



October 9, 2024

To: Stakeholders for the Trans Bay Cable, LLC, 2025 Wildfire Mitigation Plan Update

Enclosed is the Draft Decision of the Office of Energy Infrastructure Safety (Energy Safety), presenting its evaluation of the Trans Bay Cable, LLC, 2025 Wildfire Mitigation Plan Update.

This Draft Decision is published for public review and comment. Opening comments must be submitted no later than October 29, 2024. Reply comments must be submitted no later than November 8, 2024.¹

Comments must be submitted to Energy Safety's e-filing system in the 2023-2025 Wildfire Mitigation Plans docket (2023-2025-WMPs).²

Sincerely,

Tony Marino
Acting Deputy Director | Electrical Infrastructure Directorate
Office of Energy Infrastructure Safety

¹ Dates falling on a Saturday or holiday as defined in Government Code Section 6700 have been adjusted to the next business day in accordance with Government Code Section 6707.

² Submit comments via the [2023-2025-WMPs docket](https://efiling.energysafety.ca.gov/EFiling/DocketInformation.aspx?docketnumber=2023-2025-WMPs) on Energy Safety's e-filing system (<https://efiling.energysafety.ca.gov/EFiling/DocketInformation.aspx?docketnumber=2023-2025-WMPs>, accessed July 31, 2024).



OFFICE OF ENERGY INFRASTRUCTURE SAFETY
DRAFT DECISION
TRANS BAY CABLE, LLC
2025 WILDFIRE MITIGATION PLAN UPDATE

October 2024

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1. Executive Summary

The Office of Energy Infrastructure Safety (Energy Safety) works to ensure electrical corporations take effective actions to reduce utility-related wildfire risk. This Decision approves Trans Bay Cable, LLC's (TBC's) 2025 Wildfire Mitigation Plan (WMP) Update, submitted on July 8, 2024.

TBC provided a total of two reportable updates in its 2025 WMP Update. These include reporting progress on two areas for continued improvement.

The above-listed updates encompass two initiative categories. These include asset inspections and community outreach and engagement.

Energy Safety evaluated TBC's 2025 WMP Update and finds several strengths. For example, TBC demonstrated that it has a documented process for quality control for its asset inspections and has conducted an analysis of the process to demonstrate the effectiveness. In doing so, TBC adequately responded to all areas for continued improvement required in its 2025 WMP Update.

TBC also has one area of its WMP that can be further developed and improved for which it is required to demonstrate progress in its 2026-2028 Base WMP submittal. In the community outreach and engagement section of its 2026-2028 Base WMP, TBC is required to provide documentation of its best practice sharing.

2. Introduction and Background

Trans Bay Cable, LLC, (TBC) submitted its 2023-2025 Wildfire Mitigation Plan (2023-2025 Base WMP) in 2023.¹ Energy Safety approved TBC's 2023-2025 Base WMP on January 30, 2024. On July 8, 2024, TBC submitted its 2025 Wildfire Mitigation Plan Update (2025 WMP Update) to its 2023-2025 Base WMP in accordance with Energy Safety's 2025 Wildfire Mitigation Plan Update Guidelines (2025 WMP Update Guidelines)² and Energy Safety's 2023-2025 Wildfire Mitigation Plan Process and Evaluation Guidelines (WMP Process Guidelines).³

Pursuant to Public Utilities Code section 8386.3(a), this Decision approves TBC's 2025 WMP Update to its 2023-2025 Base WMP.

2.1 Consultation with California Department of Forestry and Fire Protection

The Office of the State Fire Marshal is part of the California Department of Forestry and Fire Protection (CAL FIRE). Public Utilities Code section 8386.3(a) requires Energy Safety to consult with the Office of the State Fire Marshal in reviewing electrical corporations' WMPs and WMP Updates. The Office of the State Fire Marshal provided consultation and input into Energy Safety's evaluation, but this Decision is an action of Energy Safety and not the Office of the State Fire Marshal or CAL FIRE.

2.2 Stakeholder Comments

Energy Safety invited stakeholders and members of the public to provide comments on the electrical corporations' 2025 WMP Updates and Revision Notices. Opening comments on TBC's 2025 WMP Update were due on August 12, 2024, and reply comments were due on August 22, 2024.

See Appendix D for lists of stakeholders and members of the public who submitted comments.

¹ In accordance with [Energy Safety's 2023-2025 Wildfire Mitigation Plan Technical Guidelines \(December 6, 2022\)](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true) (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true, accessed April 9, 2024).

² [Energy Safety's 2025 Wildfire Mitigation Plan Update Guidelines \(adopted Jan. 2024, published Feb. 2024\) \(hereafter 2025 WMP Update Guidelines\)](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56254&shareable=true) (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56254&shareable=true, accessed May 6, 2024).

³ [Energy Safety's 2023-2025 Wildfire Mitigation Plan Process and Evaluation Guidelines \(Revised\) \(adopted Jan. 2024, published Feb. 2024\) \(hereafter Revised WMP Process Guidelines\)](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56255&shareable=true) (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56255&shareable=true, accessed May 6, 2024).

3. Energy Safety 2025 WMP Update Evaluation Process

Energy Safety issued the following guidelines for electrical corporations' 2025 WMP Updates:

- **2025 Wildfire Mitigation Plan Update Guidelines (January 2024)** (hereafter 2025 WMP Update Guidelines), which sets forth reportable updates and general instructions for each electrical corporation's 2025 WMP Update.
- **2023-2025 Wildfire Mitigation Plan Process and Evaluation Guidelines (Revised January 2024)** (hereafter WMP Process Guidelines), which outlines the process for Energy Safety's evaluation of WMPs, details the public participation process, and establishes submission requirements for the electrical corporations.
- **2023-2025 Electrical Corporation Wildfire Mitigation Maturity Model (Revised January 2024)** and **2023-2025 Electrical Corporation Wildfire Mitigation Maturity Survey (Revised February 2024)** (hereafter Maturity Model and Maturity Survey), which together provide a quantitative method for assessing electrical corporation wildfire risk mitigation capabilities and examining how electrical corporations continue to improve in key areas of their WMPs.^{4, 5}

3.1 Reportable Updates

Energy Safety's 2025 WMP Update Guidelines delineate the following five categories of updates that the electrical corporations are required to report:⁶

1. Updates to risk models
2. Updates to approved targets, objectives, and projected expenditures⁷
3. Quarterly inspection targets for 2025 for vegetation management and asset inspections

⁴ [Energy Safety's 2023-2025 Electrical Corporation Wildfire Mitigation Maturity Model \(revised and adopted Jan. 2024, published Feb. 2024\) \(hereafter Maturity Model\)](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56256&shareable=true)

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56256&shareable=true>, accessed May 6, 2024).

⁵ [Energy Safety's 2023-2025 Electrical Corporation Wildfire Mitigation Maturity Survey \(adopted Jan. 2024, revised and published Feb. 2024\) \(hereafter Maturity Survey\)](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56306&shareable=true)

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56306&shareable=true>, accessed May 6, 2024).

⁶ [2025 WMP Update Guidelines](#), "Reportable Updates," p. 3

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56254&shareable=true>, accessed May 6, 2024).

⁷ Energy Safety's WMP evaluation and decision on a WMP is not an approval of, or agreement with, costs listed in the WMP.

4. New or discontinued programs
5. Progress on areas for continued improvement

The 2025 WMP Update Guidelines direct electrical corporations that they may not include any updates in their 2025 WMP Update that do not fall under one of these categories.⁸

The 2025 WMP Update Guidelines further direct that if an electrical corporation does not have any updates that fall within any of the above categories, it must affirm that it has no reportable updates for 2025 and that the information provided in its 2023-2025 Base WMP is current and accurate.⁹

3.2 Maturity Model and Survey

Energy Safety used the Maturity Model¹⁰ and the electrical corporations' 2023 and 2024 responses to the Maturity Survey¹¹ to assess the maturity of each electrical corporation's wildfire risk mitigation program.¹²

The Maturity Model consists of 37 individual capabilities describing the ability of electrical corporations to mitigate wildfire risk and Public Safety Power Shutoff (PSPS) risk within their service territory.¹³ The 37 capabilities are aggregated into 7 categories.¹⁴ Maturity levels range from 0 (below minimum requirements) to 4 (beyond best practice). For each electrical corporation, Energy Safety calculated maturity levels for each capability, each category, five

⁸ [2025 WMP Update Guidelines](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56254&shareable=true), p. 3 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56254&shareable=true, accessed March 29, 2024).

⁹ [2025 WMP Update Guidelines](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56254&shareable=true), p. 3 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56254&shareable=true, accessed March 29, 2024).

¹⁰ [Maturity Model](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56256&shareable=true) (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56256&shareable=true, accessed May 6, 2024).

¹¹ [Maturity Survey](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56306&shareable=true) (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56306&shareable=true, accessed May 6, 2024).

¹² Energy Safety revised the 2023-2025 Electrical Corporation Wildfire Mitigation Maturity Model and Maturity Survey in January 2024. The revisions did not result in any changes to Maturity Survey questions, therefore the responses from 2024 are directly comparable to the responses from 2023. See the Maturity Survey issued by Energy Safety to the electrical corporations in 2023:

[Revised Final 2023 Electrical Corporation Wildfire Mitigation Maturity Survey \(April 24, 2023\)](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53708&shareable=true) (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53708&shareable=true, accessed May 6, 2024)

¹³ [Maturity Model](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56256&shareable=true), Section 1, "Introduction," p. 1 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56256&shareable=true, accessed April 9, 2024).

¹⁴ [Maturity Model](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56256&shareable=true), Section 3.1, "Capabilities and Categories," pp. 7-8 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56256&shareable=true, accessed April 9, 2024).

cross-category themes, and the overall WMP, based on the electrical corporation's answers to Maturity Survey questions and the scoring system described in the Maturity Model.¹⁵

Appendix F summarizes TBC's 2024 Maturity Survey results and changes in TBC's maturity compared to its 2023 Maturity Survey results.

3.3 Areas for Continued Improvement

Energy Safety's Decisions on the 2023-2025 Base WMPs focused on each electrical corporation's strategies for reducing the risk of utility-related ignitions. In those Decisions, Energy Safety identified areas where the electrical corporation must continue to improve its wildfire mitigation capabilities in future plans. For some areas, the electrical corporation was required to report its progress in its 2025 WMP Update. Energy Safety discusses the results of its evaluation of the electrical corporation's progress in each of those areas in Sections 5 through 9 of this Decision.

3.4 Errata

TBC did not submit an errata and Energy Safety did not request an errata from TBC.

3.5 Revision Notice

Public Utilities Code section 8386.3(a) states, "Before approval, [Energy Safety] may require modifications of the [WMP]." If Energy Safety requires modifications to a WMP, it does so by issuing a Revision Notice to an electrical corporation.¹⁶

Energy Safety did not issue TBC a Revision Notice for its 2025 WMP Update.

3.6 Decision

In its evaluation of an electrical corporation's 2025 WMP Update, Energy Safety considers the information provided by the electrical corporation regarding its reportable updates and the associated justifications. Energy Safety's approval of a 2025 WMP Update constitutes collective approval of the reported items in the electrical corporation's 2025 WMP Update. The approval therefore authorizes the updates to the electrical corporation's 2023-2025 Base

¹⁵ [Maturity Model](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56256&shareable=true), Section 4, "Maturity Level Determination," pp. 39-42 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56256&shareable=true, accessed April 9, 2024).

¹⁶ [Revised WMP Process Guidelines](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56255&shareable=true), Section 4.4, "Revision Notice," pp. 6-8 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56255&shareable=true, accessed May 6, 2024).

WMP, as shown in the “Redlined 2023-2025 Base WMP” and “Clean Updated 2023-2025 Base WMP” provided as part of the electrical corporation’s 2025 WMP Update submission.¹⁷

TBC’s reported updates reduce risk and demonstrate thorough QA/QC processes for asset inspections. Therefore, Energy Safety approves TBC’s 2025 WMP Update.

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¹⁷ [2025 WMP Update Guidelines](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56254&shareable=true), pp. 3-4
(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56254&shareable=true>, accessed March 29, 2024).

4. TBC 2025 WMP Update

In accordance with the 2025 WMP Update Guidelines,¹⁸ TBC provided the following for its 2025 WMP Update submission:

1. **2025 WMP Update:** A standalone 2025 WMP Update document that describes TBC's reportable updates, or confirmation of no updates to the approved 2023-2025 Base WMP.
2. **Redlined 2023-2025 Base WMP:** A redlined version of TBC's 2023-2025 Base WMP showing reportable updates to the approved 2023-2025 Base WMP.
3. **Clean Updated 2023-2025 Base WMP:** A clean, updated copy of TBC's 2023-2025 Base WMP (i.e., without any updates marked in redline) incorporating the reportable updates from TBC's 2025 WMP Update as demonstrated in the redlined version.

Specifically, in response to the five categories of reportable updates of the 2025 WMP Update Guidelines, TBC provided the required information for each category. Energy Safety discusses each reportable update under the relevant mitigation initiative in Sections 5 through 9 of this Decision.

¹⁸ [2025 WMP Update Guidelines, pp. 3-4](#)

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56254&shareable=true>, accessed May 6, 2024).

5. Overview of the Service Territory

In its 2025 WMP Update, TBC did not report any updates to the overview of the service territory section of its 2023-2025 Base WMP.

6. Risk Methodology and Assessment

In its 2025 WMP Update, TBC did not report any updates to the risk methodology and assessment section of its 2023-2025 Base WMP.

7. Wildfire Mitigation Strategy Development

In its 2025 WMP Update, TBC did not report any updates to the wildfire mitigation strategy development section of its 2023-2025 Base WMP.

8. Wildfire Mitigation Initiatives

This section provides Energy Safety's evaluation of TBC's reportable updates related to the following wildfire mitigation initiatives:

- Grid design, operations, and maintenance, including grid design and system hardening, asset inspections, equipment maintenance and repair, and grid operations and procedures
- Vegetation management and inspections
- Situational awareness and forecasting
- Emergency preparedness
- Community outreach and engagement

Energy Safety discusses its evaluation of TBC’s reportable updates related to PSPS in Section 9. Energy Safety includes discussion of any reportable updates affecting TBC’s process for continuous improvement in Section 10.

8.1 Grid Design, Operations, and Maintenance

In its 2025 WMP Update, TBC provided one total update related to the grid design, operations, and maintenance section of its 2023-2025 Base WMP. The update TBC provided related to this section included reporting required progress on one area for continued improvement.

8.1.1 Grid Design and System Hardening

8.1.1.1 2023 Areas for Continued Improvement

Energy Safety’s Decision on TBC’s 2023-2025 Base WMP¹⁹ did not require TBC to report progress on any areas for continued improvement in the grid design and system hardening section in its 2025 WMP Update. Therefore, TBC has no reportable updates in this area.

8.1.1.2 New or Discontinued Programs

In its 2025 WMP Update, TBC did not report any new or discontinued programs related to the grid design and system hardening section of its 2023-2025 Base WMP.

8.1.1.3 Targets, Objectives, and Projected Expenditures

In its 2025 WMP Update, TBC did not provide any updates to approved targets, objectives, or projected expenditures related to the grid design and system hardening section of its 2023-2025 Base WMP.

8.1.2 Asset Inspections

8.1.2.1 2023 Areas for Continued Improvement

TBC reported its progress on one area for continued improvement in the asset inspections section in its 2025 WMP Update.

¹⁹ [Energy Safety Decision on TBC 2023-2025 Base Wildfire Mitigation Plan](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56223&shareable=true) (Jan. 30, 2024), Section 11 “Required Areas for Continued Improvement,” p. 51 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56223&shareable=true, accessed August 29, 2024).

TBC-23B-01.²⁰ QA/QC Process Documentation

In its Decision on TBC's 2023-2025 Base WMP, Energy Safety required TBC to provide all documentation related to its QA/QC processes and an analysis demonstrating its QA/QC process effectively mitigates wildfire risk.²¹

In its response, TBC provided its converter maintenance procedure document, its weekly inspection of watch (IOW) documents, and its monthly IOW documents.²²

TBC stated its staff consists of six operations and maintenance (O&M) technicians who conduct inspections and perform maintenance work.²³ The technicians use the IOW documents to conduct inspections and identify conditions that require remediation. TBC stated its Operations Manager (or delegate) monitors the work of the O&M technicians by reviewing each completed IOW checklist.²⁴ TBC stated that its review process in conjunction with the frequency of inspections reduces ignition risk.²⁵

Energy Safety Evaluation

TBC provided the required documentation in response to this area for continued improvement. Given the thoroughness of TBC's inspection procedures, frequency of inspection, hardscaped nature of facilities, and procedural review of all completed inspection

²⁰ Energy Safety is instituting a new naming convention for its areas for continued improvement. Moving forward, areas for continued improvement identified in Energy Safety's evaluation of Base WMPs will be designated with a "B" and areas for continued improvement identified in Energy Safety's evaluation of WMP Updates will be designated with a "U." Accordingly, areas for continued improvement that were identified in Energy Safety's evaluation of 2023-2025 Base WMPs are retitled "23B" and new areas for continued improvement identified in Energy Safety's evaluation of 2025 Update WMPs herein are titled "25U."

²¹ [Energy Safety Decision on TBC 2023-2025 Base Wildfire Mitigation Plan](#) (Jan. 30, 2024), Section 11 "Required Areas for Continued Improvement," p. 51 (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56223&shareable=true>, accessed August 29, 2024).

²² [TBC 2025 WMP Update \(R0\)](#) (July 8, 2024), p. 12 (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56996&shareable=true>, accessed August 28, 2024).

²³ [TBC 2025 WMP Update \(R0\)](#) (July 8, 2024), p. 13 (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56996&shareable=true>, accessed August 28, 2024).

²⁴ [TBC 2025 WMP Update \(R0\)](#) (July 8, 2024), p. 13 (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56996&shareable=true>, accessed August 28, 2024).

²⁵ [TBC 2025 WMP Update \(R0\)](#) (July 8, 2024), p. 13 (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56996&shareable=true>, accessed August 28, 2024).

checklists, Energy Safety finds that TBC's response demonstrates that TBC has a documented QA/QC process and that TBC has conducted an analysis of the process to demonstrate the effectiveness of its QA/QC process.

TBC sufficiently responded to this area for continued improvement; no further reporting is required on this area for continued improvement in TBC's 2026-2028 Base WMP.

8.1.2.2 New or Discontinued Programs

In its 2025 WMP Update, TBC did not report any new or discontinued programs related to the asset inspections section of its 2023-2025 Base WMP.

8.1.2.3 Targets, Objectives, and Projected Expenditures

In its 2025 WMP Update, TBC did not report any updates to approved targets, objectives, or projected expenditures related to the asset inspections section of its 2023-2025 Base WMP.

8.1.3 Equipment Maintenance and Repair

8.1.3.1 2023 Areas for Continued Improvement

Energy Safety's Decision on TBC's 2023-2025 Base WMP²⁶ did not require TBC to report progress on any areas for continued improvement in the equipment maintenance and repair section in its 2025 WMP Update. Therefore, TBC has no reportable updates in this area.

8.1.3.2 New or Discontinued Programs

In its 2025 WMP Update, TBC did not report any new or discontinued programs related to the equipment maintenance and repair section of its 2023-2025 Base WMP.

8.1.3.3 Targets, Objectives, and Projected Expenditures

In its 2025 WMP Update, TBC did not report any updates to approved targets, objectives, or projected expenditures related to the equipment maintenance and repair section of its 2023-2025 Base WMP.

²⁶ [Energy Safety Decision on TBC 2023-2025 Base Wildfire Mitigation Plan](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56223&shareable=true) (Jan. 30, 2024), Section 11 "Required Areas for Continued Improvement," p. 51 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56223&shareable=true, accessed August 29, 2024).

8.1.4 Grid Operations and Procedures

8.1.4.1 2023 Areas for Continued Improvement

Energy Safety's Decision on TBC's 2023-2025 Base WMP²⁷ did not require TBC to report progress on any areas for continued improvement in the grid operations and procedures section in its 2025 WMP Update. Therefore, TBC has no reportable updates in this area.

8.1.4.2 New or Discontinued Programs

In its 2025 WMP Update, TBC did not report any new or discontinued programs related to the grid operations and procedures section of its 2023-2025 Base WMP.

8.1.4.3 Targets, Objectives, and Projected Expenditures

In its 2025 WMP Update, TBC did not report any updates to approved targets, objectives, or projected expenditures related to the grid operations and procedures section of its 2023-2025 Base WMP.

8.2 Vegetation Management and Inspections

In its 2025 WMP Update, TBC did not report any updates to the vegetation management and inspections section of its 2023-2025 Base WMP.

8.3 Situational Awareness and Forecasting

In its 2025 WMP Update, TBC did not report any updates to the situational awareness and forecasting section of its 2023-2025 Base WMP.

8.4 Emergency Preparedness

In its 2025 WMP Update, TBC did not report any updates to the emergency preparedness section of its 2023-2025 Base WMP.

8.5 Community Outreach and Engagement

In its 2025 WMP Update, TBC provided one total update related to the community outreach and engagement section of its 2023-2025 Base WMP. The update TBC provided related to this section included reporting on one area for continued improvement.

²⁷ [Energy Safety Decision on TBC 2023-2025 Base Wildfire Mitigation Plan](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56223&shareable=true) (Jan. 30, 2024), Section 11 "Required Areas for Continued Improvement," p. 51 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56223&shareable=true, accessed August 29, 2024).

8.5.1 2023 Areas for Continued Improvement

Energy Safety’s Decision on TBC’s 2023-2025 Base WMP²⁸ did not require TBC to report progress on any areas for continued improvement in the community outreach and engagement section in its 2025 WMP Update. TBC elected to report its progress on one area for continued improvement in the community outreach and engagement section in its 2025 WMP Update.

8.5.1.1 TBC-23B-02. Documentation of Sharing Best Practices

TBC elected to report in its 2025 WMP Update that it will provide an update on its progress on providing documented examples of its best practice sharing in its 2026-2028 Base WMP. TBC must respond to this area for continued improvement in its 2026-2028 Base WMP.

8.5.2 New or Discontinued Programs

In its 2025 WMP Update, TBC did not report any new or discontinued programs related to the community outreach and engagement section of its 2023-2025 Base WMP.

8.5.3 Targets, Objectives, and Projected Expenditures

In its 2025 WMP Update, TBC did not report any updates to approved targets, objectives, or projected expenditures related to the community outreach and engagement section of its 2023-2025 Base WMP.

²⁸ [Energy Safety Decision on TBC 2023-2025 Base Wildfire Mitigation Plan](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56223&shareable=true) (Jan. 30, 2024), Section 11 “Required Areas for Continued Improvement,” p. 51 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56223&shareable=true, accessed August 29, 2024).

9. Public Safety Power Shutoff

In its 2025 WMP Update, TBC did not report any updates to the Public Safety Power Shutoff section of its 2023-2025 Base WMP.

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10. TBC Process for Continuous Improvement

TBC did not indicate any changes to the lessons learned or corrective action program sections of its 2023-2025 Base WMP.

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11. Required Areas for Continued Improvement

Energy Safety's WMP evaluations focus on each electrical corporations' strategies for reducing the risk of utility-related ignitions. The list below comprises all of TBC's areas for continued improvement and the required progress that TBC must address in its 2026-2028 Base WMP. This includes areas for continued improvement from Energy Safety's Decision on TBC's 2023-2025 Base WMP.

11.1 Community Outreach and Engagement

- **TBC-23B-02. Documentation of Sharing Best Practices**
 - Description: TBC does not document instances of sharing best practices.
 - Required Progress: In its 2026-2028 Base WMP, TBC must provide documented examples of its sharing of best practices to date (as of the 2026-2028 submission).
 - Discussed in Section 8.5 of Energy Safety's Decision on TBC's 2023-2025 Base WMP.²⁹

²⁹ [Energy Safety Decision on TBC 2023-2025 Base Wildfire Mitigation Plan](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56223&shareable=true) (Jan. 30, 2024), Section 11 "Required Areas for Continued Improvement," p. 51 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56223&shareable=true, accessed August 29, 2024).

12. Conclusion

TBC's 2025 WMP Update is approved.

Catastrophic wildfires remain a serious threat to the health and safety of Californians. Electrical corporations, including TBC, must continue to make progress toward reducing utility-related ignition risk.

Energy Safety expects TBC to effectively implement its wildfire mitigation activities to reduce the risk of utility-related ignitions and the potential catastrophic consequences if an ignition occurs, as well as to reduce the scale, scope, and frequency of PSPS events.

TBC must meet the commitments in its WMP and fully address the areas for continued improvement identified within this Decision to ensure it meaningfully reduces utility-related ignition and PSPS risk within its service territory over the plan cycle.

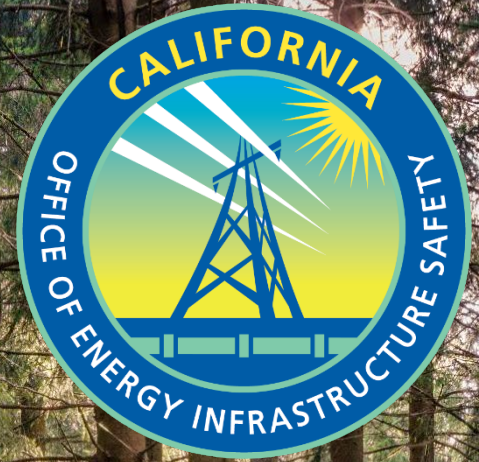
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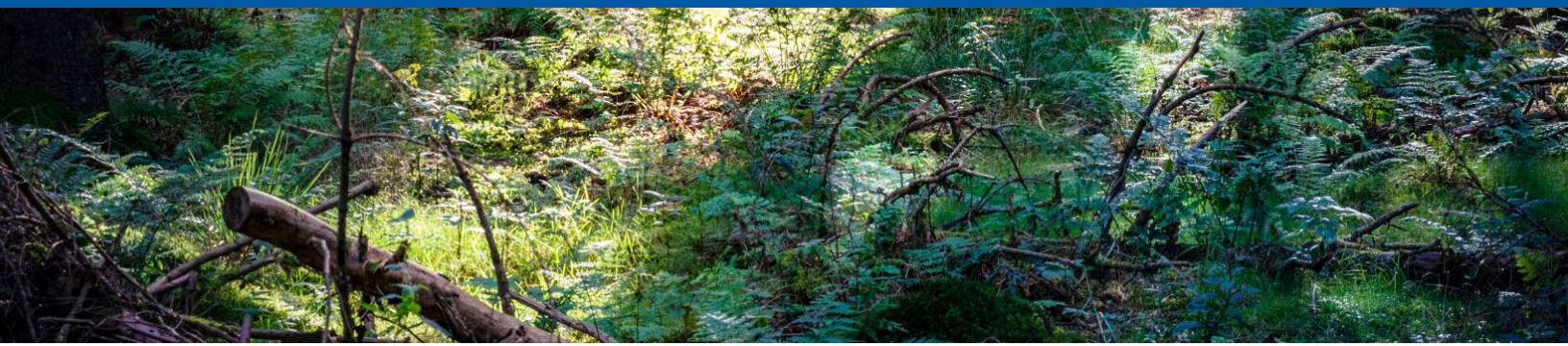


OFFICE OF ENERGY INFRASTRUCTURE SAFETY
A California Natural Resources Agency
www.energysafety.ca.gov
715 P Street, 20th Floor
Sacramento, CA 95814
916.902.6000





APPENDICES



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Appendix A.

Glossary of Terms

Term	Definition
AFN	Access and functional needs
BVES	Bear Valley Electric Service
CAISO	California Independent System Operator
Cal Advocates	The Public Advocates Office at the California Public Utilities Commission
CAL FIRE	California Department of Forestry and Fire Protection
Cal OES	California Governor's Office of Emergency Services
CAP	Corrective action program
CBO	Community-based organization
CDFW	California Department of Fish and Wildlife
CEC	California Energy Commission
CEJA	California Environmental Justice Alliance
CNRA	California Natural Resources Agency
CPUC	California Public Utilities Commission
D.	Prefix to a proceeding number designating a CPUC decision
DR	Data request
DWR	California Department of Water Resources
EBMUD	East Bay Municipal Utility District
EFD	Early fault detection

Term	Definition
EPUC	Energy Producers and Users Coalition
EVM	Enhanced vegetation management
FERC	Federal Energy Regulatory Commission
FPI	Fire potential index
FWI	Fire weather index
GFN	Ground-fault neutralizers
GIS	Geographic information systems
GO	General order
GPI	Green Power Institute
GRC	General rate case
HD	High definition
HFRA	High Fire Risk Area
HFTD	High fire threat district
HWT or Horizon West	Horizon West Transmission
I.	Prefix to a proceeding number designating a CPUC Order Instituting Investigation (OII)
ICS	Incident command system or structure
IOU	Investor-owned utility
IR	Infrared
ISA	International Society of Arboriculture
ITO	Independent transmission operator
kV	Kilovolt

Term	Definition
Liberty	Liberty Utilities
LiDAR	Light detection and ranging
Maturity Model	Electrical Corporation Wildfire Mitigation Maturity Model
Maturity Survey	Electrical Corporation Wildfire Mitigation Maturity Survey
MAVF	Multi-attribute value function
MBL	Medical Baseline
MGRA	Mussey Grade Road Alliance
ML	Machine learning
NDVI	Normalized difference vegetation index
NERC	North American Electric Reliability Corporation
NFDRS	National Fire Danger Rating System
NOD	Notice of defect
NOV	Notice of violation
OCM	Overhead circuit miles
OEIS or Energy Safety	Office of Energy Infrastructure Safety
PG&E	Pacific Gas and Electric Company
PoF	Probability of failure
PoI	Probability of ignition
PRC	Public Resources Code
PSPS	Public Safety Power Shutoff

Term	Definition
Pub. Util. Code or PU Code	Public Utilities Code
QA	Quality assurance
QC	Quality control
QDR	Quarterly Data Report
R.	Prefix to a proceeding number designating a CPUC rulemaking
RAMP	Risk Assessment and Mitigation Phase
RCRC	Rural County Representatives of California
REFCL	Rapid earth fault current limiter
RFW	Red Flag Warning
RSE	Risk-spend efficiency
SAWTI	Santa Ana Wildfire Threat Index
SCADA	Supervisory control and data acquisition
SCE	Southern California Edison Company
SDG&E	San Diego Gas & Electric Company
S-MAP	Safety Model Assessment Proceeding, now the Risk-Based Decision-Making Framework Proceeding
SMJU	Small and multijurisdictional utilities
TAT	Tree Assessment Tool
TBC	Trans Bay Cable
TURN	The Utility Reform Network
USFS	United States Forest Service
VM	Vegetation management

Term	Definition
VRI	Vegetation risk index
WMP	Wildfire Mitigation Plan
WRRM	Wildfire Risk Reduction Model
WSAB	Wildfire Safety Advisory Board
WUI	Wildland-urban interface

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Appendix B.

Status of 2023 Areas for Continued Improvement

Energy Safety’s 2023 Decision¹ for TBC identified areas for continued improvement and associated required progress. Areas for continued improvement are where TBC must continue to improve its wildfire mitigation capabilities. As part of the 2025 WMP Update evaluation process, Energy Safety reviewed the progress reported by TBC on areas for continued improvement that Energy Safety required progress on by the 2025 WMP Update. Energy Safety is satisfied that TBC has made sufficient progress in all the identified areas for continued improvement.

TBC’s 2023 areas for continued improvement that Energy Safety required progress on by the 2025 WMP Update are listed in Table A-1. The status column indicates whether each has been fully addressed. If not, the column notes where to find more information in this Decision.

¹ [Energy Safety Decision on TBC 2023-2025 Base Wildfire Mitigation Plan](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56223&shareable=true) (Jan. 30, 2024), Section 11 “Required Areas for Continued Improvement,” p. 51 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56223&shareable=true, accessed August 29, 2024).

Table A-1. TBC 2023 Areas for Continued Improvement

ID	Title	Status
TBC-23B-01 (TBC-23-01)	QA/QC Process Documentation	TBC sufficiently addressed the required progress.

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Appendix C. Stakeholder Data Request Responses Used in WMP Evaluation

No stakeholder data request responses were cited in this Decision.

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Appendix D. Stakeholder Comments on the 2025 WMP Updates

Energy Safety invited stakeholders, including members of the public, to provide comments on the electrical corporations' 2025 WMP Updates. Opening comments on Group 2 WMPs were due on August 12, 2024, and reply comments were due on August 22, 2024. Comments received on the 2025 WMP Updates can be viewed in the 2023-2025 Wildfire Mitigation Plan (2023-2025-WMPs) docket log.

Energy Safety did not receive any stakeholder comments on TBC's 2025 WMP Update.

Appendix E.

Stakeholder Comments on the Draft Decision

This appendix will contain Energy Safety's summary of stakeholder comments on Energy Safety's draft Decision on TBC's 2025 WMP Update.

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Appendix F.

Maturity Survey Results

Energy Safety's 2023-2025 Electrical Corporation Wildfire Mitigation Maturity Model² (Maturity Model) and Electrical Corporation Wildfire Mitigation Maturity Survey³ (Maturity Survey) together provided a quantitative method to assess the maturity of each electrical corporation's wildfire risk mitigation program.

The Maturity Model consists of 37 individual capabilities describing the ability of electrical corporations to mitigate wildfire risk within their service territory. The 37 capabilities are aggregated into seven categories. The seven mitigation categories are:

- A. Risk Assessment and Mitigation Selection
- B. Situational Awareness and Forecasting
- C. Grid Design, Inspections, and Maintenance
- D. Vegetation Management and Inspections
- E. Grid Operations and Protocols
- F. Emergency Preparedness
- G. Community Outreach and Engagement

Maturity levels range from 0 (below minimum requirements) to 4 (beyond best practice). Electrical corporations' responses to the Maturity Survey, listed by mitigation category, are depicted in the figures and tables below.

Figure A-1 displays TBC's 2024 response to the Maturity Survey across mitigation categories showing minimum and average values. Figure A-2 compares TBC's 2024 response to the Maturity Survey to its 2023 response to the Maturity Survey, depicting values that increased, decreased, or had no change (indicated by "NC").

² [Energy Safety's 2023-2025 Electrical Corporation Wildfire Mitigation Maturity Model \(revised and adopted Jan. 2024, published Feb. 2024\)](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56256&shareable=true)

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56256&shareable=true>, accessed May 6, 2024).

³ [Energy Safety's 2023-2025 Electrical Corporation Wildfire Mitigation Maturity Survey \(adopted Jan. 2024, revised and published Feb. 2024\)](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56306&shareable=true)

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56306&shareable=true>, accessed May 6, 2024).

Figure A-1. TBC 2024 Response to the 2023-2025 Maturity Survey

		1. Capability				2. Capability				3. Capability				4. Capability				5. Capability				6. Capability			
		2023	2024	2025	2026	2023	2024	2025	2026	2023	2024	2025	2026	2023	2024	2025	2026	2023	2024	2025	2026	2023	2024	2025	2026
A. Risk Assessment and Mitigation Strategy		1. Statistical weather, climate, and wildfire modeling				2. Calculation of wildfire and PSPS risk exposure for societal values				3. Calculation of community vulnerability to wildfire and Public Safety Power Shutoffs (PSPS)				4. Calculation of risk and risk components				5. Risk event tracking and integration of lessons learned				6. Risk-informed wildfire mitigation strategy			
	Minimum of Sub-Cap.	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
	Average of Sub-Cap.	0.0	0.0	0.0	0.0	0.1	0.1	0.1	0.1	0.0	0.0	0.0	0.0	0.1	0.1	0.1	0.1	0.7	0.7	0.7	0.7	0.0	0.0	0.0	0.0
B. Situational Awareness and Forecasting		7. Ignition likelihood estimation				8. Weather forecasting ability				9. Wildfire spread forecasting				10. Data collection for near-real-time conditions				11. Wildfire detection and alarm systems				12. Centralized monitoring of real-time conditions			
	Minimum of Sub-Cap.	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	
	Average of Sub-Cap.	0.0	0.0	0.0	0.0	0.2	0.2	0.2	0.2	0.0	0.0	0.0	0.0	0.6	0.6	0.6	0.6	1.0	1.0	1.0	1.0	1.2	1.2	1.2	1.2
C. Grid Design, Inspections, and Maintenance		13. Asset inventory and condition database				14. Asset inspections				15. Asset maintenance and repair				16. Grid design and resiliency				17. Asset and grid personnel training and quality							
	Minimum of Sub-Cap.	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	
	Average of Sub-Cap.	1.8	1.8	1.8	1.8	1.3	1.3	1.3	1.3	0.5	0.5	0.5	0.5	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	
D. Vegetation Management and Inspections		18. Vegetation inventory and condition database				19. Vegetation inspections				20. Vegetation treatment				21. Vegetation personnel training and quality											
	Minimum of Sub-Cap.	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	
	Average of Sub-Cap.	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	
E. Grid Operations and Protocols		22. Protective equipment and device settings				23. Incorporation of ignition risk factors in grid control				24. PSPS operating model				25. Protocols for PSPS re-energization				26. Ignition prevention and suppression							
	Minimum of Sub-Cap.	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	1.0				
	Average of Sub-Cap.	0.5	0.5	0.5	0.5	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.8	0.8	0.8	0.8	1.0	1.0	1.0	1.7				
F. Emergency Preparedness		27. Wildfire and PSPS emergency and disaster preparedness plan				28. Collaboration and coordination with public safety partners				29. Public emergency communication strategy				30. Preparedness and planning for service restoration				31. Customer support in wildfire and PSPS emergencies				32. Learning after wildfires and PSPS incidents			
	Minimum of Sub-Cap.	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	
	Average of Sub-Cap.	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	1.2	1.2	1.2	1.2	0.0	0.0	0.0	0.0	0.0	0.0	0.0	
G. Community Outreach and Engagement		33. Public outreach and education awareness				34. Public engagement in electrical corporation wildfire mitigation planning				35. Engagement with AFN and socially vulnerable populations				36. Collaboration on local wildfire mitigation planning				37. Cooperation and best practice sharing with other electrical corporations							
	Minimum of Sub-Cap.	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	
	Average of Sub-Cap.	0.0	0.0	0.0	0.0	0.3	0.3	0.3	0.3	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.3	0.3	0.3	1.0				

