

PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA**SAFETY POLICY DIVISION****Resolution SPD-33
February 20, 2025****R E S O L U T I O N****RESOLUTION SPD-33 Resolution Ratifying Action of the Office of Energy Infrastructure Safety on Horizon West Transmission’s 2025 Wildfire Mitigation Plan Update Pursuant to Public Utilities Code Section 8386.3(a).**

This Resolution ratifies the attached Decision (Appendix A hereto) of the Office of Energy Infrastructure Safety (Energy Safety) approving Horizon West Transmission’s (HWT 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 11, 2024, pursuant to the Commission’s obligations under Pub. Util. Code Section 8386.3(a). HWT’s WMP responds to a list of 23 requirements set forth in Pub. Util. Code Section 8386(c). HWT 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. HWT’s 2025 WMP Update provides information on HWT’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.¹

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].”

¹ 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 HWT.
- 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 HWT's actual costs for 2020–2022 and its projected costs for the implementation of wildfire mitigation efforts in its 2023–2025 WMP.

Table 1: HWT's 2023-2025 WMP Costs²

Costs by Year	Costs \$USD
Actual 2023 costs	\$210,000
Proposed 2024 costs	\$153,000
Proposed 2025 costs	\$147,000
Actual 2020–2022 WMP 3-year total costs	\$29,024,000
Difference between 2020-2022 Actual and 2023–2025 Actual/Proposed costs (+/-)	-\$28,514,000
Proposed 2023–2025 WMP 3-year total costs	\$510,000

DISCUSSION

1. Summary

This Resolution ratifies the attached Energy Safety Decision, issued on December 11, 2024, approving the 2025 WMP Update submitted by HWT on July 9, 2024 (Appendix A hereto).³ 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

² From Data Request response SPD_HWT_2024_001

³ HWT'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 901⁴ in 2018 and its successor Assembly Bill (AB) 1054,⁵ as well as AB 111 in 2019.⁶

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.⁷ 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.⁸ The Commission may assess penalties on electrical corporations if they fail to substantially comply with their plans.⁹

HWT 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).¹⁰

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

⁴ Stats. 2018, Ch. 626.

⁵ Stats. 2019, Ch. 79.

⁶ Stats. 2019, Ch. 81.

⁷ Pub. Util. Code Section 8386.3(c).

⁸ Pub. Util. Code Section 8389(g).

⁹ Pub. Util. Code Section 8386.1.

¹⁰ Pub. Util. Code § 8386(c)

([https://leginfo.legislature.ca.gov/faces/codes_displaySection.xhtml?lawCode=PUC§ionNum=8386.#:~:text=\(c\)](https://leginfo.legislature.ca.gov/faces/codes_displaySection.xhtml?lawCode=PUC§ionNum=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 11, 2024, HWT 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 HWT's 2025 WMP Update for public comment.¹¹ 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 HWT's WMP.¹² Energy Safety identified 1 area for continued improvement (ACI) for which HWT is required to demonstrate progress in its 2026-2028 Base WMP submittal. This ACI requires HWT 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 HWT'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).¹³

¹¹ 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>.

¹² 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>.

¹³ 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 HWT 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 HWT's 2025 WMP Update in its final Decision on HWT'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 HWT's 2025 WMP Update, Energy Safety's evaluation of HWT'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 HWT's 2025 WMP Update.

While the Commission is ratifying Energy Safety's action approving HWT'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 HWT, 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 HWT'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 HWT'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 Horizon West Transmission'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 Horizon West Transmission'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 Horizon West Transmission's 2025 Wildfire Mitigation Plan Update.
3. The Commission takes official notice that the Office of Energy Infrastructure Safety approved Horizon West Transmission'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:

RACHEL PETERSON
Executive Director

APPENDIX A

OFFICE OF ENERGY INFRASTRUCTURE SAFETY DECISION



December 11, 2024

To: Stakeholders for the Horizon West Transmission, LLC, 2025 Wildfire Mitigation Plan Update

Enclosed is the Decision of the Office of Energy Infrastructure Safety (Energy Safety), approving the Horizon West Transmission, LLC (HWT) 2025 Wildfire Mitigation Plan (WMP) Update.

On October 9, 2024, Energy Safety published a draft of this Decision for public review and comment.¹ 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 HWT 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 HWT's 2025 WMP Update. See Section 12 of Energy Safety's 2023-2025 WMP Process and Evaluation Guidelines² 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

¹ [Draft Decision for HWT 2025 WMP Update](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57492&shareable=true)

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57492&shareable=true>, accessed November 7, 2024).

² [Energy Safety's 2023-2025 Wildfire Mitigation Plan Process and Evaluation Guidelines \(Revised\) \(adopted Jan. 2024, published Feb. 2024\)](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56255&shareable=true), 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
HORIZON WEST TRANSMISSION, 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 Horizon West Transmission, LLC's (HWT's) 2025 Wildfire Mitigation Plan (WMP) Update, submitted July 8, 2024, and revised September 17, 2024.

HWT provided a total of five reportable updates in its 2025 WMP Update. These include one update to projected expenditures, two updates to quarterly inspection targets for 2025, and reporting progress on two areas for continued improvement.

The above-listed updates encompass three initiative categories. These include asset inspections, vegetation management and inspections, and community outreach and engagement.

Energy Safety evaluated HWT's 2025 WMP Update and finds several strengths. For example, HWT demonstrated a thorough quality control process for its asset inspections. In addition, HWT has taken initiative to increase its best practice sharing with other electrical corporations by joining two industry groups focused on wildfire mitigation.

HWT 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, HWT is required to provide documentation of its best practice sharing.

2. Introduction and Background

Horizon West Transmission, LLC, (HWT) submitted its 2023-2025 Wildfire Mitigation Plan (2023-2025 Base WMP) in 2023.¹ Energy Safety approved HWT's 2023-2025 Base WMP on January 30, 2024. On July 8, 2024, HWT submitted its 2025 Wildfire Mitigation Plan Update (2025 WMP Update). On September 17, 2024, HWT submitted its revised 2023-2025 Base WMP R2² to its 2023-2025 Base WMP in accordance with Energy Safety's 2025 Wildfire Mitigation Plan Update Guidelines (2025 WMP Update Guidelines)³ and Energy Safety's 2023-2025 Wildfire Mitigation Plan Process and Evaluation Guidelines (WMP Process Guidelines).⁴

Pursuant to Public Utilities Code section 8386.3(a), this Decision approves HWT'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

¹ 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).

² As discussed in Section 3.4, in response to Energy Safety's Notice on Errata for Horizon West Transmission, LLC, 2023-2025 Base WMP Revision 1, HWT submitted [Horizon West Transmission 2023-2025 Base Wildfire Mitigation Plan Revision 2 \(redlined\)](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57365&shareable=true) and [Horizon West Transmission 2023-2025 Base Wildfire Mitigation Plan Revision 2 \(clean\)](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57366&shareable=true) (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57365&shareable=true, accessed October 7, 2024), (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57366&shareable=true, accessed October 7, 2024).

³ [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).

⁴ [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).

HWT'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 HWT's 2025 WMP Update.

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.^{5, 6}

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:⁷

1. Updates to risk models
2. Updates to approved targets, objectives, and projected expenditures⁸
3. Quarterly inspection targets for 2025 for vegetation management and asset inspections

⁵ [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).

⁶ [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).

⁷ [2025 WMP Update Guidelines](#), "Reportable Updates," p. 3

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

⁸ 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.⁹

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.¹⁰

3.2 Maturity Model and Survey

Energy Safety used the Maturity Model¹¹ and the electrical corporations' 2023 and 2024 responses to the Maturity Survey¹² to assess the maturity of each electrical corporation's wildfire risk mitigation program.¹³

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.¹⁴ The 37 capabilities are aggregated into 7 categories.¹⁵ 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

⁹ [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).

¹⁰ [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).

¹¹ [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).

¹² [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).

¹³ 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)

¹⁴ [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).

¹⁵ [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.¹⁶

Appendix F summarizes HWT's 2024 Maturity Survey results and changes in HWT'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

Energy Safety requested that HWT submit a new version of its revised 2023-2025 Base WMP incorporating corrections to non-substantive and substantive errata identified by Energy Safety.¹⁷ In response, HWT submitted a corrected version of its revised 2023-2025 Base WMP on September 17, 2024.¹⁸ The corrected version fixed errors in the quarterly inspection targets tables and resolved other copyediting and format errors.

Energy Safety considered HWT's corrected version of its revised 2023-2025 Base WMP in its evaluation.

¹⁶ [Maturity Model](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56256&shareable=true), Section 4, "Maturity Level Determination," pp. 39-42 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56256&shareable=true, accessed April 9, 2024).

¹⁷ [Notice on Errata for HWT 2023-2025 Base WMP Revision 1](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57328&shareable=true) (Sept. 10, 2024) (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57328&shareable=true, accessed November 26, 2024).

¹⁸ [Horizon West Transmission 2023-2025 Base Wildfire Mitigation Plan Revision 2 \(redlined\)](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57365&shareable=true) and [Horizon West Transmission 2023-2025 Base Wildfire Mitigation Plan Revision 2 \(clean\)](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57366&shareable=true) (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57365&shareable=true, accessed October 7, 2024), (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57366&shareable=true, accessed October 7, 2024).

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.¹⁹

Energy Safety did not issue HWT 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 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.²⁰

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

Energy Safety invited stakeholders, including members of the public, to provide comments on Energy Safety’s draft Decision for HWT’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.

¹⁹ [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).

²⁰ [2025 WMP Update Guidelines](#), pp. 3-4 (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56254&shareable=true>, accessed March 29, 2024).

4. HWT 2025 WMP Update

In accordance with the 2025 WMP Update Guidelines,²¹ HWT provided the following for its 2025 WMP Update submission:

1. **2025 WMP Update:** A standalone 2025 WMP Update document that describes HWT'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 HWT'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 HWT's 2023-2025 Base WMP (i.e., without any updates marked in redline) incorporating the reportable updates from HWT'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, HWT 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.

²¹ [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, HWT 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, HWT 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, HWT 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 HWT’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 HWT’s reportable updates related to PSPS in Section 9. Energy Safety includes discussion of any reportable updates affecting HWT’s process for continuous improvement in Section 10.

8.1 Grid Design, Operations, and Maintenance

In its 2025 WMP Update, HWT provided two total updates related to the grid design, operations, and maintenance section of its 2023-2025 Base WMP. The updates HWT provided related to this section included reporting required progress on one area for continued improvement and reporting quarterly targets for 2025 for one asset inspection program.

8.1.1 Grid Design and System Hardening

8.1.1.1 2023 Areas for Continued Improvement

Energy Safety’s Decision on HWT’s 2023-2025 Base WMP²² did not require HWT to report progress on any areas for continued improvement in the grid design and system hardening section in its 2025 WMP Update. Therefore, HWT has no reportable updates in this area.

8.1.1.2 New or Discontinued Programs

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

²² [Energy Safety Decision on HWT 2023-2025 Base Wildfire Mitigation Plan](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56224&shareable=true) (Jan. 30, 2024), Section 11 “Required Areas for Continued Improvement,” p. 49 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56224&shareable=true, accessed August 29, 2024).

8.1.1.3 Targets, Objectives, and Projected Expenditures

In its 2025 WMP Update, HWT 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

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

HWT-23B-01.²³ QA/QC Process Description

In its Decision on HWT's 2023-2025 Base WMP, Energy Safety required HWT to provide all checklists and procedures related to its QA/QC program.²⁴ Additionally, Energy Safety required HWT to provide an analysis demonstrating its QA/QC process effectively mitigates wildfire risk.²⁵

In its response, HWT provided its wildfire mitigation assessment procedure and form, underground system operation and maintenance manual, wildlife and vegetation procedure, substation condition assessment program, and Suncrest Static VAR Compensator (SVC) condition assessment form.

HWT stated its staff consists of two field engineers that perform maintenance and inspection work.²⁶ HWT stated that its field engineers perform monthly inspections on an alternating basis, and inspection findings are either addressed immediately by the field engineer or a

²³ 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."

²⁴ [Energy Safety Decision on HWT 2023-2025 Base Wildfire Mitigation Plan](#) (Jan. 30, 2024), Section 11 "Required Areas for Continued Improvement," p. 49 (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56224&shareable=true>, accessed August 29, 2024).

²⁵ [Energy Safety Decision on HWT 2023-2025 Base Wildfire Mitigation Plan](#) (Jan. 30, 2024), Section 11 "Required Areas for Continued Improvement," p. 49 (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56224&shareable=true>, accessed August 29, 2024).

²⁶ [HWT 2025 WMP Update \(R0\)](#) (July 8, 2024), p. 13 (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57000&shareable=true>, accessed August 28, 2024).

work order is created.²⁷ HWT updated its WMP to require annual review of at least one monthly inspection by a field engineer other than the inspector.²⁸

Energy Safety Evaluation

HWT provided the required documentation in response to this area for continued improvement. Given the thoroughness of HWT's inspection and maintenance procedures, monthly alternating inspection personnel, and HWT's commitment to audit one monthly inspection per year, Energy Safety finds that HWT's response demonstrates that HWT has a documented QA/QC process and has performed an analysis to determine its effectiveness.

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

8.1.2.2 New or Discontinued Programs

In its 2025 WMP Update, HWT 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, HWT provided quarterly targets (end of Q2 and end of Q3) for its one 2025 asset inspection program, as required by the 2025 WMP Update Guidelines.²⁹

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

Energy Safety Evaluation

HWT's quarterly targets for its 2025 asset inspections are consistent with quarterly targets for 2023 and 2024 and meet the requirements of the 2025 WMP Update Guidelines.

Areas for Continued Improvement

Energy Safety has no new areas for continued improvement for HWT in asset inspections.

²⁷ [HWT 2025 WMP Update \(R0\)](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57000&shareable=true) (July 8, 2024), p. 13 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57000&shareable=true, accessed August 28, 2024).

²⁸ [HWT 2025 WMP Update \(R0\)](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57000&shareable=true) (July 8, 2024), p. 13 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57000&shareable=true, accessed August 28, 2024).

²⁹ [2025 WMP Update Guidelines](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56254&shareable=true), Section 3, "Quarterly Inspection Targets for 2025," p. 15 - (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56254&shareable=true, accessed April 9, 2023)

8.1.3 Equipment Maintenance and Repair

8.1.3.1 2023 Areas for Continued Improvement

Energy Safety’s Decision on HWT’s 2023-2025 Base WMP³⁰ did not require HWT to report progress on any areas for continued improvement in the equipment maintenance and repair section in its 2025 WMP Update. Therefore, HWT has no reportable updates in this area.

8.1.3.2 New or Discontinued Programs

In its 2025 WMP Update, HWT 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, HWT 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 HWT’s 2023-2025 Base WMP³¹ did not require HWT to report progress on any areas for continued improvement in the grid operations and procedures section in its 2025 WMP Update. Therefore, HWT has no reportable updates in this area.

8.1.4.2 New or Discontinued Programs

In its 2025 WMP Update, HWT 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, HWT 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.

³⁰ [Energy Safety Decision on HWT 2023-2025 Base Wildfire Mitigation Plan](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56224&shareable=true) (Jan. 30, 2024), Section 11 “Required Areas for Continued Improvement,” p. 49 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56224&shareable=true, accessed August 29, 2024).

³¹ [Energy Safety Decision on HWT 2023-2025 Base Wildfire Mitigation Plan](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56224&shareable=true) (Jan. 30, 2024), Section 11 “Required Areas for Continued Improvement,” p. 49 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56224&shareable=true, accessed August 29, 2024).

8.2 Vegetation Management and Inspections

In its 2025 WMP Update, HWT provided one total update related to the vegetation management and inspections section of its 2023-2025 Base WMP. The update HWT provided related to this section included reporting quarterly targets for 2025 for one vegetation management inspection program.

8.2.1 2023 Areas for Continued Improvement

Energy Safety's Decision on HWT's 2023-2025 Base WMP³² did not require HWT to report progress on any areas for continued improvement in the vegetation management and inspections section in its 2025 WMP Update. Therefore, HWT has no reportable updates in this area.

8.2.2 New or Discontinued Programs

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

8.2.3 Targets, Objectives, and Projected Expenditures

In its 2025 WMP Update, HWT provided quarterly targets (end of Q2 and end of Q3) for its one 2025 vegetation management inspection program, as required by the 2025 WMP Update Guidelines.³³

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

8.2.3.1 Energy Safety Evaluation

HWT's quarterly targets for its 2025 vegetation management inspections are consistent with quarterly targets for 2023 and 2024 and meet the requirements of the 2025 WMP Update Guidelines.

³² [Energy Safety Decision on HWT 2023-2025 Base Wildfire Mitigation Plan](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56224&shareable=true) (Jan. 30, 2024), Section 11 "Required Areas for Continued Improvement," p. 49 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56224&shareable=true, accessed August 29, 2024).

³³ [2025 WMP Update Guidelines](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56254&shareable=true), Section 3 "Quarterly Inspection Targets for 2025," p. 15 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56254&shareable=true, accessed April 9, 2023)

8.2.3.2 Areas for Continued Improvement

Energy Safety has no new areas for continued improvement for HWT in vegetation management and inspections.

8.3 Situational Awareness and Forecasting

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

8.4 Emergency Preparedness

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

8.5.1 2023 Areas for Continued Improvement

Energy Safety’s Decision on HWT’s 2023-2025 Base WMP³⁴ did not require HWT to report progress on any areas for continued improvement in the community outreach and engagement section in its 2025 WMP Update. HWT 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 HWT-23B-02. Documentation of Sharing Best Practices

HWT 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. HWT must respond to this area for continued improvement in its 2026-2028 Base WMP.

³⁴ [Energy Safety Decision on HWT 2023-2025 Base Wildfire Mitigation Plan](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56224&shareable=true) (Jan. 30, 2024), Section 11 “Required Areas for Continued Improvement,” p. 49 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56224&shareable=true, accessed August 29, 2024).

8.5.2 New or Discontinued Programs

In its 2025 WMP Update, HWT 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, HWT provided updates to projected expenditures related to the community outreach and engagement section of its 2023-2025 Base WMP. Energy Safety finds that these reportable updates meet the requirements set forth in the 2025 WMP Update Guidelines.

Specifically, HWT provided an increase to its projected expenditures for Best Practice Sharing with Other Electrical Corporations program, from \$0 to \$80,000.³⁵ HWT stated that its 2025 projected expenditures for this program increased to address Energy Safety's area for continued improvement on "Best Practices [*sic*] Sharing with Other Utilities" (HWT-23B-02).³⁶ HWT plans to join two industry groups, the International Wildfire Risk Mitigation Consortium and the Wildfire Interdisciplinary Research Center, in 2025 and projected expenditures are for participation in the industry groups.³⁷

8.5.3.1 Energy Safety Evaluation

Energy Safety finds the reported change consistent with Energy Safety direction for HWT to continue to share best practices with other industry participants. Energy Safety finds the reported change to be appropriate.

8.5.3.2 Areas for Continued Improvement

Energy Safety has no new areas for continued improvement for HWT in community outreach and engagement. In its 2026-2028 Base WMP, HWT must report its progress on any existing

³⁵ [HWT 2025 WMP Update \(R0\)](#) (July 8, 2024), p. 8 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57000&shareable=true, accessed August 28, 2024).

³⁶ [HWT 2025 WMP Update \(R0\)](#) (July 8, 2024), p. 8 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57000&shareable=true, accessed August 28, 2024).

³⁷ [HWT 2025 WMP Update \(R0\)](#) (July 8, 2024), p. 8 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57000&shareable=true, accessed August 28, 2024).

areas for continued improvement specified in Energy Safety’s Decision on HWT’s 2023-2025 Base WMP.³⁸

³⁸ [Energy Safety Decision on HWT 2023-2025 Base Wildfire Mitigation Plan](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56224&shareable=true) (Jan. 30, 2024), Section 11 “Required Areas for Continued Improvement,” p. 49 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56224&shareable=true, accessed August 29, 2024).

9. Public Safety Power Shutoff

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

10. HWT Process for Continuous Improvement

HWT 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 HWT’s areas for continued improvement and the required progress that HWT must address in its 2026-2028 Base WMP. This includes areas for continued improvement from Energy Safety’s Decision on HWT’s 2023-2025 Base WMP.

11.1 Community Outreach and Engagement

- **HWT-23B-02. Documentation of Sharing Best Practices**
 - Description: HWT does not document instances of sharing best practices.
 - Required Progress: In its 2026-2028 Base WMP, HWT 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 HWT’s 2023-2025 Base WMP.³⁹

³⁹ [Energy Safety Decision on HWT 2023-2025 Base Wildfire Mitigation Plan](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56224&shareable=true) (Jan. 30, 2024), Section 11 “Required Areas for Continued Improvement,” p. 49 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56224&shareable=true, accessed August 29, 2024).

12. Conclusion

HWT's 2025 WMP Update is approved.

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

Energy Safety expects HWT 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.

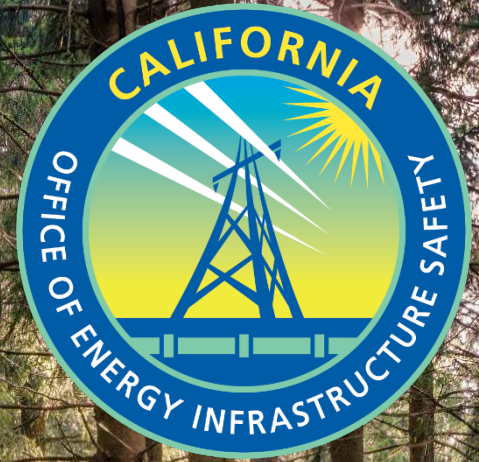
HWT must meet the commitments in its WMP and fully address the area for continued improvement identified within this Decision to ensure it meaningfully reduces utility-related ignition and PSPS risk within its service territory over the plan cycle.

DATA DRIVEN FORWARD-THINKING INNOVATIVE SAFETY FOCUSED

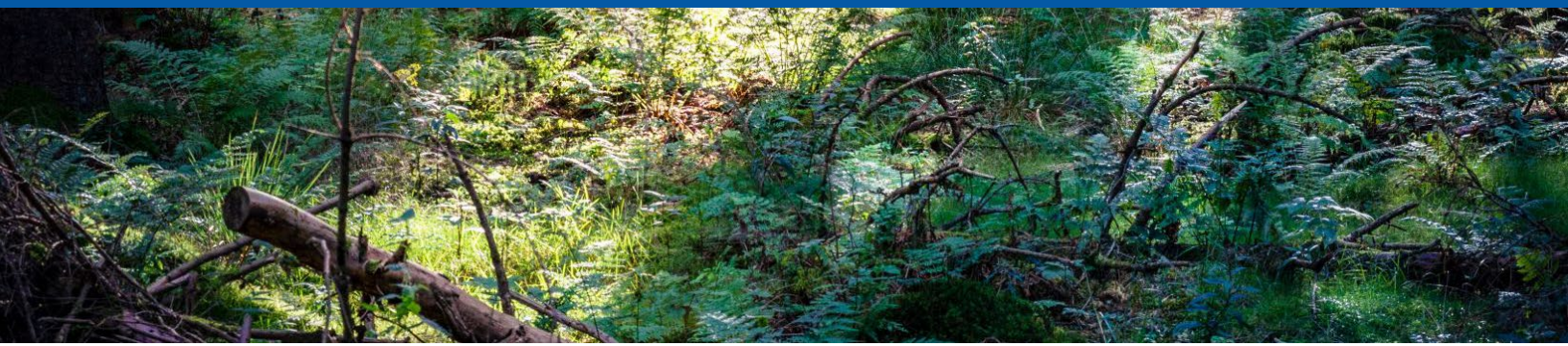


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APPENDICES



APPENDICES

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Appendix A.

Glossary of Terms

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

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

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

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

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

Appendix B.

Status of 2023 Areas for Continued Improvement

Energy Safety’s 2023 Decision¹ for HWT identified areas for continued improvement and associated required progress. Areas for continued improvement are where HWT must continue to improve its wildfire mitigation capabilities. As part of the 2025 WMP Update evaluation process, Energy Safety reviewed the progress reported by HWT on areas for continued improvement that Energy Safety required progress on by the 2025 WMP Update. Energy Safety is satisfied that HWT has made sufficient progress in all the identified areas for continued improvement.

HWT’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.

¹ [Energy Safety Decision on HWT 2023-2025 Base Wildfire Mitigation Plan](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56224&shareable=true) (Jan. 30, 2024), Section 11 “Required Areas for Continued Improvement,” p. 49 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56224&shareable=true, accessed August 29, 2024).

Table A-1. HWT 2023 Areas for Continued Improvement

ID	Title	Status
HWT-23B-01 (HWT-23-01)	QA/QC Process Description	HWT 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 HWT'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 HWT'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 HWT's 2025 WMP Update.

Appendix F.

Maturity Survey Results

Energy Safety's 2023-2025 Electrical Corporation Wildfire Mitigation Maturity Model² (Maturity Model) and Electrical Corporation Wildfire Mitigation Maturity Survey³ (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 HWT's 2024 response to the Maturity Survey across mitigation categories showing minimum and average values. Figure A-2 compares HWT'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").

² [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).

³ [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. HWT 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.	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.0	0.0	0.0	0.0	0.2	0.2	0.2	0.2	1.1	1.1	1.1	1.1	0.5	0.5	0.5	0.5
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	0.0
	Average of Sub-Cap.	0.2	0.2	0.2	0.2	0.4	0.4	0.4	0.4	0.4	0.4	0.4	0.4	0.4	0.4	0.4	0.4	0.0	0.0	0.0	0.0	2.6	2.6	2.6	2.6
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				
	Average of Sub-Cap.	1.5	1.5	1.5	1.5	1.7	1.7	1.7	1.7	1.5	1.5	1.5	1.5	0.2	0.2	0.2	0.2	0.5	0.5	0.5	0.5				
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								
	Average of Sub-Cap.	1.5	1.5	1.5	1.5	1.8	1.8	1.8	1.8	0.3	0.3	0.3	0.3	0.3	0.3	0.3	0.3								
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	2.0				
	Average of Sub-Cap.	0.8	0.8	0.8	0.8	0.0	0.0	0.0	0.0	1.3	1.3	1.3	1.3	1.5	1.5	1.5	1.5	2.0	2.0	2.0	2.7				
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	0.0
	Average of Sub-Cap.	0.8	0.8	0.8	0.8	0.0	0.0	0.0	0.0	0.5	0.5	0.5	0.5	1.8	1.8	1.8	1.8	0.0	0.0	0.0	0.0	0.5	0.5	0.5	0.5
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				
	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				

Figure A-2. HWT Maturity Survey Changes from 2023 to 2024

		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.	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC
	Average of Sub-Cap.	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC
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.	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC
	Average of Sub-Cap.	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC
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.	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC				
	Average of Sub-Cap.	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC				
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.	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC								
	Average of Sub-Cap.	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC								
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.	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC				
	Average of Sub-Cap.	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC				+0.67
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.	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC
	Average of Sub-Cap.	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC
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.	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC				
	Average of Sub-Cap.	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC	NC				+0.67