

**PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA****SAFETY POLICY DIVISION****Resolution SPD-32  
February 20, 2025****R E S O L U T I O N****RESOLUTION SPD-32 Resolution Ratifying Action of the Office of Energy Infrastructure Safety on Trans Bay Cable's 2025 Wildfire Mitigation Plan Update Pursuant to Public Utilities Code Section 8386.3(a).**

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This Resolution ratifies the attached Decision (Appendix A hereto) of the Office of Energy Infrastructure Safety (Energy Safety) approving Trans Bay Cable's (TBC or electrical corporation) 2025 Wildfire Mitigation Plan (WMP) Update pursuant to Public Utilities Code (Pub. Util. Code) Section 8386.3(a).

This Resolution acts on the WMP submitted July 9, 2024, pursuant to the Commission's obligations under Pub. Util. Code Section 8386.3(a). TBC's WMP responds to a list of 23 requirements set forth in Pub. Util. Code Section 8386(c). TBC submitted a comprehensive WMP in 2023 covering the three-year period 2023–2025. That WMP filing focused on measures the electrical corporation will take to reduce the risk of, and impact from, a catastrophic wildfire related to its electrical infrastructure and equipment. TBC's 2025 WMP Update provides information on TBC's progress over the past year as well as its 2024 and 2025 projections. Pursuant to California Public Utilities Code Section 8386(b), electrical corporations must annually prepare and submit a WMP to Energy Safety for review and approval. Furthermore, Energy Safety may allow the annual submissions to be updates to the last approved comprehensive wildfire mitigation plan. In 2024, each electrical corporation was required to provide an update (2025 WMP Update) to its approved 2023-2025 Base WMP. In addition, the 2025 WMP Update responds to any additional requirements and metrics approved by the Commission in Resolutions SPD-26 and SPD-27 as well as the 2025 WMP Update Guidelines adopted by Energy Safety.<sup>1</sup>

Section 8386.3(a) provides that "After approval [of the 2025 WMP Update by Energy Safety,] the [C]ommission shall ratify the action of [Energy Safety]."

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<sup>1</sup> Energy Safety's 2025 Wildfire Mitigation Plan Update Guidelines (adopted Jan. 2024, published Feb. 2024):  
<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56254&shareable=true>.

OUTCOME SUMMARY:

- Ratifies the attached Decision of Energy Safety to approve the 2025 WMP Update of TBC.
- Does not approve costs attributable to WMPs, as Pub. Util. Code Section 8386.4(b) requires electrical corporations to seek and prove the legitimacy of all expenditures in their general rate cases (GRC) or other applications for cost recovery.
- 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 the WMPs articulate an electrical corporation's understanding of its utility-related wildfire risk and the proposed actions to reduce that risk and prevent catastrophic wildfires caused by utility infrastructure and equipment.

Utility-related catastrophic wildfire risk should be reduced over time by implementing measures such as vegetation management, system hardening (such as undergrounding power lines, covering conductors on overhead lines and removing or upgrading equipment most likely to cause fire ignition), making grid topology improvements (such as installation and operation of electrical equipment to sectionalize or island portions of the grid), improving asset inspection and maintenance, situational awareness (such as cameras, weather stations, and use of data to predict areas of highest fire threat), improving community engagement and awareness, and other measures.

ESTIMATED COST:

- Costs are not considered in this Resolution, as Pub. Util. Code Section 8386.4(b) provides for Commission cost review in a utility GRC or separate application. 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 TBC's actual costs for 2020–2022 and its projected costs for the implementation of wildfire mitigation efforts in its 2023–2025 WMP.

**Table 1: TBC's 2023-2025 WMP Costs<sup>2</sup>**

Costs by Year	Costs \$USD
Actual 2023 costs	\$201,900
Proposed 2024 costs	\$35,800
Proposed 2025 costs	\$0 <sup>3</sup>
Actual 2020–2022 WMP 3-year total costs	\$17,338,000
Difference between 2020-2022 Actual and 2023–2025 Actual/Proposed costs (+/-)	-\$17,100,300
Proposed 2023–2025 WMP 3-year total costs	\$237,700

## **DISCUSSION**

### **1. Summary**

This Resolution ratifies the attached Energy Safety Decision, issued on December 11, 2024, approving the 2025 WMP Update submitted by TBC on July 9, 2024 (Appendix A hereto).<sup>4</sup> Pub. Util. Code Section 8386(c) requires that an electrical corporation's WMP contain 23 elements. Energy Safety's approval and the Commission's ratification do not relieve the electrical corporation from any otherwise applicable permitting, ratemaking, or other legal and regulatory obligations.

### **2. Background**

Since several catastrophic wildfires in the San Diego area in 2007, the equipment of electrical utilities the Commission regulates has been implicated in the most devastating wildfires in our state's history. The California Legislature enacted several measures requiring electrical corporations to submit, Energy Safety to review, approve, or otherwise act on, and the Commission to ratify, WMPs designed to reduce the risk of utility-related catastrophic wildfire. Catastrophic wildfires in 2017–2019 led the

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<sup>2</sup> From Data Request response SPD\_TBC\_2024\_001.

<sup>3</sup> Per Data Request SPD\_TBC\_2024\_002 - TBC completed all planned fire prevention upgrades in the 2023-2025 WMP Cycle by December 2023 and has no plans for any fire prevention related upgrades in 2025.

<sup>4</sup> TBC's 2025 WMP Update can be found on the 2023–2025 Wildfire Mitigation Plan (2023-2025-WMPs) docket log at:

<https://efiling.energysafety.ca.gov/EFiling/DocketInformation.aspx?docketnumber=2023-2025-WMPs>.

California Legislature to pass Senate Bill 901<sup>5</sup> in 2018 and its successor Assembly Bill (AB) 1054,<sup>6</sup> as well as AB 111 in 2019.<sup>7</sup>

AB 1054 requires Energy Safety to review and approve or deny electrical corporations' WMPs, with Commission ratification of any approval to follow thereafter. Energy Safety oversees electrical corporations' compliance with the WMP.<sup>8</sup> If Energy Safety determines an electrical corporation is not in compliance with its approved WMP, it may recommend that the Commission pursue an enforcement action against the electrical corporation for noncompliance with its approved plan.<sup>9</sup> The Commission may assess penalties on electrical corporations if they fail to substantially comply with their plans.<sup>10</sup>

TBC is an Independent Transmission Operator (ITO). ITOs are transmission-only electrical corporations with no end-use customers. These corporations have few assets and small territorial footprints compared to the large investor-owned utilities and small and multi-jurisdictional utilities in California. All California electrical corporations, including all ITOs, must meet the minimum statutory requirements provided in Public Utilities Code section 8386(c).<sup>11</sup>

### **3. 2025 WMP Update Evaluation Process**

The wildfire mitigation statute requires a three-year WMP and permits Energy Safety to require only a WMP update in the year following the three-year WMP period. Pursuant to Public Utilities Code Section 8386(b),

Each electrical corporation shall annually prepare and submit a wildfire mitigation plan to the Wildfire Safety Division for review and approval. In calendar year 2020, and thereafter, the plan shall cover at least a three-year period. The division shall establish a schedule for the submission of subsequent comprehensive wildfire mitigation plans, which may allow for the staggering of compliance periods for each electrical corporation. In its discretion, the division may allow the annual submissions to be updates to the last approved comprehensive wildfire mitigation

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<sup>5</sup> Stats. 2018, Ch. 626.

<sup>6</sup> Stats. 2019, Ch. 79.

<sup>7</sup> Stats. 2019, Ch. 81.

<sup>8</sup> Pub. Util. Code Section 8386.3(c).

<sup>9</sup> Pub. Util. Code Section 8389(g).

<sup>10</sup> Pub. Util. Code Section 8386.1.

<sup>11</sup> Pub. Util. Code § 8386(c)

([https://leginfo.legislature.ca.gov/faces/codes\\_displaySection.xhtml?lawCode=PUC&sectionNum=8386.#:~:text=\(c\)](https://leginfo.legislature.ca.gov/faces/codes_displaySection.xhtml?lawCode=PUC&sectionNum=8386.#:~:text=(c)), accessed January 26, 2024).

plan; provided, that each electrical corporation shall submit a comprehensive wildfire mitigation plan at least once every three years.

On January 26, 2024, Energy Safety issued a schedule allowing electrical corporations to submit updates to their WMPs in 2024, after requiring a comprehensive WMP for the preceding three-year periods.

On July 9, 2024, TBC submitted its 2025 WMP Update. It provided an overview of the WMP in a public workshop on July 19, 2024. Comments to Energy Safety on 2025 WMP Updates were due August 12, 2024, and reply comments were due August 22, 2024. No stakeholder comments were submitted to energy safety.

On October 9, 2024, Energy Safety published a draft Decision approving TBC's 2025 WMP Update for public comment.<sup>12</sup> Comments on the draft Decision were due on October 29, 2024, and reply comments were due on November 8, 2024. No comments were provided to Energy Safety.

On December 11, 2024, Energy Safety issued its final Decision approving TBC's WMP.<sup>13</sup> Energy Safety identified 1 area for continued improvement (ACI) for which TBC is required to demonstrate progress in its 2026-2028 Base WMP submittal. This ACI requires TBC to share examples of its best practices on WMP implementation with affiliated electric utilities and document the instances into its 2026-2028 WMP submission.

#### **4. Notice**

In accordance with Pub. Util. Code Section 8386(d), notice of TBC's 2025 WMP Update was given by posting the WMP on Energy Safety's web page at [2025 Wildfire Mitigation Plan Updates | Office of Energy Infrastructure Safety \(ca.gov\)](https://efiling.energysafety.ca.gov/EFiling/DocketInformation.aspx?docketnumber=2023-2025-WMPs).<sup>14</sup>

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<sup>12</sup> Available on the 2023–2025 Wildfire Mitigation Plan (2023-2025-WMPs) docket log at: <https://efiling.energysafety.ca.gov/EFiling/DocketInformation.aspx?docketnumber=2023-2025-WMPs>.

<sup>13</sup> Available on the 2023–2025 Wildfire Mitigation Plan (2023-2025-WMPs) docket log at: <https://efiling.energysafety.ca.gov/EFiling/DocketInformation.aspx?docketnumber=2023-2025-WMPs>.

<sup>14</sup> Available on the 2023–2025 Wildfire Mitigation Plan (2023-2025-WMPs) docket log at: <https://efiling.energysafety.ca.gov/EFiling/DocketInformation.aspx?docketnumber=2023-2025-WMPs>.

## **5. Energy Safety Approval of 2025 WMP Update**

The Public Utilities Code requires Energy Safety to review, request revision, and approve or deny a utility's WMP. Energy Safety approved the 2025 WMP Update for TBC pursuant to Public Utilities Code Section 8386.3 and submitted it to the Commission for ratification. According to Energy Safety's Decision, attached hereto as Appendix A, Energy Safety reviewed the WMP and considered input from the California Department of Forestry and Fire Protection and stakeholders, responses to data requests, and responses to ongoing reporting required in connection with previous WMP submissions and decisions. Energy Safety also applied a "maturity model" to test whether electrical corporations are improving or "maturing" in their response to catastrophic wildfire over time.

We take official notice that Energy Safety approved TBC's 2025 WMP Update in its final Decision on TBC's 2025 WMP Update on December 11, 2024, pursuant to Commission Rules of Practice and Procedure 13.10 and California Evidence Code Section 452(c). Parties may address the propriety of taking such notice in comments on this draft Resolution.

## **6. Ratification**

The Commission has reviewed TBC's 2025 WMP Update, Energy Safety's evaluation of TBC's 2025 WMP Update, the Decision issued by Energy Safety pursuant to Pub. Util. Code Section 8386.3, stakeholder comments served on Energy Safety's 2025 WMP Update docket, and other public input. Pursuant to Pub. Util. Code Section 8386.3(a), the Commission ratifies Energy Safety's action approving TBC's 2025 WMP Update.

While the Commission is ratifying Energy Safety's action approving TBC's WMP Update, a CPUC decision approving a GRC may authorize a revenue requirement for wildfire risk mitigation programs and activities for a year covered by the WMP that differ from those approved in this WMP. If the wildfire risk mitigation programs and activities in a utility's approved WMP differ from those authorized in a GRC, the utility may need to file with Energy Safety an appropriate request to address differences in the approved WMP and approved GRC.

## **7. Wildfire Mitigation Costs**

Pursuant to statute, an electrical corporation's costs associated with wildfire mitigation activities are not approved as part of its WMP; rather, costs are evaluated in each electrical corporation's GRC or other application for rate recovery. For Independent Transmission Operators such as TBC, costs may be addressed through a process at the Federal Energy Regulatory Commission (FERC).

The Commission has evaluated or will evaluate 2023–2025 wildfire mitigation costs in TBC's GRCs or in future applications.

## **8. Conclusion**

Consistent with Pub. Util. Code Section 8386.3(a), the Commission ratifies Energy Safety's Decision (Appendix A hereto) approving TBC's 2025 WMP Update.

## **COMMENTS**

Pub. Util. Code Section 311(g)(1) provides that resolutions must be served on all parties to a proceeding and subject to at least 30 days' public review. However, given that this Resolution is issued outside of a formal proceeding, interested stakeholders do not need party status in a Commission proceeding in order to submit comments. Comments are due 20 days from the mailing date of this Resolution. Replies will not be accepted.

This draft Resolution will be served on the service list of R.18-10-007 and the parties that submitted comments on the WMP to Energy Safety and placed on the Commission's agenda no earlier than 30 days from its mailing date.

## **FINDINGS**

1. The Office of Energy Infrastructure Safety reviewed and approved Trans Bay Cable's 2025 Wildfire Mitigation Plan Update pursuant to Public Utilities Code Section 8386.3(a) (Appendix A hereto).
2. Public Utilities Code Section 8386.3(a) provides that "After approval [of the 2025 Wildfire Mitigation Plan by the Office of Energy Infrastructure Safety,] the [C]ommission shall ratify the action of [Energy Safety]."

**THEREFORE, IT IS ORDERED THAT:**

1. The Office of Energy Infrastructure Safety’s Decision approving Trans Bay Cable’s 2025 Wildfire Mitigation Plan Update is ratified.
2. Nothing in this Resolution should be construed as approval of the costs associated with the implementation of Trans Bay Cable’s 2025 Wildfire Mitigation Plan Update.
3. The Commission takes official notice that the Office of Energy Infrastructure Safety approved Trans Bay Cable’s 2025 Wildfire Mitigation Plan Update in its Decision on December 11, 2024, pursuant to the Commission’s Rules of Practice and Procedure Rule 13.10 and California Evidence Code Section 452(c).
4. Nothing in this Resolution should be construed as a defense to any enforcement action for a violation of a Commission decision, order, or rule.

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 February 20, 2025; the following Commissioners voting favorably thereon:

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RACHEL PETERSON  
Executive Director



## **APPENDIX A**

### **OFFICE OF ENERGY INFRASTRUCTURE SAFETY DECISION**



December 11, 2024

To: Stakeholders for the Trans Bay Cable, LLC, 2025 Wildfire Mitigation Plan Update

Enclosed is the Decision of the Office of Energy Infrastructure Safety (Energy Safety), approving the Trans Bay Cable, LLC (TBC) 2025 Wildfire Mitigation Plan (WMP) Update.

On October 9, 2024, Energy Safety published a draft of this Decision for public review and comment.<sup>1</sup> Opening comments on the draft Decision were due on October 29, 2024, and reply comments were due on November 8, 2024.

No stakeholder comments were received during either of these comment periods. Energy Safety made non-substantive changes to correct typographical errors in the text.

If TBC seeks to change its approved 2025 mitigation initiative targets, it must submit a change order request within 10 business days of Energy Safety's issuance of this Decision for TBC's 2025 WMP Update. See Section 12 of Energy Safety's 2023-2025 WMP Process and Evaluation Guidelines<sup>2</sup> for further instructions and criteria for submitting a change order request.

Sincerely,

          /s/ Tony Marino          

Tony Marino

Acting Deputy Director | Electrical Infrastructure Directorate  
Office of Energy Infrastructure Safety

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<sup>1</sup> [Draft Decision for TBC 2025 WMP Update](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57493&shareable=true)

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57493&shareable=true>, accessed November 7, 2024).

<sup>2</sup> [Energy Safety's 2023-2025 Wildfire Mitigation Plan Process and Evaluation Guidelines \(Revised\) \(adopted Jan. 2024, published Feb. 2024\)](#), Section 12 "Change Order Requests," pp. 22-28

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56255&shareable=true>, accessed May 6, 2024).



OFFICE OF ENERGY INFRASTRUCTURE SAFETY

**DECISION**

**TRANS BAY CABLE, LLC**

**2025 WILDFIRE MITIGATION PLAN UPDATE**

December 2024

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# 1. Executive Summary

The Office of Energy Infrastructure Safety (Energy Safety) works to ensure electrical corporations take effective actions to reduce utility-related wildfire risk. This Decision approves Trans Bay Cable, LLC's (TBC's) 2025 Wildfire Mitigation Plan (WMP) Update, submitted July 8, 2024.

TBC provided a total of two reportable updates in its 2025 WMP Update. These include reporting progress on two areas for continued improvement.

The above-listed updates encompass two initiative categories. These include asset inspections and community outreach and engagement.

Energy Safety evaluated TBC's 2025 WMP Update and finds several strengths. For example, TBC demonstrated that it has a documented process for quality control for its asset inspections and has conducted an analysis of the process to demonstrate the effectiveness. In doing so, TBC adequately responded to all areas for continued improvement required in its 2025 WMP Update.

TBC also has one area of its WMP that can be further developed and improved for which it is required to demonstrate progress in its 2026-2028 Base WMP submittal. In the community outreach and engagement section of its 2026-2028 Base WMP, TBC is required to provide documentation of its best practice sharing.

## 2. Introduction and Background

Trans Bay Cable, LLC, (TBC) submitted its 2023-2025 Wildfire Mitigation Plan (2023-2025 Base WMP) in 2023.<sup>1</sup> Energy Safety approved TBC's 2023-2025 Base WMP on January 30, 2024. On July 8, 2024, TBC submitted its 2025 Wildfire Mitigation Plan Update (2025 WMP Update) to its 2023-2025 Base WMP in accordance with Energy Safety's 2025 Wildfire Mitigation Plan Update Guidelines (2025 WMP Update Guidelines)<sup>2</sup> and Energy Safety's 2023-2025 Wildfire Mitigation Plan Process and Evaluation Guidelines (WMP Process Guidelines).<sup>3</sup>

Pursuant to Public Utilities Code section 8386.3(a), this Decision approves TBC's 2025 WMP Update to its 2023-2025 Base WMP.

### 2.1 Consultation with California Department of Forestry and Fire Protection

The Office of the State Fire Marshal is part of the California Department of Forestry and Fire Protection (CAL FIRE). Public Utilities Code section 8386.3(a) requires Energy Safety to consult with the Office of the State Fire Marshal in reviewing electrical corporations' WMPs and WMP Updates. The Office of the State Fire Marshal provided consultation and input into Energy Safety's evaluation, but this Decision is an action of Energy Safety and not the Office of the State Fire Marshal or CAL FIRE.

### 2.2 Stakeholder Comments

Energy Safety invited stakeholders and members of the public to provide comments on the electrical corporations' 2025 WMP Updates and Revision Notices. Opening comments on TBC's 2025 WMP Update were due on August 12, 2024, and reply comments were due on August 22, 2024. Energy Safety did not receive any stakeholder comments on TBC's 2025 WMP Update.

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<sup>1</sup> In accordance with [Energy Safety's 2023-2025 Wildfire Mitigation Plan Technical Guidelines \(December 6, 2022\)](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true) (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true, accessed April 9, 2024).

<sup>2</sup> [Energy Safety's 2025 Wildfire Mitigation Plan Update Guidelines \(adopted Jan. 2024, published Feb. 2024\) \(hereafter 2025 WMP Update Guidelines\)](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56254&shareable=true) (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56254&shareable=true, accessed May 6, 2024).

<sup>3</sup> [Energy Safety's 2023-2025 Wildfire Mitigation Plan Process and Evaluation Guidelines \(Revised\) \(adopted Jan. 2024, published Feb. 2024\) \(hereafter Revised WMP Process Guidelines\)](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56255&shareable=true) (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56255&shareable=true, accessed May 6, 2024).

## 3. Energy Safety 2025 WMP Update Evaluation Process

Energy Safety issued the following guidelines for electrical corporations' 2025 WMP Updates:

- **2025 Wildfire Mitigation Plan Update Guidelines (January 2024)** (hereafter 2025 WMP Update Guidelines), which sets forth reportable updates and general instructions for each electrical corporation's 2025 WMP Update.
- **2023-2025 Wildfire Mitigation Plan Process and Evaluation Guidelines (Revised January 2024)** (hereafter WMP Process Guidelines), which outlines the process for Energy Safety's evaluation of WMPs, details the public participation process, and establishes submission requirements for the electrical corporations.
- **2023-2025 Electrical Corporation Wildfire Mitigation Maturity Model (Revised January 2024)** and **2023-2025 Electrical Corporation Wildfire Mitigation Maturity Survey (Revised February 2024)** (hereafter Maturity Model and Maturity Survey), which together provide a quantitative method for assessing electrical corporation wildfire risk mitigation capabilities and examining how electrical corporations continue to improve in key areas of their WMPs.<sup>4, 5</sup>

### 3.1 Reportable Updates

Energy Safety's 2025 WMP Update Guidelines delineate the following five categories of updates that the electrical corporations are required to report:<sup>6</sup>

1. Updates to risk models
2. Updates to approved targets, objectives, and projected expenditures<sup>7</sup>
3. Quarterly inspection targets for 2025 for vegetation management and asset inspections

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<sup>4</sup> [Energy Safety's 2023-2025 Electrical Corporation Wildfire Mitigation Maturity Model \(revised and adopted Jan. 2024, published Feb. 2024\) \(hereafter Maturity Model\)](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56256&shareable=true)

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56256&shareable=true>, accessed May 6, 2024).

<sup>5</sup> [Energy Safety's 2023-2025 Electrical Corporation Wildfire Mitigation Maturity Survey \(adopted Jan. 2024, revised and published Feb. 2024\) \(hereafter Maturity Survey\)](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56306&shareable=true)

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56306&shareable=true>, accessed May 6, 2024).

<sup>6</sup> [2025 WMP Update Guidelines](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56254&shareable=true), "Reportable Updates," p. 3

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56254&shareable=true>, accessed May 6, 2024).

<sup>7</sup> Energy Safety's WMP evaluation and decision on a WMP is not an approval of, or agreement with, costs listed in the WMP.



4. New or discontinued programs
5. Progress on areas for continued improvement

The 2025 WMP Update Guidelines direct electrical corporations that they may not include any updates in their 2025 WMP Update that do not fall under one of these categories.<sup>8</sup>

The 2025 WMP Update Guidelines further direct that if an electrical corporation does not have any updates that fall within any of the above categories, it must affirm that it has no reportable updates for 2025 and that the information provided in its 2023-2025 Base WMP is current and accurate.<sup>9</sup>

## 3.2 Maturity Model and Survey

Energy Safety used the Maturity Model<sup>10</sup> and the electrical corporations' 2023 and 2024 responses to the Maturity Survey<sup>11</sup> to assess the maturity of each electrical corporation's wildfire risk mitigation program.<sup>12</sup>

The Maturity Model consists of 37 individual capabilities describing the ability of electrical corporations to mitigate wildfire risk and Public Safety Power Shutoff (PSPS) risk within their service territory.<sup>13</sup> The 37 capabilities are aggregated into 7 categories.<sup>14</sup> Maturity levels range from 0 (below minimum requirements) to 4 (beyond best practice). For each electrical corporation, Energy Safety calculated maturity levels for each capability, each category, five

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<sup>8</sup> [2025 WMP Update Guidelines](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56254&shareable=true), p. 3 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56254&shareable=true, accessed March 29, 2024).

<sup>9</sup> [2025 WMP Update Guidelines](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56254&shareable=true), p. 3 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56254&shareable=true, accessed March 29, 2024).

<sup>10</sup> [Maturity Model](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56256&shareable=true) (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56256&shareable=true, accessed May 6, 2024).

<sup>11</sup> [Maturity Survey](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56306&shareable=true) (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56306&shareable=true, accessed May 6, 2024).

<sup>12</sup> Energy Safety revised the 2023-2025 Electrical Corporation Wildfire Mitigation Maturity Model and Maturity Survey in January 2024. The revisions did not result in any changes to Maturity Survey questions, therefore the responses from 2024 are directly comparable to the responses from 2023. See the Maturity Survey issued by Energy Safety to the electrical corporations in 2023:

[Revised Final 2023 Electrical Corporation Wildfire Mitigation Maturity Survey \(April 24, 2023\)](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53708&shareable=true) (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53708&shareable=true, accessed May 6, 2024)

<sup>13</sup> [Maturity Model](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56256&shareable=true), Section 1, "Introduction," p. 1 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56256&shareable=true, accessed April 9, 2024).

<sup>14</sup> [Maturity Model](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56256&shareable=true), Section 3.1, "Capabilities and Categories," pp. 7-8 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56256&shareable=true, accessed April 9, 2024).

cross-category themes, and the overall WMP, based on the electrical corporation's answers to Maturity Survey questions and the scoring system described in the Maturity Model.<sup>15</sup>

Appendix F summarizes TBC's 2024 Maturity Survey results and changes in TBC's maturity compared to its 2023 Maturity Survey results.

### 3.3 Areas for Continued Improvement

Energy Safety's Decisions on the 2023-2025 Base WMPs focused on each electrical corporation's strategies for reducing the risk of utility-related ignitions. In those Decisions, Energy Safety identified areas where the electrical corporation must continue to improve its wildfire mitigation capabilities in future plans. For some areas, the electrical corporation was required to report its progress in its 2025 WMP Update. Energy Safety discusses the results of its evaluation of the electrical corporation's progress in each of those areas in Sections 5 through 9 of this Decision.

### 3.4 Errata

TBC did not submit an errata and Energy Safety did not request an errata from TBC.

### 3.5 Revision Notice

Public Utilities Code section 8386.3(a) states, "Before approval, [Energy Safety] may require modifications of the [WMP]." If Energy Safety requires modifications to a WMP, it does so by issuing a Revision Notice to an electrical corporation.<sup>16</sup>

Energy Safety did not issue TBC a Revision Notice for its 2025 WMP Update.

### 3.6 Decision

In its evaluation of an electrical corporation's 2025 WMP Update, Energy Safety considers the information provided by the electrical corporation regarding its reportable updates and the associated justifications. Energy Safety's approval of a 2025 WMP Update constitutes collective approval of the reported items in the electrical corporation's 2025 WMP Update. The approval therefore authorizes the updates to the electrical corporation's 2023-2025 Base

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<sup>15</sup> [Maturity Model](#), Section 4, "Maturity Level Determination," pp. 39-42 (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56256&shareable=true>, accessed April 9, 2024).

<sup>16</sup> [Revised WMP Process Guidelines](#), Section 4.4, "Revision Notice," pp. 6-8 (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56255&shareable=true>, accessed May 6, 2024).

WMP, as shown in the “Redlined 2023-2025 Base WMP” and “Clean Updated 2023-2025 Base WMP” provided as part of the electrical corporation’s 2025 WMP Update submission.<sup>17</sup>

TBC’s reported updates reduce risk and demonstrate thorough QA/QC processes for asset inspections. Therefore, Energy Safety approves TBC’s 2025 WMP Update.

Energy Safety invited stakeholders, including members of the public, to provide comments on Energy Safety’s draft Decision for TBC’s 2025 WMP Update (published for comment on October 9, 2024). No stakeholders or members of the public provided comments, as noted in Appendix E.

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<sup>17</sup> [2025 WMP Update Guidelines](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56254&shareable=true), pp. 3-4  
(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56254&shareable=true>, accessed March 29, 2024).

## 4. TBC 2025 WMP Update

In accordance with the 2025 WMP Update Guidelines,<sup>18</sup> TBC provided the following for its 2025 WMP Update submission:

1. **2025 WMP Update:** A standalone 2025 WMP Update document that describes TBC's reportable updates, or confirmation of no updates to the approved 2023-2025 Base WMP.
2. **Redlined 2023-2025 Base WMP:** A redlined version of TBC's 2023-2025 Base WMP showing reportable updates to the approved 2023-2025 Base WMP.
3. **Clean Updated 2023-2025 Base WMP:** A clean, updated copy of TBC's 2023-2025 Base WMP (i.e., without any updates marked in redline) incorporating the reportable updates from TBC's 2025 WMP Update as demonstrated in the redlined version.

Specifically, in response to the five categories of reportable updates of the 2025 WMP Update Guidelines, TBC provided the required information for each category. Energy Safety discusses each reportable update under the relevant mitigation initiative in Sections 5 through 9 of this Decision.

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<sup>18</sup> [2025 WMP Update Guidelines, pp. 3-4](#)

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56254&shareable=true>, accessed May 6, 2024).

## 5. Overview of the Service Territory

In its 2025 WMP Update, TBC did not report any updates to the overview of the service territory section of its 2023-2025 Base WMP.

## 6. Risk Methodology and Assessment

In its 2025 WMP Update, TBC did not report any updates to the risk methodology and assessment section of its 2023-2025 Base WMP.

## 7. Wildfire Mitigation Strategy Development

In its 2025 WMP Update, TBC did not report any updates to the wildfire mitigation strategy development section of its 2023-2025 Base WMP.

## 8. Wildfire Mitigation Initiatives

This section provides Energy Safety’s evaluation of TBC’s reportable updates related to the following wildfire mitigation initiatives:

- Grid design, operations, and maintenance, including grid design and system hardening, asset inspections, equipment maintenance and repair, and grid operations and procedures
- Vegetation management and inspections
- Situational awareness and forecasting
- Emergency preparedness
- Community outreach and engagement

Energy Safety discusses its evaluation of TBC’s reportable updates related to PSPS in Section 9. Energy Safety includes discussion of any reportable updates affecting TBC’s process for continuous improvement in Section 10.

### 8.1 Grid Design, Operations, and Maintenance

In its 2025 WMP Update, TBC provided one total update related to the grid design, operations, and maintenance section of its 2023-2025 Base WMP. The update TBC provided related to this section included reporting required progress on one area for continued improvement.

#### 8.1.1 Grid Design and System Hardening

##### 8.1.1.1 2023 Areas for Continued Improvement

Energy Safety’s Decision on TBC’s 2023-2025 Base WMP<sup>19</sup> did not require TBC to report progress on any areas for continued improvement in the grid design and system hardening section in its 2025 WMP Update. Therefore, TBC has no reportable updates in this area.

##### 8.1.1.2 New or Discontinued Programs

In its 2025 WMP Update, TBC did not report any new or discontinued programs related to the grid design and system hardening section of its 2023-2025 Base WMP.

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<sup>19</sup> [Energy Safety Decision on TBC 2023-2025 Base Wildfire Mitigation Plan](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56223&shareable=true) (Jan. 30, 2024), Section 11 “Required Areas for Continued Improvement,” p. 51 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56223&shareable=true, accessed August 29, 2024).



### 8.1.1.3 Targets, Objectives, and Projected Expenditures

In its 2025 WMP Update, TBC did not provide any updates to approved targets, objectives, or projected expenditures related to the grid design and system hardening section of its 2023-2025 Base WMP.

## 8.1.2 Asset Inspections

### 8.1.2.1 2023 Areas for Continued Improvement

TBC reported its progress on one area for continued improvement in the asset inspections section in its 2025 WMP Update.

#### TBC-23B-01.<sup>20</sup> QA/QC Process Documentation

In its Decision on TBC's 2023-2025 Base WMP, Energy Safety required TBC to provide all documentation related to its QA/QC processes and an analysis demonstrating its QA/QC process effectively mitigates wildfire risk.<sup>21</sup>

In its response, TBC provided its converter maintenance procedure document, its weekly inspection of watch (IOW) documents, and its monthly IOW documents.<sup>22</sup>

TBC stated its staff consists of six operations and maintenance (O&M) technicians who conduct inspections and perform maintenance work.<sup>23</sup> The technicians use the IOW documents to conduct inspections and identify conditions that require remediation. TBC stated its Operations Manager (or delegate) monitors the work of the O&M technicians by

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<sup>20</sup> Energy Safety is instituting a new naming convention for its areas for continued improvement. Moving forward, areas for continued improvement identified in Energy Safety's evaluation of Base WMPs will be designated with a "B" and areas for continued improvement identified in Energy Safety's evaluation of WMP Updates will be designated with a "U." Accordingly, areas for continued improvement that were identified in Energy Safety's evaluation of 2023-2025 Base WMPs are retitled "23B" and new areas for continued improvement identified in Energy Safety's evaluation of 2025 Update WMPs herein are titled "25U."

<sup>21</sup> [Energy Safety Decision on TBC 2023-2025 Base Wildfire Mitigation Plan](#) (Jan. 30, 2024), Section 11 "Required Areas for Continued Improvement," p. 51 (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56223&shareable=true>, accessed August 29, 2024).

<sup>22</sup> [TBC 2025 WMP Update \(R0\)](#) (July 8, 2024), p. 12 (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56996&shareable=true>, accessed August 28, 2024).

<sup>23</sup> [TBC 2025 WMP Update \(R0\)](#) (July 8, 2024), p. 13 (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56996&shareable=true>, accessed August 28, 2024).

reviewing each completed IOW checklist.<sup>24</sup> TBC stated that its review process in conjunction with the frequency of inspections reduces ignition risk.<sup>25</sup>

## Energy Safety Evaluation

TBC provided the required documentation in response to this area for continued improvement. Given the thoroughness of TBC's inspection procedures, frequency of inspection, hardscaped nature of facilities, and procedural review of all completed inspection checklists, Energy Safety finds that TBC's response demonstrates that TBC has a documented QA/QC process and that TBC has conducted an analysis of the process to demonstrate the effectiveness of its QA/QC process.

TBC sufficiently responded to this area for continued improvement; no further reporting is required on this area for continued improvement in TBC's 2026-2028 Base WMP.

### **8.1.2.2 New or Discontinued Programs**

In its 2025 WMP Update, TBC did not report any new or discontinued programs related to the asset inspections section of its 2023-2025 Base WMP.

### **8.1.2.3 Targets, Objectives, and Projected Expenditures**

In its 2025 WMP Update, TBC did not report any updates to approved targets, objectives, or projected expenditures related to the asset inspections section of its 2023-2025 Base WMP.

## **8.1.3 Equipment Maintenance and Repair**

### **8.1.3.1 2023 Areas for Continued Improvement**

Energy Safety's Decision on TBC's 2023-2025 Base WMP<sup>26</sup> did not require TBC to report progress on any areas for continued improvement in the equipment maintenance and repair section in its 2025 WMP Update. Therefore, TBC has no reportable updates in this area.

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<sup>24</sup> [TBC 2025 WMP Update \(R0\)](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56996&shareable=true) (July 8, 2024), p. 13 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56996&shareable=true, accessed August 28, 2024).

<sup>25</sup> [TBC 2025 WMP Update \(R0\)](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56996&shareable=true) (July 8, 2024), p. 13 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56996&shareable=true, accessed August 28, 2024).

<sup>26</sup> [Energy Safety Decision on TBC 2023-2025 Base Wildfire Mitigation Plan](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56223&shareable=true) (Jan. 30, 2024), Section 11 "Required Areas for Continued Improvement," p. 51 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56223&shareable=true, accessed August 29, 2024).

### **8.1.3.2 New or Discontinued Programs**

In its 2025 WMP Update, TBC did not report any new or discontinued programs related to the equipment maintenance and repair section of its 2023-2025 Base WMP.

### **8.1.3.3 Targets, Objectives, and Projected Expenditures**

In its 2025 WMP Update, TBC did not report any updates to approved targets, objectives, or projected expenditures related to the equipment maintenance and repair section of its 2023-2025 Base WMP.

## **8.1.4 Grid Operations and Procedures**

### **8.1.4.1 2023 Areas for Continued Improvement**

Energy Safety's Decision on TBC's 2023-2025 Base WMP<sup>27</sup> did not require TBC to report progress on any areas for continued improvement in the grid operations and procedures section in its 2025 WMP Update. Therefore, TBC has no reportable updates in this area.

### **8.1.4.2 New or Discontinued Programs**

In its 2025 WMP Update, TBC did not report any new or discontinued programs related to the grid operations and procedures section of its 2023-2025 Base WMP.

### **8.1.4.3 Targets, Objectives, and Projected Expenditures**

In its 2025 WMP Update, TBC did not report any updates to approved targets, objectives, or projected expenditures related to the grid operations and procedures section of its 2023-2025 Base WMP.

## **8.2 Vegetation Management and Inspections**

In its 2025 WMP Update, TBC did not report any updates to the vegetation management and inspections section of its 2023-2025 Base WMP.

## **8.3 Situational Awareness and Forecasting**

In its 2025 WMP Update, TBC did not report any updates to the situational awareness and forecasting section of its 2023-2025 Base WMP.

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<sup>27</sup> [Energy Safety Decision on TBC 2023-2025 Base Wildfire Mitigation Plan](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56223&shareable=true) (Jan. 30, 2024), Section 11 "Required Areas for Continued Improvement," p. 51 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56223&shareable=true, accessed August 29, 2024).

## 8.4 Emergency Preparedness

In its 2025 WMP Update, TBC did not report any updates to the emergency preparedness section of its 2023-2025 Base WMP.

## 8.5 Community Outreach and Engagement

In its 2025 WMP Update, TBC provided one total update related to the community outreach and engagement section of its 2023-2025 Base WMP. The update TBC provided related to this section included reporting on one area for continued improvement.

### 8.5.1 2023 Areas for Continued Improvement

Energy Safety's Decision on TBC's 2023-2025 Base WMP<sup>28</sup> did not require TBC to report progress on any areas for continued improvement in the community outreach and engagement section in its 2025 WMP Update. TBC elected to report its progress on one area for continued improvement in the community outreach and engagement section in its 2025 WMP Update.

#### 8.5.1.1 TBC-23B-02. Documentation of Sharing Best Practices

TBC elected to report in its 2025 WMP Update that it will provide an update on its progress on providing documented examples of its best practice sharing in its 2026-2028 Base WMP. TBC must respond to this area for continued improvement in its 2026-2028 Base WMP.

### 8.5.2 New or Discontinued Programs

In its 2025 WMP Update, TBC did not report any new or discontinued programs related to the community outreach and engagement section of its 2023-2025 Base WMP.

### 8.5.3 Targets, Objectives, and Projected Expenditures

In its 2025 WMP Update, TBC did not report any updates to approved targets, objectives, or projected expenditures related to the community outreach and engagement section of its 2023-2025 Base WMP.

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<sup>28</sup> [Energy Safety Decision on TBC 2023-2025 Base Wildfire Mitigation Plan](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56223&shareable=true) (Jan. 30, 2024), Section 11 "Required Areas for Continued Improvement," p. 51 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56223&shareable=true, accessed August 29, 2024).

## 9. Public Safety Power Shutoff

In its 2025 WMP Update, TBC did not report any updates to the Public Safety Power Shutoff section of its 2023-2025 Base WMP.

## 10. TBC Process for Continuous Improvement

TBC did not indicate any changes to the lessons learned or corrective action program sections of its 2023-2025 Base WMP.

# 11. Required Areas for Continued Improvement

Energy Safety’s WMP evaluations focus on each electrical corporations’ strategies for reducing the risk of utility-related ignitions. The list below comprises all of TBC’s areas for continued improvement and the required progress that TBC must address in its 2026-2028 Base WMP. This includes areas for continued improvement from Energy Safety’s Decision on TBC’s 2023-2025 Base WMP.

## 11.1 Community Outreach and Engagement

- **TBC-23B-02. Documentation of Sharing Best Practices**
  - Description: TBC does not document instances of sharing best practices.
  - Required Progress: In its 2026-2028 Base WMP, TBC must provide documented examples of its sharing of best practices to date (as of the 2026-2028 submission).
  - Discussed in Section 8.5 of Energy Safety’s Decision on TBC’s 2023-2025 Base WMP.<sup>29</sup>

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<sup>29</sup> [Energy Safety Decision on TBC 2023-2025 Base Wildfire Mitigation Plan](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56223&shareable=true) (Jan. 30, 2024), Section 11 “Required Areas for Continued Improvement,” p. 51 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56223&shareable=true, accessed August 29, 2024).

## 12. Conclusion

TBC's 2025 WMP Update is approved.

Catastrophic wildfires remain a serious threat to the health and safety of Californians. Electrical corporations, including TBC, must continue to make progress toward reducing utility-related ignition risk.

Energy Safety expects TBC to effectively implement its wildfire mitigation activities to reduce the risk of utility-related ignitions and the potential catastrophic consequences if an ignition occurs, as well as to reduce the scale, scope, and frequency of PSPS events.

TBC must meet the commitments in its WMP and fully address the area for continued improvement identified within this Decision to ensure it meaningfully reduces utility-related ignition and PSPS risk within its service territory over the plan cycle.

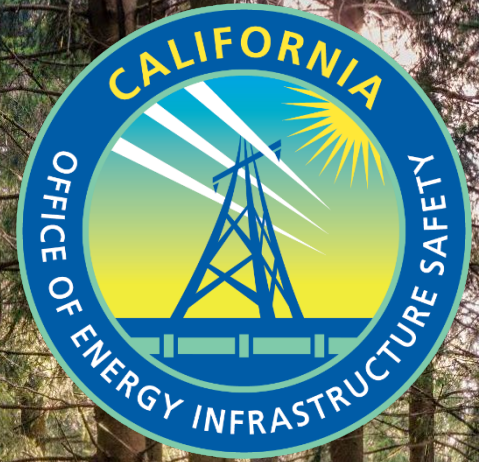


# DATA DRIVEN FORWARD-THINKING INNOVATIVE SAFETY FOCUSED

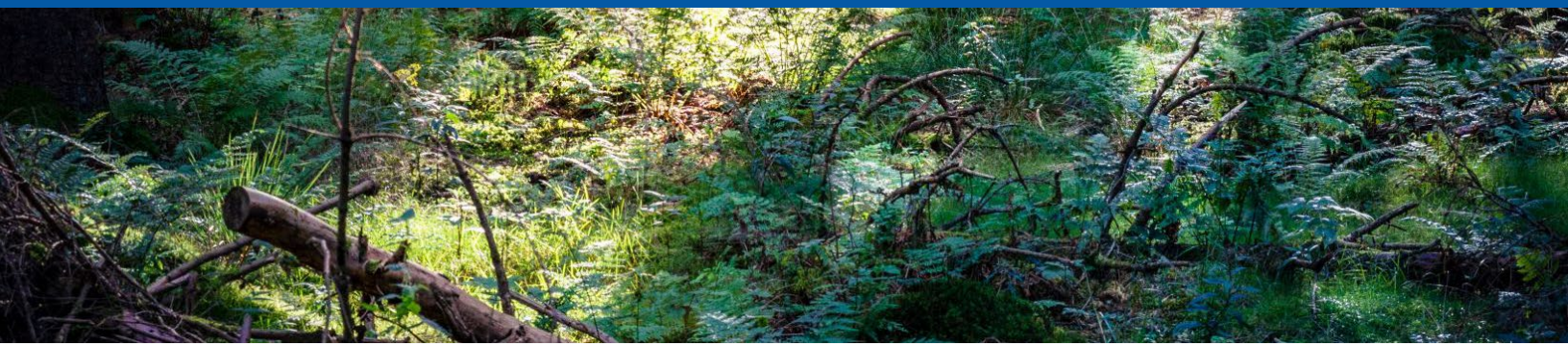


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# APPENDICES



## APPENDICES

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# Appendix A.

## Glossary of Terms

Term	Definition
<b>AFN</b>	Access and functional needs
<b>BVES</b>	Bear Valley Electric Service
<b>CAISO</b>	California Independent System Operator
<b>Cal Advocates</b>	The Public Advocates Office at the California Public Utilities Commission
<b>CAL FIRE</b>	California Department of Forestry and Fire Protection
<b>Cal OES</b>	California Governor's Office of Emergency Services
<b>CAP</b>	Corrective action program
<b>CBO</b>	Community-based organization
<b>CDFW</b>	California Department of Fish and Wildlife
<b>CEC</b>	California Energy Commission
<b>CEJA</b>	California Environmental Justice Alliance
<b>CNRA</b>	California Natural Resources Agency
<b>CPUC</b>	California Public Utilities Commission
<b>D.</b>	Prefix to a proceeding number designating a CPUC decision
<b>DR</b>	Data request
<b>DWR</b>	California Department of Water Resources
<b>EBMUD</b>	East Bay Municipal Utility District
<b>EFD</b>	Early fault detection

<b>Term</b>	<b>Definition</b>
<b>EPUC</b>	Energy Producers and Users Coalition
<b>EVM</b>	Enhanced vegetation management
<b>FERC</b>	Federal Energy Regulatory Commission
<b>FPI</b>	Fire potential index
<b>FWI</b>	Fire weather index
<b>GFN</b>	Ground-fault neutralizers
<b>GIS</b>	Geographic information systems
<b>GO</b>	General order
<b>GPI</b>	Green Power Institute
<b>GRC</b>	General rate case
<b>HD</b>	High definition
<b>HFRA</b>	High Fire Risk Area
<b>HFTD</b>	High fire threat district
<b>HWT or Horizon West</b>	Horizon West Transmission
<b>I.</b>	Prefix to a proceeding number designating a CPUC Order Instituting Investigation (OII)
<b>ICS</b>	Incident command system or structure
<b>IOU</b>	Investor-owned utility
<b>IR</b>	Infrared
<b>ISA</b>	International Society of Arboriculture
<b>ITO</b>	Independent transmission owner
<b>kV</b>	Kilovolt

<b>Term</b>	<b>Definition</b>
<b>Liberty</b>	Liberty Utilities
<b>LiDAR</b>	Light detection and ranging
<b>Maturity Model</b>	Electrical Corporation Wildfire Mitigation Maturity Model
<b>Maturity Survey</b>	Electrical Corporation Wildfire Mitigation Maturity Survey
<b>MAVF</b>	Multi-attribute value function
<b>MBL</b>	Medical Baseline
<b>MGRA</b>	Mussey Grade Road Alliance
<b>ML</b>	Machine learning
<b>NDVI</b>	Normalized difference vegetation index
<b>NERC</b>	North American Electric Reliability Corporation
<b>NFDRS</b>	National Fire Danger Rating System
<b>NOD</b>	Notice of defect
<b>NOV</b>	Notice of violation
<b>OCM</b>	Overhead circuit miles
<b>OEIS or Energy Safety</b>	Office of Energy Infrastructure Safety
<b>PG&amp;E</b>	Pacific Gas and Electric Company
<b>PoF</b>	Probability of failure
<b>PoI</b>	Probability of ignition
<b>PRC</b>	Public Resources Code
<b>PSPS</b>	Public Safety Power Shutoff

Term	Definition
<b>Pub. Util. Code or PU Code</b>	Public Utilities Code
<b>QA</b>	Quality assurance
<b>QC</b>	Quality control
<b>QDR</b>	Quarterly Data Report
<b>R.</b>	Prefix to a proceeding number designating a CPUC rulemaking
<b>RAMP</b>	Risk Assessment and Mitigation Phase
<b>RCRC</b>	Rural County Representatives of California
<b>REFCL</b>	Rapid earth fault current limiter
<b>RFW</b>	Red Flag Warning
<b>RSE</b>	Risk-spend efficiency
<b>SAWTI</b>	Santa Ana Wildfire Threat Index
<b>SCADA</b>	Supervisory control and data acquisition
<b>SCE</b>	Southern California Edison Company
<b>SDG&amp;E</b>	San Diego Gas & Electric Company
<b>S-MAP</b>	Safety Model Assessment Proceeding, now the Risk-Based Decision-Making Framework Proceeding
<b>SMJU</b>	Small and multijurisdictional utilities
<b>TAT</b>	Tree Assessment Tool
<b>TBC</b>	Trans Bay Cable
<b>TURN</b>	The Utility Reform Network
<b>USFS</b>	United States Forest Service
<b>VM</b>	Vegetation management

Term	Definition
<b>VRI</b>	Vegetation risk index
<b>WMP</b>	Wildfire Mitigation Plan
<b>WRRM</b>	Wildfire Risk Reduction Model
<b>WSAB</b>	Wildfire Safety Advisory Board
<b>WUI</b>	Wildland-urban interface



# Appendix B.

## Status of 2023 Areas for Continued Improvement

Energy Safety’s 2023 Decision<sup>1</sup> for TBC identified areas for continued improvement and associated required progress. Areas for continued improvement are where TBC must continue to improve its wildfire mitigation capabilities. As part of the 2025 WMP Update evaluation process, Energy Safety reviewed the progress reported by TBC on areas for continued improvement that Energy Safety required progress on by the 2025 WMP Update. Energy Safety is satisfied that TBC has made sufficient progress in all the identified areas for continued improvement.

TBC’s 2023 areas for continued improvement that Energy Safety required progress on by the 2025 WMP Update are listed in Table A-1. The status column indicates whether each has been fully addressed. If not, the column notes where to find more information in this Decision.

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<sup>1</sup> [Energy Safety Decision on TBC 2023-2025 Base Wildfire Mitigation Plan](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56223&shareable=true) (Jan. 30, 2024), Section 11 “Required Areas for Continued Improvement,” p. 51 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56223&shareable=true, accessed August 29, 2024).

*Table A-1. TBC 2023 Areas for Continued Improvement*

ID	Title	Status
<b>TBC-23B-01</b> <b>(TBC-23-01)</b>	QA/QC Process Documentation	TBC sufficiently addressed the required progress.

# **Appendix C. Stakeholder Data Request Responses Used in WMP Evaluation**

No stakeholder data request responses were cited in this Decision.

## **Appendix D.**

# **Stakeholder Comments on the 2025 WMP Updates**

Energy Safety invited stakeholders, including members of the public, to provide comments on the electrical corporations' 2025 WMP Updates. Opening comments on Group 2 WMPs were due on August 12, 2024, and reply comments were due on August 22, 2024. Comments received on the 2025 WMP Updates can be viewed in the 2023-2025 Wildfire Mitigation Plan (2023-2025-WMPs) docket log.

Energy Safety did not receive any stakeholder comments on TBC's 2025 WMP Update.

# Appendix E.

## Stakeholder Comments on the Draft Decision

Energy Safety invited stakeholders, including members of the public, to provide comments on Energy Safety's draft Decision for TBC's 2025 WMP Update, published on October 9, 2024. Opening comments on the draft Decision were due on October 29, 2024, and reply comments were due on November 8, 2024.

Energy Safety did not receive any comments on the draft Decision for TBC's 2025 WMP Update.

# Appendix F.

## Maturity Survey Results

Energy Safety's 2023-2025 Electrical Corporation Wildfire Mitigation Maturity Model<sup>2</sup> (Maturity Model) and Electrical Corporation Wildfire Mitigation Maturity Survey<sup>3</sup> (Maturity Survey) together provided a quantitative method to assess the maturity of each electrical corporation's wildfire risk mitigation program.

The Maturity Model consists of 37 individual capabilities describing the ability of electrical corporations to mitigate wildfire risk within their service territory. The 37 capabilities are aggregated into seven categories. The seven mitigation categories are:

- A. Risk Assessment and Mitigation Selection
- B. Situational Awareness and Forecasting
- C. Grid Design, Inspections, and Maintenance
- D. Vegetation Management and Inspections
- E. Grid Operations and Protocols
- F. Emergency Preparedness
- G. Community Outreach and Engagement

Maturity levels range from 0 (below minimum requirements) to 4 (beyond best practice). Electrical corporations' responses to the Maturity Survey, listed by mitigation category, are depicted in the figures and tables below.

Figure A-1 displays TBC's 2024 response to the Maturity Survey across mitigation categories showing minimum and average values. Figure A-2 compares TBC's 2024 response to the Maturity Survey to its 2023 response to the Maturity Survey, depicting values that increased, decreased, or had no change (indicated by "NC").

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<sup>2</sup> [Energy Safety's 2023-2025 Electrical Corporation Wildfire Mitigation Maturity Model \(revised and adopted Jan. 2024, published Feb. 2024\)](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56256&shareable=true)

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56256&shareable=true>, accessed May 6, 2024).

<sup>3</sup> [Energy Safety's 2023-2025 Electrical Corporation Wildfire Mitigation Maturity Survey \(adopted Jan. 2024, revised and published Feb. 2024\)](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56306&shareable=true)

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56306&shareable=true>, accessed May 6, 2024).

Figure A-1. TBC 2024 Response to the 2023-2025 Maturity Survey

		1. Capability				2. Capability				3. Capability				4. Capability				5. Capability				6. Capability			
		2023	2024	2025	2026	2023	2024	2025	2026	2023	2024	2025	2026	2023	2024	2025	2026	2023	2024	2025	2026	2023	2024	2025	2026
A. Risk Assessment and Mitigation Strategy		1. Statistical weather, climate, and wildfire modeling				2. Calculation of wildfire and PSPS risk exposure for societal values				3. Calculation of community vulnerability to wildfire and Public Safety Power Shutoffs (PSPS)				4. Calculation of risk and risk components				5. Risk event tracking and integration of lessons learned				6. Risk-informed wildfire mitigation strategy			
	Minimum of Sub-Cap.	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
	Average of Sub-Cap.	0.0	0.0	0.0	0.0	0.1	0.1	0.1	0.1	0.0	0.0	0.0	0.0	0.1	0.1	0.1	0.1	0.7	0.7	0.7	0.7	0.0	0.0	0.0	0.0
B. Situational Awareness and Forecasting		7. Ignition likelihood estimation				8. Weather forecasting ability				9. Wildfire spread forecasting				10. Data collection for near-real-time conditions				11. Wildfire detection and alarm systems				12. Centralized monitoring of real-time conditions			
	Minimum of Sub-Cap.	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	
	Average of Sub-Cap.	0.0	0.0	0.0	0.0	0.2	0.2	0.2	0.2	0.0	0.0	0.0	0.0	0.6	0.6	0.6	0.6	1.0	1.0	1.0	1.0	1.2	1.2	1.2	1.2
C. Grid Design, Inspections, and Maintenance		13. Asset inventory and condition database				14. Asset inspections				15. Asset maintenance and repair				16. Grid design and resiliency				17. Asset and grid personnel training and quality							
	Minimum of Sub-Cap.	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	
	Average of Sub-Cap.	1.8	1.8	1.8	1.8	1.3	1.3	1.3	1.3	0.5	0.5	0.5	0.5	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	
D. Vegetation Management and Inspections		18. Vegetation inventory and condition database				19. Vegetation inspections				20. Vegetation treatment				21. Vegetation personnel training and quality											
	Minimum of Sub-Cap.	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	
	Average of Sub-Cap.	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	
E. Grid Operations and Protocols		22. Protective equipment and device settings				23. Incorporation of ignition risk factors in grid control				24. PSPS operating model				25. Protocols for PSPS re-energization				26. Ignition prevention and suppression							
	Minimum of Sub-Cap.	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	1.0	1.0	1.0	1.0	
	Average of Sub-Cap.	0.5	0.5	0.5	0.5	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.8	0.8	0.8	0.8	1.0	1.0	1.0	1.7	1.7	1.7	1.7	
F. Emergency Preparedness		27. Wildfire and PSPS emergency and disaster preparedness plan				28. Collaboration and coordination with public safety partners				29. Public emergency communication strategy				30. Preparedness and planning for service restoration				31. Customer support in wildfire and PSPS emergencies				32. Learning after wildfires and PSPS incidents			
	Minimum of Sub-Cap.	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	
	Average of Sub-Cap.	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	1.2	1.2	1.2	1.2	0.0	0.0	0.0	0.0	0.0	0.0	0.0	
G. Community Outreach and Engagement		33. Public outreach and education awareness				34. Public engagement in electrical corporation wildfire mitigation planning				35. Engagement with AFN and socially vulnerable populations				36. Collaboration on local wildfire mitigation planning				37. Cooperation and best practice sharing with other electrical corporations							
	Minimum of Sub-Cap.	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	
	Average of Sub-Cap.	0.0	0.0	0.0	0.0	0.3	0.3	0.3	0.3	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.3	0.3	0.3	1.0	1.0	1.0	1.0	

