Final Independent Evaluator
2024 Annual Report on Compliance

July 1, 2025

Trans Bay Cable

BUREAU VERITAS

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1 Executive Summary

Background

The devastating wildfires of the past and present have taught us valuable lessons about safeguarding California's lands, particularly in areas where electrical infrastructure coexists with wildland environments. In response to these challenges, the California Public Utilities Commission (CPUC) initiated Rulemaking 18-10-007 to provide guidance on Wildfire Mitigation Plans (WMPs) for Investor-Owned Utilities (IOUs), now referred to as Electrical Corporations (ECs). These WMPs are designed to cover a three-year period, with the first cycle of independent evaluations beginning in 2020.

The 2024 WMP is part of the second three-year planning cycle. During the first evaluation of this cycle, which ended in 2023, Trans Bay Cable (TBC) completed all the initiatives outlined in the 2023-2025 WMP. In 2024, TBC continued to implement activities to maintain their efforts of wildfire risk reduction, these activities are not outlined as initiatives in the WMP and rather serve as general mitigation efforts.

This Independent Evaluator (IE) Annual Report of Compliance (ARC) assesses TBC's second cycle plan, which began in 2023 and extends to 2025. The IE ARC typically reviews the WMP initiatives as outlined for 2024 and would evaluate TBC's performance in meeting their committed objective targets. However, due to not outlining any initiative targets for 2024, the IE reviewed general mitigation efforts outlined in the WMP, verification of QA/QC program implementation, processes, and results, as well as the distribution of funding to initiatives described within the WMP.

Pursuant to Public Utilities Code Section 8386.3(c)(2)(B)(i), (ii), (iii), and (iv), Bureau Veritas North America, Inc. (BVNA) has been selected as the IE to review and assess TBC's 2024 WMP in its entirety. This IE ARC will present BVNA's findings and results for review. BVNA was included in the Office of Energy Infrastructure and Safety (Energy Safety) Independent Evaluator List for 2024 WMPs, dated January 27, 2025, in accordance with Public Utilities Code section 8386.3(c)(2)(A).

In compliance with Energy Safety's requirements, Trans Bay Cable has contracted BVNA to provide the IE assessment. This assessment includes the IE responsibilities outlined in Public Utilities Code section 8386.3(c)(5)(C), which involve performing the following tasks:

- Task 1: Consult with Energy Safety on compliance assurance auditing that will be performed
- Task 2: Perform compliance assurance auditing, including field inspections
- Task 3: Draft and provide to Energy Safety a report on audit findings, including deficiencies of underfunded WMP activities
- Task 4: Draft and provide to Energy Safety a report on deficiencies of electrical corporations

- Task 5: Track and report deficiencies of audit findings

Docket Title: 2023 to 2025 Electrical Corporation Wildfire Mitigation Plans; Docket #: 2023-2025-WMPs produced on July 8, 2024, for Trans Bay Cable. 2024 WMP R1 update and the requirements of the Public Utilities Code (PU Code); Bureau Veritas North America, Inc. (BVNA) has reviewed TBC's 2024 WMP.

Introduction to Trans Bay Cable

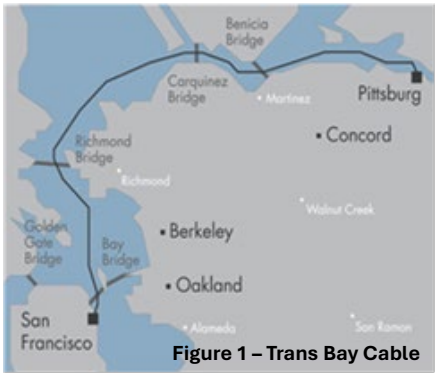

Figure 1 – Trans Bay Cable

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.


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 located in close proximity to an area that has been designated as an elevated fire threat area. This designation indicates a higher likelihood and potential for impact on people and property from utility-related wildfire events in this region.

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

Figure 3 – CPUC HFTD 2 Map

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 is 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).

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).

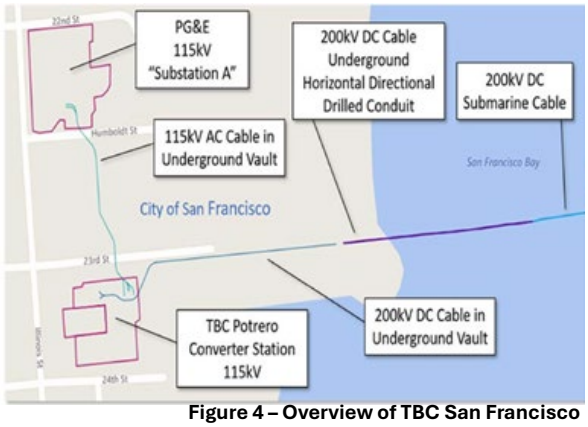

Figure 4 – Overview of TBC San Francisco

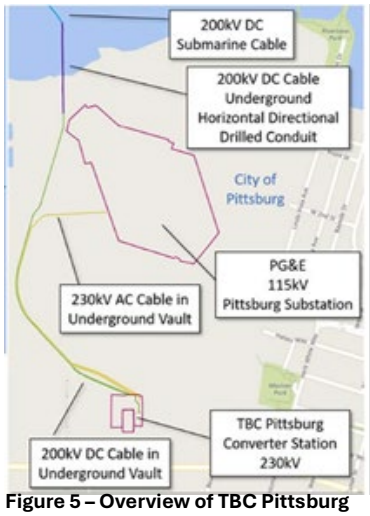

Figure 5 – Overview of TBC Pittsburg

Site Visit

TBC Pittsburg Converter Station – IE field visit on April 22, 2025, [redacted] Pittsburg, CA. Attendees were:

1. Michael Blunt, TBC Operations Manager
2. Lenneal Gardner, TBC Senior Manager Regulatory Affairs
3. Greg Ledesma, Supervising Fire and Life Safety Specialist, BVNA (IE)

The visit included a question-and-answer meeting followed by a site survey and audit of the facility and field verification of completion of the outstanding items from the 2022 WMP planning cycle. Current maintenance and inspection tags were observed for all visible fire protection and alarm systems within the facility; the recently commissioned fire extinguishing system was online in the automatic protection position and the weed abatement program appears to be performed on a regular basis.

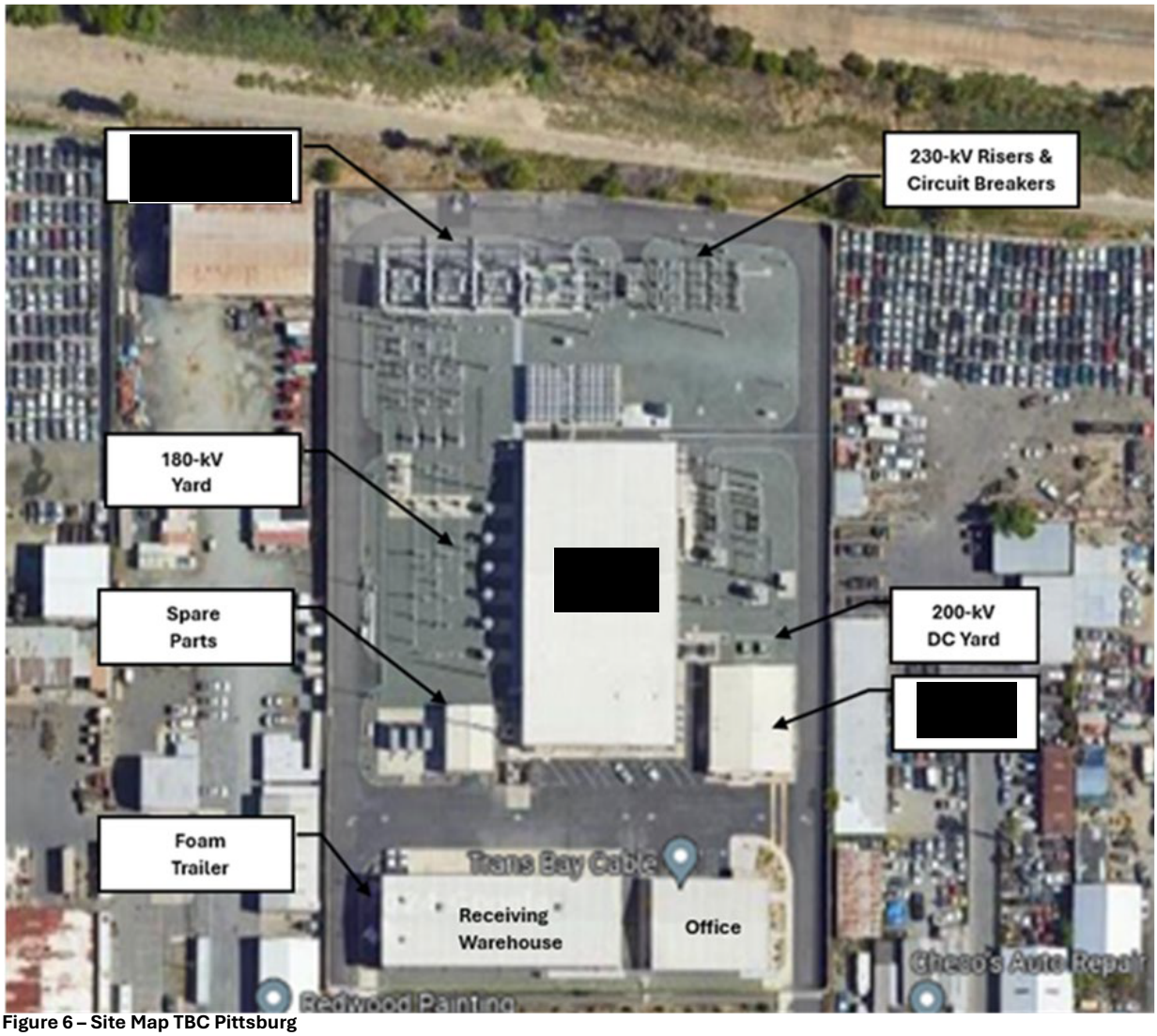

Figure 6 – Site Map TBC Pittsburg

Adjacent Properties

The facility is surrounded by active commercial, light industrial, and residential use buildings. 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.

Below are the street addresses for the properties to the East and West of TBC:

1. [redacted] – Fernandes Auto Wrecking
2. – Redwood Painting
3. – Motorise City LLC Auto Sales
4. – Scattered Sheep Church

Security

Figure 7 – Security Camera (typ.) and Buffer Areas

The Pittsburg Converter Station facility is a secure 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 both the 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 services are provided by the Contra Costa County Fire Protection District. This fire protection district is 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 has been selected as the IE for TBC's 2023-2025 WMP. The IE ARC will focus on evaluating TBC's progress in implementing the WMP during 2024, analyzing the distribution of allocated funds, and verifying the effectiveness of QAQC programs. This independent evaluation aims to ensure TBC's compliance with its wildfire mitigations commitments and targets.

The evaluation process began with an Energy Safety kick-off meeting, which served as an introduction between TBC representatives, BVNA staff, and assigned Energy Safety personnel. This introductory meeting established key elements, including communication and documentation protocols, as well as the identification of individuals responsible for receiving requests from the IE. Following this meeting, the IE initiated a review of TBC's 2024 WMP and related publicly available documents, as listed in Section 7. This review aimed to identify TBC's stated goals within the 2024 WMP.

To evaluate activities described in the WMP that were not available in public records, BVNA's team of evaluators submitted data requests and conducted interviews with Subject Matter Experts (SMEs). These steps helped verify activities stated within the 2023-2025 WMP (see Section 7 for a list of Data Requests/SME Interviews). In addition to document analysis, data requests, and SME interviews, the IE conducted a site visit to Pittsburg Converter Station. These assessments allowed the IE to collect photographic evidence and evaluate compliance with 2024 activities and initiatives identified during the initial review. Detailed analysis and key findings for each respective category are presented in the following sections of this report.

Key Findings

Upon review of the documents provided, as well as the site visit conducted at the Pittsburg, California converter station on April 22, 2025; TBC is acting in compliance with the 2024 WMP as no new initiative targets were outlined. This is described in further detail in the Review of Initiatives Across WMP Categories section and supporting documents in the Appendices. In summary:

1. All 2024 WMP initiatives were completed in 2023 and confirmed with document review, an onsite inspection, and reference to prior year IE ARC.
2. 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. The only spending in 2024 was spillover from completion in 2023.

A site visit to the Pittsburg converter substation and review of all documents supporting the implementation of the 2024 WMP initiatives was conducted. Subsequently, BVNA has provided the following Independent Evaluator Annual Report on Compliance (IE ARC) describing the technical review and findings.

2 Focus Initiatives and Discussion

Due to the size of the Electrical Utility and the small total number of initiatives contained in the WMP having been completed, there are no initiatives to review for 2024.Therefore, BVNA has opted to conduct a review and audit on portions of Trans Bay Cable's WMP outside of initiatives – more detail is provided in the Review of Initiatives Across WMP Categories section.

3 Site & Sample Selection and Discussion

TBC only has one operating facility, the Pittsburg Converter Station, as described above in the Executive Summary – Introduction section. Sampling methodology and percentages do not apply as the initiatives do not call for it and the IE has opted to review TBC facility in its entirety. Information regarding the site and WMP activities was captured during the onsite field visit of TBC's Pittsburg Facility on April 22, 2025, and through document review.

4 Review of Initiatives Across WMP Categories

There are no initiatives outlined in the 2024 WMP due to completion of them during 2023. The WMP outlines a limited number of activities that the utility maintains to mitigate ignition risk. 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 the best applicable 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.

4.1 Grid Design, Operations, and Maintenance

4.1.1 Initiative Summary Table

Initiative Number, WMP Section Number, and Name	WMP – Initiative Target	EC-Claimed Progress	EC-Claimed Initiative Status	Sample Size	Sample Validation Rate (%)	Verification Method	IE Finding on Initiative (Initiative Validation Rate)	WMP – Planned Spend ($)	EC-Claimed Actual Spend ($ and % from budget)	Satisfied Risk Reduction Goal?
002 8.1.2 Compressed Gas Cylinder Housing	N/A	N/A	N/A	N/A	N/A	N/A	N/A	Zero	Zero	N/A
007 8.1.2 Spare Parts Building Suppression System	N/A	N/A	N/A	N/A	N/A	N/A	N/A	Zero	$35,800	N/A

4.1.2 Written Detail for Initiatives

4.1.2.1 Initiative Review – Findings & Methods

TBC does not have any current proposed mitigation initiatives in the 2023-2025 WMP cycle. In 2023, TBC completed installation of the two outstanding initiatives from the 2020-2022 WMP cycle that were carried over to the 2023-2025 WMP due to delays caused by vendor availability and supply chain issues. These initiatives included the installation of an outdoor compressed gas cylinder housing and the installation of a fire suppression system in its Pittsburg Spare Parts building.

Figure 8 (Top Left) – Entry to Spare Parts Building

Figure 9 (Top Right) – Front of Spare Parts Building

Figure 10 (Bot. Left) – Clean Agent System Supply

Figure 11 (Bot. Right) – Clean Agent Release Panel

4.1.2.2 Funding Verification – Findings

In 2023, TBC completed the two remaining Grid Design, Operations, and Maintenance initiatives 002 & 007.

BVNA reviewed Section 4.3 of the WMP which outlines TBC's proposed expenditures during the planning cycle. TBC anticipated zero planned spending for 2024 as outlined in Table 4-1 on page 31 of the WMP. Furthermore, TBC has no planned expenditure for the 2025 WMP planning cycle with no proposed mitigation initiatives. TBC plans to maintain the currently in place processes and procedures around fire safety, mitigation, and preparedness as outlined on page 30 of the WMP.

In review of QDR4 Table 11, dated February 2025, TBC reported a projected expenditure of $27,200 for 2024 and an actual expenditure of $35,800. Review of TBC's Annual Report on Compliance for 2024, dated March 2025, as submitted to the California Office of Energy Infrastructure Safety, outlined that, although there were no planned wildfire initiatives for 2024, TBC did have expenditures during the year. Page 3 of the Annual Report on Compliance states, "Trans Bay had minor carryover costs in 2024 related to closing out the Spare Parts building fire suppression system project which was completed in October 2023" and these costs amounted to $35,800. The 2024 EC ARC does not outline any planned spending for 2024 as the 2024 QDR4 Table 11 does, as seen in the table below. In response to DR003, TBC stated that the $27,200 shown on QDR 4 Table 11 was meant to reflect carryover costs in connection with the 2023 projects which were not anticipated. The 2024 EC ARC reported no planned spending because TBC stated that they did not have "true planned spending" in 2024 connected to any initiative.

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

WMP Category	2024 WMP Planned	2024 Actual	Difference
Community Outreach and Engagement	0	0	0
Emergency Preparedness	0	0	0
Grid Design, Operations, and Maintenance	0	35.8	35.8
Overview of the Service Territory	0	0	0
Risk Methodology and Assessment	0	0	0
Situational Awareness and Forecasting	0	0	0
Vegetation Management and Inspection	0	0	0
Wildfire Mitigation Strategy Development	0	0	0
Total	0	35.8	35.8

Figure 12 – Summary of WMP Expenditures from 2024 Report on Compliance

4.1.3 Synthesis of Findings

4.1.3.1 Synthesis of Findings – Initiative Review

TBC's transmission infrastructure provides inherent system hardening against wildfire risk due to the two converter station sites being connected by an underground/submerged armored cable

bundle. The Pittsburg facility is fully outside of any High Fire Threat District (HFTD) and TBC does not anticipate the foreseeable expansion of the HFTD that the station is adjacent to.

Both initiatives outlined in the 2024 WMP were completed in 2023 and therefore not applicable for review. TBC staff conducts weekly and monthly inspections of the Pittsburg Converter Station as verified by the Data Request provided in Section 7. These inspections are routine and not WMP initiatives.

4.1.3.2 Synthesis of Findings – Funding Verification

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.

4.2 Vegetation Management & Inspections

Given the nature of TBC's Pittsburg Converter Station as described in the Executive Summary – Introduction section, and due to the conditions outlined below, TBC has no vegetation management initiatives for the 2023-2025 WMP Cycle.

TBC's system utilizes no overhead transmission lines and is therefore not required to maintain a VMP under the NERC Reliability Standards or any CAISO maintenance requirements (WMP 100).

TBC does undertake weed abatement on its converter station, the cost of which is incorporated into landscape maintenance. Visual inspections of vegetation or weed growth around the converter station are conducted on a quarterly basis.

4.2.1 Initiative Summary Table

No Initiative Summary Table is provided due to TBC having no initiatives for Vegetation Management & Inspections.

4.2.2 Written Detail for Initiatives

4.2.2.1 Initiative Review – Findings & Methods

Due to TBC having no initiatives for this category, the IE opted to review general documentation that the EC referenced in the WMP.

BVNA requested the quarterly inspection reports referenced on page 100 of the WMP and received all four (4) quarterly reports in response. Each report was completed, signed, and dated with no reference to any issues.

4.2.2.2 Funding Verification – Findings

The only cost for VM is incorporated into the landscape maintenance budget which is not applicable to the WMP.

4.2.3 Synthesis of Findings

4.2.3.1 Synthesis of Findings – Initiative Review

Based on the IE's review, the documentation submitted by TBC aligns with what is outlined in the WMP. Overall, TBC has a limited scope for VMP per NERC Reliability Standards and maintains the procedures and protocols needed for their unique situation.

4.2.3.2 Synthesis of Findings – Funding Verification

Not Applicable.

4.3 Situational Awareness and Forecasting

TBC maintains thorough situational awareness capability through its highly trained System Operators, advanced monitoring systems, and close coordination with external entities. TBC's system operators undergo extensive training on the potential impacts of weather and fire risks, leveraging local news sources and reliability monitoring tools.

TBC utilizes the Siemens SIMATIC WinCC platform, a scalable process visualization system that provides comprehensive functionality for monitoring the HVDC converter and associated transmission infrastructure. This interface enables process supervision, control, data archiving, and event recording at TBC's primary and backup control centers.

To further enhance situational awareness, TBC is directly supported by its Balancing Authority, CAISO, and neighboring Transmission Operator, PG&E. Operations personnel also monitor real-time cable and transformer health data. TBC's GIS system provides high-accuracy geospatial data, including excavation notifications to mitigate potential infrastructure issues.

Additionally, the Pittsburg Converter Station is equipped with motion sensors and cameras, and TBC has installed a weather station to improve monitoring weather conditions. TBC also conducts weekly and monthly asset inspections. These inspections include general checks and measurements, visual inspections, and general housekeeping.

Due to these processes and protocols, TBC has no currently planned Situational Awareness initiative objectives in the 2023-2025 WMP Cycle.

4.3.1 Initiative Summary Table

No Initiative Summary Table is provided due to TBC having no initiatives for Situational Awareness.

4.3.2 Written Detail for Initiatives

4.3.2.1 Initiative Review – Findings & Methods

Due to TBC having no initiatives for this category, the IE opted to review general documentation that the EC referenced in the WMP.

BVNA requested the weekly and monthly inspection reports referenced on page 130 of the WMP and received twelve (12) monthly and fifty-one (51) weekly inspection reports in response, which aligns with the required amount for a given year. BVNA reviewed all twelve (12) monthly inspections and found them to be filled out completely, as well as signed and dated by the proper personnel. One (1) weekly inspection report was reviewed for each of the twelve (12) months and no discrepancies were found. Each report was signed and dated by the proper personnel and all areas of the report were properly filled out with comments as needed at the bottom of the report.

4.3.2.2 Funding Verification – Findings

TBC does not outline any planned spending, and no actual spending was reported in the 2024 Report on Compliance for this WMP category.

4.3.3 Synthesis of Findings

4.3.3.1 Synthesis of Findings – Initiative Review

Based on the IE's review, the documentation submitted by TBC aligns with what is outlined in the WMP. TBC elicits strict inspection protocols and are diligent in the frequency at which they perform them.

4.3.3.2 Synthesis of Findings – Funding Verification

Not applicable.

4.4 Emergency Preparedness

TBC maintains a comprehensive Emergency Action Plan that aligns with all applicable regulations, including the California Public Utilities Code, Cal/OSHA requirements, and NFPA 850 guidelines for electric generating plants and HVDC converter stations.

Given the limited scope of TBC's operations, which do not include a defined service area or any retail/distribution customers, their emergency preparedness plans are focused on maintaining its own critical infrastructure to support the Bulk Electric System.

Regarding Public Safety Power Shut Off (PSPS), 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 event 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 events that impact the PG&E Pittsburg Substation would be the prevailing driver of any PSPS impacts on Trans Bay service territory.

Due to the reasoning provided above, TBC has no currently planned Emergency Preparedness initiative objectives in the 2023-2025 WMP Cycle.

4.4.1 Initiative Summary Table

No Initiative Summary Table is provided due to TBC having no initiatives for Emergency Preparedness.

4.4.2 Written Detail for Initiatives

4.4.2.1 Initiative Review – Findings & Methods

Due to TBC having no initiatives for this category, the IE opted to review general documentation that the EC referenced in the WMP.

BVNA requested the emergency preparedness plans referenced on page 156 of the WMP and received two (2) documents: "TBC Health & Safety Procedure TBC-HS-200 Emergency Action Plan (TBC-HS-200)" and "TBC Operating Procedure TBC-OP-022 Extreme Weather and Earthquake Preparedness and Response (TBC-OP-022)."

TBC-HS-200 was initially published in February of 2010 and was last updated in December of 2020. The document is an Emergency Action Plan (EAP) and outlines the organization, responsibilities, and procedures to be followed by TBC employees and the Emergency Response Team I the event of an emergency at their facility. The document covers topics such as emergency

notification and evacuation, alarm systems, emergency reporting, critical plant operations, and procedures for specific emergency scenarios like fire, earthquake, injury, active shooter, and bomb threats. The EAP is designed to comply with applicable regulations and provide guidance to protect personnel and minimize damage to the facility during emergencies.

TBC-OP-022 was initially published in November of 2019 and was last updated in May of 2024. The document outlines the operating procedures and provides guidance on actions to take before, during, and after extreme weather events and earthquakes to maximize continuity of operations and minimize restoration time. The procedure covers preparedness and response for a range of extreme weather conditions including extreme temperatures, wind events, heavy rain, flooding, and earthquakes. It outlines specific steps to be taken for each type of event, such as inspections, equipment checks, and activation of mitigation systems. The procedure aims to ensure the safety of personnel and the integrity of TBC's critical infrastructure during these types of events.

4.4.2.2 Funding Verification – Findings

TBC does not outline any planned spending, and no actual spending was reported in the 2024 Report on Compliance for this WMP category.

4.4.3 Synthesis of Findings

4.4.3.1 Synthesis of Findings – Initiative Review

Based on the IE's review, the documentation submitted by TBC aligns with what is outlined in the WMP. Overall, TBC demonstrates a high level of emergency preparedness, which is reflected by the protocols and procedures they have in place along with continual communication and collaboration with local emergency responders. TBC is dedicated to continuously monitoring the effectiveness of its current processes, procedures, and capabilities, and will assess any necessary changes or improvements going forward.

4.4.3.2 Synthesis of Findings – Funding Verification

Not Applicable.

4.5 Community Outreach & Engagement

As a transmission-only utility, TBC does not serve end-use customers or have a traditional service territory or distribution system. As outlined in the previous section, Emergency Preparedness, given that any PSPS event impacting the TBC system would be driven by PG&E's protocols for the Pittsburg station, TBC does not anticipate the need to provide direct customer support or engage with local communities during emergencies.

TBC has opted to develop a communication and coordination protocol with its primary stakeholders: CAISO and the Interconnecting Transmission Owner. The TBC president or a designated representative for TBC would lead the implementation of this protocol in the event of an emergency.

Due to the rationale provided above, TBC has no currently planned Community Outreach & Engagement initiative objectives in the 2023-2025 WMP Cycle.

4.5.1 Initiative Summary Table

No Initiative Summary Table is provided due to TBC having no initiatives for Community Outreach & Engagement.

4.5.2 Written Detail for Initiatives

4.5.2.1 Initiative Review – Findings & Methods

Due to TBC having no initiatives for this category, the IE opted to review general documentation that the EC referenced in the WMP.

BVNA requested the EOP or protocols for engaging stakeholders during an emergency that is referenced on page 201 of the WMP and received three (3) documents in return: 1) "TBC-EOP-005 Approval Letter 2024-25," 2) "TBC-OP-004_Emergency Operations_R14_EOP-011_05_03_2024 (TBC-OP-004)," and 3) "TBC-OP-008_System Restoration_R3.4_2024-07-01_EOP005 (TBC-OP-008)."

TBC-EOP-005 approval letter was sent by RC West to confirm the review and approval of TBC's Restoration Plan as outlined in TBC-OP-008. RC West is the Reliability Coordinator (RC) of record for operations in the western United States as outlined by California ISO (CAISO).

TBC-EOP-004 outlines the emergency operations procedures that TBC Operators must follow in the event of an emergency. It defines the roles and responsibilities of TBC Operators and On-Call Operators, and provides detailed steps for responding to different types of emergencies, such as re-dispatching real and reactive power, shutting down the facility, and coordinating with the Reliability Coordinator, CAISO, and PG&E. The procedure also covers requirements for restricted maintenance operations, communication and coordination during emergencies. TBC states that this document is reviewed and updated annually which is evidenced by the revision history, with the last update being May of 2024.

TBC-EOP-008 outlines the procedure for restoring the TBC facility during a major system disturbance. It covers two restoration options: Normal Restoration and System Recovery Ancillary Service (SRAS) Restoration. The document details the minimum requirements for each restoration option, the coordination and communication required with the Reliability Coordinator, Balancing Authority, and Transmission Owner, and the training requirements for TBC system operators on restoration measures. This document was last updated in July of 2024 for its annual review.

4.5.2.2 Funding Verification – Findings

TBC does not outline any planned spending, and no actual spending was reported in the 2024 Report on Compliance for this WMP category.

4.5.3 Synthesis of Findings

4.5.3.1 Synthesis of Findings – Initiative Review

Based on the IE's review, the documentation submitted by TBC aligns with what is outlined in the WMP. TBC thoroughly outlines the procedures for engaging stakeholders if an emergency event were to happen. The procedures and protocols are subject to an annual review and changes to the outlining documents are subsequently made, as reflected in the revision history.

4.5.3.2 Synthesis of Findings – Funding Verification

Not Applicable.

5 Evaluation of QA/QC Programs

In 2024, TBC conducted weekly inspections of its substations. However, starting on January 1, 2025, and continuing throughout 2025, the company shifted to monthly inspections per the CAISO-approved Version 5 maintenance standards. Throughout 2024, TBC also performed monthly inspections of its transmission infrastructure, this schedule remains unchanged.

TBC utilizes the Siemens WinCC HMI SCADA system for real-time monitoring, alarm dispatching, and event tracking. The SCADA system is reviewed by on-duty system operators, and the logs are further reviewed by supervisors.

Any quality assurance (QA) findings and issues are ranked by risk level, ranging from low to very high. Corrective work orders are assigned accordingly, and medium or higher-risk items are reported to CAISO. A centralized Corrective Work Tracking Log is maintained and overseen by the Operations Manager.

Based on SME interviews and supporting documentation, TBC's QA/QC program is implemented and actively maintained. Inspection frequency, SCADA oversight, and corrective action tracking are consistent with the utility's WMP and industry expectations. Initiative field verification and QA documentation align with maturity scoring targets for this review cycle.

Roles and Responsibilities – Score: 2 (Applied)

The IE has determined that TBC achieves a score of 2 – applied, determined by the OEIS QA/QC Program Assessment Framework. TBC's roles and responsibilities are generally clear for a small utility with limited operational complexity. Program ownership is documented in the WMP and QA/QC oversight appears embedded within the broader roles held by the Operations Manager and field technicians. Work order oversight and inspections are delegated and tracked accordingly. The SME Interview Questionnaire confirms staff awareness and documentation handoffs. There is no centralized QA/QC department or external QA auditor, but responsibilities are documented and functionally applied.

Quality Culture – Score: 1 (Initiated)

The IE has determined that TBC achieves a score of 1 – initiated, determined by the OEIS QA/QC Program Assessment Framework. Operators and supervisors actively review SCADA alerts, and they understand the importance of reporting issues as it relates to quality. Inspection issues are escalated based on risk rankings, and corrective actions are assigned and tracked. While broader cultural indicators like QA/QC onboarding and QA incentives were not identified, a quality-aware operational environment is clearly in place.

Quality Management System (QMS) – Score: 2 (Applied)

The IE has determined that TBC achieves a score of 2 – applied, determined by the OEIS QA/QC Program Assessment Framework. TBC uses monthly inspection checklists, Corrective Work

Tracking Logs, and risk-based escalation protocols. These protocols and procedures fulfill basic QMS functions for a small EC. The system is functional and consistent but lacks the sophistication of digital integration or enterprise-wide QA management tools.

Quality Inspections and Audits – Score: 3 (Routine)

The IE has determined that TBC achieves a score of 3 – routine, determined by the OEIS QA/QC Program Assessment Framework. TBC conducts monthly weekly/monthly inspections, internal audits of logs, and an annual CAISO review of procedures. This structure is well documented and consistently executed based upon the documentation provided. The primary gap is the absence of a third-party audit function and formal lessons-learned documentation.

QA/QC Technology Adoption – Score: 2 (Applied)

The IE has determined that TBC achieves a score of 2 – applied, determined by the OEIS QA/QC Program Assessment Framework. TBC uses Siemens WinCC SCADA for teal-time system monitoring. SCADA alarms are reviewed and logged by operators and reviewed by supervisors. While the system is effective, it is not deeply integrated into QA documentation or analytics platforms - no predictive tools are used. The current adoption reflects adequate implementation for a utility of TBC's scale.

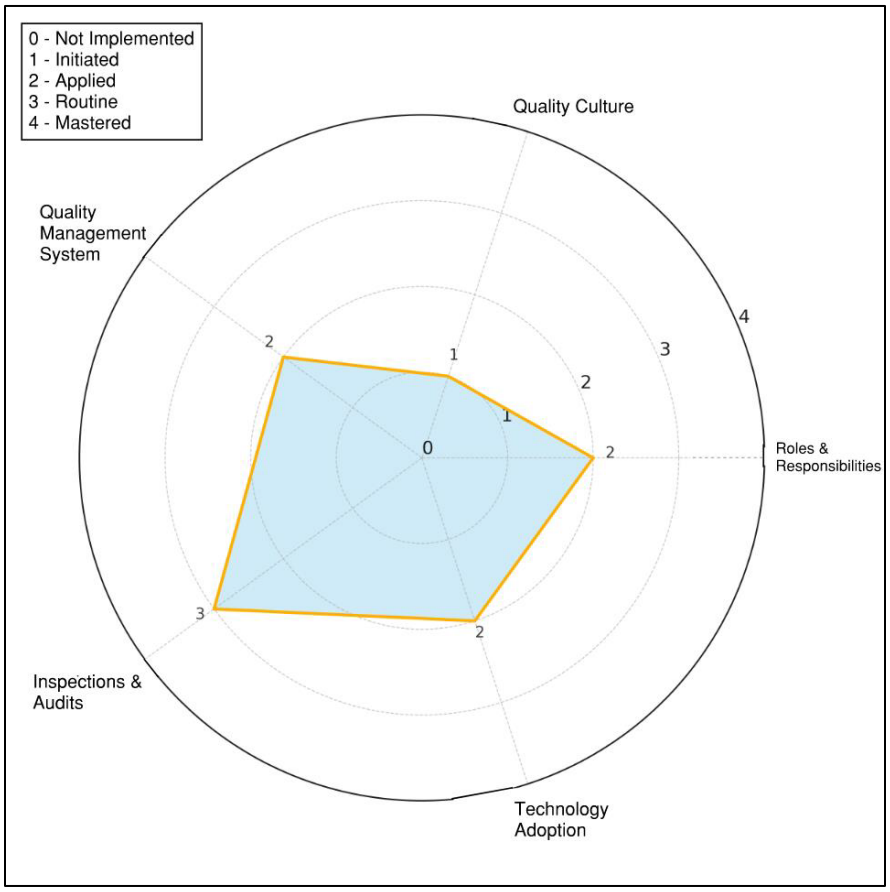

Figure 13 – Trans Bay Cable QA/QC Maturity Spider Chart

6 Conclusion

Based upon the IE review, site visit, and overall assessment outlined in this document, BVNA has found that Trans Bay Cable has met the initiatives, processes, and protocols as outlined in the 2024 WMP. TBC wildfire mitigation strategies have not substantially changed since the 2020 WMP due to the unique nature of TBC's operating area and the Pittsburg facility.

Both planned and actual expenditures for WMP initiatives have trended downward. TBC projected planned expenditures to be $27,200 which is down 86% from the $201,900 that was planned in 2023. Even with the unexpected expenditure in 2024, the total amount spent in said year is approximately 82% less than the amount spent in 2023. The planned and actual expenditure accurately reflects and aligns with the WMP where 2023 saw the completion of all remaining initiatives and 2024 outlined no initiative targets.

As outlined in this report, TBC had no initiative target goals for 2024 and anticipates no initiative target goals for the 2025 WMP planning cycle. To identify opportunities for improvement, TBC utilizes the Failure Mode and Effects Analysis (FMEA) methodology. This process enables TBC to pinpoint potential failure points and mitigate wildfire risks associated with its transmission infrastructure.

Upon completion of the onsite assessment, review of documentation received via data requests, and public documentation review, it is determined that Trans Bay Cable has completed the activities outlined in their 2024 WMP. Although no initiative targets were set for 2024, TBC maintained and implemented other activities to help reduce wildfire ignition risk. TBC has successfully met their intent to reduce or eliminate the impact of a potential fire that would have a likelihood of extending from the TBC Pittsburg facility and engaging with off-site fuels.

TBC remains committed to enhancing its infrastructure fire prevention approach, while also collaborating with local response agencies. This collaboration ensures that the agencies are equipped and trained to provide effective fire protection for TBC's Pittsburg facility. TBC achieves this without a dedicated wildfire management program within the organization. This approach has proven functional and compliant due to the size, scope, design, and inherent protection features of TBC's operations and infrastructure and the lack of historical fire events at the facility.

7 Attachments

The attachments listed below can be found on a separate Microsoft Excel file titled "TBC 2025 IE ARC Appendix."

7.1 Catalog of Initiatives

7.2 Data Requests

7.3 SME Interviews

7.4 List of "Fail-to-Fund" Initiatives

7.5 Pictures of Non-Conformance