



September 8, 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

Re: Submission of TBC's 2026-2028 Wildfire Mitigation Plan Revision Notice of Non-Substantive Errata

Dear Deputy Director Marino:

Pursuant to Section 7 of the Office of Energy Infrastructure Safety's (Energy Safety) Policy Division Process Guidelines (Process Guidelines), Trans Bay Cable (TBC) hereby submits its non-substantive errata for the 2026-2028 WMP Revision R0.

The errata are as follows:

- Attachment 1: Pages 192-193: Updated at request of Energy Safety to include additional narrative on enterprise system utilized by TBC.

Please let us know if any additional materials or clarifications are needed.

Sincerely,

/s/ Lenneal Gardner

Lenneal Gardner
Senior Manager Regulatory Affairs
NextEra Energy Transmission, LLC

Attachment 1 to TBC's 2026-2028 Base WMP R0 Non-Substantive Errata



TBC-HS-103
Wildfire Mitigation Plan

locations), and retention (any policies the electrical corporation for how long it stores data and how it disposes of data after any retention period)

- *Any QA/QC or auditing of its system*
- *Overview of any data governance plan that the electrical corporation has in place. Highlighting any data stewardship practices*
- *How current WMP initiatives and activities are being tracked and monitored in enterprise systems*
- *Employee and/or contractor ability to access and interact with the data and systems for tracking work order status and scheduling*
- *How the electrical corporation's work order and asset management systems feed into risk analysis and alternative or interim activity selection*
- *Any changes to the electrical corporation's enterprise systems since the last Base WMP submission and a brief explanation as to why those changes were made. Include any planned improvements or updates to the enterprise systems and the timeline for implementation*

The Trans Bay System is a 400MW HVDC consisting of two converter stations connected by an approximate 53-mile submarine cable. The System's western converter station is in San Francisco, a fully developed and urbanized area with minimal wildfire-threat risk. The submarine cable is fully submerged beneath the Bay Waters for approximately 53 miles and therefore has no fire-threat risk. The eastern converter station is located in Pittsburg, CA which is adjacent to an area designated as a Tier 2 HFTD. All aboveground transmission infrastructure is fully contained within the walls of the system's converter stations. Considering TBC's limited footprint with one transmission asset, TBC has a small staff that oversees its operations, including asset inspection and management, maintenance, system operation and initial emergency response. All TBC maintenance work, including asset inspections, is conducted by dedicated TBC operations personnel, that, by reason of training, experience, and instruction, are qualified to perform the task, with support from qualified contractors as needed. Operations personnel maintain and operate TBC facilities in accordance with good utility practice, sound engineering judgment, the guidelines as outlined in applicable NERC reliability standards, laws, and regulations. Operators are trained for emergency scenarios and authorized to take precautionary measures such as reduction in power flow or initiating system shutdown when presented with system warnings or instruction from the CAISO or requests from PG&E. Infrastructure assessment is conducted by TBC's operators and engineers who are charged with physically inspecting TBC's substation and all equipment thereon, inspecting underground cable vaults and assessing cable surveys. All TBC operations and engineering staff take proper care to ensure the safety of personnel and the public in performing maintenance, inspection, and repair duties. Maintenance, vegetation and asset management tasks are inputted tracked and monitored in AMP. AMP is a custom-built, in-house asset management program which is utilized by all NextEra Energy affiliates, including TBC. AMP is managed at the corporate level by NextEra Energy's Power Delivery business unit and its dedicated IT department. As such any changes, updates, etc. are directed, managed, and controlled at the corporate level. There is no current plan for any integration of new software for

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AMP in the 2026-2028 WMP -years. However, there is a corporate-directed plan to transition to Elements (a custom-build, in-house asset management program), the upgraded version of AMP, during this timeframe.