



July 25, 2025

By E-Filing Docket #2026-2028-Base-WMPS

Tony Marino
Deputy Director, Electrical Infrastructure Directorate
Office of Energy Infrastructure Safety
715 P Street, 20th Fl.
Sacramento, CA 95814

Subject: Trans Bay Cable LLC (U934-E) 2026-2028 Wildfire Mitigation Plan Submission

Dear Deputy Director Marino:

Trans Bay Cable (TBC) provided its 2026-2028 Base Wildfire Mitigation Plan (WMP) Pre-Submission to the Office of Energy Infrastructure Safety (Energy Safety) on June 13, 2025. Energy Safety reviewed TBC's WMP Pre-Submission for completeness pursuant to Section 4.1.1 of the Wildfire Mitigation Plan Guidelines and the Energy Safety Policy Division Process Guidelines.

On June 27, 2025, Energy Safety issued a determination letter stating that TBC's WMP Pre-Submission did not satisfy the completeness check. TBC has addressed the completeness check items (as shown in Appendix A). TBC has also made additional corrections to fix non-substantive errors (as shown in Appendix B).

If you have any questions, please contact me at lenneal.gardner@transbaycable.com.

Sincerely,

A handwritten signature in blue ink, appearing to read "Lenneal K. Gardner", is written over a light blue rectangular background.

Lenneal K. Gardner
Sr. Manager Regulatory Affairs

Appendix A – Completeness Checklist

Section of TBC's WMP Pre-Submission	WMP pre-submission PDF page number	Information to Make Complete	TBC'S Actions to Make Complete
Cover Page	1	TBC did not include the docket name and docket number of the document on the cover page. TBC must follow the submission format requirements, as required in Section 8.3 (p. 12) of the Energy Safety Policy Division Process Guidelines.	TBC corrected cover page to include required information.
Table Data in Excel File	-	TBC did not provide an Excel file with matching information from each table within its WMP TBC must provide an excel file that contains the required tables, as required in Section 2.1.1 (p. 5) of Chapter II in the WMP Guidelines.	TBC revised submission to include Excel file of tables.
Table of Contents	3-8	TBC did not follow the correct order and titles of required sections. For instance, Section 7 in the pre-submission includes "Grid Design, Operation, and Maintenance," "Vegetation Management and Inspections," "Situational Awareness and Forecasting," "Emergency Preparedness," and "Community Outreach" as sub-sections whereas the WMP Guidelines, adopted February 24, 2025, designate Section 7 for "Public Safety Power Shutoff." TBC must adhere to the correct order and titles as outlined in Chapter III of the WMP Guidelines (pp. ii - viii).	TBC corrected formatting errors in table of contents.
Table of Contents	2, 9-12	TBC included a table of contents with page numbers, but multiple entries display errors such as "Error! Bookmark not defined." TBC must correct all formatting errors in the table of contents.	TBC corrected formatting errors in table of contents.
Section 2 Responsible Persons	16-18	TBC provided Section 2 "Responsible Persons," but the content of this section does not conform to the WMP Guidelines. Specifically, TBC used incorrect section titles and section numbering and omitted several required sections.	TBC revised Section 2 to conform with WMP Guidelines.

		For instance, TBC titled Section 3 as “Statutory Requirements Checklist,” whereas the WMP Guidelines designate Section 3 as “Overview of Base WMP.” Additionally, Section 13 “Lessons Learned” was not included. TBC must ensure the inclusion of all 13 required sections with correct section titles and numbering in full alignment with the WMP Guidelines.	
3.4 Prioritized List of Wildfire Risks and Risk Drivers	22-25	In Table 3-1, List of Risks and Risk Drivers to Prioritize, TBC did not provide values for the “Priority” and “x% of ignitions in HFTD” columns. TBC must provide a value for all table cells. When there is no value available, TBC must note in the table “N/A,” “None,” or another designation to acknowledge the lack of information is intentional. If TBC provides “N/A,” or similar designation, TBC must explain why the required entry cannot be provided.	TBC revised Table 3-1 with the requested information.
3.5 Performance Metrics	26	TBC stated “... including initiatives targets that HWT reports to Energy Safety in accordance with the Energy Safety Data Guidelines, HWT asserts that...” TBC must provide information about itself, not about HWT.	TBC revised Section 3.5 with information about its performance metrics.
3.6 Projected Expenditures	27	TBC did not provide its projected expenditures, claiming “TBC has not current WMP initiatives.” However, the WMP Guidelines require that the electrical corporation summarize its projected expenditures in thousands of U.S. dollars per year for the “activities” planned over the three-year WMP cycle in both tabular and graph form. Additionally, TBC incorrectly titled Section 3.6 as “Project Expenditures” instead of “Projected Expenditures.” TBC must correct the title of the section, and if TBC does not have any planned activities, it must state that it has no planned activities for the cycle. If TBC has any planned activities, it must provide its projected	TBC revised Section 3.6 to with the requested information and graph.

		expenditures in both tabular and graph form.	
5 Risk Methodology and Assessment	37-40	TBC did not provide all the required sub-sections for Section 5 Risk Methodology and Assessment. TBC must comply with the structure and content requirements of Section 5 as detailed in the WMP Guidelines (pp. 29-59) and Chapter V of the WMP Guidelines that shows a list of independent transmission operators (ITOs) modified reporting requirements for Section 5 (pp. 177-179). If any sub-sections do not apply to TBC, TBC must provide a justification under each corresponding sub-section.	TBC revised Section 5 to include required subsections and information.
Section 6 Wildfire Mitigation Strategy	41-42	TBC did not include the required sub-sections for Section 6 Wildfire Mitigation Strategy. TBC must include the required sub-sections for Section 6, conforming to the structure and content requirements from the WMP Guidelines (pp. 60-78) and Chapter V of the WMP Guidelines that shows ITOs modified reporting requirements for Section 6 (p. 179). If any sub-sections do not apply to TBC, TBC must provide a justification under each corresponding sub-section.	TBC revised Section 6 to include required subsections information.
Section 7.1 Grid Design, Operations, and Maintenance	43-70	There are multiple issues throughout TBC's Section 7.1: 1. The Grid Design, Operations, and Maintenance section belongs under Section 8 per the WMP Guidelines. 2. TBC did not include all the required sub-sections for the Grid Design, Operations, and Maintenance section, as required in the WMP Guidelines. 3. Throughout TBC's Section 7.1, the content references the 2023-2025 Base WMP, not the required 2026-2028 Base WMP cycle. TBC must correct the section number, follow the current WMP Guidelines, and include its plans for the 2026-2028 Base WMP cycle.	TBC revised its response to Section 7 and Section 8 to address multiple issues with the requested information.
Section 7.2 Vegetation	70-88	There are multiple issues throughout TBC's Section 7.2:	TBC revised its response to Section 7 and Section 8 to address multiple issues

Management and Inspections		1. The Vegetation Management and Inspections section belongs under Section 9 per the WMP Guidelines. 2. TBC did not include all the required sub-sections for the Vegetation Management and Inspections section, as required in the WMP Guidelines. 3. Throughout TBC's Section 7.2, the content references the 2023-2025 Base WMP, not the required 2026-2028 Base WMP cycle. TBC must correct the section number, follow the current WMP Guidelines, and include its plans for the 2026-2028 Base WMP cycle.	with the requested information.
Section 7.3 Situational Awareness and Forecasting	88-116	There are multiple issues throughout TBC's Section 7.3: 1. The Situational Awareness and Forecasting belongs under Section 10 per the WMP Guidelines. 2. TBC did not include all the required sub-sections for the Situational Awareness section, as required in the WMP Guidelines. 3. Throughout TBC's Section 7.3, the content references the 2023-2025 Base WMP, not the required 2026-2028 Base WMP cycle. TBC must correct the section title and number, follow the current WMP Guidelines, and include plans for the 2026-2028 Base WMP cycle.	TBC revised its response to Section 7 and Section 8 to address multiple issues with the requested information.
Section 7.4 Emergency Preparedness Section 7.5 Community Outreach and Engagement	117-186	There are multiple issues throughout TBC's Section 7.4 and Section 7.5: 1. The Emergency Preparedness, Collaboration, and Community Outreach section belongs under Section 11 per the WMP Guidelines. 2. TBC did not include all the required sub-sections for the Emergency Preparedness, Collaboration, and Community Outreach section, as required in the WMP Guidelines. 3. Throughout TBC's Section 7.4 and Section 7.5, the content references the 2023-2025 Base WMP, not the required 2026-2028 Base WMP cycle. TBC must correct the section title and number, follow the current WMP	TBC revised its response to Section 7 to address multiple issues with the requested information.

		Guidelines, and include plans for the 2026-2028 Base WMP cycle.	
Section 8 Public Safety Power Shutoff	187-217	There are multiple issues throughout TBC's Section 8: 1. The Public Safety Power Shutoff section belongs under Section 7. 4. TBC did not include all the required sub-sections for the Public Safety Power Shutoff section, as required in the WMP Guidelines. 2. Throughout TBC's PSPS Section, the content references the 2023-2025 Base WMP, not the required 2026-2028 Base WMP cycle. 3. TBC included its Vegetation Management content under Sections 8.6 through 8.12, but the Vegetation and Management section belongs under Section 9, per the WMP Guidelines. Additionally, TBC did not include all required sub-sections under Vegetation Management as specified in the WMP Guidelines. TBC must correct the section number, follow the current WMP Guidelines, include plans for the 2026-2028 Base WMP cycle, relocate Vegetation Management content to Section 9, and ensure all required sub-sections are included.	TBC revised its response to Section 8 to address multiple issues with the requested information.
Section 9 Situational Awareness and Forecasting	218-238	There are multiple issues throughout TBC's Section 9: 1. The Situational Awareness and Forecasting section belongs under Section 10 per the WMP Guidelines. 2. In Section 9.2.2. Evaluation and Selection of New Systems, the content references the 2023-2025 Base WMP, not the required 2026-2028 Base WMP cycle. 3. In Section 9.6 Fire Potential Index, TBC did not include all required sub-sections per the WMP Guidelines. 4. In Table 13-1. Lessons Learned, TBC stated TBC will leverage enterprise level engagement of Technosylva for situational awareness, referencing the 2026-2028 WMP Section 10, but Section 10 does not provide any details supporting this reference.	TBC revised its response to Section 9 to address multiple issues with the requested information.

		TBC must correct section number, provide TBC's plan for 2026-2028 Base WMP cycle along with details about Technosylva mentioned in the Lessons Learned section, and include all required sub-sections, conforming to Section 10 requirements of WMP Guidelines (pp. 125-139) and Chapter V of the WMP Guidelines that shows a list of ITOs modified reporting requirements for Section 10 (p. 180).	
Section 10 Emergency Preparedness, Collaboration, and Community Outreach	239-268	There are multiple issues throughout TBC's Section 10: 1. The Emergency Preparedness, Collaboration, and Community Outreach section belongs under Section 11 per the WMP Guidelines. 2. In Section 10.3.1 Communication Strategy with Public Safety Partners, TBC stated "Given the limited scale of HWT's operations, HWT maintains..." TBC must correct section number and provide information about itself, not about HWT.	TBC revised Section 10 with the requested information as it pertains to TBC's operations.
Section 11 Enterprise Systems	269-277	There are multiple issues throughout TBC's Section 11: 1. The Enterprise Systems section belongs under Section 12 per the WMP Guidelines. 2. Throughout Section 11.2 Summary of Enterprise Systems, the section refers to HWT instead of TBC. TBC must correct section number and provide information about itself, not about HWT.	TBC revised Section 11 with the requested information as it pertains to TBC's operations.
Appendix D	303	TBC did not provide section and page numbers, as required in the WMP Guidelines (p. D-1). Additionally, TBC provided the wrong code and title of its area for continued improvement. TBC must include the section and page number in Appendix D for any area for continued improvement and must correct the area for continued improvement code and title.	TBC revised its response to correct code and title of area for continued improvement and related section and page number.

Appendix B – Non-Substantive Errors

TBC identified a limited number of non-substantive edits since submitting the WMP on June 13, 2025. The table below summarizes the revisions made by TBC.¹

Section/Table/Figure	Page	Nature of Change
Section 2	14-16	Removed Section 2.1 to conform with Section 2 WMP requirements
Tables	Throughout	Revised naming convention and revised to more accurately represent location within the WMP.
Figure Numbering	Throughout	Revised naming convention and revised to more accurately represent location within the WMP.

¹ Note this list does not include edits due to formatting, grammar, spelling or typographical errors.