

Horizon West Transmission (HWT)

Data Request From: Office of Energy Infrastructure Safety

Data Request Number: OEIS-P-WMP_2025-HWT-001

Date Received: August 12, 2025

Date Responded: August 15, 2025

REQUEST

Q01. Regarding Defensible Space (VM-02) Weed Abatement Frequency:

On page 119 of its 2026-2028 Base WMP, HWT states that its “primary vegetation management activity consists of weed control which occurs once per year with supplemental treatments up to four times per year.” However, on page 99 of its 2023-2025 Base WMP, HWT states that it performs weed abatement six times per year, “bimonthly during winter and spring, and quarterly during summer and fall.”

- a. Explain why HWT reduced its Defensible Space (VM-02) target from six treatments per year, to one with up to four treatments per year (e.g., resource use efficiency, treatments have become more effective over time, etc.).*
- b. Explain how defensible space treatments one to four times per year will reduce the average annual fuel loading as effectively as six treatments.*
- c. State the time of year that HWT plans to perform weed abatement to achieve its target of one treatment per year (e.g., late spring, early summer, fall, etc.).*

HWT Response to Q01:

- a. The Suncrest Substation and the fuel modification zone around the substation are both hardscaped with rock which provides limited opportunity for vegetative fuels to grow. HWT’s field engineers conduct monthly vegetation inspections to assess the existence and growth of weeds and other low lying vegetation within Suncrest’s operational space. Limited weed abatement treatments have been effective in inhibiting the growth and existence of weeds both within the substation and the fuel modification zone. As a result, HWT elected to revise the cadence of weed abatement to better align with historically observed existence/growth of vegetation within the substation and fuel modification zone and best practices for optimal use/best practices associated with herbicide treatments.
- b. Given the fact the both the Suncrest Substation and the fuel modification zone around the substation are both hardscaped with rock, there is limited growth of weeds and other low lying vegetation within Suncrest’s operational space. As Suncrest was a new facility which went operational in 2020, HWT did not have an operational history upon which to base its cadence of weed abatement treatments and initially established a program of six treatments. Over the course of 5 years of monthly vegetation inspections by field engineers and periodic weed abatement activities conducted by contracted vendors, the field engineers have been able to observe the growth of vegetation and the effectiveness of weed abatements. Additionally considering recommendations from contracted vendor and best practices for use of herbicides and vegetation management techniques, HWT has determined that a minimum one year treatment, with up to three additional treatments, dependent on vegetation growth driven by observed rainfall, will be sufficiently effective

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for address the limited vegetative fuels that may exist in and around the Suncrest Substation.

- c. Target treatment will occur in the spring before peak fire risk months.

Q02. Regarding Quality Assurance and Quality Control Record Keeping:

On page 134 of its 2026-2028 Base WMP HWT describes its documentation of quality assurance and quality control findings. HWT states that “asset management and inspection tasks are tracked and reported as complete in HWT’s asset management program, AMP. Field engineers review results of monthly equipment inspections. Any identified issues which need further mitigation will be discussed and addressed with the appropriate subject matter expert (SME) or the supervisor as required. Issues are documented and monitored by entering corresponding work tasks in the database.”

- a. *Does HWT’s field engineer also verify that its vegetation management and inspection contractor completed work and then record that the work is complete in its asset management program?*
 - i. *If yes, provide an example of conditions the field engineer records when performing a quality check (e.g., no vegetation within the Suncrest Facility walls, no vegetation within 5 feet outside of the Suncrest Facility walls, etc.).*
 - ii. *If no, describe how HWT tracks the results of its quality checks and, as in (i.) above, provide an example of conditions the field engineer records.*

HWT Response to Q02:

- a. An HWT field engineer perform the monthly vegetation inspections as part of the monthly WMP Condition Assessment (WCA) and mark the task complete in AMP. Any vegetation need identified is communicated to the vegetation management contractor. Field engineers document vegetation management works by the contractor as complete via an AMP task after the work is completed (See screenshot below). The WCA which occurs subsequent to the vegetation management works by the contractor functions as the assessment of the conditions observed by the field engineer and includes follow-up/after action items if needed. Two WCAs (OEIS-P-WMP_2025-HWT-001_Attachment_WCA_20240425 and OEIS-P-WMP_2025-HWT-001_Attachment_WCA_20250129) are provided as confidential attachments.

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Figure 1. AMP record of completed Weed Abatement Activity conducted by contractor in 2024

The screenshot displays the AMP-PROD software interface. On the left, the 'Asset-Stations-Area' pane shows a tree view with 'HWT' expanded, containing 'SUNCREST' and 'Suncrest SVC'. The main window is titled 'Work Tasks - Suncrest SVC' and shows a table of work tasks. Below this, a 'Problems' section is visible but empty. The bottom of the interface features a tabbed menu with options: General Info, Problems, AOPs, Equipment, Work Tasks, Maps, Reports, Comments, Pictures, CA, Environment Inspection Data, and Leadership Review.

Work Task No	Major Facility...	Functional Area	Work Task Type	Work Task Sub-Type	Work Task Status	Completion %	Due Date	Cy
T3K4744168	Suncrest SVC	Substation	CAISO HWT Main...	Station Weed Spray - Accessible Areas As Necessary	Complete	12/13/2024	04/23/2025	7.1
T3K4526178	Suncrest SVC	Substation	CAISO HWT Main...	Station Weed Spray - Accessible Areas As Necessary	Complete	09/23/2024	10/25/2024	7.1
T3K4499294	Suncrest SVC	Substation	CAISO HWT Main...	Station Weed Spray - Including HV Areas	Complete	05/29/2024	06/17/2024	14
T3K4306404	Suncrest SVC	Substation	CAISO HWT Main...	Station Weed Spray - Accessible Areas As Necessary	Complete	03/25/2024	03/31/2024	7.1

Problem ID	Created By	Date Found	Status	Corrected By	Priority	Asset Name	Last Date Up...	Repair Code	Cause 1	Cause 2	Cause 3
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