

JULY 1, 2024



**FINAL INDEPENDENT EVALUATOR  
ANNUAL REPORT ON COMPLIANCE**  
Presented to:



# INDEPENDENT EVALUATOR ANNUAL REPORT ON COMPLIANCE

## *Disclaimer*

This report has been compiled through the process of observation and review of documents provided by the electric service provider named herein. Energy Safety (Office of Energy Infrastructure Safety) 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.

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# INDEPENDENT EVALUATOR ANNUAL REPORT ON COMPLIANCE

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# INDEPENDENT EVALUATOR ANNUAL REPORT ON COMPLIANCE

## 1. EXECUTIVE SUMMARY

### Background

As a result of 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 role electrical corporation's infrastructure 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 has transitioned to Energy Safety. The wildfire mitigation process requires utilities to submit their annual Wildfire Mitigation Plan (WMP) in a 3-year cycle; the initial WMP was submitted in the first year (2020) and followed with annual updates occurring for years 2 (2021) and 3 (2022).

On May 9, 2023, Trans Bay Cable's (TBC) submitted its 2023-2025 Wildfire Mitigation Plan to Energy Safety pursuant to the obligations set forth in Public Utilities Code Section 8386.3(a). Energy Safety approved the TBC 2023-2025 Wildfire Mitigation Plan on March 8, 2024, via Resolution SPD-23 pursuant to Public Utilities Code (PUC) Section 8386.

### Scope

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 the TBC 2023-2025 Wildfire Mitigation Plan (WMP) and provide a report on July 1 of each year. BVNA has evaluated TBC's compliance with its 2023 WMP pursuant to Public Utilities Code Section 8386, validated TBC's quality assurance and quality control (QA/QC) programs outlined for support of WMP initiatives and reviewed its WMP funding activities.

BVNA has reviewed the WMP for initiative compliance, as well as verification for the execution of the WMP goals and targets. In addition, supplemental documents (see Appendix A) were also reviewed for verification of compliance, validation of quality assurance QA/QC programs, and assessment of the utility funding activities related to WMP.

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## Introduction to TBC, Site Visit and SME Interview

Trans Bay Cable

Pittsburg Converter Station

570 W 10<sup>th</sup> St

Pittsburg, CA 94565

Figure 1- Trans Bay Cable



TBC (figure 1) is a transmission-only utility with no retail/end-use customers. TBC is the owner and operator of a 53-mile, high voltage, direct-current (HVDC) submarine transmission cable buried at various depths beneath the San Francisco Bay, with AC/DC converter stations (or substations) at each end (the Trans Bay System). The Trans Bay System's western converter station is in the City and County of San Francisco, a fully developed and urbanized area with minimal fire-threat risk. The eastern converter station is in Pittsburg, CA which is adjacent to an area

designated as a Tier 2 (elevated) fire-threat area based on the CPUC Fire-Threat Map. Given that the submarine cable is fully submerged there is no fire threat risk. The connections to PG&E substation at each end are via underground AC cables. All the above ground transmission infrastructure is contained within the walls of the systems converter stations.

TBC Pittsburg is operated by a team of operations, engineering, and maintenance staff, on a 24-hour a day basis and is a Participating Transmission Operator on the California Independent System Operator Grid.

### Key Findings

Upon review of the documents provided, as well as the site visit conducted at the Pittsburg, California converter station on May 7, 2024; TBC is following the 2023 WMP. This is described in further detail in the Independent Evaluator Review of Compliance section and supporting documents in the Appendices. In summary:

1. All 2023 WMP activities are completed and confirmed with inspections.
2. 2023 WMP activities were originally detailed and funded within the 2020-2023 WMP planning cycle and initiatives.
3. All were substantially funded and implemented in 2022 due to vendor availability and supply chain issues, pending final acceptance by Authority Having Jurisdiction (AHJ) in 2023.

A site visit to the Pittsburg converter substation and the review of all documents supporting the implementation of the 2023 WMP initiatives was conducted. Subsequently, BVNA has provided



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the following Independent Evaluator Annual Report on Compliance (IE ARC) describing the technical review and findings.

Figure 2 – TBC Pittsburg, CA



TBC transmission cable extends from its mostly urban converter station in Pittsburg, California to its Potrero converter station and 115kV High Voltage AC Underground Cable in San Francisco, California. TBC interconnects with Pacific Gas and Electric (PG&E) substations in Pittsburg and San Francisco via underground Alternating Current (AC) transmission cables. All above-ground transmission infrastructure is fully contained within the walls of the

systems converter station (Figure 2).

The Pittsburg substation is adjacent to an area designated as an elevated fire threat area with a higher risk that may include the likelihood and potential impact on people and property from utility related wildfire.

Figure 3 – CPUC HFTD 2 Map



The San Francisco substation is surrounded entirely by an urban environment and has no potential to cause a wildfire ignition.

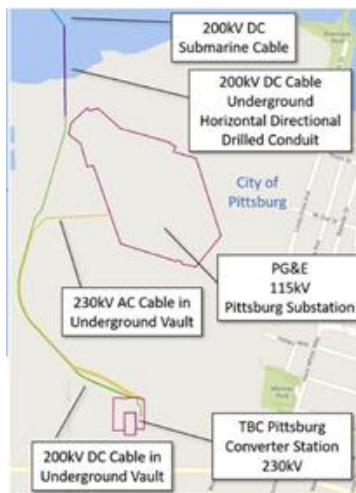
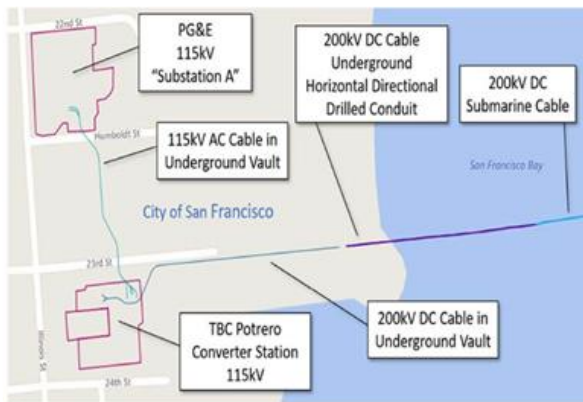
TBC has been in service since November 2010 and its asset footprint has not changed.

The TBC transmission facilities can transport up to 400-Megawatts between the two PG&E substations and surrounded by PG&E service territory. Other than the equipment within the substation boundaries, TBC has no overhead lines or equipment and is substantially hardened against wildfires (Figures 4 and 5).

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Figure 5 – Overview of TBC Pittsburg, CA

Figure 4 – Overview of TBC San Francisco



The Pittsburg substation is also in an urban setting. It is approximately 3-miles directly north of an area designated as Tier 2 (elevated) High Fire-Threat District (HFTD) per the California Public Utility Commission's (CPUC) published fire threat maps (Figure 3).

TBC Pittsburg Converter Station – IE field visit on May 7, 2024, 710 West 10<sup>th</sup> Street, Pittsburg, CA. Attendees were:

1. Michael Blunt, TBC Operations Manager
2. Raj Prakash, TBC Environmental Health, and Safety Manager
3. David Stoddard, Fire and Life Safety Specialist, BVNA (IE)

The visit included a question-and-answer meeting followed by an audit of the facility and field verification of completion of the outstanding items from the 2022 WMP planning cycle.

**Note:** Pictures were taken by BVNA during the site visit and are included in the report with a photo log in Appendix B. All pictures were granted verbal approval at the time they were taken by TBC Environmental, Health, and Safety (EH&S) Manager.

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Figure 6 - Site Map TBC Pittsburg

## Adjacent Properties

The facility is surrounded with active commercial, light industrial, and residential uses. Currently an abandoned bulk oil and industrial power plant is located to the north. TBC informed the IE that the Contra Costa County Planning Department is gathering information and perhaps an environmental impact report is being prepared for the property that may allow development if approved.

The City manages the creek and drainage areas to the north of the facility and the property owner(s) is responsible for the vacant properties other than the drainage easement.

Street addressed for the property to E and W

1. 650 W 10<sup>th</sup> Street – Fernandes Auto Wrecking
2. 620 W 10<sup>th</sup> Street – Redwood Painting



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3. 566 W 10<sup>th</sup> Street – Motorise City LLC – Auto Sales
4. 564 W 10<sup>th</sup> Street – Checo’s Auto Parts

## Security

Figure 7 – Security camera (typical) and buffer areas



The Pittsburg Converter Station facility is a secured facility with a perimeter wall that consists of a 12-foot-high concrete masonry unit (CMU) wall. Vehicular and pedestrian access is to the south via a two-gate system (inner and outer) at each access point. There is a wrought iron vehicle gate with both an intercom and keypad installed in the southeast exit driveway adjacent to public thoroughfare, followed by a second vehicle gate north of the above, at each of the eastern and western access/egress driveways. The gates and buildings are equipped with Knox emergency access for use by the Fire Department. The roadside frontage is fully landscaped with lush dense foliage (anti-climbing) on the exterior surface. All ground surfaces within the concrete perimeter walls are either hardscape (concrete or asphalt) or covered with gravel, with no hazardous vegetation within the facility interior.

TBC also incorporates visual, ultraviolet, and infrared cameras that allow remote observation of inner and outer areas of the property. All remote security devices are monitored 24/7/365 via the Control Center on site.

## Emergency Services/Local Responders

Emergency response is provided by the Contra Costa County Fire Protection District. They are a full-service fire agency that provides fire and emergency medical services. Station 84 is located 1.4 miles away from the site at 1903 Railroad Avenue, Pittsburg, CA.

## INDEPENDENT EVALUATOR REVIEW OF COMPLIANCE

BVNA initiated the assessment with a review of the 2023-2025 WMP along with all publicly available documents as listed in Appendix A. The intent of this initial review was to identify stated WMP goals, initiatives, and any outstanding actionable items. In addition, the IE submitted data requests and conducted a site visit for the purpose of documenting WMP

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activities. See Appendix C for data requests submitted and the responses from TBC. The site visit included pictures and interviews with SMEs to validate compliance with the 2023 WMP activities and initiatives. Each section's key findings and analysis are detailed further within this section and the IE Review of Compliance Section.

## WMP Initiative Assessment

There are limited initiatives and activities outlined within the 2023 WMP due to the scope and scale of the Pittsburg operations. TBC's intent is to harden the transmission infrastructure to wildfire risks. This hazard is already limited by the underground and submerged infrastructure, as well as not having any above ground transmission equipment or lines creating a wildland fire risk.

Due to the limited scale and scope of Trans Bay's operations, the substantial hardening of TBC 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.

TBC participates in the CPUC wildfire mitigation workshops and continues to learn and implement applicable best practices in fire mitigation. TBC is committed to continuous improvement of its overall fire prevention plans and processes which have the added benefit of mitigating wildfire risk. TBC has developed objectives that are directly related to maximizing fire prevention efforts such as containing fire to the facility and implementing fire extinguishing strategies to minimize the potential of spread of fire from the facility and extending to its surrounding environment. Further, TBC has facility monitoring and surveillance systems in place that will augment early detection, discovery, and rapid communication at the start of a fire on site. The WMP sets forth the methodology for and assessment of the risk of wildfire ignition; leverages preventative strategies and protocols currently in place for fire prevention, directives for operational response in the event of a wildfire or wildfire conditions, and system restoration.

TBC's grid design, operations, and maintenance is strong. They do not have any current proposed mitigation initiatives in the 2023-2025 WMP cycle. TBC has completed installation of the two outstanding initiatives from the 2020-2022 WMP cycle. Those initiatives were installation of an outdoor compressed gas cylinder housing and the installation of a fire suppression system in its Pittsburg Spare Parts building.

## Sampling Methodology and Discussion

Sampling methodology and percentages do not apply to this facility as this IE observed it in its entirety. Information regarding the site and the WMP activities was captured during the onsite field visit of TBC's Pittsburg Facility on May 7, 2024. This included a question-and-answer session with TBC personnel. Pictures of all identified items were captured, and a summary of the site findings is provided within this report.

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## Large Volume Quantifiable Goal/Target – Field Verifiable

Large Volume Quantifiable Goal/Target - Field Verifiable initiative(s) or commitment(s) is not included in the assessment of TBC's Pittsburg facility since these activities are not present in the 2022 WMP list due to the facility's limited operational scope and nature. Therefore, this subject is not applicable to or covered in this report.

## Large Volume Quantifiable Goal/Target – Not Field Verifiable

Large Volume Quantifiable Goal/Target - Not Field Verifiable initiative(s) or commitment(s) is not included in the assessment of TBC's Pittsburg facility since these activities are not present in the 2023 WMP list due to the facility's limited operational scope and nature. Therefore, this subject is not applicable to or covered in this report.

## Small (less than 100 items) Volume Quantifiable Goal/Target

Small Volume Quantifiable Goal/Target initiative(s) or commitment(s) is not included in the assessment of TBC's Pittsburg facility since these activities are not present in the 2023 WMP list due to the facility's limited operational scope and nature. Therefore, this subject is not applicable to or covered in this report.

## Qualitative Goal/Target

Qualitative Goal/Target initiative(s) or commitment(s) is not included in the assessment of TBC's Pittsburg facility since these activities are not present in the 2023 WMP list due to the facility's limited operational scope and nature. Therefore, this subject is not applicable to or covered in this report.

## Review of Initiatives

**Table 1: Grid Design, Operations, and Maintenance Summary Table**

Initiative Name	Description	Validation	Finding
Grid design, operations and maintenance	Compressed gas cylinder housing	Field verified	Completed and met
Grid design, operations and maintenance	Spare Parts building fire suppression system	Field verified	Completed and met

TBC completed the two remaining Grid Design, Operations, and Maintenance initiatives that had been carried over from the 2022 WMP Planning cycle:

1. Fire suppression system for the Spare Parts building (October 2023)
2. Compressed gas cylinder storage (April 2023)

Both projects were delayed and carried over from the 2020-2022 WMP cycle because of vendor availability and supply chain issues.

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**Note** – The final acceptance test of the Novec 130 suppression system was conducted and the system passed. Given that system inspection and approval was still pending, structural enclosure integrity was in question during 2022 evaluation by the IE and is critical for total flooding systems and the agent must be contained at a sufficient design concentration long enough to be effective. The AHJ (Contra Costa County Fire) conducted an inspection and witnessed said test and the system was commissioned. [Michael Pratt, Raj Prakash]

TBC's lone operational asset is the Trans Bay System consisting of two 400MW HVDC converter stations connected by an approximate 53-mile submarine cable.

The only element within the TBC system evaluated for wildfire mitigation is the Pittsburg Converter Station, which is adjacent to, but not located in, a Tier 2 HFTD. The Pittsburg Converter Station is surrounded by a twelve (12) foot concrete perimeter wall and is hardscaped with asphalt, as well as rock/gravel hardscape. The transmission cables entering and exiting the station are all underground as part of the system's original design.

When evaluating TBC, the IE considered the inherent fire hardened infrastructure and the facility received upgrades that were begun and substantially completed during the 2020-2022 WMP cycle. TBC has improved employee situational awareness, significantly enhanced seismic resiliency of its transformers, and stationed on-site suppression resources for use by local responders. Further TBC trains their employees and works with local responders to support their WMP and Fire Prevention efforts.

Regarding Public Safety Power Shut Off, TBC has not issued a PSPS to date. 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. Since 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.

TBC currently has no other fire-related initiatives planned for the 2023-2025 WMP cycle. TBC will monitor the effectiveness of its currently emplaced processes, procedures, capabilities and assess changes or enhancements as needed.



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Figure 8 – Compressed gas storage



Figure 9 – Spare Parts Building



Figure 10 – Extinguishing Agent Cylinders



Figure 11 – Control Panel for suppression system



Figure 12 – Foam Suppression Trailer



## TBC Mitigation by TBC not Explicitly Detailed within the WMP

During the IE review of the 2022 WMP observations were made concerning Initiatives around Asset Management and Inspections, as well as Vegetation Management, and Emergency Preparedness. These observations did not reach the level of a finding but directly affect the

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strategic goal of TBC to prevent ignition and if ignition occurs to limit spread onto and off their property because of a fire event.

TBC demonstrated continued commitment to this strategy in 2023 with site visits and training by local responders to discuss the site and fire protection plans, while encouraging this commitment throughout the 2023-2025 WMP Planning Cycle.

BVNA acknowledges TBC commitment to their emergency planning and preparedness, ongoing inspection programs for fire protection systems, fire alarm systems, and supplemental foam fire suppression systems.

## Trends and Themes

Given the IE review, site visit and assessment BVNA has found that TBC has met the initiatives outlined in the 2023 WMP.

TBC wildfire mitigation strategies have not materially changed since the 2020 WMP. Planned and actual expenditures for WMP initiatives have trended downward since 2020. WMP expenditures is clearly shown with most of the spending having been completed in 2020 and 2021 with smaller amounts in 2022. There are no initiative activities proposed for 2024 or 2025 WMP planning cycles.

TBC utilizes the Failure Mode and Effects Analysis (FMEA) for identification of potential failure points and mitigate wildfire risks originated by their transmission infrastructure. TBC continues to direct their approach to fire prevention while working with local response agencies to provide them with the equipment and training they need to provide fire protection to their Pittsburg, CA site. This is done without a designated wildfire management program within their organization, which is functional because of the size, scope, design, and protection features of their operations and infrastructure.

## Verification of Funding

TBC completed the two remaining Grid Design, Operations, and Maintenance initiatives that had been carried over from the 2022 WMP Planning cycle:

1. Fire suppression system for the Spare Parts building (October 2023)
2. Compressed gas cylinder storage (April 2023)

BVNA reviewed Section 4.3 of the WMP specific to TBC proposed expenditures during the Planning Cycle. Most of the WMP planned and actual expenditures were completed in 2020 and 2021 with smaller amounts in 2022 and 2023.

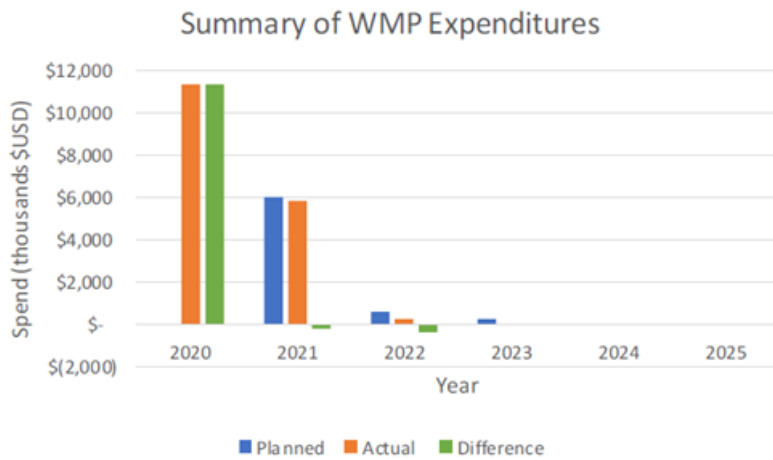
During the 2023 cycle planned WMP expenditures were \$280,000 with no actual spending identified in Table 4.3-1, page 32 WMP. (figure 14 below). The 2023 TBC Annual Compliance Report indicates the actual expenditure was \$201,900.

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Upon considering the 2023 planned initiative spend compared to the actual initiative spend, the actual 2023 spend is slightly lower than planned spend primarily because of project efficiencies. (TBC Annual Compliance Report 2023)

Moving forward TBCs overall objective for the WMP planning cycles is to focus on maintaining current processes and procedures with respect to fire safety, fire prevention and emergency preparedness to mitigate fire ignition potential within the Pittsburg facility. They indicated a desire to periodically evaluate new technologies, materials, and methods to further protect the Pittsburg Converter Station.

Figure 13 - TBC WMP Expenditures by Planning Cycle (in thousands \$ USD)



**Note** – TBC has no planned expenditures for the 2024 or 2025 WMP planning cycles with no proposed mitigation initiatives during this planning cycle. They plan to maintain currently in place processes and procedures around fire safety, mitigation, and preparedness. (WMP Page 30)

**Table 2: 2023 WMP Expenditures – Planned and Actual  
(Spend in Thousand USD)**

WMP Category	2023 Planned	2023 Actual	Difference	
Community Outreach & Engagement	0	0	0	
Emergency Preparedness	0	0	0	
Grid, Design, Operations & Maintenance	280	201.9 <sup>(1)</sup>	(78.1)	Met
Overview of Service Territory	0	0	0	
Risk Methodology & Assessment	0	0	0	
Situation Awareness & forecasting	0	0	0	
Vegetation Management & Inspection	0	0	0	
Wildfire Mitigation Strategy Development	0	0	0	
Public Safety Power Shutoff	0	0	0	
Total	280	201.9	(78.1)	

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## Verification of QA/QC Programs

As described earlier in the report TBC’s only outstanding initiatives for the 2023 WMP planning cycle was relocation of the compressed gas storage cage to outside location, as well as the final acceptance testing and commissioning of the clean agent suppression system for the Spare Parts building. The completed initiatives were field verified during the site visit.

**Table 3: QA/QC Verification Summary**

DestInitiative	Description	Finding	QA/QC Program	Reference (Section & Page)
Compressed gas cylinder housing	Relocate outside	Field verified	Visual inspection	8.1.2, page 66
Spare Parts building suppression system	Clean agent system final acceptance test and commissioning of system	Field verified	Site visit	8.1.2, page 66

## Conclusions

TBC is an independent transmission operator (ITO) that has transmission-only assets and does not have a distribution or customer service territory. The Trans Bay System is a 400MW HVDC consisting of two converter stations connected by a submarine cable.

1. The System’s western converter station is in San Francisco, a fully developed and urbanized area with minimal wildfire -threat risk.
2. The submarine cable is fully submerged beneath the Bay Waters and therefore has no fire-threat risk.
3. The eastern converter station is in Pittsburg, CA which is adjacent to an area designated as a Tier 2 HFTD.
4. The System transmits up to 400MW of power from the East Bay to into PG&E’s Potrero Substation in San Francisco, CA.
5. TBC interconnects with Pacific Gas and Electric (PG&E) substations in Pittsburg and San Francisco via underground alternating current (AC) transmission cables at each converter station.
6. All above-ground transmission infrastructure is fully contained within the walls of the systems converter stations.
7. All current-carrying conductors are entirely contained on site and within the footprint of the AC/DC Converter Station perimeter 12 ft. concrete wall.



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Upon completion of the onsite assessment, review of materials received via the data requests, and public documentation review, it is determined that TBC has completed activities outlined in their 2023 WMP.

TBC has no planned WMP expenditures or initiatives for the remaining 2024 and 2025 WMP planning cycle.

TBC has met the intent of reducing or eliminating the impact of the fire that would have a likelihood of extending from the TBC Facility and engaging off-site fuels. TBC is committed to fire prevention best practices that are focused on utilizing existing operational procedures, maintenance PM's and best practices to focus on general fire prevention and maintaining equipment integrity to preclude the potential for ignition events. This philosophy of fire prevention has been demonstrated to be successful due to the lack of historical fire events at the facility.

There are no initiative activities or project funding in 2024 and 2025.

**Table 4: IE Findings Summary**

WMP Category	Initiative Number	Initiative Name	Finding	Details
Grid Operations and Protocols	8.1.2-page 66	Compressed gas cylinder housing	Field verified	Outdoor enclosure for compressed gas storage. They were in a gas storage cage inside Spare Parts building, required new cage for relocation outside under covered storage at Receiving Warehouse
Grid Operations and Protocols	8.1.2-page 66	Spare Parts Building Fire Suppression System	Field verified	Fire protection within Spare Parts building. Plans completed and system installed. Final acceptance test completed October 2023.

# APPENDICES



BUREAU

VERITAS

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## Appendix A

### Appendix A: List of Documents Reviewed

Item	Documents	Document Date
1	2023 TBC-HS-103 Fire Prevention Plan Annex A Wildfire Mitigation Plan Rev 0	5/9/23
2	TBC Annual Report on Compliance 2023	March 2024
3	BVNA Data Request TBC DR001 WMP Report	4/12/24
4	BVNA Data Request TBC DR002 Initiative List and Goals	4/12/24
5	BVNA Data Request TBC DR003 QA/QC Programs	4/12/24

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## Appendix B

### Appendix B: Photo Log - All Photos Taken by BVNA

Item	Description	Date
1	230kV risers and circuit breakers	5/7/24
2	230kV risers and circuit breakers, 230/180 kV transformers in background	5/7/24
3	230/180 kV transformers	5/7/24
4	180 kV yard	5/7/24
5	Fire hydrant (typical) at 180 kV yard	5/7/24
6	Security camera (typical) west property line	5/7/24
7	180 kV yard with fire hydrants, and 230/180 kV transformers in background	5/7/24
8	Emergency generators and Spare Parts building	5/7/24
9	Compressed gas storage container at west end of Receiving Warehouse	5/7/24
10	Class B foam trailer at west end of Receiving Warehouse	5/7/24
11	Class B foam trailer – Purple K system with reel line and foam nozzle	5/7/24
12	Class B foam trailer – foam lines in bumper box	5/7/24
13	Spare Parts building	5/7/24
14	East entrance to Spare Parts building with Knox entry and NFPA 704	5/7/24
15	Suppression agent cylinders for Novec 130 system in Spare Parts building	5/7/24
16	Suppression system control panel with documents storage container	5/7/24
17	Control Center exterior only	5/7/24
18	Office and Administration building	5/7/24
19	Converter Hall	5/7/24
20	Converter Hall and Spare Parts buildings with weather station	5/7/24
21	Receiving Warehouse	5/7/24
22	Fire sprinkler PIV and FDC for Warehouse and Administration buildings (typical)	5/7/24
23	South side Receiving Warehouse and exterior security wall	5/7/24
24	Open space south end of property at public right of way	5/7/24
25	Southwest corner of front of property	5/7/24
26	Northwest corner of front of property (main entrance)	5/7/24



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## Appendix C: Photos Taken During Site Visit and Not Used in Report

These photos were taken and not utilized in the body of the main report; they are listed in the photo log and have been included for documentation.

Figure 14 - View of SE Entrance



Figure 15 – Receiving Warehouse



Figure 16 - PIV & FDC (typical) for Receiving Warehouse and Office



Figure 17 – Converter Hall, Spare Parts Building & Weather Station



Figure 18 - Converter Hall



Figure 19 – Office and Administration Building



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Figure 20 - Control Center



Figure 21 - Knox, Speaker Strobe, NFPA 704 Spare Parts Building



Figure 22 - Spare Parts, Converter Hall, and Control Center



Figure 23 - Foam Trailer, bumper pull lines, & Purple K system with reel line



Figure 24 - Foam trailer with foam nozzle



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Figure 25 – Emergency Generators Adjacent to Spare Parts Building



Figure 26 - 230/180 kV Transformers



Figure 27 - Fire Hydrant w Vehicle Impact Protection



Figure 28 - Fire Lane and 180 kV Yard





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Figure 29- 230/180 kV Transformer



Figure 30 - 230 kV Risers & Circuit Breakers



Figure 31 - Risers and Circuit Breakers with Transformers in Background






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## Appendix D

### Appendix D: Data Requests

										
<b>DATA REQUEST</b>							<b>Priority Definitions</b> 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.			
Data Request Number: TBC_DR001				Data Request Date: 04/12/24					Due Date: 4/17/24	
Name: Barbara Tomajic				Email: barbara.tomajic@bureauveritas.com						
WMP Category: WMP Report				Phone #: (916)514-4511						
Company: BVNA				Preferred Point of Contact: Email						
Program Target	Units	Sections	Target	Actual	Method	Data Request	Priority Level			
NA	NA	2023 Wilfire Mitigation Plan	NA	NA	Document Review	Please provide the official and approved 2023 WMP	High			

# INDEPENDENT EVALUATOR ANNUAL REPORT ON COMPLIANCE



<b>DATA REQUEST</b>							
<b>Data Request Number:</b> TBC_DR002		<b>Data Request Date:</b> 04/12/24 <b>Due Date:</b> 4/17/24				<b>Priority Definitions</b> 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.	
Name: Barbara Tomajic		Email: barbara.tomajic@bureauveritas.com					
WMP Category: Initiative List and Goals		Phone #: (916)514-4511					
Company: BVNA		Preferred Point of Contact: Email					
Program Target	Units	Sections	Target	Actual	Method	Data Request	Priority Level
NA	NA	2023 Wildfire Mitigation Plan	NA	NA	Document Review	Please provide the official and approved 2023 Initiative List in an excel format and the final Quarterly Data Report (QDR) in an excel spreadsheet.	High

# INDEPENDENT EVALUATOR ANNUAL REPORT ON COMPLIANCE



Program Target	Units	Sections	Target	Actual	Method	Data Request	Priority Level
NA	NA	2023 Wildfire Mitigation Plan	NA	NA	Document Review	Please provide a complete list of existing QA and QC programs with detailed descriptions for each program as referenced in the 2023 WMP.	Medium

DATA REQUEST	
<b>Data Request Number:</b> TBC_DR003	<b>Data Request Date:</b> 04/12/24 <b>Due Date:</b> 4/17/24
Name: Barbara Tomajic	Email: barbara.tomajic@bureauveritas.com
WMP Category: QA and QC Programs	Phone #: (916)514-4511
Company: BVNA	Preferred Point of Contact: Email
<b>Priority Definitions</b> 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.	