

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: Horizon West Transmission Response to Notice on Errata for the Horizon West Transmission 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 Horizon West Transmission (HWT) 2026-2028 Base Wildfire Mitigation Plan (Notice on Errata). In accordance with the Notice on Errata and WMP Guidelines section 4.1.3, HWT submits the following:

The errata are as follows:

- HWT's response to the Notice on Errata, including responses to all 5 issues identified by Energy.
- A redlined version of HWT's 2026-2028 Base WMP showing the changes and updates HWT made in response to the Notice on Errata to HWT's 2026-2028 Base WMP R0 submission.
- A clean version of HWT'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 HWT previously submitted on September 8, 2025, consistent with Section 7 of the Process Guidelines.
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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

Cover Letter Appendix A – Changes to Address Critical Issues

Section	WMP Page Number	Energy Safety Correction or Clarification Requested	Description of HWT Correction or Clarification
Section 10	142-144	The WMP Guidelines require that each Base WMP cover a three-year period designated by Energy Safety.¹ HWT 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, HWT 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. 18,42, 46, 47, 142 , 145, 150, 157, 161, 163 and 200. 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. 18, 20, 42, 144, 145, 150, 157, 161 and 163
Throughout	-----	HWT must ensure the year range in its Base WMP is "2026-2028" for consistency with the Base WMP cycle. For example: a. In Section 6, Wildfire Mitigation Strategy Development, HWT stated, "Additionally, HWT will implement wildfire mitigation strategies and design criteria as soon as practical to any facility that HWT constructs or acquires during the 2023-2025 WMP cycle."³	HWT corrected error on pg. 42 to accurately refer to "2026-2028" WMP cycle.
Section 8	84	HWT stated that drones will supplement visual asset inspections,⁴ but HWT did not specify the frequency of the drone inspections. In response to HWT DR-002 Q01, HWT clarified that drone	HWT added clarification that drone inspections are conducted monthly along with visual inspections. (See pg. 84).

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

² HWT, 2026-2028 Base WMP, Section 10.1, pages 142-144

³ HWT, 2026-2028 Base WMP, Section 6, page 42.

⁴ HWT, 2026-2028 Base WMP, Section 8.3, page 84.

		inspections will be performed monthly as part of visual inspections. ⁵ HWT must update the WMP to clearly identify that its drone inspections will be performed monthly	
Section 9	111	HWT must ensure numerical totals in tables accurately reflect underlying annual values. For example: a. In Table 9-1. Vegetation Management Targets by Year (Non-inspection Targets), the “Three-Year Total” column for weed abatement under the Defensible Space (VM-02) initiative shows “1.” HWT also listed “1” for each year’s “Target/Status.”⁶ HWT must correct the “Three-Year Total” value so that it is the summation of the 2026, 2027, and 2028 weed abatement treatments.	HWT corrected Three-Year total for VM-02 in Table 9-1 on pg. 111.
Throughout	-----	HWT must ensure section and sub-section formatting includes appropriate spacing between numbering and titles throughout its WMP. For example: a. From Section 9.10 through 13.3, there is no space between the section/sub-section number and the first letter of the title (e.g., “9.10Post-Fire Service Restoration”).⁷	HWT made corrections in ensure appropriate spacing between numbering and titles throughout its WMP for Section 9.10 through 13.3.

⁵ HWT, Response to DR-002, Question 1, page 1.

⁶ HWT, 2026-2028 Base WMP, Section 9.1, page 111.

⁷ HWT, 2026-2028 Base WMP, pages 126-201.

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

Section	WMP Page Number	Description of HWT Correction or Clarification
Section 9	N/A	HWT corrected the title for Section 9.1.2 which is now identified “Quantitative Targets” respectively (See pgs. 4 and 108)