

Decision 19-05-041 May 30, 2019

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking to Implement
Electric Utility Wildfire Mitigation Plans
Pursuant to Senate Bill 901 (2018).

Rulemaking 18-10-007

**DECISION ON HORIZON WEST TRANSMISSION, LLC'S
AND TRANS BAY CABLE LLC'S 2019 WILDFIRE MITIGATION PLANS
PURSUANT TO SENATE BILL 901**

Summary

This decision approves the Wildfire Mitigation Plans of Horizon West Transmission, LLC (formerly known as NextEra Energy Transmission West, LLC)¹ and Trans Bay Cable LLC, filed pursuant to Senate Bill (SB) 901.² Along with this decision, and decisions acting on the Wildfire Mitigation Plans of other electrical corporations under Commission jurisdiction, the Commission is concurrently issuing a guidance decision governing all SB 901 Wildfire Mitigation Plan filers. Horizon West Transmission, LLC and Trans Bay Cable LLC are bound by the terms of that guidance decision as well as this decision.³

¹ NextEra Energy Transmission West, LLC changed its name to Horizon West Transmission, LLC, and filed a notice of name change in this proceeding on March 21, 2019. It will henceforth be referred to as Horizon West.

² Stats. 2018, Ch. 626 (Dodd).

³ The accompanying guidance decision also discusses all Independent Transmission Owners named as respondents in this proceeding, and explains that the Administrative Law Judges

Footnote continued on next page

1. Horizon West

Horizon West Transmission, LLC (Horizon West) became an electrical corporation and a public utility when the Commission granted it a certificate of public convenience and necessity to construct the Suncrest Dynamic Reactive Power Support Project (Suncrest Project) in Decision (D.) 18-10-030. The Suncrest Project will be constructed in San Diego County and interconnected to the existing Suncrest Substation owned by San Diego Gas & Electric Company (SDG&E). Horizon West will commence construction in the first quarter of 2019 and expects to place the Suncrest Project into service by approximately December 2019. Once constructed, the Suncrest Project will be placed under the California Independent System Operator's (CAISO) operational control, and Horizon West will operate and maintain the Suncrest Project as a Participating Transmission Owner in accordance with the CAISO's tariff.

The Horizon West Wildfire Mitigation Plan (WMP) substantially complies with Section 8386(b) and the direction provided by the Administrative Law Judge's (ALJ) Ruling on Wildfire Mitigation Plan Template, taking into account the fact that Horizon West is a transmission-only utility, its rates and cost recovery are regulated exclusively by the Federal Energy Regulatory Commission (FERC), and it is just beginning construction of its first project.

The Horizon West WMP's objectives are to build, operate, and maintain the Horizon West facilities according to established fire prevention procedures and strategies, and to periodically evaluate new technologies, materials, and methods for further reducing fire risk.

issued rulings relieving some of those respondents from the obligation to file a Wildfire Mitigation Plan this year.

The Horizon West WMP assessed risk using a site fire environment assessment to determine the presence of potential threats, a facility equipment assessment to consider potential failures from facility components and potential mitigations, and fire risk assessment workshops to conduct facility-level risk analysis with planning, construction, operations and maintenance, and management personnel. The risk assessment concluded that the fire risk would be up to moderate during construction and decommissioning, and low during operation, primarily due to the fire prevention measures that would be implemented. The WMP identifies and prioritizes the wildfire risk and risk drivers associated with the five program areas, i.e., (1) facility design and construction, (2) inspection and maintenance, (3) operation practices, (4) situational/condition awareness, and (5) response and recovery, and describes fire prevention strategies and programs to address each of them.

The Horizon West WMP establishes a performance metrics and monitoring program to track and correct compliance with the fire prevention strategies and programs, and to adapt metrics as conditions mandate. The WMP identifies the executives and program managers responsible for implementing the WMP and establishes a monthly meeting of Horizon West's president, senior director for operations, system control manager, and field operations lead to monitor wildfire risk and audit the WMP.

2. TBC

Trans Bay Cable LLC (TBC) is the owner and operator of a transmission system connecting Pacific Gas and Electric Company's (PG&E) 115 kV Pittsburg Substation to PG&E's 115 kV "Substation A" in San Francisco primarily via a 200 kV submarine cable that runs through San Francisco Bay, San Pablo Bay,

Carquinez Strait, and Suisun Bay. TBC's facility is under CAISO's operational control, and TBC is a Participating Transmission Owner.

The TBC WMP substantially complies with Section 8386(b) and the direction provided by the ALJ's Ruling on Wildfire Mitigation Plan Template, taking into account the fact that TBC is a transmission-only utility and its rates and cost recovery are regulated exclusively by FERC.

The TBC WMP's objectives are to maximize its fire prevention efforts, build and maintain fire containment and extinguishing strategies which minimize the potential spread of wildfire that would ignite due to a TBC facility fault, and ensure awareness and rapid communication of the start of fire at a TBC facility.

The TBC WMP assessed risk in the context of proximity to high fire risk areas, existence of vegetative fuels, nature and location of TBC facilities, and effectiveness of implemented mitigants. The WMP concludes that most of TBC's facilities are inherently fire hardened by virtue of being located underwater, underground, or in an urban environment remote from wildlands or vegetative fuels other than urban landscaping. However, the WMP notes that TBC's Pittsburg Converter Station is adjacent to West Pittsburg, a high-risk community within the wildland-urban interface, and that the Pittsburg Converter Station borders, and TBC's underground cable infrastructure in Pittsburg passes underneath, an area with vegetative fuels. The WMP comprehensively identifies the wildfire risk and risk drivers associated with this facility and describes and prioritizes mitigation measures to address them.

The TBC WMP identifies the executives and program managers responsible for managing the WMP and provides for annual evaluation of the

WMP in conjunction with the annual evaluation of its Fire Prevention Plan as required by the Commission.

3. Comments on Proposed Decision

The proposed decision of ALJ Thomas and ALJ Allen in this matter was mailed to the parties in accordance with Section 311 of the Public Utilities Code and comments were allowed under Rule 14.3 of the Commission's Rules of Practice and Procedure. In accordance with the May 7, 2019 ALJ ruling, parties filed a single set of comments on the five decisions on electrical corporations' individual WMPs. On May 20, 2019, Horizon West Transmission, LLC filed comments addressing the decision on ITOs' WMPs.

4. Assignment of Proceeding

Michael Picker is the assigned Commissioner and Sarah R. Thomas and Peter V. Allen are the assigned ALJs for this proceeding.

Findings of Fact

1. The Horizon WMP substantially complies with Section 8386(b) and the direction provided by the ALJ's Ruling on Wildfire Mitigation Plan Template, taking into account the fact that Horizon West is a transmission-only utility, its rates and cost recovery are regulated exclusively by FERC, and it is just beginning construction of its first project.

2. The TBC WMP substantially complies with Section 8386(b) and the direction provided by the ALJ's Ruling on Wildfire Mitigation Plan Template, taking into account the fact that TBC is a transmission-only utility and its rates and cost recovery are regulated exclusively by FERC.

Conclusions of Law

1. The Horizon WMP should be approved.

2. The TBC WMP should be approved.

O R D E R

IT IS ORDERED that:

1. The Horizon West Transmission, LLC Wildfire Mitigation Plan is approved.
2. The Trans Bay Cable LLC Wildfire Mitigation Plan is approved.

This order is effective today.

Dated May 30, 2019, at San Francisco, California.

MICHAEL PICKER

President

LIANE M. RANDOLPH

MARTHA GUZMAN ACEVES

CLIFFORD RECHTSCHAFFEN

GENEVIEVE SHIROMA

Commissioners