FINAL INDEPENDENT EVALUATOR 2024 ANNUAL REPORT ON COMPLIANCE

JUNE 30, 2024

HORIZONWEST TRANSMISSION

C2 GROUP

BUREAU VERITAS

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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.

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1. EXECUTIVE SUMMARY

Background

Derived from the devastating wildfires of 2016 and 2017, the California Public Utilities Commission (CPUC) opened Rulemaking 18-10-0071 to provide guidance on the Investor-Owned Utilities' (IOU) Wildfire Mitigation Plans (WMPs). Moving forward, the California Legislature passed several bills increasing the oversight for investor-owned utilities (IOUs) as it related to mitigating wildfires associated with electrical corporations' 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 followed by annual updates occurring for years 2 (2021) and 3 (2022) with a new 3-year cycle for 2023-2025 years.

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) 2023 Wildfire Mitigation Plan (WMP) and provide a report on July 1 of each year. BVNA has evaluated HWT's compliance with its 2023 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 2023 WMP issued on May 2023, known as the "Wildfire Mitigation Plan 2023", 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 2024, HWT is a transmission-only utility with no end-use customers. HWT is the Suncrest Dynamic Reactive Power Support Facility (Suncrest Facility) owner and operator, located near the town of Alpine in San Diego County, California. The Suncrest Facility is comprised of a static VAR compensator (SVC) facility and an approximately one mile, 230 kV transmission line that connects the SVC facility to the Suncrest Substation owned by San Diego Gas and Electric Company (SDG&E). The approximately one mile 230 kV connecting transmission

line was installed underground in accordance with the Suncrest Facility's planned design. The Suncrest SVC Facility is in an area designated as Tier 3 Extreme Fire-Threat District (HFTD) in San Diego County.

Key Findings

As detailed in Section 3, the Independent Evaluator's (IE) compliance review has determined that HWT is substantially compliant with its 2023 WMP. This conclusion is based on the 2023 WMP, supplemental documents (see Appendix B), and confirmation of verifiable field goals. The key findings are as follows:

- HWT has substantially completed the activities outlined in its 2023 WMP.
- According to the HWT ARC for 2023, dated March 2024, WMP activities were generally underspent. HWT provided the IE team with details on individual activity underfunding and funding discrepancies, as noted in Section 3.2. Two initiatives related to "payroll expenses and contractor invoices" were lower than projected, while one initiative's discrepancy was attributed to "rounding of numbers during preparation of projections."
- The IE team reviewed Monthly Inspection Reports provided through Data Request 004 and assessed the Quality Assurance and Quality Control (QA/QC) process developed and implemented by HWT. Based on this review, HWT was found to be in conformance with its 2023 WMP.

2. INTRODUCTION

Bureau Veritas North America (BVNA) has conducted a comprehensive review of all documents supporting the implementation of Horizon West Transmission's (HWT) 2023 Wildfire Mitigation Plan (WMP) strategic initiatives. This Independent Evaluator (IE) report presents the findings and technical review of HWT's WMP.

HWT is a transmission-only utility that began operations on February 29, 2020. Its first facility, the Suncrest Static VAR Compensator (SVC), is situated on privately-owned lands in the south-central portion of San Diego County, California, approximately [redacted] miles [redacted] of Descanso and [redacted] miles [redacted] of Alpine. The facility comprises the SVC and a 230 kV underground transmission line that connects to the San Diego Gas & Electric (SDG&E) owned Suncrest Substation. [redacted] The project site is located within the northwest quarter of [redacted], on the U.S. Geographical Survey (USGS) [redacted], California quadrangle map.

HWT's facility includes an access road, an on-site fire water storage tank, a perimeter concrete wall, and related infrastructure for the SVC facility. The site is classified as a Tier 3 High Fire-Threat District (HFTD) in San Diego County. Fire hazard designations are determined by factors such as topography, vegetation, and weather, with more hazardous sites characterized by steep terrain, unmaintained fuels/vegetation, and urban-wildland interface (WUI) locations.

The surrounding area of HWT's facility consists of semi-rural residential developed lands and open space, both in private and federal land holdings. The facility is situated on privately-owned lands within the administrative boundary of the United States Forest Service-Cleveland National Forest. SDG&E's privately-owned lands, including the Suncrest Substation, are located within one mile of the facility's west side, while the Cleveland National Forest lands lie to the north. Individual and private ownerships are found to the east and south of the project site.

HWT's fire prevention performance metrics aim to reduce the potential for on-site ignitions that may spread to off-site vegetation, a philosophy that has proven successful to date. The 2023 WMP outlines established performance metrics that demonstrate an approach to preventing ignition events by identifying, documenting, tracking, and monitoring high-risk ignition sources that may result in flames, sparks, arcs, uncontrolled fires, loss of molten/heated material, or similar ignition vulnerabilities. As a transmission-only utility without distribution customers, HWT is not subject to the items outlined in PUC section §8386 and the WMP Guidelines relevant to customer communication, and no reference to Public Safety Power Shutoff (PSPS) is made.

This report includes the approach and methodology used to evaluate the Plan'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 drew upon their expertise in critical elements as the IE to determine the comprehensiveness of HWT's Wildfire Mitigation Plan. While not all strategies were necessary to confirm HWT's fulfillment of their WMP due to the facility's size, location, and system or operational characteristics, BVNA's understanding of collected utility strategies demonstrated throughout the state is summarized below:

1. **Inspection and maintenance of distribution transmission and substation assets:** This includes 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:** This encompasses 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:** This includes pole replacement, non-expulsion equipment, advanced fuses, less flammable transformer oil, covered wire and wire wrap, and undergrounding where cost-beneficial.
4. **Operational practices:** This includes 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 conductions, high voltage, etc.), tree and vegetation density, available dry fuel, and other factors that make certain locations vulnerable to wildfire risk.
5. **Situational awareness:** This involves 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:** These 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:** This includes 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:** These communications occur before, during, and after emergencies and involve engaging with key stakeholders, including 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

To verify compliance, the IE employed a comprehensive approach that included reviewing and assessing multiple WMP activities through data requests, examining publicly available documents, and conducting an on-site facility assessment to document and validate the items outlined in Horizon West Transmission's 2023 WMP.

At the outset of the evaluation, the IE initiated the assessment by thoroughly reviewing HWT's 2023 WMP and all publicly available documents listed in Appendix B to identify HWT's stated 2023 WMP goals. For WMP activities described in the 2023 WMP but not provided within the publicly available records, the IE submitted data requests to verify these activities (see Appendix C for a list of Data Requests Submitted). In addition to the document analysis and data requests, the IE conducted a site visit to HWT's sole facility, known as the Suncrest Facility, to collect images and evaluate compliance with the 2023 WMP activities or initiatives identified during the initial review (see Appendix E – Field Visit Report).

The IE's analysis and key findings for each respective section are detailed further within Section 3, "Independent Evaluator Review of Compliance," of this report. This section provides an in-depth examination of HWT's compliance with the 2023 WMP, based on the information gathered through the document review, data requests, and on-site facility assessment.

3.1 WMP Activity Completion

WMP activities outlined in HWT's 2023 WMP with specific quantifiable or qualitative performance goals/targets included the following items:

Table 1: 2023 WMP Initiatives

Large Volume (≥ 100 units), Quantifiable Goal/Target – Field Verifiable	
2023 WMP Initiative	
N/A	
Large Volume (≥ 100 units), Quantifiable Goal/Target – Not Field Verifiable	
2023 WMP Initiative	
N/A	
Small (less than 100 items) Volume Quantifiable Goal/Target	
2023 WMP Initiative	
N/A	
Qualitative Goal/Target WMP Activities	
2023 WMP Initiative	
8.1.3.1	*Grid Design, Operations, and Maintenance:* Asset Inspection - Detailed inspections of transmission electric lines and equipment
8.2.2.1	*Vegetation Management and Inspections:* Vegetation Inspections - Detailed inspections of vegetation around transmission electric lines and equipment

The following sections of this report assess the performance of the above targets and activities. Section 4, Conclusion, summarizes the completion of initiatives and adherence to applicable protocols and procedures.

3.1.1 Sampling Methodology and Discussion

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 and detailed within Appendix E along with 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 2023 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 2023 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 2023 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 2023 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

These activities are not present in the 2023 WMP activities. Therefore, this subject is not applicable to or covered in this report.

3.1.4.2 Trends and Themes

These activities are not present in the 2023 WMP activities. Therefore, this subject is not applicable to or covered in this report.

3.1.5 Qualitative Goal/Target

3.1.5.1 Review of Initiatives

The IE identified WMP activities listed in HWT's 2023 Wildfire Mitigation Plan classified as Qualitative Goal/Target that were conducted in 2023. These 2023 WMP activities identified with the Qualitative Goal/Target list 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 2023.
- Activity In Progress – Qualitative work on the initiative began in 2023 and continues into 2024.
- Activity Ongoing – Qualitative work on the initiative is incorporated in operations to be repeated annually.

Table 2: Grid Design, Operations, and Maintenance Summary Table

Initiative Name	Initiative Validation	Finding
8.1.3.1 Asset Inspections	▪ Monthly Detailed Asset inspection reports provided by HWT in Response attachment files to Data Request 004 in documents provided in "HWT Response to BVNA_C2 Group DR-004."	Activity Ongoing

Table 3: Vegetation Management and Inspection Summary Table

Initiative Name	Initiative Validation	Finding
8.2.2.1 Vegetation Inspections	▪ Monthly Detailed Vegetation inspection reports provided by HWT in Response attachment files to Data Request 004 in documents provided in "HWT Response to BVNA_C2 Group DR-004."	Activity Ongoing

3.1.5.2 Trends and Themes

As demonstrated through HWT's data request responses, HWT consistently conducts asset and vegetation inspections 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 three (3) WMP initiative categories that have shown funding to be less than 100 percent. The following are the 2023 WMP Expenditures by Category as reported in the 2023 WMP issued by HWT on May 6, 2023 and HWT ARC report from March 2024:

Table 4: Summary of WMP Expenditures by Category
(Spend in thousand $)

WMP Category	2023 Planned[2]	2023 Actual[2]	2023 Variance
Community Outreach and Engagement	$0	$0	$0
Emergency Preparedness	$75	$71	$(4)
Grid Design, Operations, and Maintenance	148	127	$(21)
Overview of the Service Territory	$0	$0	$0
Risk Methodology and Assessment	$0	$0	$0
Situational Awareness and Forecasting	$0	$3	$3
Vegetation Management and Inspection	$17	$9	$(8)
Wildfire Mitigation Strategy	$0	$0	$0
Total	**$240[1]**	**$210**	**$(30)**

[1] 2023 Total Planned data as shown from Table 4-1. Summary of WMP Expenditures (Spend in thousands $), page 29, in the 2023 WMP.

[2] 2023 Planned and Actual data as shown in HWT ARC Report Dated March 2024.

Table 5: 2023 WMP Funding Verification Summary (Thousands of Dollars)

Initiative Category	2023 Initiative Number/ ID	Initiative Name	2023 WMP Proposed Spend Amt.	Actual Spend Amt.	Detail on Funding Discrepancy	Satisfied Risk Reduction Goal
Emergency Preparedness	8.4.2	Emergency preparedness plan	$75	$71	Per Data Request 004 Response, HWT noted "The underspend reflected in the Emergency Preparedness category is attributed to rounding of numbers during the preparation of projections."	Yes
Grid Design, Operations, and Maintenance	8.1.2 8.1.3.1	Grid Design and System Hardening, Asset Inspections	$148	$127	Per Data Request 004 Response, HWT noted "The underspend shown in this category is based on actual payroll expenses being slightly lower than planned."	Yes
Vegetation Management and Inspection	8.2.2	Vegetation Management Inspections	$17	$9	Per Data Request 004 Response, HWT noted "The underspend in this category is the result of contractor invoices being lower than originally projected."	Yes

*See Appendix D - 2023 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 April 2024.

3.3 Verification of QA/QC Programs

As stated in the 2023 WMP within Sections 8.1.6 Quality Assurance and Quality Control System under Grid Design, Operations, and Maintenance and 8.2.5 Quality Assurance and Quality Control under Vegetation Management and Inspections, “due to the limited scale and scope of HWT’s operation, field operations personnel review results of monthly equipment inspections. Any identified issues which need further mitigation will be discussed and addressed with the appropriate subject matter expert (SME) or supervisor.”

To verify the QA/QC programs, the IE reviewed the DR_004 data request responses relating to the electrical equipment and vegetation management monthly inspection reports, and per HWT's DR_004 written responses that describe the processes, documentation, and monitoring of identified issues noted by Field Operations employees during the monthly inspection reporting that is done through HWT's Asset Management Program (AMP) with automated email notifications to Field Operations Employees and SMEs to ensure inspections and corrective actions are completed.

4. CONCLUSION

Per the IE Findings in Table 6, HWT has completed and has ongoing operations for the WMP programs outlined in the HWT-approved 2023 WMP. Activities and initiatives and their findings are detailed below.

Table 6: IE Findings Summary

SOW Category	2023 Initiative Number	Initiative Name	Finding	Detail on finding
WMP Activity Completion	8.1.3.1	Asset Inspections	Activity Completed	Compliant with 2023 WMP
WMP Activity Completion	8.2.2.1	Vegetation Inspections	Activity Completed	Compliant with 2023 WMP
Verification of QA/QC Programs	N/A	QA/QC of electrical equipment inspections and vegetation management inspections	Activity Completed	Compliant with 2023 WMP
Verification of Funding	8.4.2	Emergency preparedness plan	Underspend: Variance Amount is $4K	HWT did not spend $4K out of the total amount of $75K initially planned for this initiative category. See Appendix D - 2023 WMP Funding Verification Summary (Spend in thousand $) for more details.
Verification of Funding	8.1.2 8.1.3.1	Grid Design and System Hardening, Asset Inspections	Underspend: Variance Amount is $21K	HWT did not spend $21K out of the total amount of $148K initially planned for this initiative category. See Appendix D - 2023 WMP Funding Verification Summary (Spend in thousand $) for more details.
Verification of Funding	8.2.2	Vegetation Management Inspections	Underspend: Variance	HWT did not spend $8K out of the total

			Amount is $8K	amount of $17K initially planned for this initiative category. See Appendix D - 2023 WMP Funding Verification Summary (Spend in thousand $) for more details.

APPENDICES

APPENDICES

Appendix A – List of 2023 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	N/A	N/A	N/A
WMP Activity Completion	4. Qualitative Goal	Grid Design, Operations, and Maintenance	8.1.3.1	Asset Inspection - Detailed inspections of transmission electric lines and equipment
WMP Activity Completion	4. Qualitative Goal	Vegetation Management and Inspections	8.2.2.1	Vegetation Inspections - Detailed inspections of vegetation around transmission electric lines and equipment
Verification of QA/QC Programs	QA/QC Programs	QA/QC of WMP Activities	N/A	Field Personnel/SME/Supervisor Review of Monthly Inspections

Appendix B – List of Supplemental Documents Reviewed

Item No.	Documents Reviewed - Public	Document Date
1	OEIS Decision on Horizon West Transmission's 2023-2025 Wildfire Mitigation Plan	Jan 2023
2	HWT Application for Confidentiality Designation for Attachment A through E of Horizon West Transmission, LLC's 2022 Wildfire Mitigation Plan	May 2023
3	HWT Horizon West Transmission, LLC (U222-E) 2023-2025 Wildfire Mitigation Plan Submission	May 2023
4	OEIS Data Request OEIS-HWT-23-001	Sept 2023
5	HWT's Response to Data Request OEIS-HWT-23-001	Sept 2023
6	OEIS Data Request OEIS-HWT-23-002	Sept 2023
7	HWT's Response to Data Request OEIS-HWT-23-002	Sept 2023
8	OEIS Data Request OEIS-HWT-23-003	Sept 2023
9	HWT's Response to Data Request OEIS-HWT-23-003	Sept 2023
10	HWT ARC on Compliance for 2023	March 2024
11	HWT 2023 Q4 Tables 1-15 R1	April 2024

Appendix C – Data Requests

DATA REQUEST

Data Request Number: HWT_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

Priority Definitions

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
NA	NA	2023 Wildfire Mitigation Plan	NA	NA	Document Review	Please provide the official and approved 2023 WMP	High

DATA REQUEST

Data Request Number: HWT_DR002

Data Request Date: 04/12/24
Due Date: 4/17/24

Name: Barbara Tomajic
WMP Category: Initiative List and Goals

Email: barbara.tomajic@bureauveritas.com

Phone #: (916)514-4511

Company: BVNA

Preferred Point of Contact: Email

Priority Definitions

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
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

DATA REQUEST

Data Request Number: HWT_DR003

Name: Barbara Tomajic
WMP Category: QA and QC Programs

Company: BVNA

Data Request Date: 04/12/24
Due Date: 4/17/24
Email: barbara.tomajic@bureauveritas.com

Phone #: (916)514-4511

Preferred Point of Contact: Email

Priority Definitions

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
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

Data Request Number: HWT_DR004

Data Request Date: 04/22/24
Due Date: 4/25/24

Name: Tatiana Friesen

Email: tatianaf@c2group.us

WMP Category: Qualitative and Funding Verification

Phone #: 858-231-1961

Company: BVNA

Preferred Point of Contact: Email

Priority Definitions

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
Grid Design, Operations, and Maintenance	N/A	8.1.3.1 Asset Inspection	N/A	N/A	Document	Please provide all 2023 monthly asset inspection reports.	Medium
Grid Design, Operations, and Maintenance	N/A	8.1.6 Quality Assurance and Quality Control System	N/A	N/A	Document	Please provide evidence of monthly Field Operations Personnel, SME or Supervisor review of monthly asset inspections reports.	Medium
Vegetation Management and	N/A	8.2.2.1 Vegetation Inspection	N/A	N/A	Document	Please provide all 2023 monthly vegetation inspection reports.	Medium

Inspections							
Vegetation Management and Inspections	N/A	8.2.5 Quality Assurance and Quality Control	N/A	N/A	Document	Please provide evidence of monthly Field Operations Personnel, SME or Supervisor review of monthly vegetation inspection reports.	Medium
All WMP Sections	N/A	Funding Verification	N/A	N/A	Document	1. From Horizon West - Response to BVNA_C2 Group DR-002, HWT-2023_Q4_Tabels1-15-R1, please confirm if the values listed under the 2023 Projected CAPEX and OPEX costs within Table 11 are actuals rather than projected values. 2. Based on planned and actuals reported within HWT's 2023 ARC Report dated March 2024 in Table 1, three categories were identified with underspend that include 1. Emergency Preparedness, 2. Grid Design, Operations, and Maintenance, and 3. Vegetation Management and Inspection. Please provide justification for the the underspend for these three WMP categories indicated.	Medium

Appendix D – 2023 WMP Funding Verification Summary (Spend in thousand $)

From ARC Report Dated March 2024					From WMP Quarterly Report - Table 11, Dated April 2024							IE Funding Verification Summary	
#	WMP Category	2023 Total Planned[1]	2023 Total Actual[1]	Difference	WMP Initiative #	Initiative Activity	Actual CAPEX[2]	Actual OPEX[2]	Total Actual	Difference from 2023 WMP Total Planned	HWT Comments	Funding Discrepancy Amount	Detail on Funding Discrepancy
1	**Community Outreach and Engagement**	N/A	N/A	N/A			N/A	N/A	N/A	N/A	N/A	N/A	N/A
2	**Emergency Preparedness**	$ 75	$ 71	$ (4)	8.4.2	Emergency preparedness plan	$ -	$ 71	$ 71	$ (4)	HWT conducts detailed After Action Reviews after wildfire events in the proximity of HWT's Suncrest Facility 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. This contract predates the implementation of Tracking ID and therefore is not assigned a Tracking Identification number.	$4 Reported as Underspend.	Per Data Request 004 Response, HWT noted "The underspend reflected in the Emergency Preparedness category is attributed to rounding of numbers during the preparation of projections."
3	Grid Design, Operations, and Maintenance				8.1.2	Grid Design and System Hardening	$ 21	$ -	$ 21		HWT is implementing a number of wildfire hardening measures to reduce wildfire risk at its Suncrest Facility 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 Suncrest facility, 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. These projects were combined into one reporting line but include Tracking IDs No. 4 -seismic pads, No. 5 - blast walls and No. 6 – flame-suppressing containment. Other work included in this reporting line predates the implementation of Tracking ID and therefore was not assigned Tracking Identification numbers.		
3	Grid Design, Operations, and Maintenance				8.1.3.1	Asset Inspections	$ -	$ 106	$ 106		HWT conducts monthly detailed inspections of transmission line and equipment, including vegetation inspection at its Suncrest facility in compliance with its CPUC-approved 202 WMP		

3	**Grid Design, Operations, and Maintenance (Summary)**	$ 148	$ 127	$ (21)			$ 21	$ 106	$ 127	$ (21)		$21 Reported as Underspend	Per Data Request 004 Response, HWT noted "The underspend shown in this category is based on actual payroll expenses being slightly lower than planned."
4	**Overview of the Service Territory**	N/A	N/A	N/A			N/A	N/A	N/A	N/A	N/A	N/A	N/A
5	**Risk Methodology and Assessment**	N/A	N/A	N/A			N/A	N/A	N/A	N/A	N/A	N/A	N/A
6	**Situational Awareness and Forecasting**	$ -	$ 3	$ 3	8.3.6	Fire Potential Index	$ 3	$ -	$ 3	$ 3	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.). Work predated the implementation of Tracking ID and therefore is not assigned a Tracking Identification number.	N/A	N/A
7	**Vegetation Management and Inspection**	$ 17	$ 9	$ (8)	8.2.2	Vegetation Management Inspections	$ -	$ 9	$ 9	$ (8)	HWT contracts with a service provider to regularly manage the vegetation around the immediate perimeter of its substation and weather station, including weed abatement	$8 Reported as Underspend	Per Data Request 004 Response, HWT noted "The underspend in this category is the result of contractor invoices being lower than originally projected."
8	**Wildfire Mitigation Strategy**	N/A	N/A	N/A			N/A	N/A	N/A	N/A	N/A	N/A	N/A
	Total	**$ 240**	**$ 210**	**$ (30)**									

[1]2023 Planned and Actual data as shown in HWT ARC Report Dated March 2024.

[2]Per Data Response 004, HWT Confirmed the 2023 CAPEX/OPEX costs within Table 11 are actuals.

Appendix E – Field Visit Report

IE Field Visit

On Friday, May 3rd, 2024, the IE team conducted a field visit from 10 a.m. to 11:30 a.m. The field site visit attendees included:

- Alexandre Veilleux, NextEra Energy
- Eric Pavlowski, NextEra Energy
- Brandon Del Priore, C2 Group
- Benton McCanne, C2 Group

After completing the security check-in process, the IE field team met with NextEra Energy's representative, Alexandre Veilleux, at the HWT Suncrest Facility. The team accessed the facility through the Northwest main entrance and parked their vehicles along the Southwest-facing perimeter wall. Upon arrival, they participated in a mandatory general safety and fire briefing.

Mr. Veilleux and the IE team began the field audit by inspecting the interior of the fenced facility, paying close attention to the components identified in Figure 1. They then proceeded to assess the exterior perimeter of the site, ensuring that all WMP compliance measures were properly implemented. Finally, the team moved to the west side of the facility, where the 230 kV transmission line connects to SDG&E's Suncrest Substation. The audit concluded with an inspection of the remote monitoring station and solar panels located northeast of the 230 kV entrance pole.

The field visit provided valuable insights into the HWT Suncrest Facility's layout, infrastructure, and safety measures, enabling the IE team to gather essential information and verify compliance with the WMP.

Figure 1 below provides an overview of the HWT Suncrest Facility:

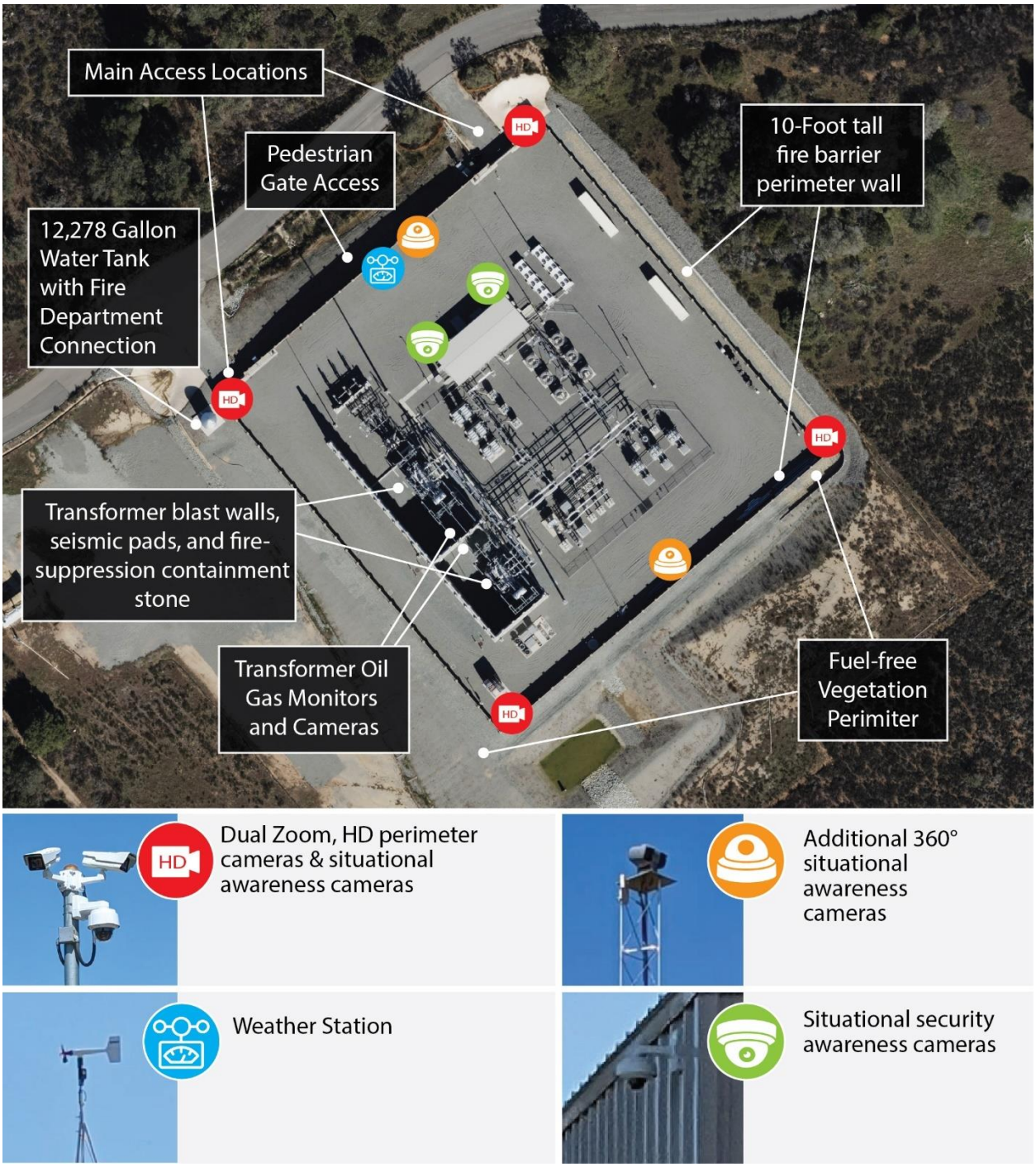

Figure 1: HWT Suncrest Facility

Facility Audit, Inside Fence

Mr. Veilleux began the tour by leading the IE field team inside the fenced Suncrest Facility, where he described the ongoing wildfire mitigation measures being implemented by the HWT team. During the walk-through, the IE field team inquired about HWT's Vegetation Management Inspections, Weed Abatement, Facilities Monitoring, and Asset Inspection

methods and schedules. HWT employs a comprehensive approach to monitoring the facility, which includes:

- An optical and thermal camera system
- A cable monitoring system
- Detailed monthly facility inspections
- Contracted firefighting services
- Weather condition monitoring
- Facility vegetation management work

These measures are consistent with those described in HWT's 2023 WMP and reviewed herein.

According to Mr. Veilleux, the scheduled Weed Abatement in and around the substation defensible space was conducted in April 2023, with the next abatement planned for the end of May 2024. A review of the monthly vegetation inspection records corroborates this statement, confirming HWT's adherence to their established wildfire mitigation plan. The IE field team's inquiries and observations during the inside-fence audit provided valuable insights into HWT's ongoing efforts to maintain a safe and compliant facility, demonstrating their commitment to reducing wildfire risks through proactive vegetation management and comprehensive monitoring systems.

Note: A couple small patches of small weeds were observed at the northwest perimeter wall that are scheduled for removal during their scheduled May 2024 Weed Abatement per Mr. Veilleux.

05/12/2023 Imagery - Post Weed Abatement[1] | 05/03/2024 Imagery - Pre-Weed Abatement[2]

Figure 2: Post- and Pre-Weed Abatement Imagery

[1] 2023 Imagery from IE's Field Visit of the HWT Facility on 05/12/2023.
[2] Small patch of weeds visible at interior of NW facing perimeter wall scheduled for removal at the end of May 2024.

Facility Audit, Outside Fence

After completing the inside-fence audit, the IE team and Mr. Veilleux proceeded to examine the exterior of the substation. They were joined by Eric Pavlowski, a colleague of Mr. Veilleux, who provided additional insights into the facility's wildfire mitigation measures.

During the exterior inspection, the IE team and HWT representatives engaged in a discussion about the ongoing Vegetation Management practices implemented outside the perimeter walls. They also reviewed the firebreak maintenance procedures and the 12,000+ gallon on-site water tank, which serves as a crucial resource for fire control in the event of an emergency.

The IE team observed a well-maintained, 30-foot-wide crushed rock fire break running adjacent to the perimeter wall. This firebreak is subject to regular inspections and maintenance to ensure its effectiveness in minimizing the risk of utility-caused ignitions spreading beyond the confines of the Suncrest Facility.

Note: Even after significant rain events from 2023-2024, the facility shows no signs of erosion or flooding, and the exterior catch basin/retention pond is visibly free from damage with no oily sheen present.

Figure 3: HWT Facility Perimeter Fire Rock Break

View of retention pond and firebreak facing NE

Figure 4: HWT Retention Pond and Fire Rock Break

230 kV Transmission Line (Underground) Entrance Pole & Observation System (camera, solar panel, & control box)

The IE team and HWT representatives then proceeded to the point of interconnection between HWT's 230 kV underground transmission line and SDG&E's Suncrest Substation. At this location, the HWT-owned infrastructure includes a 230 kV cable pole, a mast-mounted camera, a ground-mounted solar panel, and a control box.

During the audit, Mr. Veilleux informed the IE team that these assets are subject to regular monthly inspections and ongoing vegetation management. HWT contracts with a third-party service provider to ensure that the area surrounding the 230 kV entrance pole and observation system remains clear of vegetation, reducing the risk of ignition and potential damage to the critical infrastructure.

Note: At the time of the field audit, both the 230 kV entrance pole and the observation system were due for their scheduled Weed Abatement & Clearance activities.

Road to Solar Panel & Camera – Entrance pole top visible to the Left

Solar Panel, Camera, and Control box

Entrance Pole

Figure 5: Transmission Line Underground Entrance Pole & Observation System