



September 16, 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: Trans Bay Cable Response to Notice on Errata for the Trans Bay Cable 2026-2028 Base Wildfire Mitigation Plan

Dear Deputy Director Marino:

On September 2, 2025, the Office of Energy Safety (Energy Safety) issued a Notice on Errata for the Trans Bay Cable (TBC) 2026-2028 Base Wildfire Mitigation Plan (Notice on Errata). In accordance with the Notice on Errata and WMP Guidelines section 4.1.3, TBC submits the following:

The errata are as follows:

- TBC's response to the Notice on Errata, including responses to all 3 issues identified by Energy.
- A redlined version of TBC's 2026-2028 Base WMP showing the changes and updates TBC made in response to the Notice on Errata to TBC's 2026-2028 Base WMP R0 submission.
- A clean version of TBC's 2026-2028 Base WMP identified as R1 that incorporates the updates reflected in the redlined version. The clean version also reflects non-substantive errata that TBC previously submitted on September 8, 2025, consistent with Section 7 of the Process Guidelines.

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

Trans Bay Cable LLC

P. O. Box 666, Pittsburg, CA 94565

Cover Letter Appendix A – Changes to Address Critical Issues

Section	WMP Page Number	Energy Safety Correction or Clarification Requested	Description of TBC Correction or Clarification
Section 10	140-142	The WMP Guidelines require that each Base WMP cover a three-year period designated by Energy Safety.¹ TBC must revise its Base WMP to include only activities scheduled for the 2026-2028 Base WMP cycle or must explain why out-of-cycle activities are relevant to the 2026-2028 Base WMP cycle. For example: a. In Table 10-1, Situational Awareness Targets by Year, TBC reported activities scheduled for completion in 2025 within its 2026-2028 Base WMP, such as Utilization of Technosylva's Wildfire Analyst Platform (SA-02) and Completion of Upgrades to Optos/Firecaster (SA-02).²	Utilization of Technosylva's Wildfire Analyst Platform (SA-01), which driven by enterprise level engagement is currently projected for completion in Q2 2026 and therefore proper for inclusion in the 2026-2028 Base WMP cycle. Updates reflecting this change are on pgs. 44, 140, 143, 158 and 196. Completion of Upgrades to Optos/Firecaster (SA-02) was removed as improvements do not materially alter use/ functionality of Optos/ Firecaster. SA-02 has been redefined as evaluation of Optos/Firecaster performance. Updates reflecting this change are on pgs. 142, 143, and 158.
Section 8, 10	102, 147	Version 5 of TBC's Maintenance Practices, approved by CAISO in 2024, switches TBC's asset inspection from weekly and monthly inspections to just monthly inspections, effective January 1, 2025.³ However, TBC's 2026-2028 Base WMP is inconsistent with the approved practices and still states "weekly" in some sections instead of "monthly." TBC must revise its	TBC revised its inspection interval to align with Version 5 of TBC's Maintenance Practice, which all reflect a monthly, rather than weekly cadence. (See pgs. 102 and 147)

¹ WMP Guidelines, Chapter I, Section 3.1, page 2.

² TBC, 2026-2028 Base WMP, Section 10.1, pages 140-142.

³ TBC, 2026-2028 Base WMP, Section 8.3.1.3, page 81.

		inspection interval to align with Version 5 of TBC’s Maintenance Practice.⁴ For example: a. In Section 8.7.3, Personnel Work Procedures and Training Conditions of Elevated Fire Risk, TBC states, “TBC Operations personnel are trained on all relevant TBC procedures, including regular weekly inspections...”⁵ b. In Section 10.3, Grid Monitoring Systems, TBC states, “TBC also performs weekly asset inspections...”⁶	
Section 8	67	TBC repeated sub-section titles in its 2026-2028 Base WMP, and TBC must correct its section titles to conform to the WMP Guidelines. For example: a. Both Sections 8.1.1 and 8.1.2 are titled “Qualitative Targets,”⁷ whereas Section 8.1.2 must be “Quantitative Targets” per the WMP Guidelines.⁸	TBC corrected the error in the title for Section 8.1.2 (See pgs. 3 and 67). TBC also corrected the title for Section 9.1.1 and Section 9.1.2 which are now identified as “Qualitative Targets” and “Quantitative Targets” respectively (See pgs. 4, 105 and 106

⁴ TBC, 2026-2028 Base WMP, Section 8.3.1.3, page 81.

⁵ TBC, 2026-2028 Base WMP, Section 8.7.3, page 102.

⁶ TBC, 2026-2028 Base WMP, Section 10.3, page 147.

⁷ TBC, 2026-2028 Base WMP, Section 10.3, pages 66-67.

⁸ WMP Guidelines, pages 80-81.

Cover Letter Appendix B – Additional Corrections for Non-substantive Changes

Section	WMP Page Number	Description of TBC Correction or Clarification
Throughout	N/A	Corrected spacing in subsection titles from Section 9.10 through 13.3, where there is no space between the section/sub-section number and the first letter of the title (e.g., “9.10Post-Fire Service Restoration”).
10.2.3	146	Corrected grammatical error to replace “in” with “and”.