

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: Horizon West Transmission, LLC (U222-E) 2023-2025 Wildfire Mitigation Plan Submission

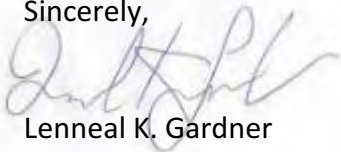
Dear Deputy Director Marino:

Horizon West Transmission (HWT) provided its 2023-2025 Wildfire Mitigation Plan (WMP) Pre-Submission to the Office of Energy Infrastructure Safety (Energy Safety) on June 13, 2025. Energy Safety reviewed HWT'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 HWT's WMP Pre-Submission did not satisfy the completeness check. HWT has addressed the completeness check items (as shown in Appendix A). HWT 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@nexteraenergy.com.

Sincerely,



Lenneal K. Gardner
Sr. Manager Regulatory Affairs

Appendix A – Completeness Checklist

Section of HWT's WMP Pre-Submission	WMP pre-submission PDF page number	Information to Make Complete	HWT's Actions to Make Complete
Cover Page	1	HWT did not include the docket name and docket number of the document on the cover page. HWT must follow the submission format requirements, as required in Section 8.3 (p. 12) of the Energy Safety Policy Division Process Guidelines.	HWT corrected cover page to include required information.
Table Data in Excel File	-	HWT did not provide an Excel file with matching information from each table within its WMP. HWT must provide an Excel file that contains the required tables, as required in Section 2.1.1 (p. 5) of Chapter II in WMP Guidelines.	HWT revised submission to include Excel file of tables.
Table of Contents		HWT included a table of contents with page numbers, but multiple entries display errors such as "Error! Bookmark not defined." HWT must correct all formatting errors in the table of contents.	HWT corrected formatting errors in table of contents
Section 2 Responsible Persons	13-14	HWT provided Section 2 "Responsible Persons," but the content of this section does not conform to the WMP Guidelines. Specifically, HWT used incorrect section titles and section numbering and omitted several required sections. For instance, HWT titled Section 3 as "Actuals and planned spending," whereas the WMP Guidelines designate Section 3 as "Overview of Base WMP." Additionally, Section 13 "Lessons Learned" was not included. Also, under the executive-level owner information, the name is listed as "Jaime Hoffman," but in subsequent sections, it appears as "Jamie Hoffman."	HWT revised Section 2 to conform with WMP Guidelines..

		HWT must ensure the inclusion of all 13 required sections with correct section titles and numbering in full alignment with the WMP Guidelines and ensure consistent use of names throughout.	
Section 3.4 Prioritized List of Wildfire Risks and Risk Drivers	19-22	In Table 3-1, List of Risks and Risk Drivers to Prioritize, HWT did not provide values for the “Priority” and “x% of ignitions in HFTD” columns. HWT must provide a value for all table cells. When there is no value available, HWT must note in the table “N/A,” “None,” or another designation to acknowledge the lack of information is intentional. If HWT provides “N/A,” or similar designation, HWT must explain why the required entry cannot be provided.	HWT revised Table 3-1 with the requested information.
Section 3.6 Project Expenditures	24	In Table 3-3, Summary of Projected WMP Expenditures, HWT did not include a graph form of the projected expenditures, as required in the WMP Guidelines. Additionally, HWT incorrectly titled Section 3.6 as “Project Expenditures” instead of “Projected Expenditures.” HWT must provide both tabular and graph forms of the projected expenditures in the thousand US dollars and must correct the title of the section.	HWT revised Section 3.6 to with the requested information and graph.
Section 6 Wildfire Mitigation Strategy Development	41-46	HWT did not include the required sub-sections for Section 6 Wildfire Mitigation Strategy. HWT 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 independent transmission operators (ITOs) modified reporting requirements for Section 6 (p. 179).	HWT revised Section 6 to include required subsections information.

		If any sub-sections do not apply to HWT, HWT must provide a justification under each corresponding sub-section.	
Section 8 Grid Design, Operations, and Maintenance	51 61 75	HWT did not include Year 1 through Year 3 values in the required columns in the following tables: - Table 8-1, Grid Design, Operation, and Maintenance Targets by year, - Table 8-2, Asset Inspection Frequency, Methods, and Criteria, and - Table 8-4, Grid Design, Asset Inspections, and Maintenance QA and QC Activity Targets. HWT must include the year values in the required columns.	HWT revised its response to include Year values.
Section 9 Vegetation Management and Inspections	89 109	HWT did not include Year 1 through Year 3 values in the required columns in the following tables: - Table 9-1, Vegetation Management Targets by Year (Non-inspection Targets), - Table 9-2, Vegetation Inspections and Pole Clearing Targets by Year, and - Table 9-6, Vegetation Management QA and QC Activity Targets. Additionally, In Table 9-6, HWT did not include [Year 2]: Pass Rate Target and [Year 3]: pass Rate Target columns. HWT must include the year values in the required columns, and HWT must include “2027: Pass Rate Target” and “2028: Pass Rate Target” columns in Table 9-6.	HWT revised its response to include Year values and additional required information.
Section 10 Situational Awareness and Forecasting	120	In Table 10-1, Situational Awareness Targets by Year, HWT did not provide at least one qualitative and quantitative for all required initiatives: - Environmental Monitoring Systems, - Grid Monitoring Systems, - Ignition Detection Systems, - Weather Forecast, and	HWT revised its response to include the required information.

		- Weather Station Maintenance and Calibration. HWT must include both qualitative and quantitative targets for all required initiatives, as required in the WMP Guidelines (p. 125).	
Section 11 Emergency Preparedness, Collaboration, and Community Outreach	142	In Table 11-1, Emergency Preparedness and Community Outreach Targets by Year, HWT did not include Year 1 through Year 3 values in the required columns. HWT must include the year values in the required columns.	HWT revised its response to include Year values.
Section 12 Enterprise Systems	170	In Table 12-1, Enterprise Systems Targets, HWT did not include Year 1 through Year 3 values in the required columns. HWT must include the year values in the required columns.	HWT revised its response to include Year values.
Appendix D	201	HWT did not provide section and page numbers, as required in the WMP Guidelines (p. D-1). Additionally, HWT provided the wrong code and title of its area for continued improvement. HWT 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.	HWT revised its response to correct code and title of area for continued improvement and related section and page number.

Appendix B – Non-Substantive Errors

HWT identified a limited number of non-substantive omissions since submitting the WMP on March 6, 2023. The table below summarizes the revisions made by HWT.¹

Section/Table/Figure	Page	Nature of Change
Section 2	14-16	Removed Section 2.1 to conform with Section 2 WMP requirements

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

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.