

**Trans Bay Cable LLC
ANNUAL REPORT ON COMPLIANCE FOR 2023**

for Submittal to:

**CALIFORNIA OFFICE OF ENERGY
INFRASTRUCTURE SAFETY**

California Natural Resources Agency
715 P Street, 20th Floor
Sacramento, California 95814



P.O. Box 666
Pittsburg, California 94565

March 2024

Instructions:¹ *The Annual Report on Compliance submitted by each EC shall include a written narrative including:*

- a. *An assessment of whether the EC met the risk reduction intent by implementing all of their approved WMP initiatives, i.e., the degree to which initiative activities have reduced ignition probabilities;*
 - *If the EC fails to achieve the intended risk reduction, EC shall provide a detailed explanation of why and a reference to where associated corrective actions are incorporated into their most recently submitted WMP.*
- b. *A full and complete listing of all change orders and any other operational changes, such as initiative location changes, made to WMP initiatives, with an explanation of why the changes were necessary, and an assessment of whether the changes achieved the same risk reduction intent;*
- c. *Descriptions of all planned WMP initiative spend vs actual WMP initiative spend and an explanation of any differentials between the planned and actual spends;*
- d. *A description of whether the implementation of WMP initiatives changed the threshold(s) for triggering a PSPS event and/or reduced the frequency, scale, scope and duration of PSPS events;*
- e. *A summary of all defects identified by the WSD within the annual compliance period, the corrective actions taken and the completion and/or estimated completion date*

Trans Bay Cable LLC (U934-E) (Trans Bay) is a transmission-only utility with no retail/end-use customers. Trans Bay is the owner and operator of a 53-mile, approximately 400 MW, high voltage, direct-current (HVDC) submarine transmission cable buried at various depths beneath the San Francisco Bay Waters² (Bay Waters), with AC/DC converter stations (or substations) at each end (the Trans Bay System). The Trans Bay System's eastern converter station is located in Pittsburg, CA which is adjacent to an area designated as a Tier 2 (Elevated) Fire-Threat Area based on the California Public Utilities Commission's (CPUC or Commission) Fire-Threat Map. All other transmission elements are located fully outside and not adjacent to any Fire-Threat Area. Specifically, the transmission system is comprised of the Pittsburg converter station, 230kV High Voltage AC Underground Cable, 200kV High Voltage DC Underground Cable – Pittsburg Location, +/-200kV High Voltage DC Submarine Cable, +/-200kV High Voltage DC Underground Cable – San Francisco Location, Potrero converter station, and 115kV High Voltage AC Underground Cable. The Trans Bay System is connected to Pacific Gas & Electric (PG&E) substations in both San

¹ Text in blue italics are instructions from the Wildfire Safety Division – Compliance Operational Protocols as issued by the WSD on February 16, 2021. The WSD has been renamed the Office of Energy Infrastructure Safety (Energy Safety).

² San Francisco Bay Waters is defined as the continuous waterway that includes the San Francisco Bay, San Pablo Bay, Carquinez Strait, Suisan Bay and Sacramento River delta.

Francisco and Pittsburg, CA via underground AC cables. All aboveground transmission infrastructure is fully contained within the walls of the systems converter stations.

Due to the limited scale and scope of Trans Bay's operations, the substantial hardening of Trans Bay's transmission infrastructure to wildfire risks due to being underground or submerged and having no transmission infrastructure in wildlands or in a wildland urban interface (WUI), Trans Bay does not maintain a program specifically geared towards wildfire mitigation.

- a. Trans Bay projected to complete initiatives in the area of Grid Design, Operations, and Maintenance in 2023. As discussed below Trans Bay completed its all its Grid Design, Operations, and Maintenance initiatives in the 2023.
 - **Grid Design, Operations, and Maintenance:** Trans Bay projected to incur spend in 2023 related to two site improvement projects that were under construction and forecasted for completion in 2023. These projects were (i) fire suppression system to compliment the fire detection system in the Spare Parts building and (ii) remove the gas cylinders and construct a protected housing for them outside the Spare Parts building. The gas cylinder enclosure was completed in April 2023 and the fire suppression system was fully installed and operational in October 2023.
- b. Trans Bay did not have any applicable change orders to its 2023 WMP.
- c. As noted above, due to the limited scale and scope of Trans Bay's operations, the substantial hardening of Trans Bay's transmission infrastructure to wildfire risks due to being underground or submerged and having no transmission infrastructure in wildlands or in a wildland urban interface (WUI), Trans Bay does not maintain a program specifically geared towards wildfire mitigation. As a result, Trans Bay did not identify specific wildfire mitigation initiatives in its 2023 WMP, but did reference operational initiatives which had the added effect of potentially mitigating wildfire risk. Considering this fact, Trans Bay identifies spend on operational initiatives which may not have been driven by fire risk mitigation, but nonetheless have the benefit of incorporating fire mitigation elements as described in its 2023 WMP. Table 1 below summarizes Trans Bay's 2023 planned initiative spend vs. actual initiative spend. The actual 2023 spend is slightly lower than planned spend primarily because of project efficiencies.

Table 1 – Summary of WMP Expenditures by Category (Spend in thousand \$)

WMP Category	2023 WMP Planned	2023 Actual	Difference
Community Outreach and Engagement	0	0	0
Emergency Preparedness	0	0	0
Grid Design, Operations, and Maintenance	280	201.9	(78.1)
Overview of the Service Territory	0	0	0
Risk Methodology and Assessment	0	0	0
Situational Awareness and Forecasting	0	0	0
Vegetation Management and Inspection	0	0	0
Wildfire Mitigation Strategy Development	0	0	0
Total	280	201.9	(78.1)

- d. Trans Bay has not issued a PSPS to date. Given that Trans Bay is a transmission-only utility that has no distribution system, no distribution or retail customers, and is already substantially hardened against wildfires, Trans Bay reasonably anticipates it will seldom, if ever, need to issue a PSPS. Trans Bay’s service territory is fully encompassed by PG&E service territory. As a result, Trans Bay expects that PG&E doctrine regarding PSPS that impacts the PG&E Pittsburg Substation would be the prevailing driver of any PSPS impacts on Trans Bay service territory. Any PSPS issued by PG&E that impacted the Pittsburg Substation to the extent that Trans Bay’s interconnection would be de-energized would take Trans Bay’s transmission system offline. Therefore, Trans Bay’s WMP initiatives are focused on wildfire hardening and reduction of utility-caused ignitions at Trans Bay facilities rather than PSPS mitigation.
- e. Energy Safety reviewed and approved Trans Bay’s 2023 WMP without conditions (Full Approval) and did not identify any deficiencies or defects relevant to Trans Bay’s WMP. As a result, Trans Bay has not undertaken any corrective actions to resolve any defects.