans Bay Response:** TBC has Maintenance Procedure *TBC-MP-001 Converter Maintenance Practices*, which is reviewed and approved by California ISO. Section 4.1.4 describes the quality assurance process which occurs during routine maintenance and inspections.

Deficiencies identified during the inspection of watch (IOW) are resolved immediately, if possible, by the person performing the inspection. When remediation of a deficiency is not immediately possible, it is reported to the Operations Manager or delegate, who determines what actions to take. Any deficiencies involving maintenance or equipment faults are evaluated utilizing the maintenance or equipment Fault Risk Analysis (FRA) methodology.

The TBC Operations Manager or delegate reviews all inspection and maintenance documentation (Work Tasks) after completion of the inspection or maintenance and generate a Work Task for any necessary follow-up actions.

TBC Operators monitor the status of all sites on a 24/7 basis. Upon detection of an equipment deficiency (fault or failure), the Operator performs an Equipment Failure Risk Assessment (EFRA) using the risk management process, as it applies to Operations and Maintenance. The Operator performs a real-time assessment and determine the necessary course of action. If the risk requires real-time action, the Operator must take actions that ensure the stable and reliable operation of the BES.

Performing the EFRA is secondary to a system emergency but must be completed once stability is achieved. Once the initial assessment has been performed, the Operations Manager or delegate performs a review of the fault or failure and, if necessary, perform a secondary evaluation of the risk.

### ***Q03. Regarding Stakeholder Collaboration***

- a. *In its Section 8.5.4 of its Pre-Submission for its 2023-2025 WMP, Trans Bay Cable stated that it does not anticipate providing customer support or engaging with communities during an emergency; however, it has developed a protocol for communication and coordination with its primary stakeholders, including the CAISO and Interconnecting Transmission Owner, local fire agencies, etc. (p. 185). In its WMP submission on May 8, 2023, TBC no longer mentions this protocol in Section 8.5.4. TBC states that, given its limited footprint and scale of operations, it does not participate (or have plans to participate) in local wildfire mitigation planning. As a result, TBC's Tables 8-61 (Collaboration in Local Wildfire Mitigation Planning) and 8-62 (Key Gaps and*

## Trans Bay Cable (TBC)

**Data Request Number: DR- P-WMP\_2023-TBC\_001**

**Date Received: September 15, 2023**

**Date Responded: September 20, 2023**

*Limitations in Collaborating on Local Wildfire Mitigation Planning) are marked as “N/A” or “Not Applicable” (pp. 213-214).*

- i. Please confirm whether TBC has a protocol for communication and coordination with its primary stakeholders (CAISO, PG&E, local fire agencies, etc.)*
  - i. If TBC does have a protocol, please describe the extent of this protocol, including when this collaboration occurs, stakeholders involved, any instances of recent collaboration, any gaps or limitations with this collaboration, etc.*
  - ii. If no such protocol has been developed, please clarify and explain what is meant by “TBC has developed a protocol for communication and coordination with its primary stakeholders, including the CAISO and Interconnecting Transmission Owner, local fire agencies, etc.” in TBC’s Pre-Submission.*

**Trans Bay Response:** Section 8.5.4 specially addresses local wildfire mitigation planning. TBC provided a clarifying response in Section 8.5.4 of the WMP, noting that because TBC has no service territory does not serve end-use customers, and does not have any facilities in a HFTD it does not collaborate with any parties on local wildfire mitigation planning. However, TBC does have protocols, such as its Emergency Operations Procedure and Emergency Action Plan, (provided as confidential attachments to the 2023 WMP), which provide details for communicating with the CAISO, PG&E and emergency services in the event of off normal/emergency situations. Additionally, TBC complies with applicable CAISO, PG&E and North American Electric Reliability Corporation (NERC) Communication standards for communicating with neighboring utilities and governing regional transmission organization (See TBC 2023 WMP, Section 8.4.3.2. pgs. 184-186). TBC periodically engages the local fire department. In 2021, TBC engaged the local fire department and conducted a site walk through which including notification of foam trailer location and capabilities, site map, and locations of oil-containing assets. In Q2 of 2023, TBC again hosted the local fire department on a site tour and provided materials. A follow up visit is scheduled for October 2023 to conduct a dry run utilization of TBC’s foam trailer.