

**PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA**

Resolution WSD-009  
Wildfire Safety Division  
June 11, 2020

**R E S O L U T I O N**

RESOLUTION WSD-009 - Resolution Ratifying Action of the Wildfire Safety Division on Horizon West Transmission's and Trans Bay Cable's 2020 Wildfire Mitigation Plans Pursuant to Public Utilities Code Section 8386.

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This Resolution ratifies the attached action of the Wildfire Safety Division (WSD) pursuant to Public Utilities Code Section 8386. The California Public Utilities Commission's (Commission) and the WSD's most important responsibility is ensuring the safety of Californians. Since several catastrophic wildfires in the San Diego area in 2007, the equipment of large electric utilities the Commission regulates has been implicated in the most devastating wildfires in our state's history. California's Legislature enacted several legislative measures requiring electrical corporations to submit, and the Commission and the WSD to review, approve or otherwise act on Wildfire Mitigation Plans (WMPs) designed to reduce the risk of utility-caused catastrophic wildfire. Key among the legislative measures are Senate Bill 901 (2018), Assembly Bill 1054 (2019), and Assembly Bill 111, discussed in detail below.

This Resolution (along with several others concurrently being issued with regard to all Commission-regulated electric utilities and independent transmission owners), acts on the WMPs submitted on February 7, 2020, of Horizon West Transmission, LLC (formerly known as NextEra Energy

Transmission West, LLC)<sup>1</sup> and Trans Bay Cable, LLC (Horizon West and TBC, filer or electrical corporation). Horizon West's and TBC's WMPs respond to a list of 22 requirements set forth in Public Utilities Code 8386 and focuses on measures the electrical corporation will take over the next three years to reduce the risk of, and impact from, a catastrophic wildfire caused by its electrical infrastructure and equipment.

Electrical infrastructure and equipment pose ongoing risks of starting wildfires due to the presence of electric current. There are three elements required to start a fire: fuel (such as dry vegetation), oxygen, and an ignition source (heat). A spark from electrical infrastructure and equipment can provide the ignition point from which a wildfire can spread and cause catastrophic harm to life, property, and the environment.

WMPs contain an electrical corporation's detailed plans to reduce the risk of its equipment, operations or facilities igniting a wildfire. This Resolution ratifies the attached action of the WSD, which has approved Horizon West's and TBC's 2020 WMPs in its Action Statement. In doing so, this Resolution analyzes the extent to which Horizon West's and TBC's wildfire mitigation efforts objectively reduce wildfire risk, drive improvement, and act as cost effectively as possible. In conducting this evaluation, the Commission considers and incorporates input from the Wildfire Safety Advisory Board, the public and other stakeholders.

**PROPOSED OUTCOME:**

- Ratifies the attached action of the WSD to approve 2020 WMP of Horizon West and TBC, without conditions, designed to ensure WMP decreases risk of catastrophic wildfire in California.
- Evaluates the maturity of Horizon West and TBC's WMPs using WSD's new Utility Wildfire Mitigation Assessment, as represented in the Utility Wildfire Mitigation Maturity Model. Final maturity model outputs should be viewed as levels or thresholds – they are not absolute scores.

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<sup>1</sup> 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.

- Requires Horizon West and TBC to file an update to its 2020 WMP according to a forthcoming schedule to be released by the WSD.
- Does not approve costs attributable to WMPs, as statute requires electrical corporations to seek cost recovery and prove all expenditures are just and reasonable at a future time. Nothing in this Resolution nor the WSD's Action Statement should be construed as approval of any WMP-related costs.
- Does not establish a defense to any enforcement action for a violation of a Commission decision, order, or rule.

#### SAFETY CONSIDERATIONS:

Mitigation of catastrophic wildfires in California is among the most important safety challenges the Commission-regulated electrical corporations face. Comprehensive WMPs are essential to safety because:

- WMPs list all of an electrical corporation's proposed actions to reduce utility-related wildfire risk and prevent catastrophic wildfires caused by utility infrastructure and equipment. By implementing measures such as vegetation management, system hardening (such as insulating overhead lines and removing or upgrading equipment most likely to cause fire ignition), improving inspection and maintenance, situational awareness (cameras, weather stations, and use of data to predict areas of highest fire threat), improving community engagement and awareness, and other measures, utility-caused catastrophic wildfire risk should be reduced over time.
- The WSD's and Commission's substantive and procedural changes for evaluations of electrical corporations' 2020 WMPs will enhance California's ability to mitigate catastrophic wildfire risk related to utilities. Below is a summary of the key, new requirements in the 2020 process, required of all WMP filers:
  - A WMP template and format so WMPs are standardized and include similar information in the same format.
  - Standard data submissions, in spatial, non-spatial and tabular format, which grounds the WMPs in specific data. Data submissions will continue throughout the WMP 3-year

horizon and be used to measure compliance and performance to program, progress and outcome metrics.

- A new Utility Survey that objectively assesses the electrical corporation's maturity across 52 capabilities in 10 categories. The resulting Maturity Matrix quantitatively presents the progressive impact of the electrical corporation's wildfire mitigation plan activities over the WMP 3-year horizon.

ESTIMATED COST:

- Nothing in this Resolution should be construed as approval of the costs associated with the WMP mitigation efforts.
- For illustrative purposes, Table 1 below contains filers' estimates of its projected costs for the wildfire mitigation efforts in its 2020 WMP.
- Horizon West and TBC are subject to rate regulation by the Federal Energy Regulatory Commission (FERC) and record their costs in accordance with FERC's accounting requirements.<sup>2</sup> Horizon West and TBC may not record the same costs more than once or in more than one place, seek duplicative recovery of costs, or record or seek to recover costs in the FERC account already recovered separately. Horizon West and TBC should ensure they carefully document their expenditures, by category and be prepared for Commission review and audit of the accounts at any time.

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<sup>2</sup> FERC precedent and the utilities' FERC-filed tariffs give deference to state commission "determinations" regarding costs affecting transmission rates. *See Anaheim v. FERC*, 669 F.2d 799, 809 (D.C. Cir. 1981) *quoting Minnesota Power & Light Co., Opinion and Order on Rate Increase Filing*, 11 FERC ¶ 61312 (June 24, 1980), 1980 WL 100840. The regulation of utilities is one of the most important functions traditionally associated with the police power of the States." *Arkansas Elec. Coop. Corp. v. Arkansas Public Serv. Comm'n*, 461 U.S. 375, 377 (1983).

*Table 1: Proposed WMP costs*

	<b>Horizon West</b>	<b>Trans Bay Cable<sup>3</sup></b>
Total costs 2020-2022	\$8.4 million	0
Subtotal: 2020	\$4.7 million	0
Subtotal: 2021	\$4.3 million	0
Subtotal: 2022	\$15 thousand	0

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<sup>3</sup> Trans Bay Cable does not make a distinction between its efforts to manage wildfire risk and its efforts to ensure the overall safety and reliability of its operations. It does not maintain programs, staff, equipment, or infrastructure solely dedicated to wildfire mitigation.

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## **Summary**

This Resolution acts on the attached Wildfire Safety Division's (WSD) approval of the Wildfire Mitigation Plans (WMPs) submitted by Horizon West Transmission, LLC (Horizon West) and Trans Bay Cable, LLC (TBC) on February 7, 2020. The Resolution finds that Horizon West and TBC are in compliance with the requirements for WMPs set forth in Assembly Bill (AB) 1054, codified at Public Utilities Code (Pub. Util. Code) Section 8386(c) and the WMP Guidelines issued by the Commission to electrical corporations. Section 8386 requires that electrical corporations' WMPs contain 22 elements; the full list of elements appears in Appendix E to this Resolution.

There are three possible actions for the WSD and Commission in response to any electrical corporation's WMP: approval, denial, or approval with conditions. In the case of the WMP resolved here, we ratify the WSD's action to approve Horizon West's and TBC's WMP without conditions. Horizon West and TBC must file an update to their 2020 WMPs according to a forthcoming schedule to be released by the WSD. Horizon West and TBC will be expected to submit new 3-year, comprehensive plans in 2023.

## **1. Background**

Catastrophic wildfires in 2017-19 led the California Legislature to pass Senate Bill (SB) 901 in 2018 and its successor AB 1054 in 2019, as well as AB 111. SB 901 and AB 1054 contain detailed requirements for electrical corporations' WMPs and provide a 90-day review cycle of WMPs by the WSD. AB 111 establishes a new division, the WSD within the Commission. The duties of the WSD are contained in Pub. Util. Code Section 326(a), including to evaluate, oversee and enforce electrical corporations' compliance with wildfire safety requirements, and develop and recommend to the Commission performance metrics to achieve maximum feasible wildfire risk reduction. SB 901 required a formal Commission proceeding for WMP review in 2019, and to that end the Commission reviewed the 2019 WMPs in Rulemaking (R.) 18-10-007. The decisions dispensing of the 2019 WMPs also added additional requirements for the 2020 WMPs.

After the Commission issued its WMP decisions on May 30, 2019,<sup>4</sup> the Legislature enacted AB 1054. AB 1054 contains similar WMP requirements to SB 901 but allows WMPs a three-year rather than one-year duration. AB 1054 also requires the WSD to review and approve, deny or approve with conditions the electrical corporations' WMPs, with Commission ratification to follow thereafter. AB 1054 also requires establishment of a Wildfire Safety Advisory Board (WSAB), with appointees from the California Governor and Legislature, to provide comment on the 2020 WMPs and develop and make recommendations related to the metrics used to evaluate WMPs in 2021 and beyond.<sup>5</sup>

Building on lessons learned from the WMP review process in 2019, the WSD developed and required all electrical corporations to conform their WMPs to a set of new WMP Guidelines starting in 2020.<sup>6</sup> For 2020, the WMP Guidelines add requirements on detail, data, and other supporting information. The WMP Guidelines are designed 1) to increase standardization of information collected on electrical corporations' wildfire risk exposure, 2) enable systematic and uniform review of information each electrical corporation submits, and 3) move electrical corporations toward an effective long-term wildfire mitigation strategy, with systematic tracking of improvements over time.

The Commission adopted Resolution WSD-001 setting forth the process for the WSD and Commission review of the 2020 WMPs. The resolution called for electrical corporations to submit their 2020 WMPs on February 7, 2020. Horizon West and TBC submitted their WMPs on that date.

Shortly after electrical corporations filed their WMPs, the WSD held two sets of all-day workshops over four days, on February 18, 19, 24 and 25. The February 18-19, 2020 informational workshops called for the electrical corporations to present to stakeholders and the public details on their WMPs, and for stakeholders to ask questions, raise concerns, and otherwise comment on the WMPs' contents. The February 24-25 technical workshops focused more in depth on key provisions of the WMPs: vegetation management, system

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<sup>4</sup> Decisions 19-05-036, 037, 038, 039, 040 and 041 (May 30, 2019).

<sup>5</sup> Pub. Util. Code § 8386.3 (Wildfire Safety Division), § 326.1 (Wildfire Safety Advisory Board).

<sup>6</sup> A ruling issued on December 19, 2019 in proceeding R.18-10-007 described and attached all of the material electrical corporations were required to use in submitting their 2020 WMPs.

hardening, risk-spend efficiency emerging technology and reduction of the scale and scope of Public Safety Power Shutoff (PSPS) events. Again, stakeholder and public input was offered.<sup>7</sup>

Stakeholders were also allowed to submit comments on the WMP, to which the electrical corporation replied. Stakeholders and members of the public commented on the WMPs by April 7, 2020, and the electrical corporations responded to those comments by April 16, 2020.

## **2. Notice**

In accordance with Pub. Util. Code § 8386(d), notice of Horizon West's and TBC's WMPs was given by posting of the WMPs on the WSD's webpage, at [www.cpuc.ca.gov/wildfiremitigationplans](http://www.cpuc.ca.gov/wildfiremitigationplans), on February 7, 2020, in accordance with the requirements of Pub. Util. Code Section 8386(d). Further, the electrical corporations served their 2020 WMPs on the Commission's existing WMP formal proceeding (R.18-10-007) service list, as Resolution WSD-001 provided. Resolution WSD-001 also required the filer to post all data request responses, as well as any document referenced in its WMP, on its own website and update the website with notice to the R.18-10-007 service list on a weekly basis.

## **3. Wildfire Safety Division Analysis of WMP**

To reach a conclusion about each WMP, the WSD reviewed each electrical corporation's 2020 WMP (including updates and Geographic Information System (GIS) data), public and WSAB input, responses to WSD data requests, and responses to the maturity model survey questions. For Horizon West, the WSD issued two data requests for missing information, clarification, and supplementation where necessary. For TBC, the WSD also issued two data requests. Upon completion of this review, the WSD determined whether each utility's 2020 WMP should either be approved without conditions, approved with conditions, or denied.

There are three possible actions for the WSD in response to any electrical corporation's WMP: approval, denial, or approval with conditions. To reach its

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<sup>7</sup> Presentations, agendas and other details of the workshops appear on the Commission's WMP homepage, located at [www. cpuc.ca.gov/wildfiremitigationplans/](http://www.cpuc.ca.gov/wildfiremitigationplans/).

conclusion, the WSD reviewed the WMPs for compliance with every aspect of the WMP Guidelines and AB 1054 and requirements of the 2019 WMP Decisions. The WSD designed the WMP Guidelines to require that each filer have a comprehensive WMP that contains all elements required by AB 1054. Thus, for example, every WMP must contain plans for vegetation management, system hardening, inspections of assets and vegetation, situational awareness, a plan to reduce and manage PSPS events, customer and first responder outreach and coordination, risk analysis, GIS data, a short- and long-term vision, analysis of causes of ignition, and many other elements. To evaluate WMPs, the WSD assessed each plan for its completeness, the technical feasibility and effectiveness of its initiatives, whether proposed initiatives were an efficient use of resources, and for demonstration of a sufficiently growth-oriented approach to reducing utility-related wildfire risk over time.

A conditional approval explains each missing or inadequate component in the WMP. The 2020 WMP Resolutions for each electrical corporation contain a set of “Deficiencies” and associated “Conditions” to remedy those deficiencies. Each deficiency is categorized into one of the following categories, with Class A being the most serious:

1. Class A – aspects of the WMP are lacking or flawed.
2. Class B – insufficient detail or justification provided in WMP.
3. Class C – gaps in baseline or historical data, as required in 2020 WMP Guidelines.

Class A deficiencies are of the highest concern and require an electrical corporation to develop and submit to the WSD within 45 days of Commission ratification of this Resolution, a Remedial Compliance Plan (RCP) to resolve the identified deficiency. Class B deficiencies are of medium concern and require reporting by the electrical corporation to provide missing data or update its progress in its quarterly report. Such reporting will be either on a one-time basis or ongoing as set forth in each condition. Class C deficiencies require the electrical corporation to submit additional detail and information or otherwise come into compliance in its 2021 annual WMP update. Detailed descriptions of the RCP and quarterly reports are contained in Resolution WSD-002, the Guidance Resolution on 2020 WMPs.

The WSD did not identify any deficiencies with Horizon West's or TBC's WMPs.

#### **4. Wildfire Safety Advisory Board Input**

The WSAB provided recommendations on the WMPs of Pacific Gas and Electric Company (PG&E), Southern California Edison Company (SCE), and San Diego Gas & Electric Company (SDG&E) on April 15, 2020. Although not focusing specifically on Horizon West or TBC's WMPs, the WSD has considered the WSAB's recommendations, and this Resolution incorporates WSAB's input throughout.

The WSAB focused its recommendations on high-level input and identification of shortcomings in the 2020 WMPs to inform upcoming wildfire mitigation efforts. WSAB recommendations focused on the following areas: vegetation management and inspection; grid design and system hardening; resource allocation methodology; and PSPS preparation, including communication with the community, planning, and recovery after PSPS events.

#### **5. Public and Stakeholder Comment**

Stakeholders submitted comments on WMPs on April 7, 2020. No individual or organization submitted comments pertaining to TBC's or Horizon West's WMP.

#### **6. Discussion**

Horizon West has a new transmission line, the Suncrest line, in San Diego County. Details and maps of the project appear in Appendix 1 of its WMP. The Commission approved construction of the line in Decision (D.) 18-09-030. TBC operates a single transmission line from Pittsburg to San Francisco that consists of a 53-mile submarine cable under San Francisco Bay and less than 1 mile of underground cable to connect to the Converter Stations at either end of the submarine cable. No TBC transmission infrastructure is located directly in a High Fire Threat District (HFTD), Wildland Urban Interface (WUI), or rural area. The TBC Pittsburg Converter Station does operate in proximity to the WUI identified in West Pittsburg.

The Commission has reviewed the actions taken by the WSD pursuant to Pub. Util. Code Section 8386.3, the recommendations of the WSAB, stakeholder

comments served on the R.18-10-007 service list, the underlying documents, and other public input. Neither the WSD nor the WSAB identified any deficiencies. Horizon West's and TBC's WMPs comply with Pub. Util. Code Section 8386 and are approved.

The following sections discuss in detail Horizon West's and TBC's WMPs. The discussion follows the template provided in the WMP Guidelines attached to the R.18-10-007 Administrative Law Judge's December 16, 2019 ruling as Attachment 1.

### **6.1. Persons Responsible for Executing the Plan**

This section of the WMP requires that the filer designate a company executive with overall responsibility for the plan, and program owners specific to each component of the plan. The section also requires a senior officer to verify the contents of the plan, and the filer to designate key personnel responsible for major areas of the WMP.

Horizon West and TBC provided the required information.

### **6.2. Metrics and Underlying Data**

The metrics and underlying data section of the WMP represents an innovation over the 2019 WMP requirements in that all filers are required to report standardized and normalized data on many aspects, including their performance metrics, conditions in their service territories, grid topology, and wildfire mitigation efforts. To remedy a concern with the 2019 plans, the 2020 WMP Guidelines disallow the practice of filers characterizing only "program targets" (e.g., number of miles of covered conductor installed or trees trimmed) as the "metrics" required by the statute.<sup>8</sup> For 2020, the WMP Guidelines require filers to group metrics and program targets as follows.

- *Progress metrics* track how much electrical corporation wildfire mitigation activity has managed to change the conditions of electrical corporation wildfire risk exposure in terms of drivers of ignition probability.

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<sup>8</sup> Public Utilities Code § 8386 (c)4 and 5

- *Outcome metrics* measure the performance of an electrical corporation and its service territory in terms of both leading and lagging indicators of wildfire risk, PSPS risk, and other direct and indirect consequences of wildfire and PSPS, including the potential unintended consequences of wildfire mitigation work.
- *Program targets* measure tracking of proposed wildfire mitigation activities against the scope and pace of those activities as laid out in the WMPs but do not track the efficacy of those activities. The primary use of these program targets in 2020 will be to gauge electrical corporation follow-through on WMPs.

This section first requires filers to discuss how their plans have evolved since 2019, outline major themes and lessons learned from implementation of their 2019 plan and discuss how the filers performance against metrics used in their 2019 plans have informed their 2020 WMP. A series of tables then requires reporting of recent performance on predefined outcome and progress metrics, including numbers of ignitions, near misses, PSPS events, worker and public deaths and injuries, acreage affected, and assets destroyed by fire, and critical infrastructure impacts, as well as additional metrics the filer proposes to use to ensure the effectiveness of its efforts in quantitatively mitigating the risk of utility-caused catastrophic wildfire. This section also requires filers to detail their methodology for calculating or modeling potential impact of ignitions, including all data inputs used, data selection and treatment methodologies, assumptions, equations or algorithms used and types of outputs produced. Finally, this section requires filers to provide a number of Geographic Information System (GIS) files detailing spatial information about their service territory and performance, including recent weather patterns, location of recent ignitions, area and duration of PSPS events, location of lines and assets, geographic and population characteristics and location of planned initiatives.

### ***TBC***

TBC begins its section on metrics by describing its unique infrastructure and lessons learned from the 2019 WMP. TBC does not maintain programs specifically geared toward wildfire mitigation because most of its transmission

infrastructure is underground or submerged under the San Francisco Bay. TBC also has no transmission infrastructure in HFTD areas. TBC does not have distribution or retail customers and does not anticipate the potential use of PSPS as a wildfire mitigation measure. Therefore, TBC has no risk associated with PSPS or potential impact on end-user customers. There are no deficiencies in TBC's submission related to metrics and underlying data.

### ***Horizon West***

Horizon West begins its section on metrics by describing its unique infrastructure and lessons learned from the 2019 WMP. Horizon West is a transmission-only utility that constructed its first transmission project, the Suncrest facility, which went into service on February 29, 2020. It does not have distribution customers, minimizing its risk of a PSPS event that would directly impact end-user customers. The majority of its facilities are underground or inside a substation fence, and Horizon West has had no ignition incidents. There are no deficiencies in Horizon West's submission related to metrics and underlying data.

A detailed analysis and comparison across peer utilities is provided in Appendix B.

### **6.3. Baseline Ignition Probability and Wildfire Risk Exposure**

The baseline ignition probability and wildfire risk exposure section of the WMP requires electrical corporations to report baseline conditions and recent information related to weather patterns, drivers of ignition probability, use of PSPS, current state of utility equipment, and summary data on weather stations and fault indicators. The section then requires the filer to provide information on its planned additions, removals, and upgrades of equipment and assets by the end of the 3-year plan term, in urban, rural and highly rural areas. The information must describe the scope of hardening efforts (*i.e.*, circuit miles treated), distinguish between efforts for distribution and transmission assets, and identify certain locational characteristics (*i.e.*, urban, rural and highly rural) of targeted areas. Filers must also report the sources of ignition over the past 5 years due to ignition drivers outlined in the annual fire incident data collection report template adopted in D.14-02-015.

Considering that managing the potential sources of ignition from its infrastructure, operations, and equipment is the single most controllable aspect of utility wildfire risk, understanding the sources and drivers of near misses and ignitions is one of the most critical capabilities in reducing utility-caused wildfire risk. Moreover, it is important to consider these performance metrics relative to annual fluctuations in weather conditions (*i.e.*, incidence of Red Flag Warning (RFW) days, days with high wind conditions – 95<sup>th</sup> and 99<sup>th</sup> percentile winds, and high fire potential days measured relative to utility Fire Potential Indices (FPIs) or other fire danger rating systems) to better gauge relationships and thresholds between weather and fire potential indicators and utility ignitions. As such, the discussion in this section focuses on recent weather patterns, key drivers of utility ignitions and frequencies of such ignitions, recent use of PSPS, the current baseline conditions of the utility's service territory and equipment, and locations of planned utility upgrades.

The WSD identified no deficiencies with TBC or Horizon West in the area of baseline ignition probability and wildfire risk exposure. As noted previously, TBC does not maintain programs specifically geared toward wildfire mitigation, as its transmission infrastructure is mostly underground or submerged, and it has no transmission infrastructure in wildlands or in a wildland interface. TBC does not have distribution or retail customers and has not called a PSPS event.

TBC plans to seismically harden its transformers and install gas insulated substation infrastructure that reduces the potential for ignition from 2020-22. TBC will install the infrastructure on a portion of its San Francisco (Potrero) converter station in 2020 and on its Pittsburg Converter Station in 2021. TBC also plans to install the infrastructure to the remaining portions of both converter stations in 2022.

Horizon West is a transmission-only utility whose Suncrest line went into service on February 29, 2020. Horizon West did not collect weather data, ignition probability data, or PSPS data prior to 2019 because the line was not in service. Ignitions are the first step in a wildfire, so reducing them is critical to reducing utility-caused wildfire risk. However, neither TBC nor Horizon West experienced any ignitions events on their lines.

A detailed analysis and comparison across peer utilities is provided in Appendix B.

#### **6.4. Inputs to the Plan, Including Current and Directional Vision for Wildfire Risk Exposure**

This section of the WMP requires the filer to rank and discuss trends anticipated to exhibit the greatest change and have the greatest impact on ignition probability and wildfire consequence, within the filer's service territory, over the next 10 years. First, filers must set forth objectives over the following timeframes: Before the upcoming wildfire season, before the next annual update, within the next 3 years, and within the next 10 years.

Filers must describe how the utility assesses wildfire risk in terms of ignition probability and estimated wildfire consequence, using Commission adopted risk assessment requirements (for large investor-owned utilities) from the General Rate Case Safety Model and Assessment Proceeding (S-MAP) and Risk Assessment Mitigation Phase (RAMP). The filer must describe how the utility monitors and accounts for the contribution of weather and fuel to ignition probability and wildfire consequence, identify any areas where the Commission's HFTD should be modified, and rank trends anticipated to have the greatest impact on ignition probability and wildfire consequence.

A key area which filers are required to address is PSPS events. In 2019 electrical corporations proactively shutoff power to millions of customers for multiple days, resulting in numerous cascading consequences, including associated public safety concerns. The Commission has been clear in its judgement that those events were unacceptable and cannot be repeated. The new 2020 WMP Guidelines direct the electrical corporations to describe lessons learned from past PSPS events and quantify the projected decrease of circuits and customers affected by PSPS as a result of implementing wildfire mitigation programs and strategies contained in the WMP.

Over the near-term, TBC will emphasize training and an evaluation of potential risks. TBC does not outline plans over the 10-year timeframe, but because it has never issued a PSPS and exhibits low risk of wildfire exposure, the WSD imposes no conditions at this time. Most of the requested trend data is either not applicable or of minimal consequence to TBC's unique situation.

Horizon West identifies increased drying of vegetation near the Suncrest line as a trend to watch. However, Horizon West's transmission line is underground and exhibits low risk of wildfire exposure. Most of the requested trend information is not applicable or of minimal consequence to Horizon West's unique situation, and the WSD imposes no conditions in this area.

#### **6.5. Wildfire Mitigation Activity for Each Year of the 3-Year WMP Term, Including Expected Outcomes of the 3-Year Plan**

This section of the WMPs is the heart of the plans and requires the filer to describe each mitigation measure it will undertake to reduce the risk of catastrophic wildfire caused by the utility's infrastructure, operations, and equipment. A description of each type of measure appears below, with elaboration in Appendix D to this Resolution.

First, the WMP Guidelines require a description of the overall wildfire mitigation strategy over the following timeframes: before the upcoming wildfire season, before the next annual update, within the next 3 years and within the next 10 years. The filer is required to describe its approach to determining how to manage wildfire risk (in terms of ignition probability and estimated wildfire consequence) as distinct from other safety risks. The filer is required to summarize its major investments over the past year, lessons learned, and changes planned for 2020-2022; describe challenges associated with limited resources; and outline how the filer expects new technologies to help achieve reduction in wildfire risk.

Section 5 requires the filer to explain how it will monitor and audit the implementation of the plan and lay out the data the filer relies on in operating the grid and keeping it safe. It then requires detailed descriptions of specific mitigations or programs, in the following order:

1. Risk assessment and mapping.
2. Situational awareness and forecasting.
3. Grid design and system hardening.
4. Asset management and inspections.
5. Vegetation management and inspections.
6. Grid operations and operating protocols, including PSPS.
7. Data governance.

8. Resource allocation methodology.
9. Emergency planning and preparedness.
10. Stakeholder cooperation and community engagement.

Below, this Resolution evaluates the mitigations (or initiatives) Horizon West and TBC proposed for each of the 10 foregoing categories. After identifying each proposed mitigation or group of mitigations, the Resolution discusses concerns with the proposal, and identifies any conditions imposed. Provided in Appendix B, for illustrative purposes, are summaries of the filer's projected costs across highest total cost initiatives as well as projected costs across the highest category initiatives.

Appendix B, Figure 3.10 shows Horizon West's projected costs for its wildfire mitigation initiatives. Given its limited risk exposure, TBC does not have dedicated wildfire mitigation initiatives, and thus did not report cost projections. TBC does not make a distinction between its efforts to manage wildfire risk and its efforts to ensure the overall safety and reliability of its operations. It does not maintain programs, staff, equipment, or infrastructure solely dedicated to wildfire mitigation because its wildfire risk is minimal.

The key strengths of Horizon West's planned mitigation lie in its plans to ensure that the newly constructed Suncrest facility is fire-hardened as part of its initial design. Horizon West plans to spend approximately \$9 million for hardening initiatives during the plan term. Horizon West also anticipates increasing situational awareness at its newly constructed facility via weather monitoring, weather stations, and overhead cameras. The WSD identified no deficiencies across the 10 categories, and therefore does not assign any conditions on approval of the WMP.

The key strength of TBC is not its wildfire mitigation effort but its innate characteristic: its transmission infrastructure is underground or submerged and it has no transmission infrastructure in HFTD areas, which results in minimal wildfire risk exposure. The WSD identified no deficiencies across the 10 categories and therefore does not assign any conditions on approval of the WMP.

### **6.5.1. Risk assessment and Mapping**

This section of the WMP requires the filer to discuss the risk assessment and mapping initiatives implemented to minimize the risk of its equipment causing wildfires. Filers must describe initiatives related to maps and modelling of: overall wildfire risk, ignition probability, wildfire consequence, risk-reduction impact, match-drop simulations, and climate/weather driven risks. This section also requires the electrical corporation to provide data on spending, miles of infrastructure treated, spend per treated line mile, ignition probability drivers targeted, projected risk reduction achieved from implementing the initiative, risk spend efficiency, and other (*i.e.*, non-ignition) risk drivers addressed by the initiative.

TBC's risk assessment and forecasting plans make no distinction between efforts to manage wildfire risk and ensure the overall safety and reliability of its operations. TBC does not maintain programs, staff, equipment, or infrastructure solely dedicated to wildfire mitigation. The electrical corporation's transmission infrastructure is underground or submerged and has no transmission infrastructure in HFTD areas, which limits its wildfire risk. Therefore, TBC sufficiently meets the applicable foregoing requirements.

Horizon West's risk assessment and forecasting plans consist of having fire protection built into the newly built Suncrest facility's design. Now that the facility is in operation, it will incorporate mitigating measures into standard operating procedures. Horizon West is a transmission-only facility with no distribution or customers. The majority of its facilities are underground or inside a substation fence, and it has had no ignition incidents. Therefore, Horizon West sufficiently meets the applicable foregoing requirements.

### **6.5.2. Situational Awareness and Forecasting**

The situational awareness and forecasting section of the WMP requires the filer to discuss its use of cameras, weather stations, weather forecasting and modeling tools, grid monitoring sensors, fault indicators, and equipment monitoring. Situational awareness requires the electrical corporation to be aware of actual ignitions in real time, and to understand the likelihood of utility ignitions based on grid and asset conditions, wind, fuel conditions, temperature and other factors.

The WMP Guidelines refer to key situational awareness measures, including:

- 1) Installation of advanced weather monitoring and weather stations that collect data on weather conditions so as to develop weather forecasts and predict where ignition and wildfire spread is likely;
- 2) Installation of high definition cameras throughout an electrical corporation's service territory, with the ability to control the camera's direction and magnification remotely;
- 3) Use of continuous monitoring sensors that can provide near real-time information on grid conditions;
- 4) Use of a fire risk or fire potential index that takes numerous data points in given weather conditions and predicts the likelihood of wildfire; and
- 5) Use of personnel to physically monitor areas of electric lines and equipment in elevated fire risk conditions.

TBC's situational awareness plans consist of relying on its highly trained system operators and maintaining close coordination with California Independent System Operator (CAISO) and Pacific Gas and Electric Company (PG&E). TBC does not have its own service territory and is part of the PG&E service territory. PG&E is responsible for critical facility location data, access/functional needs customer data, and weather station data relevant to TBC's operations. The electrical corporation's transmission infrastructure is underground or submerged, and TBC has no transmission infrastructure in wildlands or in a wildland interface, which pose minimal risk of wildfires. Therefore, TBC sufficiently addresses the foregoing requirements.

Horizon West's situational awareness plans consist of developing protocols for its Suncrest facility, which went into service on February 29, 2020. Horizon West anticipates increasing situational awareness at the Suncrest facility through advanced weather monitoring, weather stations, and overhead line/pole cameras. The electrical corporation is a transmission-only facility with no distribution or customers. The majority of its facilities are underground or inside a substation fence and has had no ignition incidents. Therefore, Horizon West sufficiently meets the applicable foregoing requirements.

### **6.5.3. Grid Design and System Hardening**

The grid design and system hardening section of the WMPs examine how the filer is designing its system and what it is doing to strengthen its distribution and transmission system and substations to prevent catastrophic wildfire. The grid design and system hardening WMP section also requires discussion of routine and non-routine maintenance programs, including whether the filer replaces or upgrades infrastructure proactively rather than running facilities to failure. Programs in this category, which often cover the most expensive aspects of a WMP, include initiatives such as the installation of covered conductors to replace bare overhead wires, undergrounding of distribution or transmission lines, and pole replacement programs. The filer is required, at a minimum, to discuss grid design and system hardening in each of the following areas:

- 1) Capacitor maintenance and replacement;
- 2) Circuit breaker maintenance and installation to de-energize lines upon detecting a fault;
- 3) Covered conductor installation;
- 4) Covered conductor maintenance;
- 5) Crossarm maintenance, repair, and replacement;
- 6) Distribution pole replacement and reinforcement, including with composite poles;
- 7) Expulsion fuse replacement;
- 8) Grid topology improvements to mitigate or reduce PSPS events;
- 9) Installation of system automation equipment;
- 10) Maintenance, repair, and replacement of connectors, including hotline clamps;
- 11) Mitigation of impact on customers and other residents affected during PSPS event;
- 12) Other corrective action;

- 13) Pole loading infrastructure hardening and replacement program based on pole loading assessment program;
- 14) Transformers maintenance and replacement;
- 15) Transmission tower maintenance and replacement;
- 16) Undergrounding of electric lines and/or equipment;
- 17) Updates to grid topology to minimize risk of ignition in HFTDs; and
- 18) Other/not listed items if an initiative cannot feasibly be classified within those listed above.

TBC's grid design and system hardening plan relies on its transmission infrastructure, which consists of two converter station sites connected by an underground/submerged armored cable bundle. TBC's facilities do not utilize any overhead lines. The electrical corporation's transmission infrastructure is underground or submerged and has no transmission infrastructure in HFTD areas resulting in minimal wildfire risk. Therefore, TBC sufficiently addresses the foregoing requirements.

Horizon West's grid design and system hardening plans consist of designing its Suncrest facility, which went into service on February 29, 2020, to incorporate wildfire hardening measures. Horizon West anticipates increasing situational awareness at the Suncrest facility through advanced weather monitoring, weather stations, and overhead line/pole cameras. The electrical corporation is a transmission-only facility with no distribution or customers. The majority of its facilities are underground or inside a substation fence, and it has had no ignition incidents. Therefore, Horizon West sufficiently meets the applicable foregoing requirements.

#### **6.5.4. Asset Management and Inspections**

The asset management and inspections portion of the WMP Guidelines requires the filer to discuss power line/infrastructure inspections for distribution and transmission assets within the HFTD, including infrared, LiDAR, substation, patrol, and detailed inspections, designed to minimize the risk of its facilities or equipment causing wildfires. The filer must describe its protocols relating to maintenance of any electric lines or equipment that could, directly or indirectly,

relate to wildfire ignition. The filer must also describe how it ensures inspections are done properly through a program of quality control.

TBC's asset management and inspection plans consist of conducting a wide spectrum of operational risk mitigation beyond wildfire mitigation. TBC does not maintain programs, staff, equipment, or infrastructure solely dedicated to wildfire mitigation. The electrical corporation's transmission infrastructure is underground or submerged and has no transmission infrastructure in wildlands or in a wildland interface, which pose minimal risk of wildfires. Therefore, TBC meets the applicable foregoing requirements.

Horizon West's asset management and inspection plans consist of performing asset management and inspections for its facilities as part of its regular operational practices. The electrical corporation is a transmission-only facility with no distribution or customers. The majority of its facilities are underground or inside a substation fence, and Horizon West has had no ignition incidents. Therefore, Horizon West meets the applicable foregoing requirements.

#### **6.5.5. Vegetation Management and Inspections**

This section of the WMP Guidelines requires filers to discuss vegetation inspections, including inspections that go beyond existing regulation, as well as infrared, LiDAR, and patrol inspections of vegetation around distribution and transmission lines/equipment, quality control of those inspections, and limitations on the availability of workers. The filer must also discuss collaborative efforts with local land managers to leverage opportunities for fuel treatment activities and fire break creation, methodology for identifying at-risk vegetation, how trim clearances beyond minimum regulations are determined, and how the filer considers and addresses environmental and community impacts related to tree trimming and removal (erosion, flooding, and the like).

TBC's WMP did not provide a Vegetation Management Plan because, as it states in its WMP, it is not required to have one under North American Electric Reliability Corporation (NERC) Reliability Standards or CAISO maintenance requirements. Further, TBC's transmission infrastructure is underground or submerged, and TBC has no transmission infrastructure in wildlands or in a wildland interface, which pose minimal risk of wildfires. Therefore, TBC has sufficiently addressed the foregoing requirements.

Horizon West's vegetation management and inspections plans consist of designing appropriate setbacks and buffers into each facility, monitoring at-risk vegetation during scheduled inspections and maintenance activities, and limiting fuel modification to removal of all vegetation within the security fence, and in some areas, placement of rock to minimize erosion. The electrical corporation is a transmission-only facility with no distribution or customers. The majority of its facilities are underground or inside a substation fence and has had no ignition incidents. Therefore, Horizon West sufficiently addressed the applicable foregoing requirements.

#### **6.5.6. Grid Operations and Operating Protocols, Including PSPS**

The grid operations and operating protocols section of the WMP requires discussion of ways the filer operates its system to reduce wildfire risk. For example, disabling the reclosing function of automatic reclosers<sup>9</sup> during periods of high fire danger (*e.g.*, during RFW conditions) can reduce utility ignition potential by minimizing the duration and amount of energy released when there is a fault. This section also requires discussion of work procedures in elevated fire risk conditions, PSPS events and protocols, and whether the filer has stationed and on-call ignition prevention and suppression resources and services.

TBC's grid operations and operating protocols occur outside of HFTDs. TBC states in its WMP that it does not employ automatic reclosers in its transmission system. TBC does not maintain programs, staff, equipment, or infrastructure solely dedicated to wildfire mitigation. The electrical corporation's transmission infrastructure is underground or submerged, and TBC has no transmission infrastructure in wildlands or in a wildland interface, which, therefore, pose minimal risk of wildfires. TBC sufficiently addressed the applicable foregoing requirements.

Horizon West's grid operations and operating protocols plans, including PSPS protocols, consist of incorporating strategies and programs to guide fire prevention practices into its regular operational practices. Although, as stated in

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<sup>9</sup> A recloser is a switching device that is designed to detect and interrupt momentary fault conditions. The device can reclose automatically and reopen if a fault condition is still detected.

Horizon West's WMP, it does not believe that it will be necessary to issue a PSPS, it has developed protocols in preparation for such an event. In the event that Horizon West has responsibility for a PSPS event, it will comply with CAISO's instructions to de-energize its facilities and closely coordinate with Interconnecting Transmission Owners to monitor a PSPS event at interconnected or nearby facilities. Once the field operation teams determine that equipment and conditions are safe, Horizon West facility operators will initiate the systematic restoration of power. The electrical corporation is a transmission-only facility with no distribution or customers. The majority of its facilities are underground or inside a substation fence, and it has had no ignition incidents. Therefore, Horizon West sufficiently addressed the applicable foregoing requirements.

#### **6.5.7. Data Governance**

The data governance section of the WMP Guidelines seeks information on the filer's initiatives to create a centralized wildfire-related data repository, conduct collaborative research on utility ignition and wildfire, document and share wildfire-related data and algorithms, and track and analyze near miss data.

TBC's data governance protocols consist of maintaining a wide spectrum of operational risk mitigation and safety for the limited scale and scope of TBC's operations. TBC does not assess data governance resources beyond its operational risk mitigation. TBC does not maintain programs, staff, equipment, or infrastructure solely dedicated to wildfire mitigation. The electrical corporation's transmission infrastructure is underground or submerged, and TBC has no transmission infrastructure in wildlands or in a wildland interface, which pose minimal risk of wildfires. Therefore, TBC sufficiently addressed the applicable foregoing requirements.

Horizon West's data governance protocols are evolving. The electrical corporation is a transmission-only facility with no distribution or customers. The majority of its facilities are underground or inside a substation fence, and Horizon West has had no ignition incidents. Therefore, Horizon West sufficiently addressed the applicable foregoing requirements.

#### **6.5.8. Resource Allocation Methodology**

The resource allocation section of the WMPs requires the filer to describe its methodology for prioritizing programs to minimize the risk of its equipment or

facilities causing wildfires in the most cost-efficient manner. This section requires filers to discuss risk reduction scenario analysis and provide a risk spend efficiency analysis for each aspect of the plan.

TBC's WMP does not provide a resource allocation plan because, as it states in its WMP, TBC does not maintain programs, staff, equipment, or infrastructure solely dedicated to wildfire mitigation. The electrical corporation's transmission infrastructure is underground or submerged and has no transmission infrastructure in wildlands or in a wildland interface, which pose minimal risk of wildfires. Therefore, TBC has sufficiently addressed the foregoing requirements.

Horizon West's resource allocation plans consists of prevention and detection to enable prompt emergency response. Horizon West's resource allocation plans will evolve once the newly developed Suncrest facility is operational. The electrical corporation is a transmission-only facility with no distribution or customers. The majority of its facilities are underground or inside a substation fence, and Horizon West has had no ignition incidents. Therefore, Horizon West sufficiently addressed the applicable foregoing requirements.

#### **6.5.9. Emergency Planning and Preparedness**

The WMP Guidelines require a general description of the filer's overall emergency preparedness and response plan, including discussion of how the plan is consistent with legal requirements for customer support before, during and after a wildfire, including support for low income customers, billing adjustments, deposit waivers, extended payment plan, suspension of disconnection and nonpayment fees, and repairs. Filers are also required to describe emergency communications before, during, and after a wildfire in English, Spanish, and other languages required by the Commission.

The WMP Guidelines also require discussion of the filer's plans for coordination with first responders and other public safety organizations, plans to prepare for and restore service, including workforce mobilization and prepositioning of equipment and employees, and a showing that the filer has an adequate and trained workforce to promptly restore service after a major event.

TBC's emergency planning and preparedness plans consist of maintaining Emergency Action Plans as part of its compliance efforts to meet Commission

requirements to and adhere to practices in the National Fire Protection Association Manual. TBC does not have a defined service area and does not have retail or distribution customers. TBC does not maintain programs, staff, equipment, or infrastructure solely dedicated to wildfire mitigation. The electrical corporation's transmission infrastructure is underground or submerged, and TBC has no transmission infrastructure in wildlands or in a wildland interface, which pose minimal risk of wildfires. Therefore, TBC sufficiently addressed the applicable foregoing requirements.

Horizon West's emergency planning and preparedness plans consists of disaster and emergency preparedness as part of its overall emergency response approach at its facilities. Horizon West intends to use the Incident Command System for emergencies, and its emergency planning and preparedness plans will evolve. The electrical corporation is a transmission-only facility with no distribution or customers. The majority of its facilities are underground or inside a substation fence, and Horizon West has had no ignition incidents. Horizon West sufficiently addressed each of the applicable foregoing requirements.

#### **6.5.10. Stakeholder Cooperation and Community Engagement**

The final topic covered in Section 5 relates to the extent to which the filer will engage the communities it serves and cooperate and share best practices with community members, industry partners, government and public safety agencies, and others engaged in utility-related wildfire mitigation.

TBC's WMP does not provide a stakeholder cooperation and community engagement plan. TBC does not have a defined service area and does not have retail or distribution customers. TBC does not maintain programs, staff, equipment, or infrastructure solely dedicated to wildfire mitigation. The electrical corporation's transmission infrastructure is underground or submerged, and TBC has no transmission infrastructure in wildlands or in a wildland interface, which pose minimal risk of wildfires. Therefore, TBC has sufficiently addressed the foregoing requirements.

Horizon West is a transmission-only utility and does not anticipate providing customer support during an emergency situation. Horizon West has developed protocols for communication and coordination with CAISO, the Commission,

Interconnecting Transmission Owners, other neighboring utilities, elected officials, fire agencies and first responders, and its emergency response support team. The electrical corporation is a transmission-only facility with no distribution or customers. The majority of its facilities are underground or inside a substation fence, and Horizon West has had no ignition incidents. Therefore, Horizon West sufficiently addressed the applicable foregoing requirements.

## **7. Maturity Evaluation**

In 2020, the WSD introduced a new Utility Wildfire Mitigation Maturity Model, to establish a baseline understanding of utilities' current and projected capabilities and assess whether each utility is progressing sufficiently to improve its ability to mitigate wildfire risk effectively. The maturity model also serves as an objective means of comparing across utilities and provides a framework for driving utility progress in wildfire risk mitigation over time. WMP filers were required to complete a survey in which they answered specific questions which assessed their existing and future wildfire mitigation practices across 52 capabilities at the time of filing and at the end of the 3-year plan horizon. The 52 capabilities are mapped to the same 10 categories identified in Section 5 above.<sup>10</sup>

The maturity model will continue to evolve each year to reflect best practices and lessons learned. With the inaugural use of the maturity model in 2020, it is important to note that the resulting maturity score is to be informative of a utility's capabilities within the context of the underlying assessment criteria. Accordingly, it is essential that the maturity assessment scores are understood within the context of the qualitative detail supporting each level. The model results require context and should not be interpreted as the final word on an electrical corporation's wildfire mitigation capabilities without an understanding of the scoring process described in the Guidance Resolution. As such, the final maturity model outputs should be viewed as levels or thresholds – they are not absolute scores.

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<sup>10</sup> A detailed description of the purpose and use of the maturity model is provided in the Guidance Resolution (WSD-002) being issued concurrently with the instant Resolution.

ITOs have unique circumstances which make much of the maturity assessment less applicable to them than other electrical corporations with distribution customers. Horizon Suncrest facility went into service on February 29, 2020.

A detailed summary of TBC's and Horizon West's maturity model responses and results is provided in Appendix C.

### Horizon West

Horizon West's initial maturity evaluation reveals the limited applicability of most categories of analysis. As noted in the WMP, Horizon has only begun commercial operations in early 2020, and its facilities are geographically limited.

Horizon West indicates it is at or near the starting level for the majority of capabilities (36 of 52) but it does project some level of maturity growth for 19 capabilities, as illustrated in Section 1.3 of Appendix C.

Categories in which Horizon West anticipates advancing capabilities the most include situational awareness, by increasing weather data and analysis, and data governance activities, including collection, analysis and near-miss tracking.

While Horizon West's vegetation management programs are limited and somewhat static over the three-year period, it does intend to develop a vegetation management asset inventory for asset condition assessment. Improvement is expected in grid design to minimize ignition risk, and by using risk-based tools for grid hardening initiatives.

Horizon West projects its largest growth in maturity during the plan period to occur in its emergency planning capabilities, by putting protocols in place to learn from wildfire events, and its stakeholder cooperation and engagement capabilities, by sharing best practices with other utilities. In both capabilities, Horizon West expects to reach the highest level of maturity by 2023.

Although limited in operations and resources, Horizon West has made strategic choices of which capabilities to advance its maturity, considering its risk exposure. The company is less focused on building capabilities where it believes it has already established some level of maturity but instead is trying to raise the level of capabilities that are nascent or just starting.

### Trans Bay Cable

Trans Bay Cable's initial maturity evaluation reveals the limited applicability of most categories of analysis, in light of the company's unique role as a mostly underwater/underground independent transmission operator. Section 1.3 of Appendix C shows TBC has the lowest level of maturity in more than half of the identified capabilities (28 of 52) and expects some level of maturity growth in 10 capabilities.

Categories in which TBC indicates limited current capabilities and no expectation of maturity include situational awareness, asset management and inspections, vegetation management, and resource allocation methodology.

There are scattered capabilities in which TBC currently assesses the highest level of maturity, including its approach to prioritizing initiatives across its territory (albeit a highly limited footprint), and protocols for PSPS re-energization (which follow Commission guidelines, though the company has not experienced PSPS). These are outliers.

Where TBC expects to prioritize growth in its capabilities are risk assessment and mapping by developing risk maps and better methods for estimation of wildfire and PSPS reduction impacts in the three-year period. A second priority appears to be improving emergency planning and preparedness capabilities by integrating wildfire planning with its overall emergency planning efforts and putting protocols in place to learn from wildfire events by 2023.

Third, TBC projects advancing its capabilities in stakeholder cooperation and community engagement forward by emphasizing shared best practices and better community engagement.

In terms of grid operations, TBC projects significant maturity growth in its ignition and prevention and suppression capabilities. TBC projects to incrementally grow its data governance capabilities through improving its data collection, curation and analytics.

In sum, TBC is showing some anticipated effort to mature relevant capabilities over the 2020-2023 period, but its wildfire risk exposure and available resources are limited.

## **8. Impact of COVID-19 Pandemic**

After Horizon West and TBC submitted their WMPs, on March 19, 2020, California Governor Gavin Newsom signed Executive Order N-33-20 requiring Californians to stay at home to combat the spread of the COVID-19 virus. Specifically, Governor Newsom required Californians to heed the order of the California State Public Health Officer and the Director of the California Department of Public Health that all individuals living in California stay home or at their place of residence, except as needed to maintain continuity of operation of the federal critical infrastructure sectors, in order to address the public health emergency presented by the COVID-19 disease (stay-at-home order).<sup>11</sup>

As articulated in the March 27, 2020 joint letters<sup>12</sup> of the WSD, CAL FIRE and the California Governor's Office of Emergency Services regarding essential wildfire and PSPS mitigation work during COVID-19 sent to each electrical corporation, electrical corporations are expected to continue to prioritize essential safety work. The WSD expects the electrical corporations to make every effort to keep WMP implementation progress on track, including necessary coordination with local jurisdictions. Such effort is essential to ensuring that electrical corporations are prepared for the upcoming and subsequent wildfire seasons, while complying with COVID-19 restrictions requiring residents to shelter-in-place, practice social distancing, and comply with other measures that California's public health officials may recommend or that Governor Newsom or other officials may require in response to the COVID-19 pandemic.

Furthermore, the WSD expects the electrical corporations to continue to make meaningful progress on PSPS mitigation goals, including continuing with sectionalization projects, local outreach and coordination, establishing customer resource centers, and microgrid projects. Electrical corporations are expected to limit planned outage work during this time to wildfire mitigation, PSPS reduction, projects that immediately impact reliability if delayed, and

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<sup>11</sup> Executive Order N-30-20. Available at <http://covid19.ca.gov/img/Executive-Order-N-30-20.pdf>.

<sup>12</sup> <https://www.cpuc.ca.gov/covid/>. Letters to each electrical corporation are found under the heading "Other CPUC Actions", March 27, 2020: Joint Letters to IOUs re: Essential Wildfire and PSPS Mitigation Work.

emergency/public safety outages. In addition, electrical corporations are expected to undertake any other critical work related to operating a safe and reliable grid and to mitigate wildfire and/or PSPS risk.

## **9. Conclusion**

- Trans Bay Cable's and Horizon West's Wildfire Mitigation Plans contain all the elements required by AB 1054, Pub. Util. Code Section 8386(c) and all the elements required by the WMP Guidelines that apply to its unique situation.
- Trans Bay Cable's WMP is approved without conditions.
- Horizon West's WMP is approved without conditions.
- TBC and Horizon West are differently situated to the other electrical corporations, having minimal ignition risk due to their location and footprint.
- The WSD will issue guidance to TBC and Horizon West on the required contents of 2021 WMP updates. The WSD will also consider a more streamlined data and submission process for these companies in advance of their next comprehensive WMP filing in 2023.

## **10. Comments**

A draft of this Resolution was served on the service list for R.18-10-007. Comments were allowed under Rule 14.5 of the Commission's Rules of Practice and Procedure. The WSD accepted one set of comments per stakeholder that collectively addressed Draft Resolutions WSD-002 – WSD-009, which represent the totality of the WSD's evaluation of the 2020 WMPs.

The following stakeholders served timely comments on one or more of the WMP Draft Resolutions: Kevin Collins on May 26, 2020; and PG&E, Southern California Edison Company, SDG&E, Bear Valley, California Association of Small and Multi-Jurisdictional Utilities, Horizon West Transmission, California Environmental Justice Alliance, East Bay Municipal Utility District, Energy Producers and User Coalition, Green Power Institute, Mussey Grade Road

Alliance, Protect our Communities Foundation, Public Advocates Office, Catherine Sandoval, County of Santa Cruz, and The Utility Reform Network on May 27, 2020. Additionally, several members of the public submitted input regarding the Draft Resolutions.

This resolution is changed to accurately reflect jurisdictional issues related to cost recovery.

## **Findings**

1. Assembly Bill 1054 and Commission Resolution WSD-001 require Trans Bay Cable (TBC) to file a Wildfire Mitigation Plan for 2020 that conforms with Pub. Util. Code Section 8386(c) and guidance provided by the WSD and served on the Rulemaking 18-10-007 service list on December 16, 2019 by Administrative Law Judge ruling.
2. Assembly Bill 1054 and Commission Resolution WSD-001 require Horizon West to file a Wildfire Mitigation Plan for 2020 that conforms with Pub. Util. Code Section 8386(c) and guidance provided by the WSD and served on the Rulemaking 18-10-007 service list on December 16, 2019 by Administrative Law Judge ruling.
3. TBC's Wildfire Mitigation Plan contains all the elements required by AB 1054, Pub. Util. Code Section 8386(c) that apply to its unique situation.
4. TBC has satisfied the requirements of Pub. Util. Code Section 8386(c) and the WMP Guidelines that apply to its unique situation.
5. Horizon West's Wildfire Mitigation Plan contains all the elements required by AB 1054, Pub. Util. Code Section 8386(c) that apply to its unique situation.
6. Horizon West has satisfied the requirements of Pub. Util. Code Section 8386(c) and the WMP Guidelines that apply to its unique situation.
7. The Wildfire Mitigation Plans were reviewed and acted upon with due consideration given to comments received from governmental agencies, the WSAB, members of the public, and all other relevant stakeholders.

8. The Wildfire Mitigation Plans were reviewed and acted upon in compliance with all relevant requirements of state law.

**THEREFORE, IT IS ORDERED THAT:**

1. The Wildfire Safety Division's approval of Trans Bay Cable, LLC's 2020 Wildfire Mitigation Plan is hereby ratified.
2. The Wildfire Safety Division's approval of Horizon West Transmission, LLC's 2020 Wildfire Mitigation Plan is hereby ratified.
3. Trans Bay Cable, LLC shall submit an update to its Wildfire Mitigation Plan in 2021 according to the forthcoming guidance and schedule issued by the Wildfire Safety Division.
4. Horizon West Transmission, LLC shall submit an update to its Wildfire Mitigation Plan in 2021 according to the forthcoming guidance and schedule issued by the Wildfire Safety Division.
5. Trans Bay Cable, LLC shall submit a new comprehensive 3-year Wildfire Mitigation Plan in 2023.
6. Horizon West Transmission, LLC shall submit a new comprehensive 3-year Wildfire Mitigation Plan in 2023.
7. Nothing in this Resolution should be construed as approval of the costs associated with Trans Bay Cable, LLC's Wildfire Mitigation Plan mitigation efforts.
8. Nothing in this Resolution should be construed as approval of the costs associated with Horizon West Transmission, LLC's Wildfire Mitigation Plan mitigation efforts.
9. Trans Bay Cable, LLC may track the costs associated with its Wildfire Mitigation Plan and shall be prepared for Commission review and audit of the accounts at any time.
10. Horizon West Transmission, LLC may track the costs associated with its Wildfire Mitigation Plan and shall be prepared for Commission review and audit of the accounts at any time.

11. Trans Bay Cable, LLC shall submit a letter to the Wildfire Safety Division containing any updates to scope, timing or other aspects of any mitigation set forth in its Wildfire Mitigation Plan as result of the COVID-19 pandemic, including Public Safety Power Shutoff. The letter shall list items using the same names and sections used in the Wildfire Mitigation Plan and give a thorough description of why the COVID-19 restrictions require the specified action. The letter shall be submitted within 60 days of issuance of this Resolution and shall be addressed to the Director of the Wildfire Safety Division. The letter shall be emailed to [wildfiresafetydivision@cpuc.ca.gov](mailto:wildfiresafetydivision@cpuc.ca.gov) with service on the service list of Rulemaking 18-10-007. If there are no changes to report, no such submission is required.
12. Horizon West Transmission, LLC shall submit a letter to the Wildfire Safety Division containing any updates to scope, timing or other aspects of any mitigation set forth in its Wildfire Mitigation Plan as result of the COVID-19 pandemic, including Public Safety Power Shutoff. The letter shall list items using the same names and sections used in the Wildfire Mitigation Plan and give a thorough description of why the COVID-19 restrictions require the specified action. The letter shall be submitted within 60 days of issuance of this Resolution and shall be addressed to the Director of the Wildfire Safety Division. The letter shall be emailed to [wildfiresafetydivision@cpuc.ca.gov](mailto:wildfiresafetydivision@cpuc.ca.gov) with service on the service list of Rulemaking 18-10-007. If there are no changes to report, no such submission is required.

This Resolution is effective today.

I certify that the foregoing resolution was duly introduced, passed and adopted at a conference of the Public Utilities Commission of the State of California held on June 11, 2020; the following Commissioners voting favorably thereon:

/s/ ALICE STEBBINS

Alice Stebbins  
Executive Director

MARYBEL BATJER  
President  
LIANE M. RANDOLPH  
MARTHA GUZMAN ACEVES  
CLIFFORD RECHTSCHAFFEN  
GENEVIEVE SHIROMA  
Commissioners