



February 1, 2024

To: Horizon West Transmission (HWT)  
Lenneal Gardner  
Regulatory & Business Manager  
One California Street, Suite 1600,  
San Francisco, CA 94111

**SUBJECT: Office of Energy Infrastructure Safety’s Report on HWT’s 2021 Substantial Vegetation Management Audit**

Pursuant to the requirements of California Public Utilities Code section 8386.3(c)(5)(C), the Office of Energy Infrastructure Safety (Energy Safety) completed its final audit and report on HWT’s 2021 Substantial Vegetation Management work. Energy Safety finds that HWT substantially complied with the substantial portion of the vegetation management requirements in its 2021 Wildfire Mitigation Plan Update.

Pursuant to statutory requirements, a copy of this report is issued to HWT, published on Energy Safety’s 2021 SVM Docket<sup>1</sup> and provided to the California Public Utilities Commission.

Sincerely,

Shannon O’Rourke  
Deputy Director | Electrical Infrastructure Directorate  
Office of Energy Infrastructure Safety

Cc:

Forest Kaser, CPUC  
Leslie Palmer, CPUC  
Eric Pavlowski, HWT  
Jennifer Chaney, HWT  
Alexandre Veilleux, HWT  
Jaime Hoffman, HWT

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<sup>1</sup> <https://efiling.energysafety.ca.gov/Lists/DocketLog.aspx?doctetnumber=2021-SVM> (accessed February 1, 2024).



State of California – A Natural Resources Agency

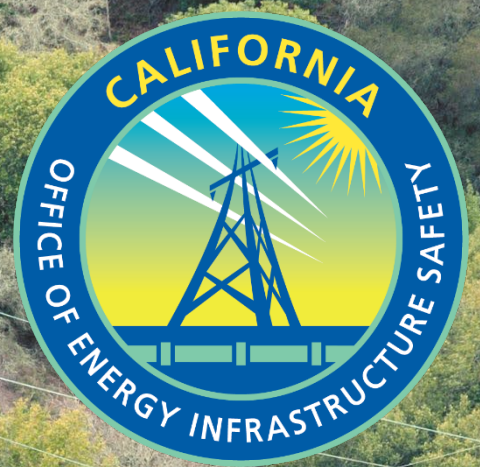
Gavin Newsom, Governor

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OFFICE OF ENERGY INFRASTRUCTURE SAFETY

**2021 SUBSTANTIAL VEGETATION  
MANAGEMENT AUDIT AND REPORT**

**HORIZON WEST TRANSMISSION**

February 2024

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# 1. Introduction and Framework

The Office of Energy Infrastructure Safety (Energy Safety) must, on an annual basis, audit the vegetation management work performed by an electrical corporation upon notification that the electrical corporation has completed a substantial portion of the vegetation management requirements in its Wildfire Mitigation Plan (WMP).<sup>1</sup> In each audit, Energy Safety must specify any failure of the electrical corporation to fully comply with the vegetation management requirements in the WMP.<sup>2</sup> To effectuate this requirement, Energy Safety identified both quantitative commitments (e.g., miles of lines to inspect) and verifiable statements (e.g., training of personnel) in the vegetation management section of Horizon West Transmission's (HWT's) 2021 WMP Update and conducted this audit to determine if HWT performed the work required by each of those commitments and statements.

In performing the audit, Energy Safety found that HWT performed all work required for the vegetation management initiative in its 2021 WMP Update, as summarized in Table 1 below.

*Table 1: Energy Safety's Analysis of HWT's 2021 WMP Update Vegetation Management Initiative*

2021 WMP Update Initiative Number	2021 WMP Update Initiative Name	Finding
7.3.5	Vegetation Management and Inspections	Performed all required work

# 2. Scope of the Substantial Vegetation Management Audit

To conduct this audit, Energy Safety evaluated the vegetation management section of HWT's 2021 WMP Update.<sup>3</sup> HWT operates a single operational asset as discussed in Section 3 below, due to the limited scope of HWT's operations, HWT's 2021 WMP Update only addresses one of the 20 initiatives from the WMP Update Guidelines. Therefore, the scope of Energy Safety's audit is limited to that single initiative.

<sup>1</sup> Cal. Pub. Util. Code §8386.3, subd. (c)(5)(A); 2023 Compliance Guidelines, Section 6.1, page 14.

<sup>2</sup> *Id.*

<sup>3</sup> HWT 2021 WMP Update, page 57.

On April 18, 2023,<sup>4</sup> HWT notified<sup>5</sup> Energy Safety<sup>6</sup> that it had completed a substantial portion of the work required by its vegetation management initiative in its 2021 WMP Update. In performing this audit, Energy Safety requested documentation substantiating the work performed by HWT. This audit does not assess the quality of that work.

### 3. Vegetation Management Program

HWT is a transmission-only utility with no end-use customers. HWT's Suncrest Facility supports the San Diego Gas & Electric Company Substation. Due to the limited scope of its operations, HWT's approved 2021 WMP Update did not contain the 20 vegetation management initiatives required for other electrical corporations. Instead, HWT's vegetation management program is limited to the removal of all vegetation from within the perimeter fenced area of its Suncrest Facility, and placement of rock and treatments with herbicide, as necessary.<sup>7</sup>

### 4. Documents Reviewed

To complete this audit, Energy Safety reviewed the following records and documents:

1. HWT's 2021 Wildfire Mitigation Plan Update.
2. HWT response to Energy Safety's Data Request DR-132.
3. Wildfire Mitigation Condition Assessment Vol. 1.

Energy Safety's communication, Data Requests, and HWT's responses pertaining to this SVM audit are listed in Table 2 below.

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<sup>4</sup> Energy Safety notified HWT transmission on April 3, 2023 that it was conducting a 2021 SVM audit on HWT's 2021 WMP Update. Energy Safety directed HWT to submit a notification in 2023 that it had completed a substantial majority of its vegetation management program.

<sup>5</sup> Letter of Notification of Substantial Compliance from Jennifer Chaney (Senior Director Operations on behalf of Horizon West Transmission) to the Director of Energy Safety dated April 18, 2023.

<sup>6</sup> Pursuant to Public Utilities Code Section 326, subdivision (b), on July 1, 2021, the Wildfire Safety Division (WSD) transitioned from the Commission into the Office of Energy Infrastructure Safety (Energy Safety), a department under the California Natural Resources Agency.

<sup>7</sup> HWT 2021 WMP Update, page 57.

*Table 2: Timeline of Events of Communication Between Energy Safety and HWT Regarding 2021 SVM Audit*

Number	Date(s)	Event
1	April 3, 2023	Energy Safety and HWT had meeting to discuss the 2021 WMP Update SVM Audit.
2	April 4, 2023	Energy Safety submitted Data Request DR-132 to HWT asking for details pertaining to vegetation management activities.
3	April 18, 2023	HWT submitted a notification to Energy Safety stating it had completed a substantial portion of its 2021 WMP Vegetation management requirements
4	April 18, 2023	HWT submitted responses to DR-132

## 5. Analysis

This section contains an analysis of the vegetation management activities in HWT's 2021 WMP Update. The subsection provides verifiable statements, supporting information, and Energy Safety analysis, followed by a summary of Energy Safety findings.

### 5.1 Subsection 7.3.5 Vegetation Management and Inspections

#### 5.1.1 2021 WMP Update Initiative Statements, Supporting Information, and Analysis

In its 2021 WMP Update, HWT stated,<sup>8</sup>

HWT incorporates a vegetation management program at HWT facilities as an important component of its fire prevention strategy. The objective of the vegetation management program is to minimize the likelihood that an ignition on-site facilitates an off-site vegetation ignition. A secondary objective of the vegetation management program is the protection of equipment from wildfire encroachment. The vegetation

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<sup>8</sup> 2021 WMP Update, page 57.

management strategies are based on the removal of all vegetation from within the perimeter fenced area and the provision of a modified fuel zone outside the fence, resulting in a layered approach. The tactics for vegetation management include vegetation removal during grading within the fenced area and maintained throughout operations by placement of rock and treatments with herbicide, as necessary. Perimeter fuel modification areas will be treated by removal of the highest flammability plants and maintenance in a thinned, low fuel condition.

HWT's "Wildfire Mitigation Condition Assessment"<sup>9</sup> procedure states: "Vegetation within the perimeter fence will be assessed for weed control, and corrective action taken as necessary. Vegetation within the (minimum) 84' wide fuel modification area surrounding the facility will be assessed for weed control, [...] action taken as necessary."<sup>10</sup> The procedure also outlines inspection on assets located outside of the facility looking at "inspect[ion] for any vegetation and/or obstruction that is impairing access to the test station covers and boxes. Visually inspect for trees or other vegetation that could pose a danger to the circuit on or off the right-of-way."<sup>11</sup>

To demonstrate compliance with its procedures, HWT provided a copy of its 2021 Weed Removal contract as well as four sample field inspection reports carried out for each quarter in 2021. The 2021 Weed Removal contract stipulates the scope of work to "perform exotic species removal in the fuel management zones[...] provide an onsite supervisor to oversee and manage the herbicide application to ensure that no sensitive resources, including nearby plants and trees, are impacted during the herbicide application."<sup>12</sup> The field inspection reports included a checklist to verify that vegetation was checked inside the HWT substation and the line span connecting the HWT's substation to SDG&E's own substation.<sup>13</sup>

Therefore, Energy Safety's audit found that HWT provided information consistent with the completion of the work identified in these statements regarding its vegetation management program.

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<sup>9</sup> Response to DR-132, question 1a; attachment "HWT\_20\_03\_02\_WMP\_Wildfire Mitigation Condition Assessment Procedure" version 1 effective 2019.

<sup>10</sup> Wildfire Mitigation Condition Assessment Procedure, page 5.

<sup>11</sup> Wildfire Mitigation Condition Assessment Procedure, page 7.

<sup>12</sup> Suncrest SVC Weed Removal 2021-Invoice, page 1.

<sup>13</sup> Response to DR-132, question 1b; attachments "HWT Wildfire Condition Assessment 210225-signed", "HWT Wildfire Condition Assessment 210628-signed", "HWT Wildfire Condition Assessment 210729-signed", and "HWT Wildfire Condition Assessment 211029 -signed".



### 5.1.2 Energy Safety's Determination for 2021 WMP Update Vegetation Management Activities

Based on the analysis above, Energy Safety finds that HWT provided information consistent with the completion of the vegetation management activities identified in its 2021 WMP Update.

## 6. Conclusion

Energy Safety reviewed the single vegetation management activity detailed in HWT's 2021 WMP Update and found that HWT performed all of the work specified. This audit is not an assessment of the quality of HWT's execution of its vegetation management program. Because this audit found no areas where HWT did not perform all specified work, Energy Safety has no corrective action requirements or timeline for HWT.

Energy Safety finds that HWT substantially complied with the substantial portion of the vegetation management requirements in its 2021 WMP Update.<sup>14</sup>

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<sup>14</sup> Pub. Util. Code, 8386.3(c)(5)(C).

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