

Appendix H

Wildfire Mitigation Plans

**Horizon West Transmission, LLC
WILDFIRE MITIGATION PLAN 2023**

for Submittal to:

**OFFICE OF ENERGY INFRASTRUCTURE SAFETY
WILDFIRE SAFETY DIVISION
CALIFORNIA NATURAL RESOURCES AGENCY**

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SEPTEMBER 17, 2024

2025 R2

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ATTACHMENTS

Attachment A (Confidential): Persons Responsible for Executing the WMP

Attachment B (Confidential): HWT Wildfire Mitigation Condition Assessment Procedure

Attachment C (Confidential): HWT-IP Emergency Operations Plan

Attachment D (Confidential): HWT- Black Start Restoration Plan

1 EXECUTIVE SUMMARY

Horizon West Transmission (HWT) is a transmission-only utility with no end-use customers. HWT's transmission project, the Suncrest Facility, was placed into operation on February 29, 2020. The Suncrest Facility is located approximately 40 miles east of San Diego near the town of Alpine in San Diego County, California. The Suncrest Facility is a +300/-100 megavolt-ampere reactive (MVar) static var compensator (SVC) facility with a rated real power output of 0 MW, and nominal terminal voltage of 230 kV, and approximately one mile underground 230 kV single-circuit transmission line, that collectively provide dynamic reactive power support at the existing San Diego Gas & Electric Company (SDG&E) Suncrest Substation, a 500/230 kV substation near Alpine, San Diego County, California.

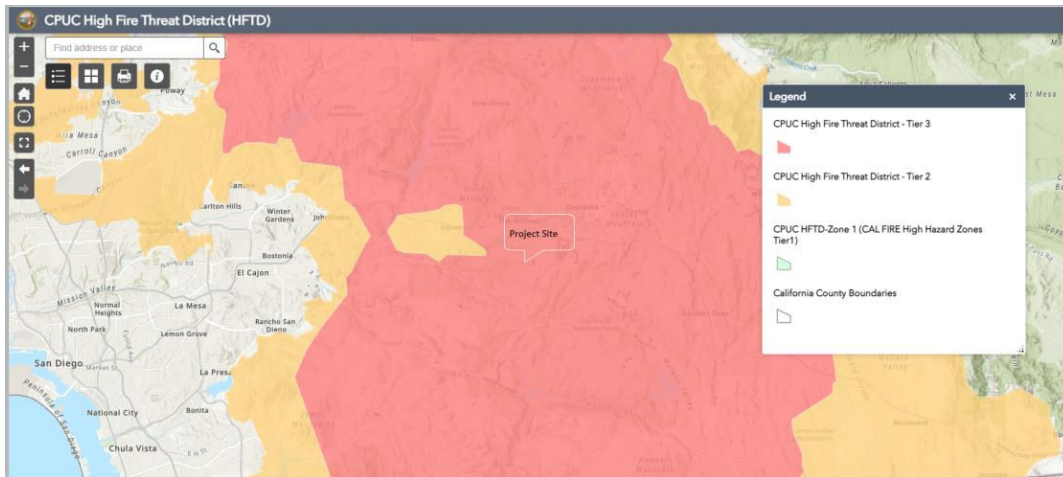
Figure HWT 1-1. Suncrest Project Vicinity Map



The Suncrest Facility is in a completely rural area that is designated as a Tier 3 (Extreme) HFTD based on the California Public Utilities Commission's (CPUC or Commission) High Fire-Threat

District (HFTD”) Map¹.

Figure HWT 1-2. Tier 3 HFTD near Alpine, CA



Catastrophic wildfires continue to have significant impact on people, wildlife, structures and the environment in California. Per California Department of Forestry and Fire Protection (CAL FIRE) an estimated 365,000 acres and 876 structures were damaged or destroyed as a result of fire in 2022, including 9 fatalities².

In particular, San Diego County experiences wildfires annually. In 2022, there was only one fire within 5 miles from the Suncrest Facility. This was the Barrett Fire, which was contained within three days and burned 65 acres of wildlands³. In 2021, the nearby Road Fire took a week to contain and burned 86 acres.⁴ In September of 2020, during Red Flag Warning conditions, the Valley Fire started a few miles away from the Suncrest Facility and rapidly spread to over 16,000 acres in under three days.⁵ The Valley Fire was within approximately four miles of the Suncrest Facility and, under different wind conditions, could have directly threatened the asset. While the cause of the Barrett, Road and Valley Fires were not linked to utility equipment, the magnitude and consistency of wildfire activity in San Diego County, in particular, and California, in general, necessitate continued focus on wildfire mitigation to minimize risk of utility-caused wildfires.

Although HWT currently has a limited scope in California with one operational asset, the company is very focused on wildfire safety and is determined to have industry-leading wildfire mitigation capabilities for its scale of operations.

¹ CPUC FireMap – <https://ia.cpuc.ca.gov/firemap/>

² <https://www.fire.ca.gov/incidents/2022/>

³ <https://www.fire.ca.gov/incidents/2022/6/12/barrett-fire/>

⁴ <https://www.fire.ca.gov/incidents/2021/7/10/road-fire/>

⁵ <https://www.fire.ca.gov/incidents/2020/9/5/valley-fire/>

HWT continues to learn and implement best practices in wildfire mitigation, as it accumulates operational experience with Suncrest and grows its footprint in California. HWT is committed to continuous improvement of its wildfire-related plans, systems, and processes and will include new wildfire-related initiatives in its future WMP submissions.

1.1 Summary of the 2020-2022 WMP cycle

HWT currently has a limited scope in California with one operational asset, the Suncrest Facility, which went into operations in Q1 2020. HWT is very focused on wildfire safety and is determined to have industry-leading wildfire mitigation capabilities. The Suncrest Facility was constructed with inherent fire-harden capabilities since it is hardscaped and surrounded by a concrete wall. HWT completed all its wildfire objectives during the 2020-2022 WMP cycle which included enhancements to minimize fire risk and improve situational awareness. Specifically these included:

- **Grid Design and System Hardening:** HWT installed transformer seismic pads, blast walls and flame-suppressing stone in the transformer containment pits. HWT completed undergrounding of 115 feet of overhead span of transmission line in August 2021. The facility is also surrounded by a 10 foot concrete perimeter wall.
- **Situational Awareness and Forecasting:** HWT conducted an independent wildfire risk assessment and utilized the report to enhance HWT's awareness of wildfire propagation risk in the area of the Suncrest Facility and identify appropriate wildfire mitigation initiatives. HWT maintains a weather station and completed development of a proprietary fire risk index for its territory to increase awareness of fire threat and to help inform operational decisions. HWT also installed a cable monitoring system for its underground cable, oil gas monitoring for its transformers and added cameras to the station site.
- **Asset Management and Inspections:** HWT continued its cadence of monthly asset inspections and monitoring, in addition to extra inspections in advance of adverse weather conditions.
- **Grid Operations and Protocols:** In addition to regular asset and vegetation inspections and monitoring, HWT maintains a contract for private fire brigade support with has access to an above ground water tank and class B foam trailer owned by HWT.

HWT utilized its experience with the Valley Fire, mentioned above, as a catalyst for lessons learned to improve its situational awareness capabilities and processes for after event review. This lead HWT to add an annual wildfire simulation to its wildfire mitigation procedures to be conducted in the spring/early summer ahead of increased frequency of red flag warning (RFW) days in late summer and fall.

1.2 Summary of the 2023-2025 Base WMP

As noted above HWT's only asset is the Suncrest SVC facility which completed and entered operational service in Q1 2020. Already having inherent fire-harden infrastructure, the facility received upgrades in the previous WMP cycle to underground its only overhead line, improve situational awareness capabilities, significantly enhance seismic resiliency of its transformers and contracted firefighting resources. Given the aforementioned improvements to an as-constructed fire-harden grid design and the limited scope of Suncrest's operations, HWT has no current plans for additional improvements to the Suncrest facility in the 2023-2025 WMP Cycle. HWT will monitor the effectiveness of its currently emplaced processes, procedures, and capabilities and assess changes or enhancements as needed. HWT endeavors to grow its footprint in California and may construct and/or acquire additional transmission facilities in the state. HWT will apply the same robust wildfire mitigation strategies that have been developed and implemented for the Suncrest Facility to new facilities, with any modifications as appropriate to take into account the specific characteristics of new facilities.

HWT is committed to continuous improvement of its wildfire-related plans, systems, and processes and will include new wildfire-related initiatives in its future WMP submissions as they are deemed to be impactful to reducing residual wildfire risk at the Suncrest Facility or applicable to any newly acquired or developed assets.

2 RESPONSIBLE PERSONS

*Instructions:*⁶ Provide an accounting of the responsibilities of the responsible person(s) executing the plan, including:

1. Executive level with overall responsibility
2. Program owners specific to each component of the plan

Title, credentials and components of responsible must be released publicly, but other contact information may be provided in a redacted file attached to the WMP submission.

Executive-level owner with overall responsibility

- Name and title: Alona Sias, President – Horizon West Transmission
- Email: Redacted, provided separately in Attachment A
- Phone number: Redacted, provided separately in Attachment A

Program owners specific to each section of the plan

Note: A program owner may own multiple sections, and multiple components across sections, but each section must have a program owner accountable.

Section 1: Persons responsible for executing the plan

Program owner (add additional program owners if separated by component in section)

- Name and title: Alona Sias, President – Horizon West Transmission
- Email: Redacted, provided separately in Attachment A
- Phone number: Redacted, provided separately in Attachment A
- Component (if entire section, put “entire section”): Entire Section

Section 2: Adherence to statutory requirements

Program owner (add additional program owners if separated by component in section)

- Name and title: Alona Sias, President – Horizon West Transmission
- Email: Redacted, provided separately in Attachment A
- Phone number: Redacted, provided separately in Attachment A
- Component (if entire section, put “entire section”): Entire Section

Section 3: Actuals and planned spending

Program owner (add additional program owners if separated by component in section)

- Name and title: Alona Sias, President – Horizon West Transmission
- Email: Redacted, provided separately in Attachment A
- Phone number: Redacted, provided separately in Attachment A
- Component (if entire section, put “entire section”): Entire Section

Section 4: Lessons learned and risk trends

Program owner (add additional program owners if separated by component in section)

- Name and title: Alona Sias, President – Horizon West Transmission

⁶ Text in blue italics are instructions, prompts, and clarifications from Office of Energy Infrastructure Safety 2023-2025 Wildfire Mitigation Plan Technical Guidelines dated December 6, 2022.

- Email: Redacted, provided separately in Attachment A
- Phone number: Redacted, provided separately in Attachment A
- Component (if entire section, put “entire section”): Entire Section

Section 5: Inputs to the plan and directional vision

Program owner (add additional program owners if separated by component in section)

- Name and title: Alona Sias, President – Horizon West Transmission
- Email: Redacted, provided separately in Attachment A
- Phone number: Redacted, provided separately in Attachment A
- Component (if entire section, put “entire section”): Entire Section

Section 6: Metrics and underlying data

Program owner (add additional program owners if separated by component in section)

- Name and title: Alona Sias, President – Horizon West Transmission
- Email: Redacted, provided separately in Attachment A
- Phone number: Redacted, provided separately in Attachment A
- Component (if entire section, put “entire section”): Entire Section

Section 7: Mitigation initiatives

Program owner (add additional program owners if separated by component in section)

- Name and title: Jennifer Chaney, Senior Director Operations – NextEra Energy Transmission
- Email: Redacted, provided separately in Attachment A
- Phone number: Redacted, provided separately in Attachment A
- Component (if entire section, put “entire section”): Entire Section

Section 8: Public Safety Power Shutoff

Program owner (add additional program owners if separated by component in section)

- Name and title: Jennifer Chaney, Senior Director Operations – NextEra Energy Transmission
- Email: Redacted, provided separately in Attachment A
- Phone number: Redacted, provided separately in Attachment A
- Component (if entire section, put “entire section”): Entire Section

Section 9: Appendix

Program owner (add additional program owners if separated by component in section)

- Name and title: Alona Sias, President – Horizon West Transmission
- Email: Redacted, provided separately in Attachment A
- Phone number: Redacted, provided separately in Attachment A
- Component (if entire section, put “entire section”): Entire Section

2.1 Verification

I am an officer of the applicant corporation herein, and am authorized to make this verification on its behalf. The statements in the foregoing document are true of my own knowledge, except as to matters which are therein stated on information or belief, and as to those matters I believe them to be true.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on May 8th, 2023.

At One California Street, Suite 1600, San Francisco 94111, California.



Alona Sias, President – Horizon West Transmission, LLC
(Signature and Title of Corporate Officer)

3 STATUTORY REQUIREMENTS CHECKLIST

Instructions: This section provides a checklist of the statutory requirements for a WMP as detailed in Public Utilities Code section 8386(c). By completing the checklist, the electrical corporation affirms that its WMP addresses each requirement.

For each statutory requirement, the checklist must include a reference and hyperlink to the relevant section and page number in the WMP. Where multiple WMP sections provide the information for a specific requirement, the electrical corporation must provide references and hyperlinks to all relevant sections. Unique references must be separated by semicolons, and each must include a brief summary of the contents of the referenced section (e.g., Section 5, pp. 30–32 [workforce]; Section 7, p. 43 [mutual assistance]).

Table 3-1 provides an example of the minimum acceptable level of information and citation for the statutory requirements checklist.

Table 3-1: Example of Statutory Requirements Checklist

Public Utilities Code section 8386	Description	WMP Section/Page
---	--------------------	-------------------------

(c)2	<i>The objectives of the plan</i>	<i>Section 4.1 p. 13</i>
(c)10	<i>Protocols for the PSPS of the electrical corporation's transmission infrastructure, etc.</i>	<i>Section 5 overview, pp. 30-31</i>
(c)(19)	<i>A description of how the WMP is consistent with the electrical corporation's disaster and emergency preparedness plan prepared pursuant to Public Utilities Code section 768.6, including plans to restore service and community outreach</i>	<i>Sections 7.3.9.2 to 7.3.9.3, pp. 790–801 (community outreach and customer support before, during, and after wildfires and customer support during emergencies)</i> <i>Section 7.3.9.4, pp. 802–804 (emergency plan)</i> <i>Section 7.3.9.5, pp. 805–808 (preparedness and planning for service restoration after emergency)</i> <i>Section 7.3.10.1, pp. 812–842 (community engagement to prepare for wildfire, PSPS, and protective devices and sensitivity settings)</i>

Table 3-1. Statutory Requirements Checklist

Public Utilities Code section 8386	Description	WMP Section/Page
(c)(1)	An accounting of the responsibilities of persons responsible for executing the plan	Section 2, pp.15-16
(c)(2)	The objectives of the plan	Section 4.1, p.27 Section 4.2, p. 28
(c)(3)	A description of the preventive strategies and programs to be adopted by the electrical corporation to minimize the risk of its electrical lines and equipment causing catastrophic wildfires, including consideration of dynamic climate change risks	Section 4.4, pp.30-34 Section 6, pp.60-64 Section 7, pp.64-71 Section 8.1.2, pp.77-81

Public Utilities Code section 8386	Description	WMP Section/Page
(c)(4)	A description of the metrics the electrical corporation plans to use to evaluate the plan's performance and the assumptions that underlie the use of those metrics	Section 4.3, pp. 28-30 Section 8.1.1.3, pp.75-78 Section 8.2.1.3pp. 99-102 Section 8.3.1.3, pp.119-122 Section 8.4.1.3, pp. 148-152 Section 8.5.1.3, pp. 200-206 Section 9.1.5, pp. 217-223
(c)(5)	A discussion of how the application of previously identified metrics to previous plan performances has informed the plan	Section 1, pp.11-14 Section 4, pp. 27-34 Section 8.1.1.3, pp.75-78 Section 8.2.1.3pp. 99-102 Section 8.3.1.3, pp.119-122 Section 8.4.1.3, pp. 148-152 Section 8.5.1.3, pp. 200-206 Section 9.1.5, pp. 217-223

(c)(6)	<p>A description of the electrical corporation’s protocols for disabling reclosers and deenergizing portions of the electrical distribution system that consider the associated impacts on public safety. As part of these protocols, each electrical corporation shall include protocols related to mitigating the public safety impacts of disabling reclosers and deenergizing portions of the electrical distribution system that consider the impacts on all of the following:</p> <ul style="list-style-type: none"> (A) Critical first responders. (B) Health and communication infrastructure. (C) Customers who receive medical baseline allowances pursuant to subdivision (c) of Section 739. The electrical corporation may deploy backup electrical resources or provide financial assistance for backup electrical resources to a customer receiving a medical baseline allowance for a customer who meets all of the following requirements: <ul style="list-style-type: none"> i. The customer relies on life-support equipment that operates on electricity to sustain life. ii. The customer demonstrates financial need, including through enrollment in the California Alternate Rates for Energy program continued pursuant to Section 739.1. iii. The customer is not eligible for backup electrical resources provided through medical services, medical insurance, or community resources. <p>Subparagraph (C) shall not be construed as preventing an electrical corporation from deploying backup electrical resources or providing financial assistance for backup electrical resources under any other authority.</p>	<p>Not applicable. The Suncrest SVC does not have any distribution elements or utilize reclosers. TBC is also a transmission-only utility and does not have any retail customers.</p> <p>Section 8.3.3, pp. 127-135 Section 9.2, pp. 219-225</p>
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Public Utilities Code section 8386	Description	WMP Section/Page
(c)(7)	A description of the electrical corporation's appropriate and feasible procedures for notifying a customer who may be impacted by the deenergizing of electrical lines, including procedures for those customers receiving medical baseline allowances as described in paragraph (6). The procedures shall direct notification to all public safety offices, critical first responders, health care facilities, and operators of telecommunications infrastructure with premises within the footprint of potential deenergization for a given event. The procedures shall comply with any orders of the commission regarding notifications of deenergization events.	Not Applicable. HWT is a transmission-only utility with no direct or retail customers. Section 8.4.6, pp. 194-198 Section 8.5, pp. 195-211 Section 9.2, pp. 219-225
(c)(8)	Identification of circuits that have frequently been de-energized pursuant to a de-energization event to mitigate the risk of wildfire and the measures taken, or planned to be taken, by the electrical corporation to reduce the need for, and impact of, future de-energization of those circuits, including, but not limited to, the estimated annual decline in circuit de-energization and de-energization impact on customers, and replacing, hardening, or undergrounding any portion of the circuit or of upstream transmission or distribution lines	Section 9.1.2, pp. 212
(c)(9)	Plans for vegetation management	Section 8.2, pp.94-116
(c)(10)	Plans for inspections of the electrical corporation's electrical infrastructure	Section 8.1, pp .70-94

Public Utilities Code section 8386	Description	WMP Section/Page
(c)(11)	A description of the electrical corporation's protocols for the deenergization of the electrical corporation's transmission infrastructure, for instances when the deenergization may impact customers who, or entities that, are dependent upon the infrastructure. The protocols shall comply with any order of the commission regarding deenergization events.	Section 8.4, pp. 144-198 Section 9.2, pp. 219-225
(c)(12)	A list that identifies, describes, and prioritizes all wildfire risks, and drivers for those risks, throughout the electrical corporation's service territory, including all relevant wildfire risk and risk mitigation information that is part of the commission's Safety Model Assessment Proceeding (A.15-05-002, et al.) and the Risk Assessment Mitigation Phase filings. The list shall include, but not be limited to, both of the following: (A) Risks and risk drivers associated with design, construction, operations, and maintenance of the electrical corporation's equipment and facilities. Particular risks and risk drivers associated with topographic and climatological risk factors throughout the different parts of the electrical corporation's service territory.	Section 4.4, pp.30-34 Section 6, pp.60-64 Section 7, pp.64-71
(c)(13)	A description of how the plan accounts for the wildfire risk identified in the electrical corporation's Risk Assessment Mitigation Phase filing	Section 6, pp.60-64 Section 7, pp.64-71

Public Utilities Code section 8386	Description	WMP Section/Page
(c)(14)	A description of the actions the electrical corporation will take to ensure its system will achieve the highest level of safety, reliability, and resiliency, and to ensure that its system is prepared for a major event, including hardening and modernizing its infrastructure with improved engineering, system design, standards, equipment, and facilities, such as undergrounding, insulation of distribution wires, and pole replacement	Section 8.1.1, pp. 70-78 Section 8.1.2, pp.77-80 Section 8.4. pp. 144-198
(c)(15)	A description of where and how the electrical corporation considered undergrounding electrical distribution lines within those areas of its service territory identified to have the highest wildfire risk in a commission fire threat map	Section 8.1.2, pp.77-80
(c)(16)	A showing that the electrical corporation has an adequately sized and trained workforce to promptly restore service after a major event, taking into account employees of other utilities pursuant to mutual aid agreements and employees of entities that have entered into contracts with the electrical corporation	Section 8.1.9, pp. 90-94 Section 8.4, pp. 144-198
(c)(17)	Identification of any geographic area in the electrical corporation's service territory that is a higher wildfire threat than is currently identified in a commission fire threat map, and where the commission should consider expanding the high fire threat district based on new information or changes in the environment	Section 5.3.3, pp.42-44 Section 5.4, pp. 53-60
(c)(18)	A methodology for identifying and presenting enterprise-wide safety risk and wildfire-related risk that is consistent with the methodology used by other electrical corporations unless the commission determines otherwise	Section 4.4, pp.30-34 Section 6, pp.60-64 Section 7, pp.64-71

Public Utilities Code section 8386	Description	WMP Section/Page
(c)(19)	<p>A description of how the plan is consistent with the electrical corporation's disaster and emergency preparedness plan prepared pursuant to Section 768.6, including both of the following:</p> <p>(A) Plans to prepare for, and to restore service after, a wildfire, including workforce mobilization and prepositioning equipment and employees.</p> <p>(B) Plans for community outreach and public awareness before, during, and after a wildfire, including language notification in English, Spanish, and the top three primary languages used in the state other than English or Spanish, as determined by the commission based on the United States Census data.</p>	Section 8.4, pp. 144-198
(c)(20)	A statement of how the electrical corporation will restore service after a wildfire	Section 8.4.5.1, pp. 186-191
(c)(21)	Protocols for compliance with requirements adopted by the commission regarding activities to support customers during and after a wildfire, outage reporting, support for low-income customers, billing adjustments, deposit waivers, extended payment plans, suspension of disconnection and nonpayment fees, repair processing and timing, access to electrical corporation representatives, and emergency communications	Not Applicable. HWT is a transmission-only utility with no direct or retail customers. Section 8.4.6, pp.194-198

Public Utilities Code section 8386	Description	WMP Section/Page
(c)(22)	<p>A description of the processes and procedures the electrical corporation will use to do all of the following:</p> <ul style="list-style-type: none"> (A) Monitor and audit the implementation of the plan. (B) Identify any deficiencies in the plan or the plan's implementation and correct those deficiencies. (C) Monitor and audit the effectiveness of electrical line and equipment inspections, including inspections performed by contractors, carried out under the plan and other applicable statutes and commission rules. 	<p>Section 4.4, pp.30-34 Section 6, pp.60-64 Section 10, pp.224-232 Section 11, pp.229-234 Appendix D: Areas for continued Improvements, p.256</p>

4 OVERVIEW OF WMP

4.1 Primary Goal

Instructions: Each electrical corporation must state the primary goal of its WMP. At a minimum, the electrical corporation must affirm its compliance with California Public Utilities Code section 8386(a):

Each electrical corporation shall construct, maintain, and operate its electrical lines and equipment in a manner that will minimize the risk of catastrophic wildfire posed by those electrical lines and equipment.

HWT's WMP goal has not changed from its initial CPUC-approved 2020 WMP report. The overarching goal of HWT's WMP is to comply with applicable provisions of California Public Utilities Code (PU Code) Section 8386⁷ at HWT's facilities.

As a newly designed and constructed facility, HWT considers the Facility to be significantly fire hardened and technologically advanced. In the past WMP cycle, HWT sought to and completed enhancements to its facility to improve its situational awareness and reduce overall fire risk. In the 2023-2025 cycle, HWT's primary goal is to maintain its currently emplaced processes and procedures with respect to fire safety, mitigation and preparedness.

While the Suncrest Facility is the only facility owned and operated by HWT at the time of filing the 2022 WMP, HWT anticipates that the processes, programs, and practices established in this WMP will apply to all HWT Facilities in the future. Because this WMP will be actively reviewed and adaptively managed, future WMPs may include variations in content, format, covered assets, and/or approach.

HWT has a vision of having industry-leading fire-protected infrastructure and facilities that appropriately mitigate operational risks including but not limited to system faults, equipment failure, seismic events, flooding, wildfires, urban fires, civil unrest, and insurgent action. HWT also endeavors to identify and evaluate industry best practices and emerging technologies to the extent applicable to its scope of operations. Lastly, HWT affirms its compliance with California Public Utilities Code section 8386(a) as stated in the Instructions for this Section 4.1.

⁷ https://leginfo.legislature.ca.gov/faces/codes_displaySection.xhtml?lawCode=PUC§ionNum=8386.

4.2 Plan Objectives

Instructions: In this section, the electrical corporation must summarize its plan objectives over the 2023-2025 WMP cycle. Plan objectives are determined by the portfolio of mitigation initiatives proposed in the WMP.

The WMP recognizes the following facts relevant to assessing wildfire risk and establishing effective objectives and mitigations:

- HWT only owns and operates transmission infrastructure with no distribution facilities.
- HWT does not operate any overhead lines.
- HWT does not serve distribution or retail customers or any residential, commercial, or industrial interconnections.
- HWT transmission facilities are monitored 24 hours a day, 7 days a week while in operation by a certified and qualified System Operator with full authority, responsibility, and requisite emergency response training to take appropriate action to mitigate any fire risk posed, including Emergency Shut-Off as a measure of last resort.
- HWT Facilities are under the operational control of the CAISO.
- HWT completed all proposed project mitigation objectives during the 2020-2023 WMP cycle

In light of the aforementioned facts, HWT does not have any current proposed mitigation initiatives in its WMP for the 2023-2025 WMP cycle. However, HWT's plan objectives are to:

- maintain its currently emplaced processes and procedures with respect to fire safety, mitigation and preparedness to minimize the likelihood of an ignition event from its facility
 - the above includes operations expenses (OPEX) for vegetation management, asset management and inspection, and contracted firefighting resource
- periodically evaluate new technologies, materials, and methods for further reducing fire risk at HWT Facilities.
- implement wildfire mitigation strategies and design criteria as soon as practical to any facility that HWT constructs or acquires during the 2023-2025 WMP cycle

4.3 Proposed Expenditures

Instructions: Each electrical corporation must summarize its projected expenditures in thousands of U.S. dollars per year for the next three-year WMP cycle, as well as the planned and

actual expenditures from the previous three-year WMP cycle (e.g., 2020–2022), in both tabular and graph form.

Table 4-1 provides an example of the minimum acceptable level of information summarizing an electrical corporation's WMP expenditures. The financials represented in the summary table equal the aggregate spending listed in the financial tables of the QDR (see the Energy Safety Data Guidelines). Energy Safety's WMP evaluation, including approval or denial, must not be construed as approval of, or agreement with, costs listed in the WMP.

Table 4-1: Example of Summary of WMP Expenditures

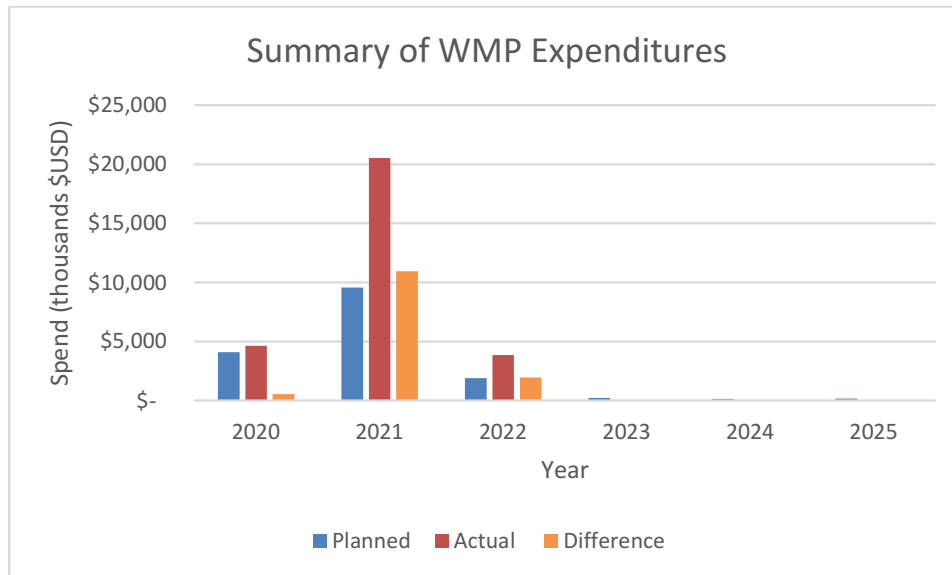
Year	Spend (thousands \$USD)
2020	Planned (as reported in the 2020 WMP) = Actual = $\pm\Delta$ =
2021	Planned (as reported in the 2021 WMP Update) = Actual = $\pm\Delta$ =
2022	Planned (as reported in the 2022 WMP Update) = Actual = $\pm\Delta$ =
2023	Planned =
2024	Planned =
2025	Planned =

Table 4-1. Summary of WMP Expenditures

Year	Spend (thousands \$USD)
2020	Planned (as reported in the 2020 WMP) = 4,085 Actual = 4,632 $\pm\Delta$ = 547
2021	Planned (as reported in the 2021 WMP Update) = 9,575 Actual = 20,536 $\pm\Delta$ = 10,691
2022	Planned (as reported in the 2022 WMP Update) = 1,890 Actual = 3,856 $\pm\Delta$ = 1,966

2023	Planned = 240
2024	Planned = 144
2025	Planned = 147

Figure HWT 4.3-1. Summary of Expenditures



4.4 Risk-Informed Framework

The electrical corporation must adopt a risk-informed approach to developing its WMP. The purposes of adopting this approach are as follows:

- To develop a WMP that achieves an optimal level of life safety, property protection, and environmental protection, while also being in balance with other performance objectives (e.g., reliability and affordability)*
- To integrate risk modeling outcomes with a range of other performance objectives, methods, and subject matter expertise to inform decision-making processes and the spatiotemporal prioritization of mitigations*
- To target mitigation efforts that prioritize the highest-risk equipment, wildfire environmental settings, and assets-at-risk (e.g., people, communities, critical infrastructure), while still satisfying other performance objectives defined by the California Public Utilities Commission (CPUC) (e.g., reliability and affordability)*
- To provide a decision-making process that is clear and transparent to internal and external stakeholders, including clear evaluation criteria and visual aids (such as flow charts or decision trees)*

The risk-informed approach adopted by the electrical corporation must, at a minimum, incorporate several key components, described below. In addition, the evaluation and management of risk must

include consideration of a broad range of performance objectives (e.g., life safety, property protection, reduction of social vulnerability, reliability, resiliency, affordability, health, environmental protection, public perception, etc.), integrate cross-disciplinary expertise, and engage various stakeholder groups as part of the decision-making process.

The risk-informed approach must have seven minimum components, as described in Table 4-2.

Table 4-2. Risk-Informed Approach Components

Risk-Informed Approach Component	Brief Description
1. Goals and plan objectives	<i>The first step in the risk-informed approach is to identify the primary goal(s) and plan objectives of the electrical corporation's WMP. These goals and objectives are electrical corporation-specific and must be defined and described in Sections 4.1 and 4.2.</i>
2. Scope of application (i.e., electrical corporation service territory)	<i>The second step is to define the physical characteristics of the system in terms of its major elements: electrical corporation service territory characteristics, electrical infrastructure, wildfire environmental settings, and various assets-at-risk (e.g., communities and people, property, critical infrastructure, cultural/historical resources, environmental services). Knowledge and understanding of how individual system elements interface are essential to this step. Sections 5–5.4 provide instructions on what electrical corporations must present regarding physical traits, environmental characteristics, and potential assets at risk in their service territory.</i>
3. Hazard identification	<i>The third step is to identify hazards and determine their likelihoods. Section 6.2.1 provides instructions on hazard identification.</i>
4. Risk scenario identification	<i>The fourth step, based on the context and desired values, is to develop risk scenarios that could lead to an undesirable event. Risk scenario techniques that may be employed include event tree analysis, fault tree analysis, preliminary hazard analysis, and failure modes and effects analysis. Section 6.3 provides instructions on risk scenario identification.</i>
5. Risk analysis (i.e., likelihood and consequences)	<i>The fifth step is to evaluate the likelihood and consequences of the identified risk scenarios to understand the potential impact on the desired goal(s) and plan objectives. The consequences are based on an array of risk components that are fundamental to overall utility risk, wildfire risk, and PSPS risk given the electrical corporation's scope of application and portfolio of wildfire mitigation initiatives. Section 6.2.2 provides instructions on risk analysis.</i>

6. Risk presentation	<i>The sixth step is to consider how the risk analysis is presented to the various stakeholders involved. Section 6.4 provides instructions on risk presentation.</i>
7. Risk evaluation	<p><i>After the risk analysis is complete, hazards can be resolved by either assuming the risk associated with the hazards or eliminating or controlling the hazards.</i></p> <p><i>Risk evaluation includes identification of criteria and procedures for identifying critical risk both spatially and temporally. Risk evaluation must also include, as a minimum, evaluating the seriousness, manageability, urgency, and growth potential of the wildfire hazard/risk. Risk evaluation should be used to determine whether the individual hazard/risk should be mitigated. Risk evaluation and risk-informed decision making should be done using a consensus approach involving a range of key stakeholder groups. Section 7 provides instructions for risk evaluation or risk-informed decision making.</i></p>
8. Risk mitigation and management	<i>In the final step, the electrical corporation must identify which risk management strategies are appropriate given practical constraints such as limited resources, costs, and time. The electrical corporation must indicate the high-level risk management approach, as determined in Step 7. The electrical corporation must identify risk mitigation initiatives (or a portfolio of initiatives) and prioritize their spatial and temporal implementation. This step includes consideration of what risk mitigation strategies are appropriate and most effectively meet the intent of the WMP goal(s) and plan objectives, while still in balance with other performance objectives. It also includes the procedures and strategies to develop, review, and execute schedules for implementation of mitigation initiatives and activities (as well as interim mitigation initiatives). Section 8 provides instructions for reporting on initiatives to mitigate identified risks.</i>

HWT is a transmission-only utility with no end-use customers. HWT's transmission project, the Suncrest Facility, was placed into operation on February 29, 2020. The Suncrest Facility is located near the town of Alpine in San Diego County, California. The Suncrest Facility is a +300/-100 MVar SVC facility with a rated real power output of 0 MW, and nominal terminal voltage of 230 kV, and an approximately one mile undergrounded 230 kV single-circuit transmission line, that collectively provide dynamic reactive power support at SDG&E's Suncrest Substation, a 500/230 kV substation near Alpine, San Diego County, California. Given that the Suncrest Facility is located

in Tier 3 (Extreme) HFTD, HWT's wildfire-related initiatives are primarily focused on infrastructure hardening, undergrounding, increased inspections, increased situational awareness, and operational measures such as detailed facility inspections prior to RFW conditions in the area of the Facility.

To inform appropriate wildfire hardening initiatives, HWT conducts an annual comprehensive assessment of equipment using a Failure Modes and Effects Analysis (FMEA). The FMEA considers the potential failures from each HWT Facility component and assesses and prioritizes the potential risk, along with providing potential mitigations. The general process of this methodology as applied by HWT to identify and prioritize wildfire risks, drivers and mitigation measures consists of the following five steps: risk identification, risk driver identification, risk prioritization, risk mitigation, risk assessment and re-prioritization. The methodology of the FMEA is further discussed in detail in Section 6.

In 2020, HWT commissioned a third-party wildfire assessment that (i) evaluated wildfire risk at the facility, (ii) modelled a hypothetical ignition event and associated wildfire propagation, and (iii) identified appropriate wildfire hardening improvements. The assessment was based on the latest in wildland fire behavior modelling and took into consideration the interaction of key influencing factors: fuel, topography and weather. The assessment was tailored to the environmental factors at the Facility and modeled a hypothetical ignition event under 97th percentile weather conditions to understand potential outcomes under extreme conditions, and produced typical flame lengths, speed of wildfire propagation, fire intensity, wildfire spotting behavior, and fire spread probability distribution.

Operational experience also factors into risk assessment and management as HWT leverages its experience and the operational experience of its affiliates to form lessons learned which contribute to the maturity of its risk management. As discussed in later Sections, lessons learned from HWT's operational experience during the Valley Fire led to and supported mitigation initiatives that materially improved HWT's situational awareness capabilities.

Based on the above, HWT conducts risk analysis and identification of risk drivers regarding wildfires in the context of proximity to high fire-risk areas, existence of vegetative fuels, nature and location of its transmission assets, and the effectiveness of implemented mitigants. HWT determines ignition probability drivers through use of the annual FMEA and the 2020 third-party wildfire mitigation assessment. HWT wildfire mitigation strategy focuses on minimizing the likelihood of utility-caused ignitions and reducing negative impact from an ignition should one occur.

5 OVERVIEW OF THE SERVICE TERRITORY

Instructions: In this section of the WMP, the electrical corporation must provide a high-level overview of its service territory and key characteristics of its electrical infrastructure. This information is intended to provide the reader with an understanding of the physical and technical scope of the electrical corporation's WMP. Sections 5.1 - 5.4 below provide detailed instructions.

5.1 Service Territory

Instructions: The electrical corporation must provide a high-level description of its service territory, addressing the following components:⁸

- Area served (in square miles)
- Number of customers served

The electrical corporation must provide a geospatial map that shows its service territory (polygons) and distribution of customers served (raster or polygons). This map should appear in the main body of the report.

Table 5-1 provides a template for presenting the required high-level service territory statistics.

Table 5-2: Example of Service Territory High-Level Statistics

Characteristic	#
Area served (sq. mi.)	
Number of customers served	

HWT is an independent transmission operator (ITO) that has transmission-only assets and does not have a service territory. The Suncrest Facility is located approximately 40 miles east of San Diego near the town of Alpine in San Diego County, California. It provides reactive support to SDG&E's Suncrest Substation, a 500/230 kV substation, which is located approximately one mile away.

As noted on page 6 of The Office of Energy Infrastructure Safety's (Energy Safety) ITO Supplement to the 2023-2025 WMP Technical Guidelines, ITOs do not have service territories. As such the reporting requirements for this Section 5.1 do not apply to ITOs such as HWT. Therefore, Table 5-1 below is marked "N/A" meaning "Not Applicable".

⁸ Annual information included in this section must align with Table 7 of the QDR.

Table 5-1. Service Territory High-Level Statistics

Characteristic	#
Area served (sq. mi.)	N/A
Number of customers served	

Figure HWT 5.1-1. Project Location

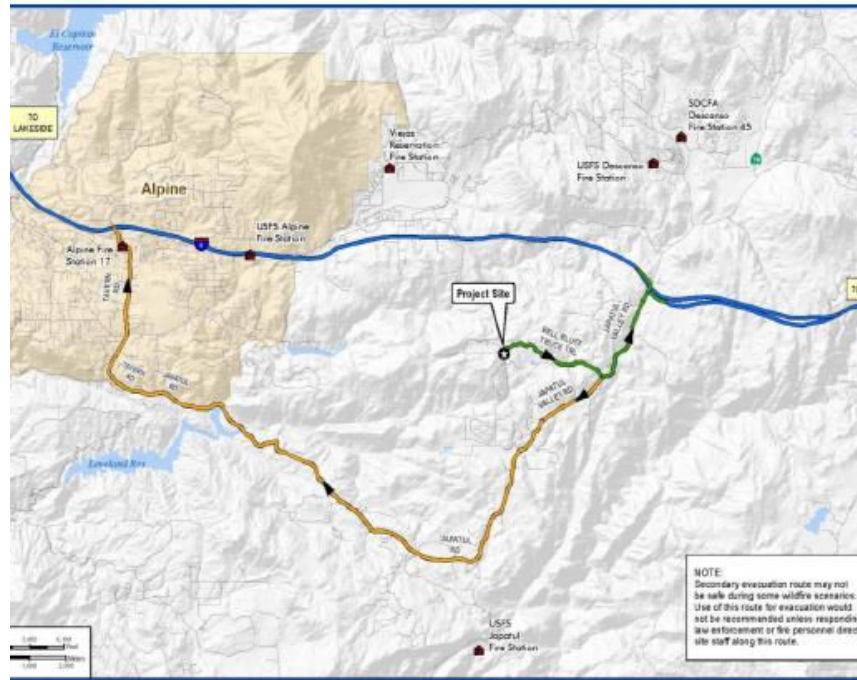


Figure HWT 5.1-2. Overhead View of Suncrest SVC and Underground Transmission Line

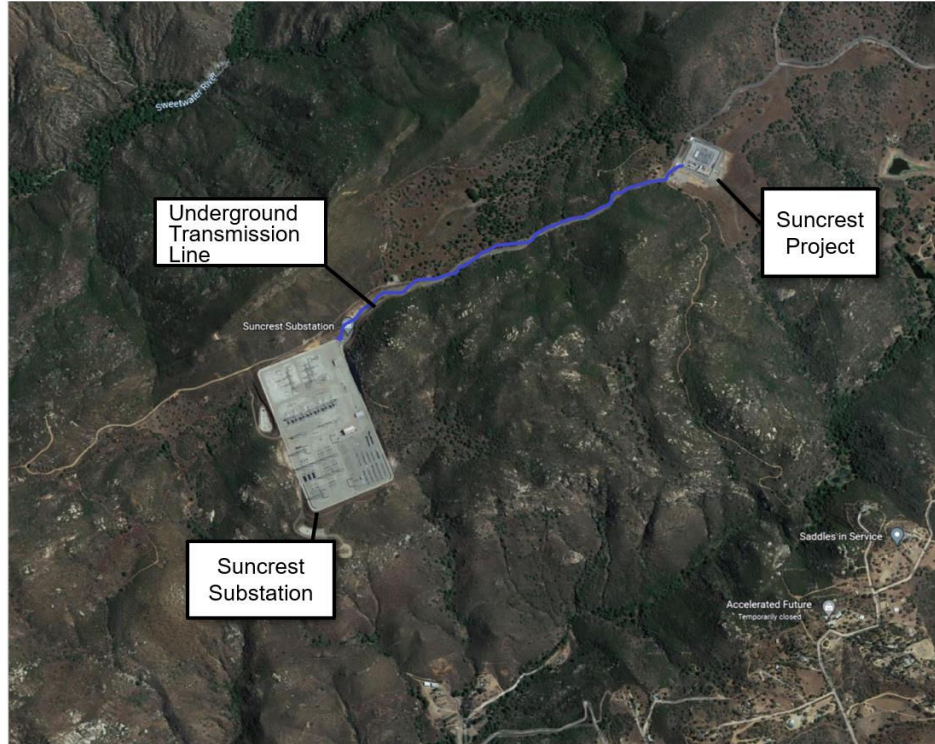


Figure HWT 5.1-3. Overhead Close-up of Suncrest SVC



5.2 Electrical Infrastructure

Instructions: The electrical corporation must provide a high-level description of its infrastructure, including all power generation facilities, transmission lines and associated equipment, distribution lines and associated equipment, substations, and any other major equipment.⁹

Table 5-2 provides a template for presenting the required information.

Table 5-2: Example of Overview of Key Electrical Equipment

Type of Equipment	HFTD	Non-HFTD	Total
Substations (#)			
Power generation facilities (#)			
Overhead transmission lines (circuit miles)			
Overhead distribution lines (circuit miles)			
Hardened overhead distribution lines (circuit miles)			
Hardened overhead transmission lines (circuit miles)			
Underground transmission and distribution lines (circuit miles)			
Distribution transformers (#)			
Reclosers (#)			
Poles (#)			
Towers (#)			
Microgrids (#)			

The Suncrest Facility is a +300/-100 MVar SVC facility with a rated real power output of 0 MW, and nominal terminal voltage of 230 kV, approximately one mile underground 230 kV single-circuit transmission line and a riser pole, that collectively provides dynamic reactive power support to SDG&E's Suncrest Substation, a 500/230 kV substation near Alpine, San Diego County, California.

⁹ Annual information included in this section must align with Table 7 of the QDR.

Table 5-2. Overview of Key Electrical Equipment

Type of Equipment	HFTD	Non-HFTD	Total
Substations (#)	1	0	
Power generation facilities (#)	0	0	0
Overhead transmission lines (circuit miles)	0	0	0
Overhead distribution lines (circuit miles)	0	0	0
Hardened overhead distribution lines (circuit miles)	0	0	0
Hardened overhead transmission lines (circuit miles)	0	0	0
Underground transmission and distribution lines (circuit miles)	0.95	0	0
Distribution transformers (#)	0	0	0
Reclosers (#)	0	0	0
Poles (#)	1	0	0
Towers (#)	0	0	0
Microgrids (#)	0	0	0

5.3 Environmental Settings

Instructions: The electrical corporation must provide a high-level overview of the wildfire environmental settings within its service territory.

5.3.1 Fire Ecology

Instructions: The electrical corporation must provide a brief narrative describing the fire ecology or ecologies across its service territory. This includes a brief description of how ecological features, such as the following, influence the propensity of the electrical corporation's service

territory to experience wildfires: generalized climate and weather conditions, ecological regions and associated vegetation types, and fire return intervals.

The electrical corporation must provide tabulated statistics of the vegetative coverage across its service territory. The tabulated data must include a breakdown of the vegetation types, total acres per type, and percentage of service territory per type. The electrical corporation must identify the vegetative database used to characterize the vegetation (e.g., CALVEG). Table 5-3 provide an example of the minimum level of content and detail required.

Table 5-3: Example of Existing Vegetation Types in the Service Territory

<i>Vegetation Type</i>	<i>Acres</i>	<i>Percentage of Service Territory</i>
<i>Annual grassland</i>	<i>1</i>	<i>0</i>
<i>Coastal oak woodland</i>	<i>0</i>	<i>0</i>
<i>Coastal scrub</i>	<i>0</i>	<i>0</i>
<i>Mixed chaparral</i>	<i>0</i>	<i>0</i>

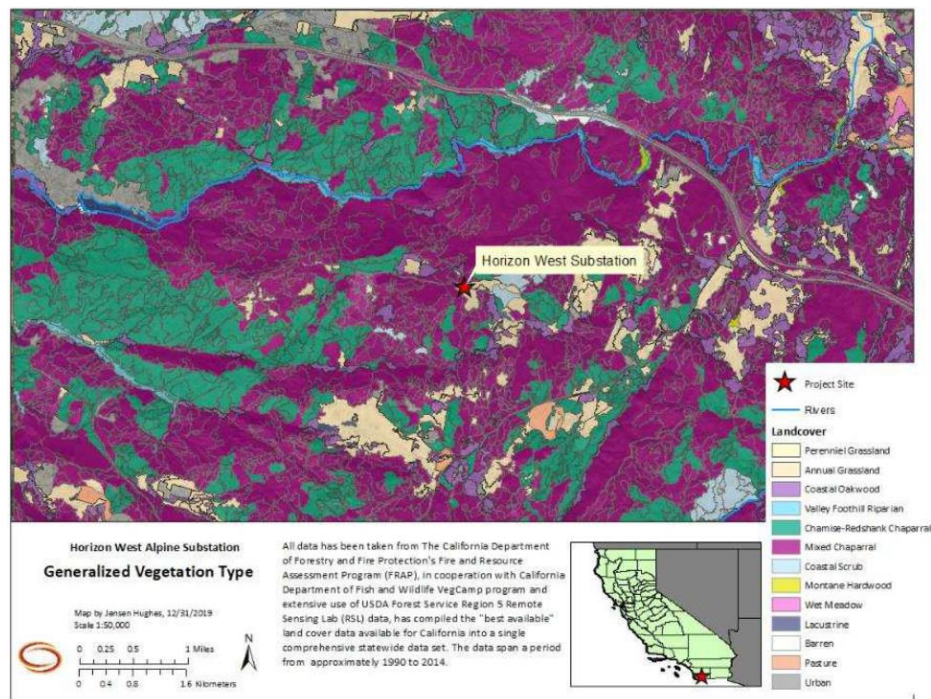
HWT is an independent transmission operator (ITO) that has transmission-only assets and does not have a service territory. As noted on page 7 of The Office of Energy Infrastructure Safety’s (Energy Safety) ITO Supplement to the 2023-2025 WMP Technical Guidelines, ITOs do not have end-use customers and therefore have no service territories. ITOs are instructed to provide a “brief narrative describing the fire ecology or ecologies adjacent to their assets.”

The Suncrest Facility is in a rural part of eastern San Diego County (approximately 40 miles east of San Diego), in the foothills of the Cuyamaca and Laguna mountain ranges, just off Interstate 8. The site is situated among large open areas of vegetation with several rural communities nearby (e.g., Descanso, Alpine, Viejas Indian Reservation, Pine Valley). HWT notes that in the greater area surrounding its Suncrest Facility (~39 square miles), there are approximately 23,976 acres of natural vegetation (~95%). This primarily consist of mixed chapparal (~56%) and chemise-redshank chaparral (~21.6%), with relatively smaller amounts of grasslands, coastal oakwood, coastal scrub, valley foothill riparian and mixed hardwood. The remaining area (approximately 5%) is developed and/or urban lands. As noted above since HWT does not have a service territory Table 5-3 is marked “N/A” meaning “Not Applicable”.

Table 5-3. Existing Vegetation Types in the Service Territory

Vegetation Type	Acres	Percentage of Service Territory
Annual grassland	N/A	N/A
Coastal oak woodland	N/A	N/A
Coastal scrub	N/A	N/A
Mixed chaparral	N/A	N/A

Figure HWT 5.3.1-1. Vegetation map surrounding the Suncrest Facility



5.3.2 Catastrophic Wildfire History

Instructions: The electrical corporation must provide a brief narrative summarizing its wildfire history for the past 20 years (2002-2022) as recorded by the electrical corporation, CAL FIRE, or another authoritative sources. For this section, wildfire history must be limited to electrical corporation ignited catastrophic fires (i.e., fires that caused at least one death, damaged over 500 structures, or burned over 5,000 acres). This includes catastrophic wildfire ignitions reported to the CPUC that may be attributable to facilities or equipment owned by the electrical corporation

and where the cause of the ignition is still under investigation.¹⁰ Electrical corporations must clearly denote those ignitions as still under investigation. In addition, the electrical corporation must provide catastrophic wildfire statistics in tabular form, including the following key metrics:

- Ignition date
- Fire name
- Official cause (if known)
- Size (acres)
- Number of fatalities
- Number of structures damaged
- Estimated financial loss (U.S. dollars)

Table 5-4 provides an example of the content and level of detail required for the tabulated historical catastrophic utility-related wildfire statistics.¹¹ The electrical corporation must provide an authoritative government source (e.g., CPUC, CAL FIRE, U.S. Forest Service, or local fire authority) for its reporting of wildfire history data and loss/damage estimates, to the extent this information is available.

Table 5-4: Example of Catastrophic Electrical Corporation Wildfires

Ignition Date	Fire Name	Official Cause	Fire Size (acres)	No. of Fatalities	No. of Structures Destroyed and Damaged	Financial Loss (US\$)

The electrical corporation must also provide a map or set of maps illustrating the catastrophic wildfires. One representative map must appear in the main body of the WMP, with supplemental or detailed maps provided in Appendix C as needed. The maps must include the following:

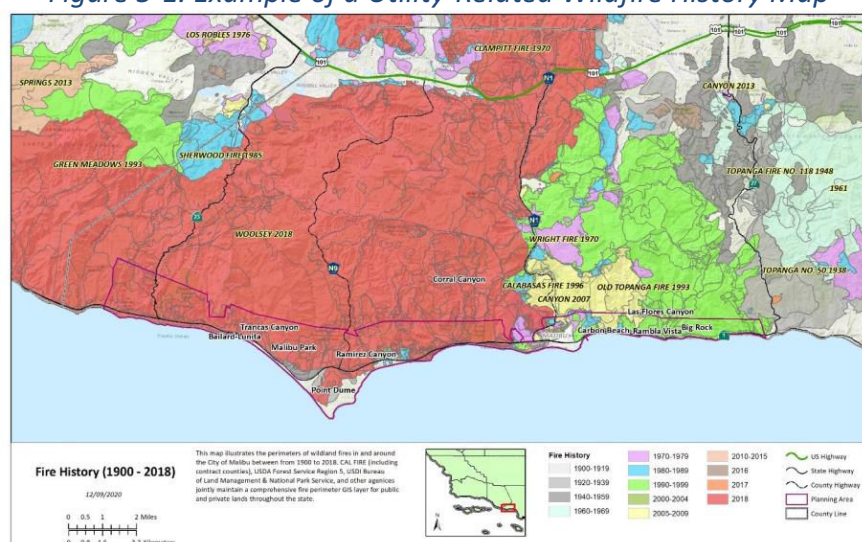
- Fire perimeters
- Legend and text labeling each fire perimeter
- County lines

Figure 5-1 provides an example of the content and level of detail required for the map(s).

¹⁰ CPUC emergency reporting instructions: <https://www.cpuc.ca.gov/regulatory-services/safety/emergency-reporting>.

¹¹ Annual information included in this section must align with Table 2 of the QDR.

Figure 5-1. Example of a Utility-Related Wildfire History Map



HWT entered commercial operations in Q1 of 2022. HWT has never had an ignited catastrophic fire, or any fire, instigated by its utility equipment. As a result Table 5-4 below is marked “N/A” meaning “Not Applicable”. Additionally there is no information to submit for Figure 5-1. Utility-Related Wildfire History Map.

Table 5-4. Catastrophic Electrical Corporation Wildfires

Ignition Date	Fire Name	Official Cause	Fire Size (acres)	No. of Fatalities	No. of Structures Destroyed and Damaged	Financial Loss (US\$)
N/A						

5.3.3 High Fire Threat Districts

Instructions: The electrical corporation must provide a brief narrative identifying the CPUC-defined HFTD across its territory. The electrical corporation must also provide a map of its service territory overlaid with the HFTD. The map must be accompanied by tabulated statistics on the CPUC-defined HFTD including the following minimum information:

- Total area of the electrical corporation’s service territory in the HFTD (sq. mi.)
- The electrical corporation’s service territory in the HFTD as a percentage of its total service territory (%)

For the HFTD map, the HFTD layer(s) (raster or polygon) must cover the electrical corporation's service territory and the HFTD layer must match the latest boundaries as published by the CPUC. Table 5-5 provides an example of the content and level of detail required.

Table 5-5: Example of an Electrical Corporation's HFTD Statistics

High Fire Threat District	Total Area of Individual District (sq. mi.)	% of Total Service Territory
<i>Non-HFTD</i>	XX	85%
<i>Tier 2</i>	XX	5%
<i>Tier 3</i>	XX	8%
Total =	XX	100%

HWT is an independent transmission operator (ITO) that has transmission-only assets and does not have a service territory. The Suncrest Facility is in a rural part of eastern San Diego County (approximately 40 miles east of San Diego), in the foothills of the Cuyamaca and Laguna mountain ranges, just off Interstate 8 near Alpine, CA. HWT's major transmission assets consists of one substation, 0.95 mi of underground cable, and a riser pole. HWT provides the following map which shows that all its assets are located in a Tier 3 HFTD.

Figure HWT 5.3.3-1. Tier 3 HFTD near Alpine, CA

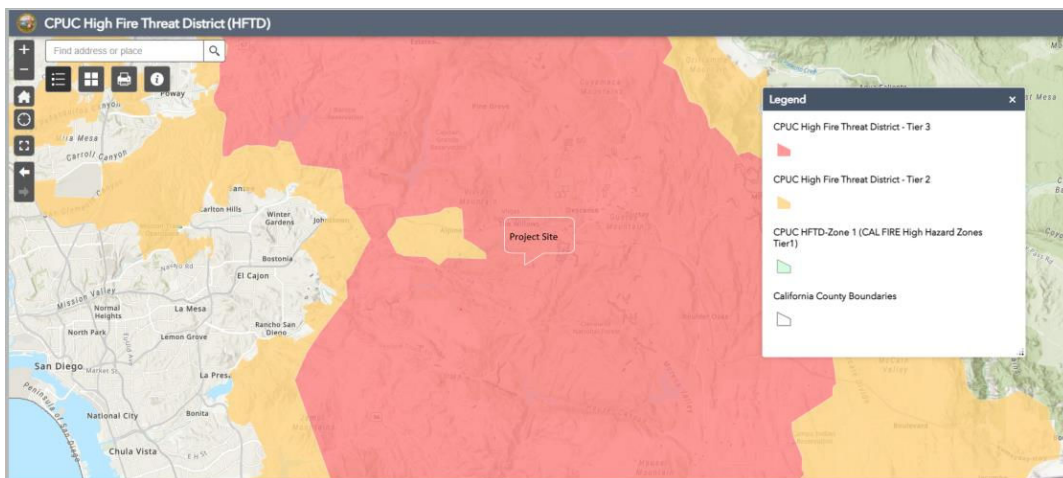


Table 5-5. Electrical Corporation's HFTD Statistics

High Fire Threat District	Total Area of Individual District (sq. mi.)	% of Total Service Territory
Non-HFTD	0	0%
Tier 2	0	0%
Tier 3	0	100%
Total =	XX	100%

5.3.4 Climate Change

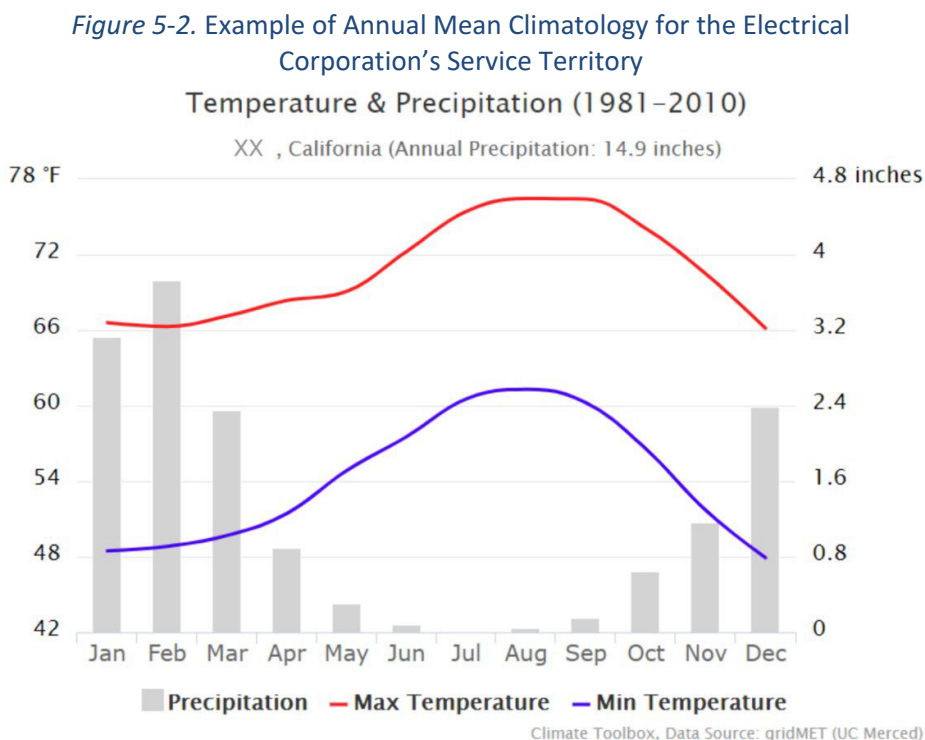
Instructions: It is critical for the electrical corporation to understand general climate conditions and how climate change impacts the frequency and the intensity of extreme weather events and the vegetation that fuels fires.

5.3.4.1 General Climate Conditions

Instructions: The electrical corporation must provide an overview of the general weather conditions and climate across its service territory in the past 30- to 40-year period.¹² The narrative must include, at a minimum, the following:

- Average temperatures throughout the year
- Extreme temperatures that may occur and when and where they may occur
- Precipitation throughout the year

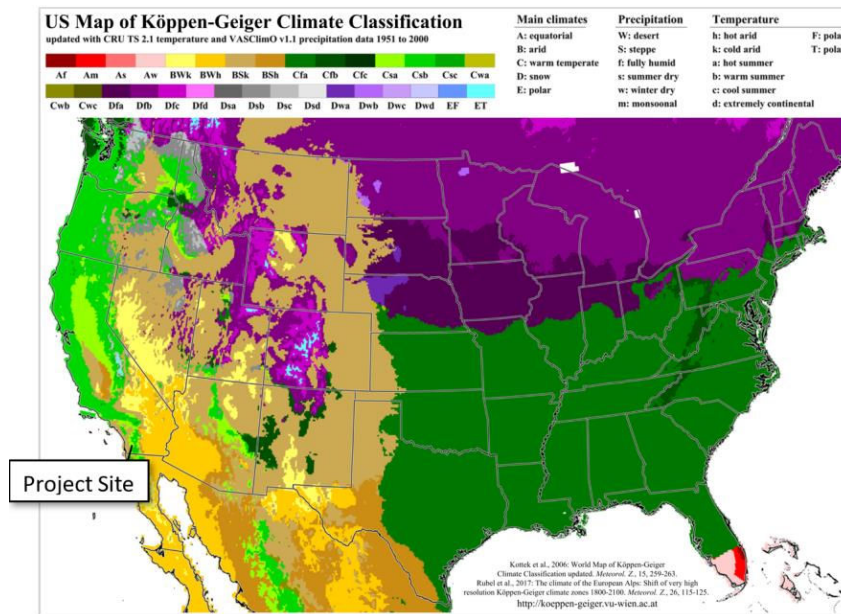
The electrical corporation must also provide a graph of the average precipitation and maximum and minimum temperatures for each distinct climatic region of its service territory. At a minimum, it must provide one graph in the main body of the report. Figure 5-2 provides an example of the climate/weather graph.



¹² Annual information included in this section must align with Table 4 of the QDR.

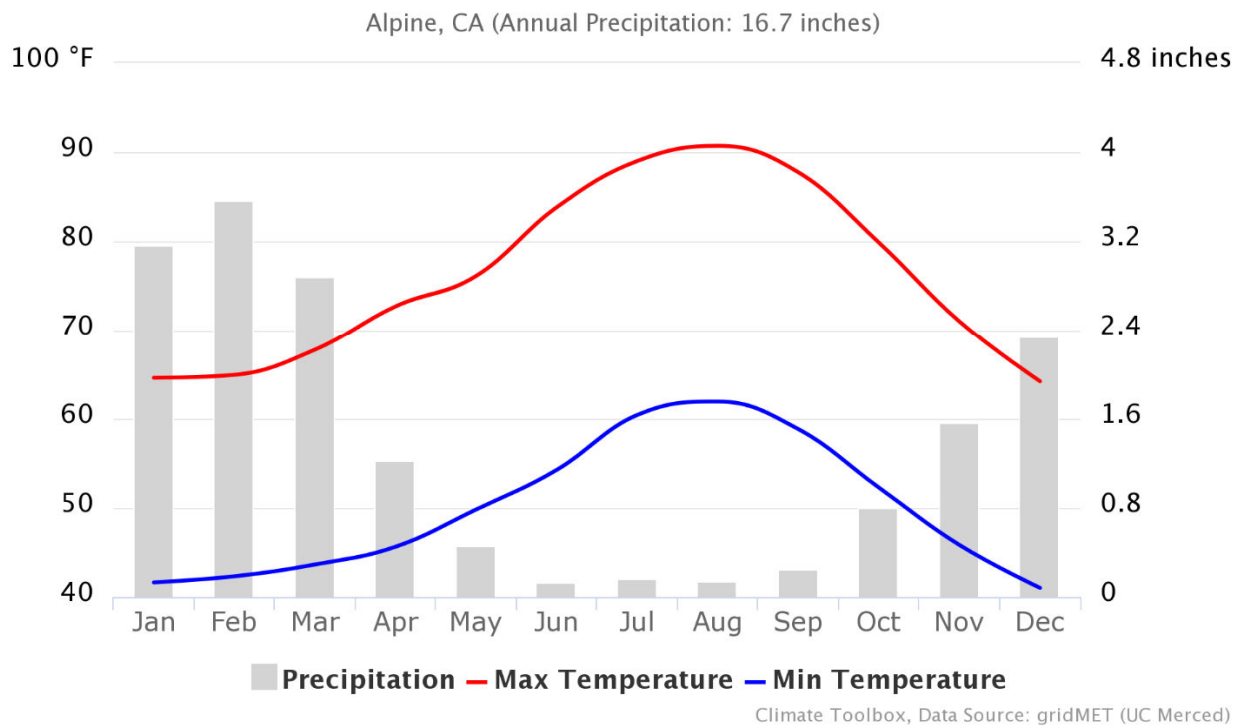
HWT is an independent transmission operator (ITO) that has transmission-only assets and does not have a service territory. The Suncrest Facility is in a rural part of eastern San Diego County (approximately 40 miles east of San Diego), in the foothills of the Cuyamaca and Laguna mountain ranges, just off Interstate 8 near Alpine, CA. The climate in the region is classified as “Mediterranean” – warm temperate with dry, warm/hot summers – according to the Köppen-Geiger Climate Classification System.¹³

Figure 5-1. Climate Classification for Alpine, CA



¹³ <http://koeppen-geiger.vu-wien.ac.at/usa.htm>

**Figure 5-2. Annual Mean Climatology for the Electrical
Temperature & Precipitation (1991–2020)**



5.3.4.2 Climate Change Phenomena and Trends

Instructions: The electrical corporation must provide a brief discussion of the local impacts of anticipated climate change phenomena and trends across its service territory. In addition, the electrical corporation must provide graphs/charts illustrating:

- Mean annual temperature (Figure 5-3)
- Mean annual precipitation (Figure 5-4)
- Projected changes in minimum and maximum daily temperatures (Figure 5-5)

The electrical corporation must also indicate the increase in extreme fire danger days (historic 95th-percentile conditions) due to climate change, considering (at a minimum) the combination of warmer temperatures, drier vegetation, and changes in high-wind events (e.g., Santa Ana winds, Diablo winds, Sundowners) for both winter/spring and summer/fall periods throughout the electrical corporation service territory. Figure 5-6 provides an example of the required information on projections of extreme fire dangers.

The electrical corporation must cite all source(s) used to write and illustrate this section.

Figure 5-3. Example of Mean Annual Temperature for Service Territory, 1900s–2020s

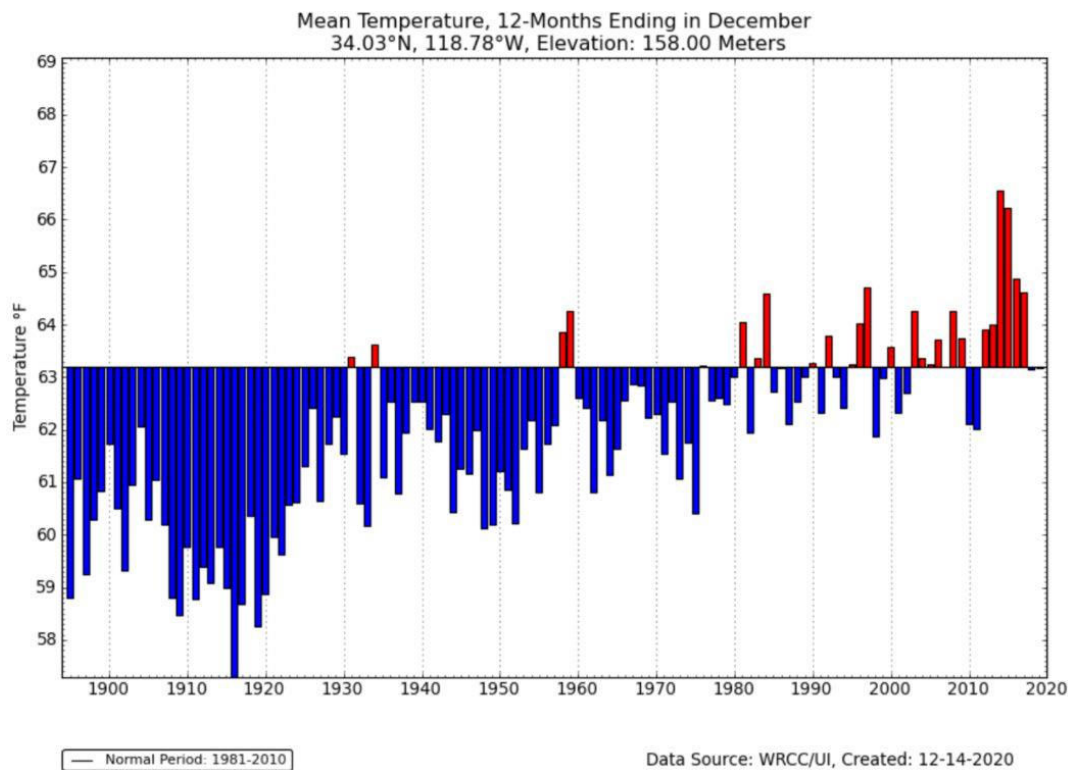


Figure 5-4. Example of Mean Annual Precipitation for Service Territory, 1900s–2020s

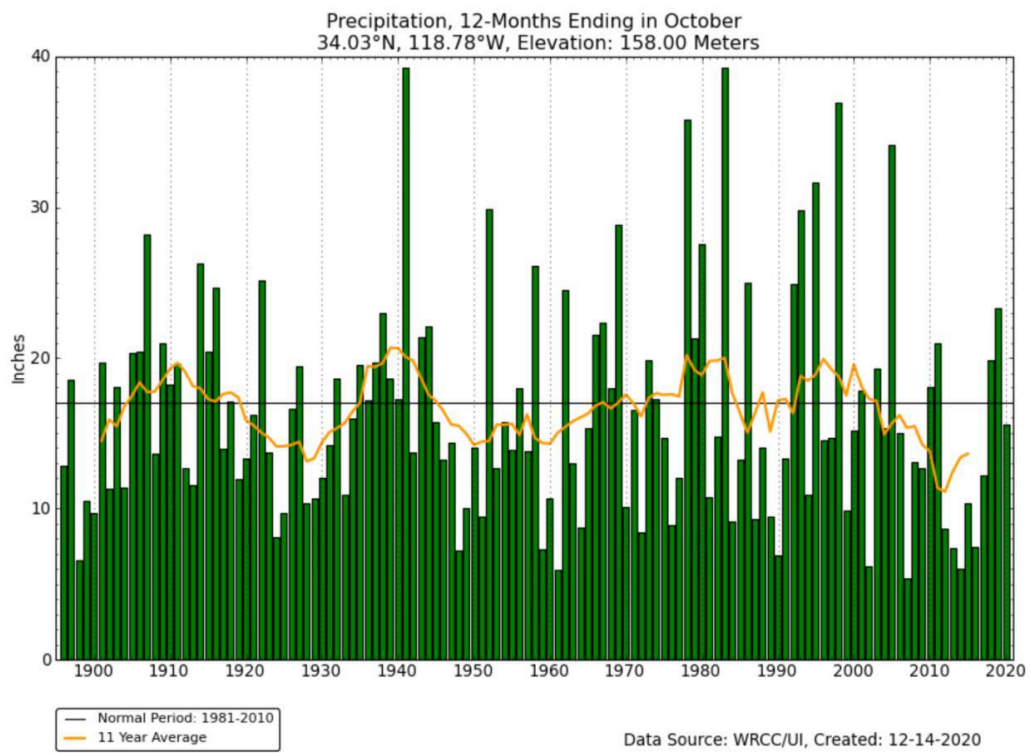


Figure 5-5. Example of Projected Change in Maximum Temperature (Daytime Highs) and Minimum Temperature (Nighttime Lows) Through 2100 for the Service Territory

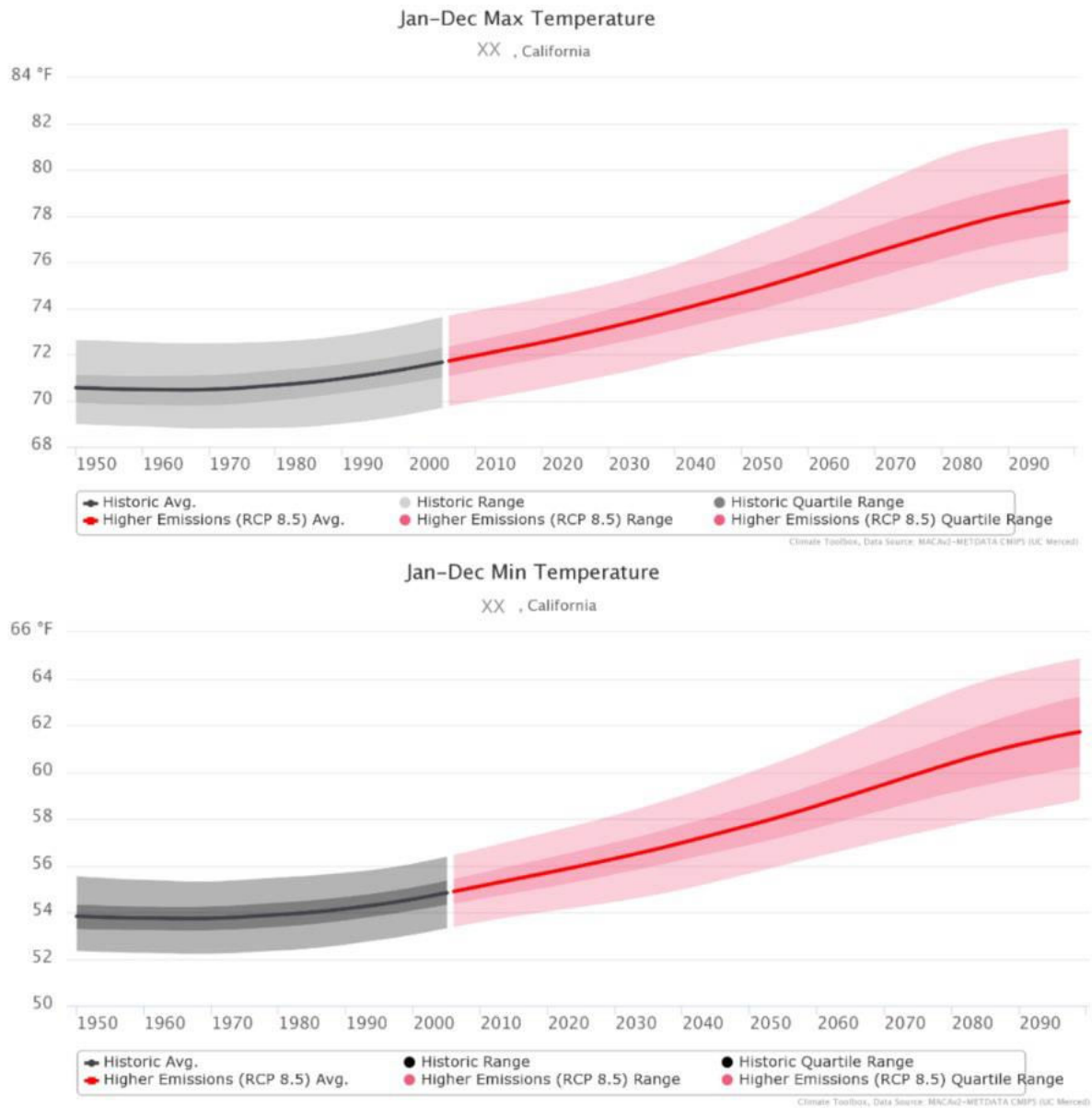
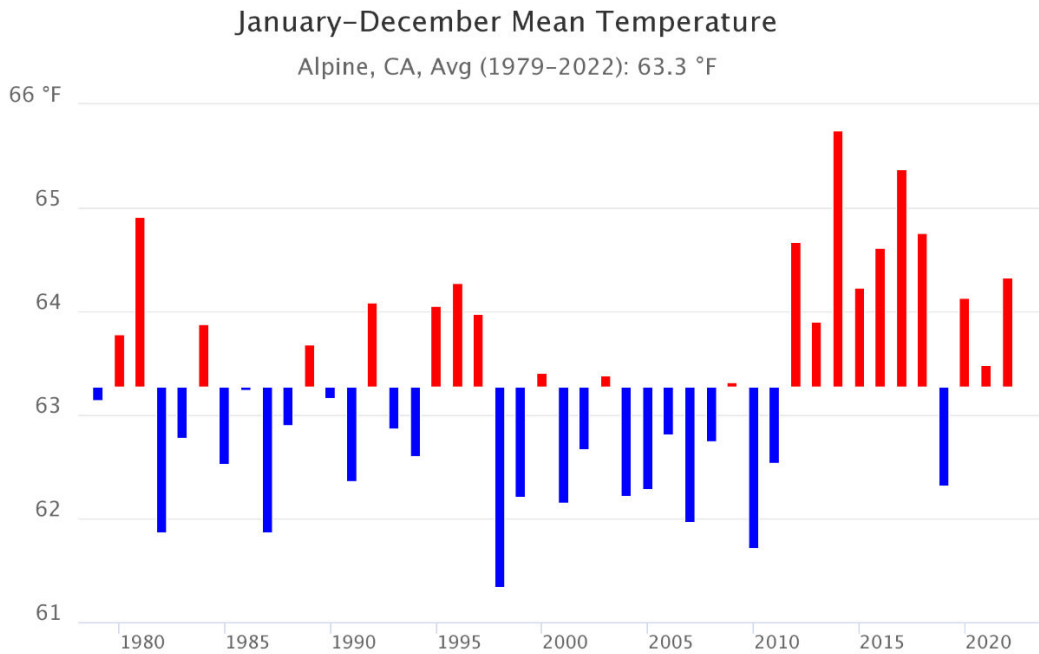


Figure 5-6. Example of Projected Changes in Average Fuel Moisture and Average Number of Days of Extreme Fire Danger for Winter/Spring and Summer/Fall Periods for the Service Territory Based on Global Climate Model Outputs



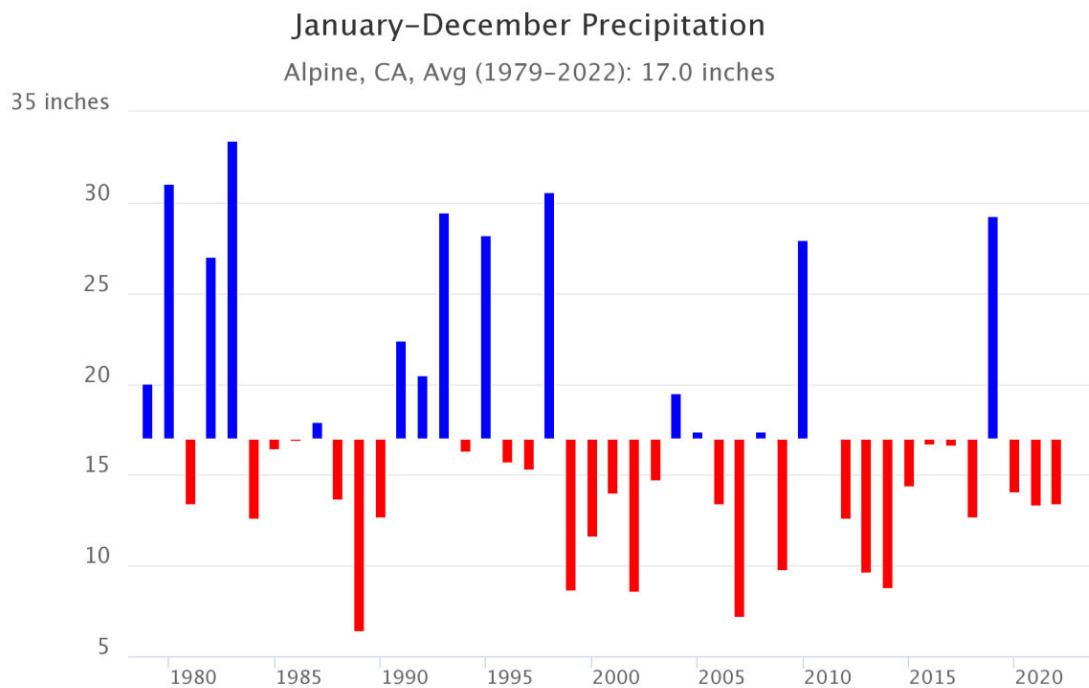
HWT utilized the climate tools available at <https://climatetoolbox.org/> for Figures 5-3 to 5-6 below. In specific HWT used the Climate Toolbox's Historical Climate Tracker for Figure 5-3 and Figure 5-4; the Future Time Series tool for Figure 5-5; and the Future Climate Dashboard for Figure 5-6. HWT notes that although the data reflects increased warming in the future, HWT is a transmission-only utility with no distribution system and no direct/retail customers and as such changes in climate have limited applicability to HWT's operations. Moreover since the majority of HWT's transmission infrastructure is underground, HWT's operations are unlikely to be materially impacted by the anticipated changes in climate.

Figure 5-3. Mean Annual Temperature for Service Territory, 1980s–2020s



Climate Toolbox, Data Source: gridMET (UC Merced)

Figure 5-4. Mean Annual Precipitation for Service Territory, 1980s–2020s



Climate Toolbox, Data Source: gridMET (UC Merced)

Figure 5-5. Projected Change in Maximum Temperature (Daytime Highs) and Minimum Temperature (Nighttime Lows) Through 2100 for the Service Territory

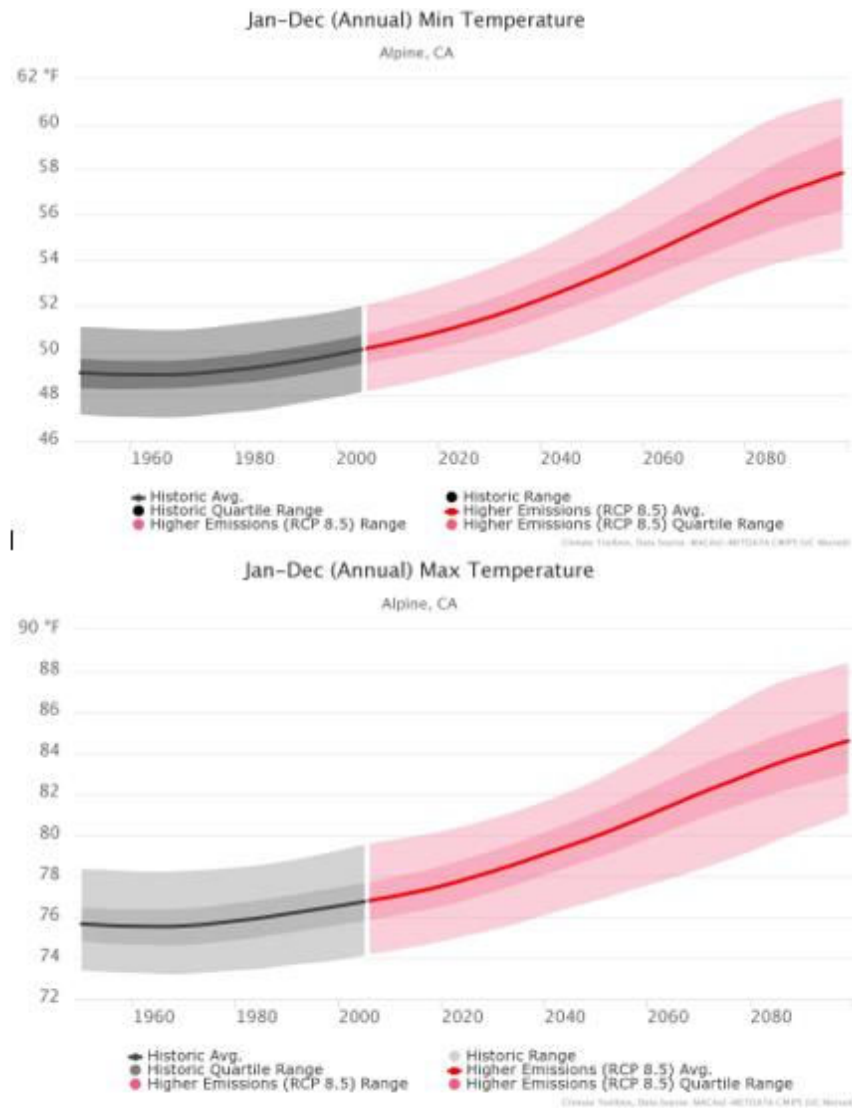
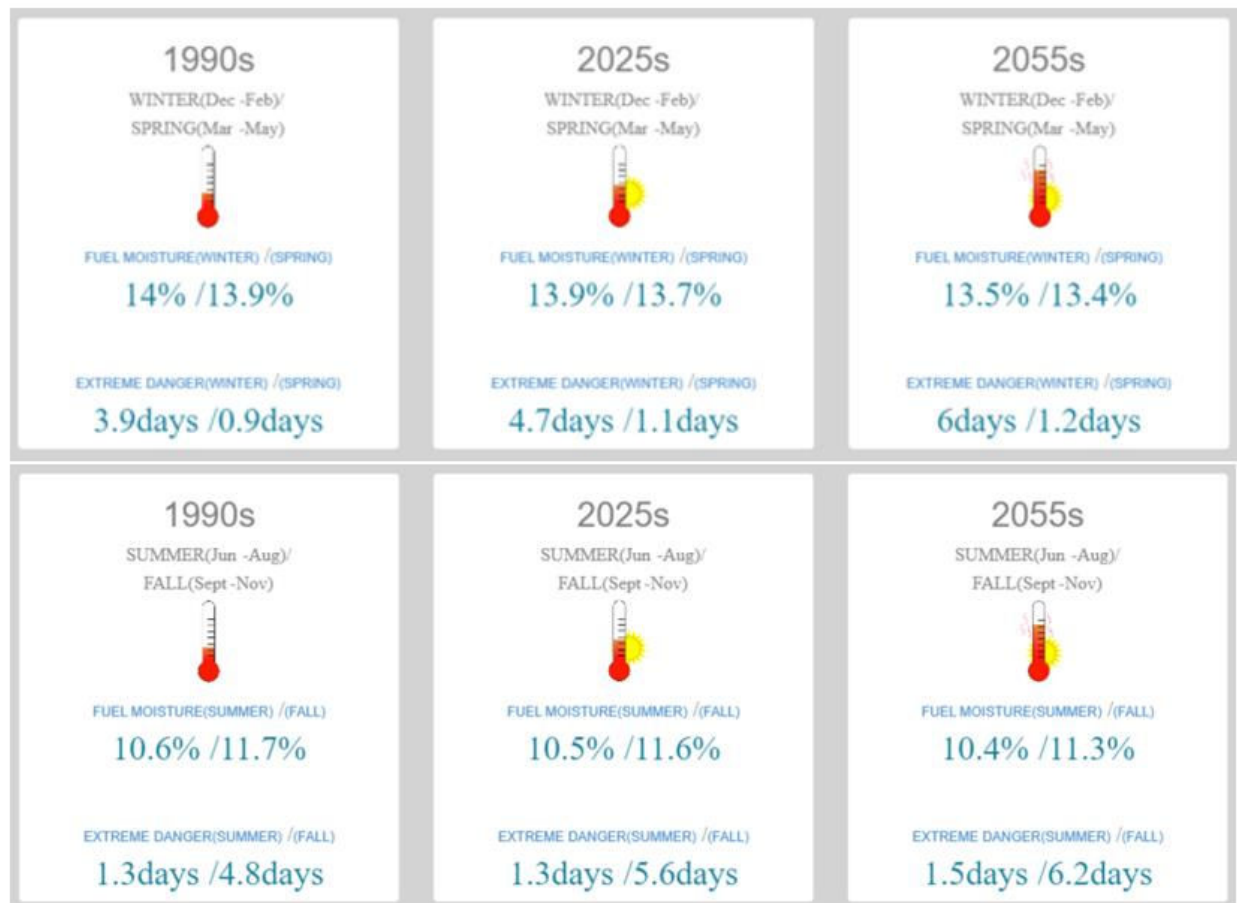


Figure 5-6. Projected Changes in Average Fuel Moisture and Average Number of Days of Extreme Fire Danger for Winter/Spring and Summer/Fall Periods for the Service Territory Based on Global Climate Model Outputs

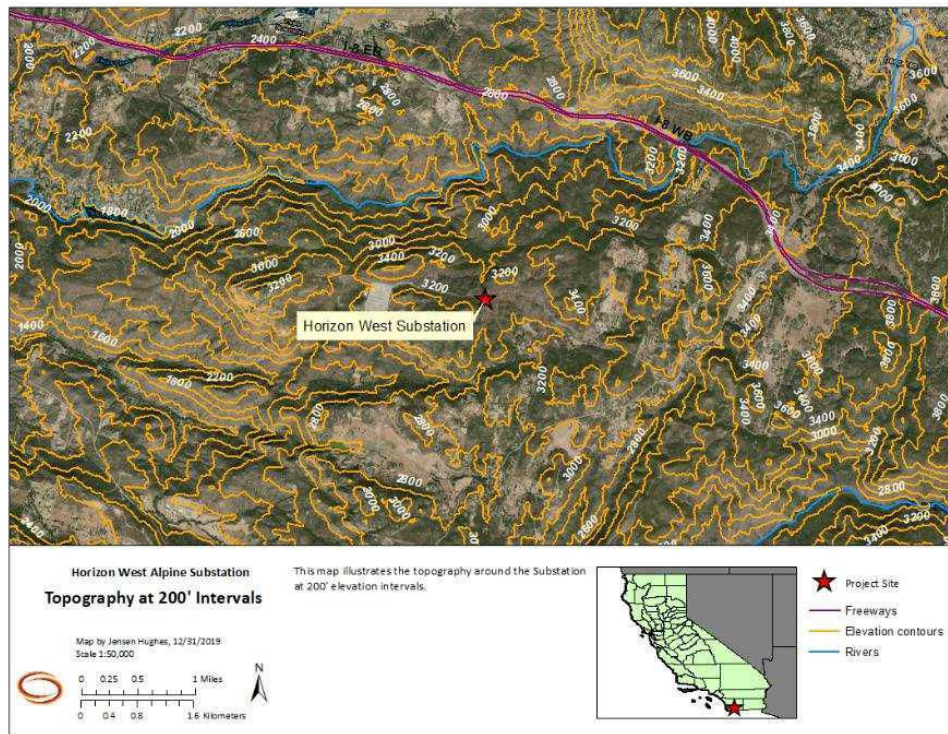


5.3.5 Topography

Instructions: The electrical corporation must provide an overview and brief description of the various topographic conditions across its service territory.

HWT's Suncrest Facility is located on a ridge which separates the Sweetwater River to the north and Pine Valley Creek to the east and south. The elevation is approximately 3,200 ft with slopes less than 15%. As the site is in the foothills of the Cuyamaca and Laguna mountain ranges, the surrounding terrain forms a rugged landscape of alternating ridges and valleys. Approximately 49% of the slopes in the surrounding terrain are between 25-49%.

Figure HWT 5.3.5-1. Elevation contours in the immediate vicinity of the Suncrest Facility



5.4 Community Values at Risk

***Instructions:** In this section of the WMP, the electrical corporation must identify the community values at risk across its service territory. Sections 5.4.1–5.4.5 provide detailed instructions.¹⁴*

5.4.1 Urban, Rural, and Highly Rural Customers

***Instructions:** The electrical corporation must provide a brief narrative describing the distribution of urban, rural, and highly rural areas and customers across its service territory. Refer to Appendix A for definitions.*

HWT is an independent transmission operator (ITO) that has transmission-only assets and does not have a service territory. As noted on page 7 of Energy Safety’s ITO Supplement, ITOs do not have service territories. As such the reporting requirements for this Section 5.4.1 do not apply to ITOs such as HWT.

¹⁴ Annual information included in these sections must align with Table 7 of the QDR.

5.4.2 Wildland-Urban Interfaces

Instructions: *The electrical corporation must provide a brief narrative describing the wildland-urban interfaces (WUIs) across its service territory. Refer to Appendix A for definitions.*

HWT is an independent transmission operator (ITO) that has transmission-only assets and does not have a service territory. As noted on page 7 of Energy Safety's ITO Supplement, ITOs do not have service territories. As such the reporting requirements for this Section 5.4.2 do not apply to ITOs such as HWT.

5.4.3 Communities at Risk from Wildfire

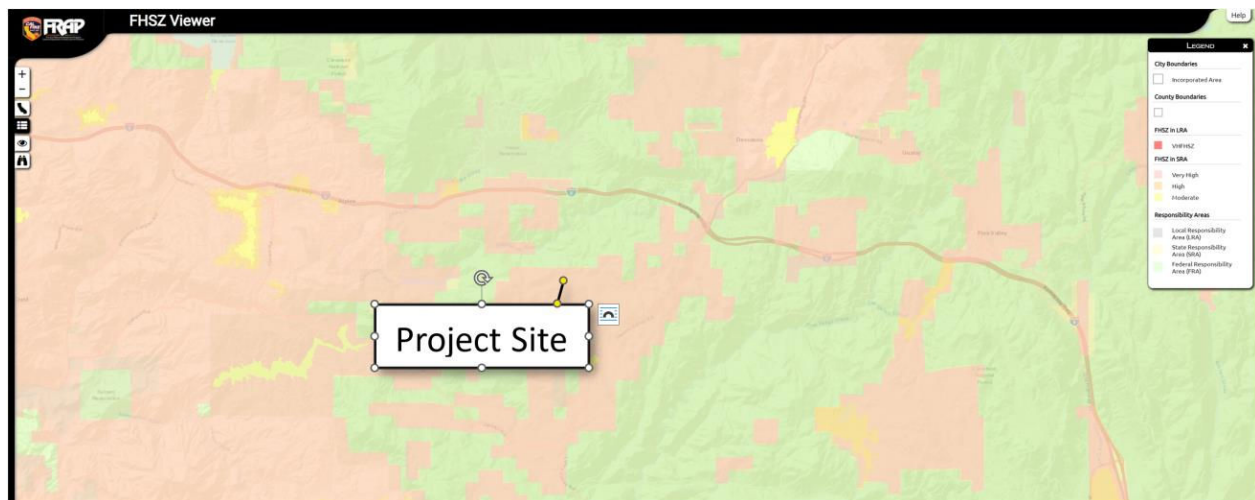
Instructions: *In this section of the WMP, an electrical corporation must provide a high-level overview of communities at risk from wildfire as defined by the electrical corporation (e.g., within the HFTD and HFRA). This includes an overview of individuals at risk, AFN customers, social vulnerability, and communities vulnerable because of single access/egress conditions within its service territory. Detailed instructions are provided below.*

HWT is an independent transmission operator (ITO) that has transmission-only assets and does not have a service territory. As noted on page 8 of Energy Safety's ITO Supplement, ITOs do not have end-use customers. ITOs are directed to provide a high-level overview of individuals at risk, communities at risk, AFN customers, social vulnerability, and communities vulnerable because of single access/egress conditions adjacent to their assets, rather than within their service territory.

The Suncrest Facility is in a rural part of eastern San Diego County (approximately 40 miles east of San Diego), in the foothills of the Cuyamaca and Laguna mountain ranges, just off Interstate 8. The site is situated among large open areas of vegetation with several rural communities nearby (e.g., Descanso, Alpine, Viejas Indian Reservation, Pine Valley), which have been designated communities at risk per Cal Fire.¹⁵ However, the Suncrest Facility is in a remote area east of Alpine and there are no residential structures within the immediate vicinity or adjacent to the Suncrest Facility.

¹⁵ <https://osfm.fire.ca.gov/divisions/community-wildfire-preparedness-and-mitigation/fire-plan/communities-at-risk/>

Figure HWT 5.4.3-1. Cal Fire Communities at Risk Map for in the area surrounding the Suncrest Facility¹⁶



5.4.3.1 Individuals at Risk from Wildfire

Instructions: The electrical corporation must provide a brief narrative (one to two paragraphs) describing the total number of people and distribution of people at risk from wildfire across its service territory.

HWT's Suncrest Facility is located in a very rural and scarcely populated area. HWT has no end-use customers and does not have a service territory. There are no structures within the immediate vicinity of the Suncrest Facility. See also HWT's response to Section 5.4.3.

5.4.3.2 Social Vulnerability and Exposure to Electrical Corporation Wildfire Risk

Instructions: The electrical corporation must provide a brief narrative describing the intersection of social vulnerability and community exposure to electrical corporation wildfire risk across its service territory. This intersection is defined as census tracts that 1) exceed the 70th percentile according to the Social Vulnerability Index (SVI) or have a median household income of less than 80 percent of the state median, and 2) exceed the 85th percentile in wildfire consequence risk according to the electrical corporation's risk assessment(s).¹⁷

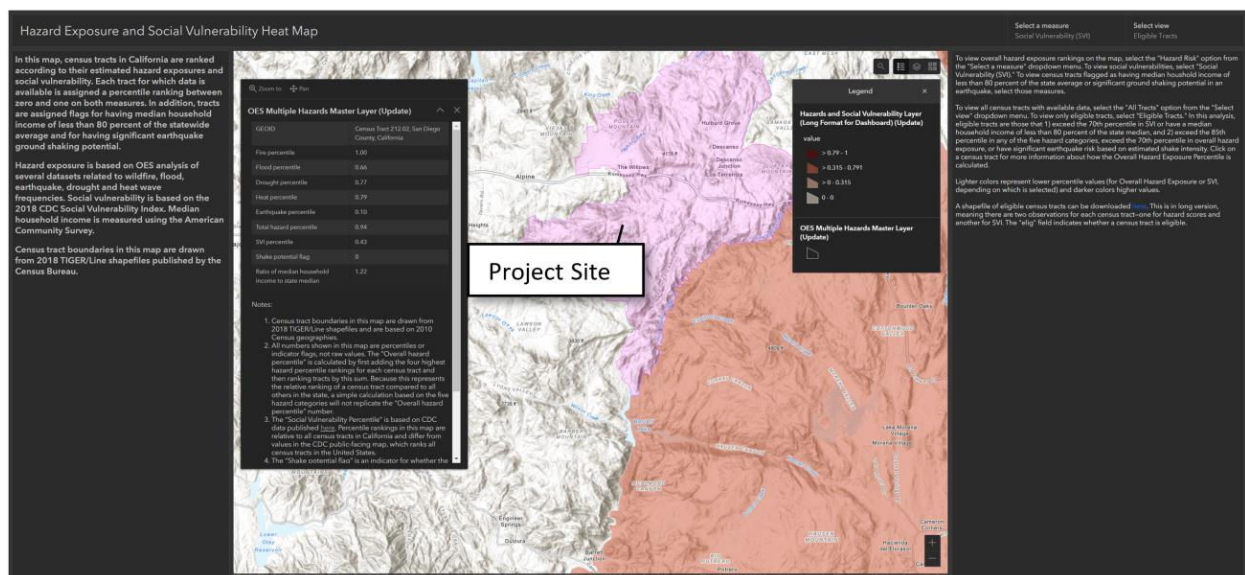
¹⁶ <https://egis.fire.ca.gov/FHSZ/>

¹⁷ These criteria are derived from Cal OES Recovery Division, Hazard Mitigation Assistance Branch's Multiple Hazards and Social Vulnerability Analysis, dated January 18, 2022: <https://www.caloes.ca.gov/wp-content/uploads/Recovery/Documents/Socially-Vulnerable-and-High-Hazard-Risk-Community-Criteria.-Methodology.pdf> & <https://calema.maps.arcgis.com/apps/dashboards/3c78aea361be4ea8a21b22b30e613d6e>

For SVI, the electrical corporation must use the most up-to-date version of Centers for Disease Control and Prevention/Agency for Toxic Substances and Disease Registry's Social Vulnerability Index dataset (Year = 2018;¹⁸ Geography = California; Geography Type = Census Tracts).¹⁹ In addition, the electrical corporation must provide a single geospatial map showing its service territory (polygon) overlaid with the distribution of the SVI and exposure intersection and urban and major roadways. Any additional maps needed to provide clarity and detail should be included in Appendix C.

HWT has reviewed the census tract on the Hazard Exposure and Social Vulnerability Heat Map for the area adjacent to its Suncrest Facility (see area highlighted in purple in Figure 9 below). There are no communities meeting the intersection definition as stated above. While the wildfire consequence exceeds the 85th percentile, the SVI percentile is well below the 70th percentile threshold and the median household income is well above the 80 percent state median.

Figure HWT 5.4.3-2. Hazard Exposure and SVI Heat Map of Census of Area Adjacent to the Suncrest Facility



¹⁸ As of the publishing of these Guidelines, 2018 was the most recent version of the dataset. Electrical corporations must use the most up-to-date version of the dataset.

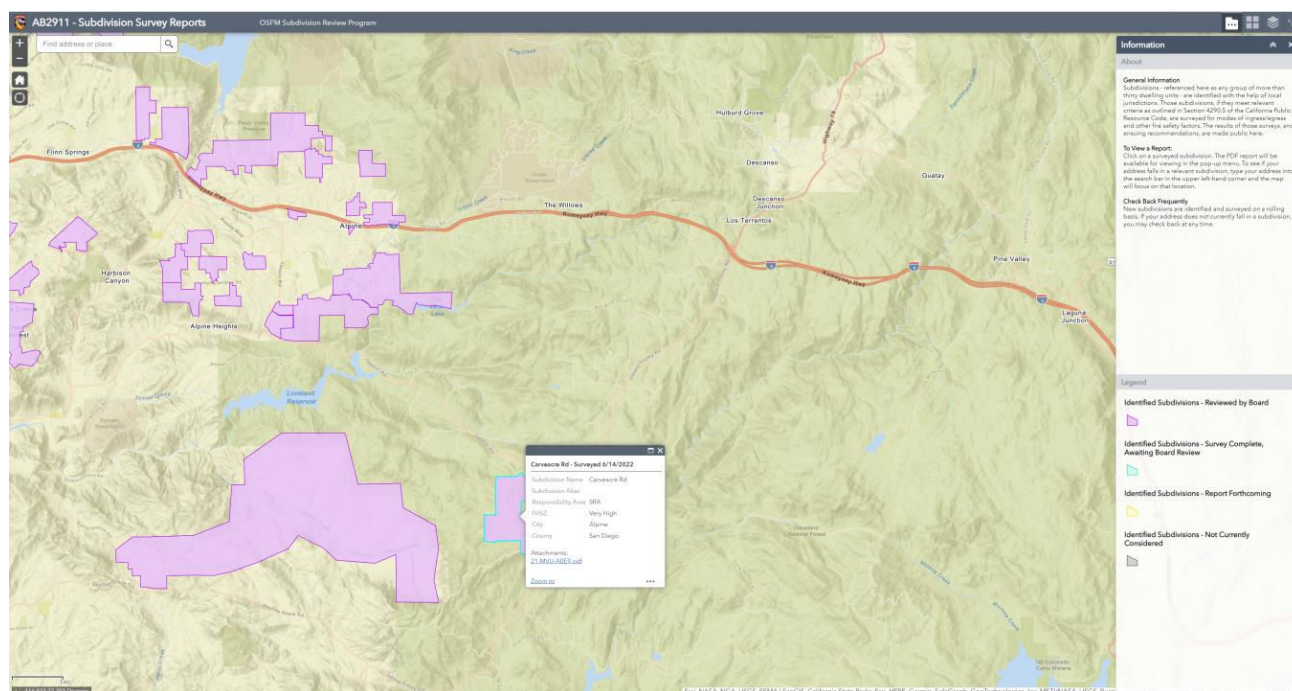
¹⁹ Centers for Disease Control and Prevention / Agency for Toxic Substances and Disease Registry Social Vulnerability Index Data and Documentation Download (https://www.atsdr.cdc.gov/placeandhealth/svi/data_documentation_download.html, accessed Oct. 11, 2022).

5.4.3.3 Sub-Divisions with Limited Egress or No Secondary Egress

Instructions: The electrical corporation must provide a brief narrative overview (one to two paragraphs) describing sub-divisions with limited egress or no secondary egress, per CAL FIRE data,²⁰ across the electrical corporation's service territory.

HWT has reviewed the Board of Forestry and Fire Protection's (BOF) Subdivision Survey Report. There are no subdivisions with limited egress or no secondary egress adjacent to the Suncrest Facility. The closest subdivision fitting this requirement is approximately 6.5 miles driving distance from the Suncrest Facility. The subdivision, identified as Carveacre Rd is located in Alpine, CA and was surveyed in June 2022 (see Figure 10 below).

Figure HWT 5.4.3-3. BOF Subdivision Survey Report Area Adjacent to the Suncrest Facility



5.4.4 Critical Facilities and Infrastructure at Risk from Wildfire

Instructions: The electrical corporation must provide a brief narrative describing the distribution of critical facilities and infrastructure located in the HFTD/HFRA across its service territory. Critical facilities and infrastructure are defined in Appendix A.

²⁰ Board of Forestry and Fire Protection Subdivision Review Program (<https://bof.fire.ca.gov/projects-and-programs/subdivision-review-program/>, accessed Oct. 11, 2022).

HWT’s Suncrest Facility is located in a highly rural area east of Alpine, CA and southwest of Descanso. Excluding San Diego Gas & Electric’s (SDG&E) Suncrest Facility, there are no other critical facilities or infrastructure within an approximately 5 mile radius of HWT’s Suncrest Station. Relevant critical facilities are sited in the neighboring cities of Descanso (~6 miles), Pine Valley (~9 miles) and Alpine (~10 miles).

5.4.5 Environmental Compliance and Permitting

Instructions: *In this section, the electrical corporation must provide a summary of how it ensures its compliance with applicable environmental laws, regulations, and permitting related to the implementation of its WMP. This overview must include:*

- *A description of the procedures/processes to ensure compliance with relevant environmental laws, regulations, and permitting requirements before and during WMP implementation. The process or procedure should include when consultation with permittees occurs (i.e., at what stage of planning and/or implementation of activities described in the WMP)*
- *Roadblocks the electrical corporation has encountered related to environmental laws, regulations, and permitting related to implementation of its WMP and how the electrical corporation has addressed, is addressing, or plans to address the roadblocks.*
- *Any notable changes to its environmental compliance and permitting procedures and processes since the last WMP submission and a brief explanation as to why those changes were made. Include any planned improvements or updates to the initiative and the timeline for implementation.*

The electrical corporation must also provide a table (Table 5-6 provides an example) of potentially relevant state and federal agencies that may be responsible for discretionary approval of activities described in WMPs and the relevant environmental laws, regulations, and permitting requirements. If this table extends past two pages, provide the required information in an appendix.

Table 5-6: Example of Relevant State and Federal Environmental Laws, Regulations, and Permitting Requirements for Implementing the WMP

<i>Environmental Law, Regulation, or Permit</i>	<i>Responsible Permittee/Agency</i>
<i>Endangered Species Act Section 10(a)(1)(B) Incidental Take Permit</i>	<i>United States Fish and Wildlife Service</i>

HWT’s Suncrest Facility is a newly constructed transmission asset that began commercial operations in Q1 2020. HWT utilizes corporate environmental services to address all environmental review, compliance and permitting. HWT does not have a service territory and has a limited footprint, as such most of HWT’s prior wildfire mitigation enhancements were all contained within the footprint of the Suncrest Facility. HWT does not have any wildfire mitigation initiatives planned for the 2023-2025 WMP cycle. HWT will monitor the effectiveness of its

currently emplaced processes, procedures, and capabilities and assess changes or enhancements as needed. As a result Table 5-6 is marked “N/A” meaning “Not Applicable”.

Table 5-6. Relevant State and Federal Environmental Laws, Regulations, and Permitting Requirements for Implementing the WMP

Environmental Law, Regulation, or Permit	Responsible Permittee/Agency
N/A	

6 RISK METHODOLOGY AND ASSESSMENT

***Instructions:** In this section of the WMP, the electrical corporation must provide an overview of its risk methodology, key input data and assumptions, risk analysis, and risk presentation (i.e., the results of its assessment). This information is intended to provide the reader with a technical understanding of the foundation for the electrical corporation’s wildfire mitigation strategy for its Base WMP. Sections 6.1–6.7 below provide detailed instructions.*

For the 2023-2025 Base WMP, the electrical corporation does not need to have performed each calculation and analysis indicated in sections 6.2, 6.3, and 6.6. If the electrical corporation is not performing a certain calculation or analysis, it must describe why it does not perform the calculation or analysis, its current alternative to the calculation or analysis (if applicable), and any plans to incorporate those calculations or analyses into its risk methodology and assessment.

HWT is an independent transmission operator (ITO) that has transmission-only assets and does not have a service territory or end-use customers. As noted on page 9 of Energy Safety’s ITO Supplement, ITOs have significantly less infrastructure than large investor-owned utilities and small and multi-jurisdictional utilities and do not have end-use customers. Energy Safety notes that ITOs must comply with the requirements of Public Utilities Code sections 8386(c)8 and (12).²¹ However, Energy Safety states that the level of detail required by Section 6 of the 2023-2025 WMP Guidelines regarding risk modeling is not required for ITOs. Instead ITOs must describe their own methods to determine risk.

Based on the foregoing, HWT’s WMP does not include Sections 6.1 through 6.7. Instead HWT provides the following information pursuant to Energy Safety’s direction on page 9 of Energy Safety’s ITO Supplement.

Compliance with Public Utilities Code sections 8386(c)8

The Suncrest Facility is a MVar SVC connected to an approximately one mile undergrounded 230 kV single-circuit transmission line. Since the beginning of its commercial operations, HWT has not deenergized any circuits to mitigate the risk of wildfire. HWT does note that as part of its 2020-2022 WMP cycle mitigation efforts, it completed a project in Q3 of 2021 to underground a 0.02 mile section of its transmission line.

²¹ (8) “Identification of circuits that have frequently been deenergized pursuant to a deenergization event to mitigate the risk of wildfire and the measures taken, or planned to be taken, by the electrical corporation to reduce the need for, and impact of, future deenergization of those circuits, including, but not limited to, the estimated annual decline in circuit deenergization and deenergization impact on customers, and replacing, hardening, or undergrounding any portion of the circuit or of upstream transmission or distribution lines”; (12) “A list that identifies, describes, and prioritizes all wildfire risks, and drivers for those risks, throughout the electrical corporation’s service territory, including all relevant wildfire risk and risk mitigation information that is part of the commission’s Safety Model Assessment Proceeding (A.15-05-002, et al.) and the Risk Assessment Mitigation Phase filings.”

Compliance with Public Utilities Code sections 8386(c)12

With respect to the CPUC's Risk Assessment Mitigation Phase (RAMP) and Safety Model and Assessment Proceedings (S-MAP), HWT is a transmission-only electrical corporation and public utility whose rates and cost recovery are regulated exclusively by FERC. As such, HWT does not utilize RAMP or S-MAP. HWT uses a failure modes and effects analysis (FMEA) methodology to assess wildfire risk, which was used to assess current processes/controls and inform wildfire mitigation measures.

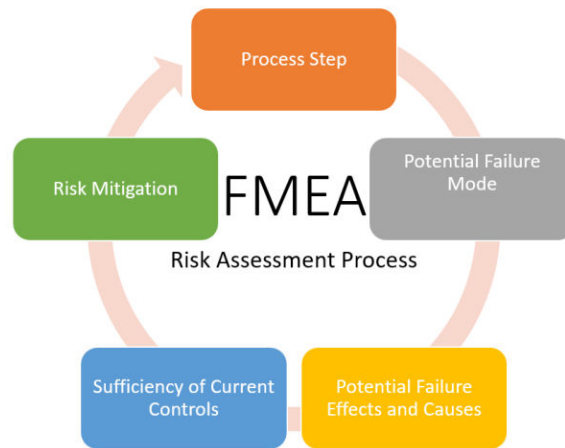
HWT's Methodology to Determine Risk

To inform appropriate wildfire hardening initiatives, HWT has conducted a comprehensive assessment of equipment using a Failure Modes and Effects Analysis (FMEA) and commissioned a third-party wildfire assessment that evaluated wildfire risk at the facility, modelled a hypothetical ignition event and associated wildfire propagation, and identified appropriate wildfire hardening improvements. The FMEA considers the potential failures from each HWT Facility component and assesses and prioritizes the potential risk, along with providing potential mitigations.

The FMEA conducted by HWT specifically focuses on identifying and mitigating wildfire risks by considering potential failure modes at the asset. Each component of the Suncrest Facility is evaluated for its potential for failure, the effects from a failure, what typically causes a failure, what controls are in place to detect and prevent failure, what actions are taken to reduce the likelihood of failure and improve early detection, and who is responsible for implementing the improvement actions. The FMEA is a risk assessment method developed by NASA to identify potential failure modes, assess and prioritize the overall risk presented by each failure mode. Risks are identified and ranked along three dimensions:

- Occurrence (likelihood of an event taking place);
- Severity (degree of impact of an event once it occurs); and
- Detection (ability to know when an event has occurred).

Figure HWT 6-1. FMEA Risk Assessment Process Cycle



This risk assessment method has become a standard and best practice in many industries, in the areas of product and process design, as well as in quality management and continuous improvement frameworks, such as Lean Six Sigma. The general process of this methodology as applied by HWT to identify and prioritize wildfire risks, drivers and mitigation measures consists of the following five steps:

- **Risk Identification:** for each major equipment component, a group of experienced subject matter experts (SMEs) brainstorm and capture all potential ways that the component could cause an ignition event (failure modes).
- **Risk Driver Identification:** for each identified failure mode, the SMEs brainstorm and capture all potential root causes (drivers).
- **Risk Prioritization:** each risk driver identified is assessed against a pre-determined scale for each of the three dimensions of Occurrence, Severity and Detection, to calculate a Risk Priority Number (RPN). The drivers are then ranked by RPN, with the higher RPNs representing the higher overall risks.
- **Risk Mitigation:** for each of the risk drivers identified, starting with the highest RPNs, the SMEs brainstorm to identify and capture cost-effective mitigation measures, and determine how to implement each measure and when.
- **Risk Assessment and Re-prioritization:** once measures have been developed, and implementation plans established for each risk driver, the RPN is recalculated and a re-ranking is done to determine the new higher priority risk drivers.

This process can be applied iteratively, which allows for further improvements and refinement of a specific plan over time. HWT is focused on continuous improvement of its wildfire strategy and thus annually refreshes the FMEA to reflect operational learnings from the field, learnings and best practices from other entities, and innovation in wildfire-related mitigation measures. As directly applied to wildfire mitigation, HWT conducts risk analysis and identification of risk drivers regarding wildfires in the context of proximity to high fire-risk areas, existence of vegetative fuels,

nature and location of its transmission assets, and the effectiveness of implemented processes, controls and mitigants.

HWT's Suncrest Facility is located in a Tier 3 (Extreme) HFTD and HWT determines ignition probability drivers through use of FMEA and a third-party wildfire mitigation assessment conduct at the start of commercial operations. HWT wildfire mitigation strategy focuses on minimizing the likelihood of utility-caused ignitions and reducing negative impact from an ignition should one occur. HWT regularly monitors for the contribution of weather to ignition probability and estimated wildfire consequence by leveraging SDG&E's Fire Potential Index (FPI) for its Suncrest Substation. SDG&E's FPI is uses a combination of weather parameters (wind speed, humidity, temperature), vegetation and fuel conditions, and other factors to judge current fire risk and to create a forecast indicative of fire risk. SDG&E's FPI and RFW alerts from National Weather Service (NWS) inform HWT's near-term operational decision-making. HWT's Operations Personnel and management get daily FPI notifications and are notified when NWS declares RFW conditions for the area of the Suncrest Facility.

HWT also utilizes its own proprietary FPI to further increase awareness of fire threat, monitor propagation of wildfires in real-time, and to help inform operations decision-making. When HWT is notified of forecasted RFW conditions, HWT's on-site personnel conduct a Wildfire Mitigation Condition Assessment of the facility ahead of RFW conditions, which includes general checks, visual inspections, general housekeeping, vegetation control, and a review of maintenance equipment. All non-critical construction and maintenance activities cease during RFW conditions and the asset is more closely monitored remotely by HWT's 24/7 Operations Center. As HWT completed undergrounding of its only span of overhead transmission line in Q3 2021, HWT foresees RFW conditions have a reduced impact on operations but those conditions will still be monitored for enhanced situational awareness. Due to the limited scale and scope of HWT's operations, HWT does not employ other additional models for ignition probability, wildfire, and public safety power shut-off (PSPS) risk.

7 WILDFIRE MITIGATION STRATEGY DEVELOPMENT

***Instructions:** In this section of the WMP, the electrical corporation must provide a high-level overview of its risk evaluation and process for deciding on a portfolio of mitigation initiatives to achieve maximum feasible²² risk reduction and that meet the goal(s) and plan objectives stated in Sections 4.1–4.2, and wildfire mitigation strategy for 2023-2025. Sections 7.1 and 7.2 below provide detailed instructions.*

HWT is an independent transmission operator (ITO) that has transmission-only assets and does not have a service territory or end-use customers. As noted on page 10 of Energy Safety’s ITO Supplement, ITOs have significantly less infrastructure than large investor-owned utilities and SMJUs and do not have service territories. Energy Safety notes that ITOs do not have to utilizing modeling to develop their wildfire mitigation strategy. However, Energy Safety states that ITOs must describe their wildfire mitigation strategy, including the process they utilize to select mitigations.

Based on the foregoing, HWT’s WMP does not include Sections 7.1 through 7.2. Instead HWT provides the following information pursuant to Energy Safety’s direction on page 10 of Energy Safety’s ITO Supplement.

As noted in Section 1, HWT’s only asset is the Suncrest Facility which completed and entered operational service in Q1 2020. Already having inherent fire-harden infrastructure, the facility received upgrades in the 2020-2023 WMP cycle to underground its only overhead line, improve situational awareness capabilities, significantly enhance seismic resiliency of its transformers and contracted firefighting resources. Given the aforementioned improvements to an as constructed fire-harden grid design and the limited scope of Suncrest’s operations, HWT has no current plans for additional improvements to the Suncrest facility in the 2023-2025 WMP Cycle. HWT will monitor the effectiveness of its currently emplaced processes, procedures, and capabilities and assess changes or enhancements as needed. Additionally HWT will implement wildfire mitigation strategies and design criteria as soon as practical to any facility that HWT constructs or acquires during the 2023-2025 WMP cycle.

HWT’s wildfire mitigation strategy and mitigation selection process remains the same from the 2020-2023 WMP cycle. The strategy focuses on minimizing the likelihood of utility-caused ignitions and reducing negative impact from an ignition should one occur. HWT’s wildfire mitigation strategy can be summarized as: (1) during the facility design phase, engaging with experienced vendors and contractors to design transmission facilities to minimize wildfire risk;

²² “Maximum feasible” means, in accordance with Public Utilities Code section 326(a)(2), capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social, and technological factors.

(2) during the construction phase, developing and implementing measures to prevent or minimize the probability of occurrence of site-specific risks and risk drivers; and (3) during the operations phase, including mitigating measures into standard operating procedures to ensure that day-to-day operations are performed in a manner that prevents or minimizes the probability of occurrence of site-specific risks and risk drivers.

HWT's approach to determining how to manage wildfire risk is informed by industry best practices, collaboration with experienced internal and external SMEs, and lessons learned through the 2020-2023 WMP cycle. Many of HWT's strategies to manage wildfire risk are similar or related to strategies it undertakes to manage overall risks related to safety and reliability. In addition, as a new transmission-only utility with one operational facility that was recently energized, HWT is continually developing its strategies, particularly as it gains operational experience. As described in detail in Section 6 of this WMP, HWT uses the FMEA process to identify and mitigate wildfire-related risks at its Suncrest Facility. Given that the Suncrest Facility is located in Tier 3 (Extreme) HFTD, HWT's general wildfire-related initiatives are primarily focused on infrastructure hardening, undergrounding, increased inspections, increased situational awareness, and operational measures such as detailed facility inspections prior to inclement weather conditions in the area of the Facility.

HWT's fire prevention performance metrics are focused on reducing the potential for on-site ignitions that may spread to off-site vegetation. This approach has proven to be successful to date, as it focuses on leading indicators and prevention of ignition events by identifying, documenting, tracking, and monitoring the anticipated ignition sources with the highest potential for resulting in flame, sparks, arcs, heated material, or similar ignition conduits. This approach also offers the ability to track compliance trends over time, correct issues as they occur, and adapt metrics as conditions mandate. There have been no reportable on-site ignition events or near misses at the Suncrest Facility since the commencement of commercial operations.

To inform appropriate wildfire hardening initiatives, HWT uses the FMEA process and support from third-party site wildfire assessments. The FMEA considers the potential failures from each HWT Facility component and assesses and prioritizes the potential risk, along with providing potential mitigations. A third-party wildfire assessment was utilized to supplement the initial FMEA and provides independent evaluation/assessment of wildfire risk at the facility and opportunities for risk mitigation. HWT utilized the combined information to target mitigation initiatives that provided meaningful impact to reducing the likelihood of utility equipment instigating a fire and the promulgation and impact of a fire if one occurred. HWT updates the FMEA annually to ensure controls and processes are functioning as intended, review potential failure modes and effects of any newly added or changed equipment, and assess new opportunities for risk reduction driven by new technologies, best practices, and experience of affiliates, among other things.

Additionally, as noted above, HWT utilizes lessons learned as it gains operational experience to inform its wildfire mitigation strategy. For example, during the first year of Suncrest's operation in 2020, at least three wildfires occurred in close proximity to the asset. The most significant was

the Valley Fire which occurred on September 5, 2020 during a NWS-declared RFW. The Valley Fire was mostly contained by September 14, but not before consuming over 17,000 acres and coming within for miles of the Suncrest Facility. The facility could have been threatened if prevailing winds had change as the fire spread. During the event, HWT's Operations Team reviewed all relevant procedures and completed the onsite Wildfire Mitigation Assessment in preparation of a potential fire event. HWT reviewed the response to the Valley Fire to record lessons learned and further enhance its systems and processes. These lessons learned provide operations personnel with improved methods for monitoring and assessing subsequent wildfire related events, such as the 2021 Road Fire.

Figure HWT 7-1. HWT's Suncrest Facility in Relation to the Valley Fire 2020

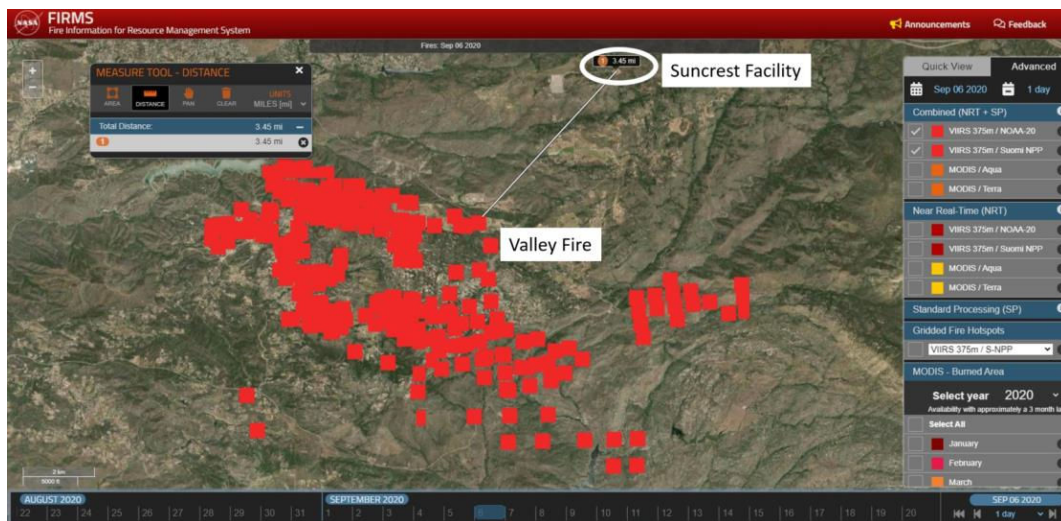
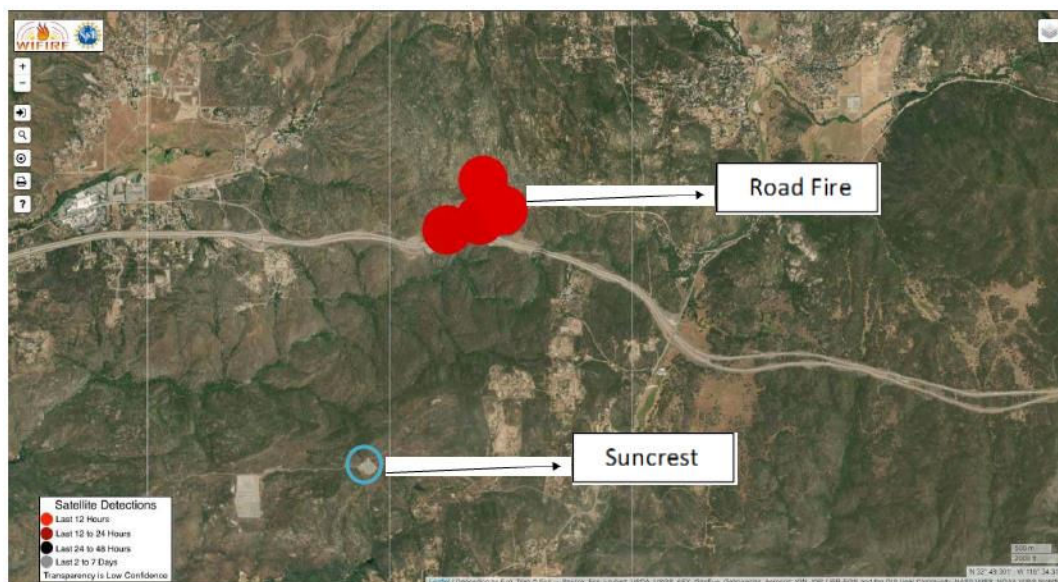


Figure HWT 7-2. Proximity of Road Fire to Suncrest Facility ©WIFIRE



HWT identified the following lessons learned from the execution of its 2020 and 2021 WMP submissions and the Valley Fire and Road Fire experiences:

- 1. Proactive asset inspections when RFW conditions are issued** – in addition to monthly inspections of the Suncrest Facility by designated Operations personnel, HWT conducts facility inspections ahead of extreme fire weather periods when NWS issues RFW for the area of the facility. Inspections are conducted by experienced and trained individuals, who document their findings and submit them to the NextEra Energy Transmission, LLC (NEET) Director of Operations and other appropriate personnel. Since CAL FIRE estimates that 90% of the acreage burned occurs from the 10% of the fires that coincide with RFW conditions, HWT will continue conducting proactive asset inspections ahead of RFW conditions to minimize the risk of ignitions at the Suncrest Facility. The inspections include general checks and measurements, visual inspections, general housekeeping, and vegetation control. As HWT completed undergrounding of its only span of overhead transmission line in Q3 2021, HWT foresees RFW conditions have a reduced impact on operations but those conditions will still be monitored for enhanced situational awareness.
- 2. Wildfire modeling capabilities and real-time wildfire tracking** –During the Valley Fire, which rapidly grew in size during RFW conditions, approached within approximately four miles of the Suncrest Facility and could have directly threatened the asset under different wind conditions, the HWT Operations team monitored the asset 24/7 through the facility's remote sensors and monitors, on-site cameras, and third-party wildfire tracking tools. To enhance HWT's situational awareness and better inform operational decision-making during extreme fire weather events, HWT developed a proprietary fire risk index to determine real-time fire risk. Additionally, HWT is working to access third-party granular real-time wildfire tracking tools that utilize satellite data to monitor and track propagation of wildfires to help evaluate proximity of fires to HWT's assets and inform appropriate operational response if a wildfire was to approach and directly threaten HWT facilities.
- 3. Additional cameras at the Suncrest Facility** – In 2021, HWT added an additional camera to enhance situational awareness at the Suncrest Facility and to observe any off-site ignitions and the propagation of surrounding wildfires to better inform real-time operational decision-making. As described above, during the Valley Fire, the HWT Operations team remotely monitored the site 24/7 and observed the propagation of the fire through its on-site camera, including propagation of smoke from the fire as seen in Figure HWT 7-3 and Figure HWT 7-4. Such real-time situational awareness at the site is invaluable to the HWT Operations team to help inform real-time operational decision making depending on the progress of a fire. As a result, HWT added another camera at the Suncrest SVC location to expand coverage of the surrounding area through remote cameras.

Figure HWT 7-3. Smoke from Valley Fire Seen from Suncrest Facility On-site Camera

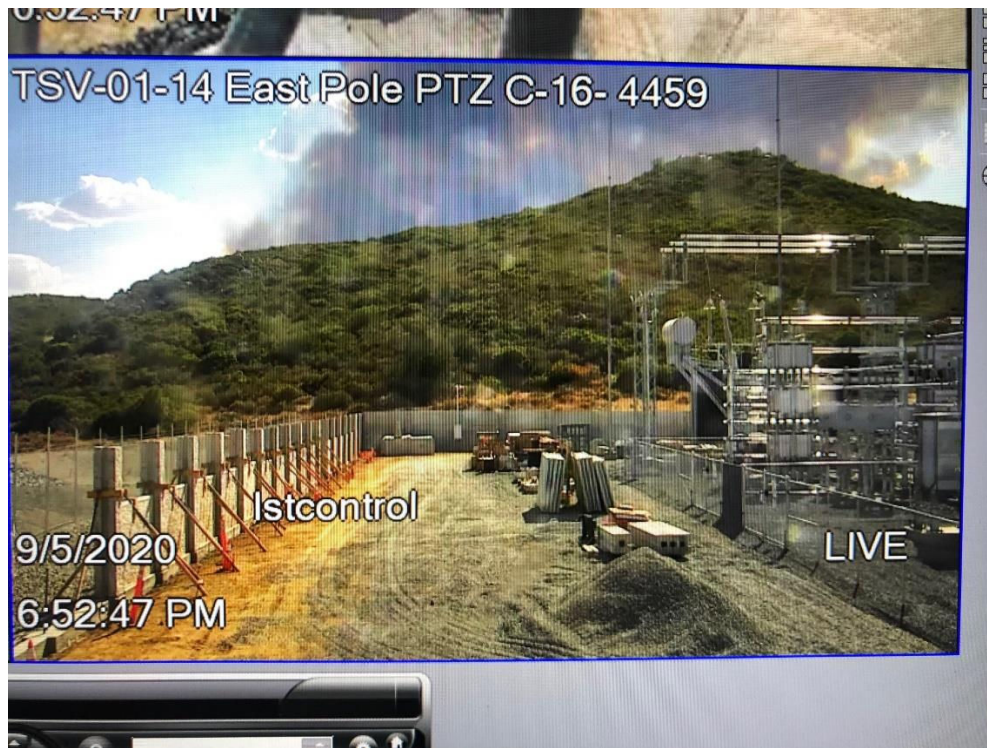
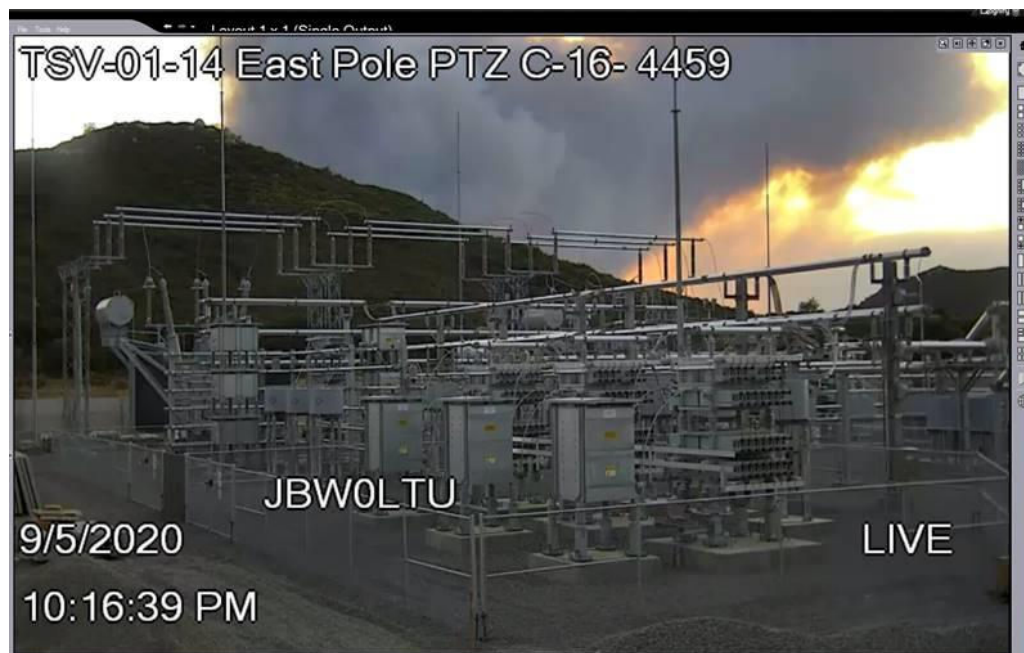


Figure HWT 7-4. Smoke from Valley Fire Seen from Suncrest Facility On-site Camera



4. **Annual wildfire simulation** – HWT added an annual wildfire simulation to its wildfire mitigation procedures to be conducted in the spring/early summer ahead of increased frequency of RFW days in late summer and fall. During the Valley Fire, HWT has responded

according to HWT's emergency operations plan as described above. To ensure that emergency operations procedures, protocols, and roles and responsibilities are top of mind for HWT's Operations and other key personnel, HWT now conducts an annual wildfire simulation at the Suncrest Facility in response to an on-site ignition event or an off-site wildfire event like the Valley Fire.

As HWT continues to gain operational experience, it expects its wildfire mitigation strategies to further mature and evolve with the industry and the wildfire threat. HWT expects to leverage new technologies in the realm of wildfire safety as they become available and as determined applicable to its facilities.

8 WILDFIRE MITIGATIONS

8.1 Grid Design, Operations, and Maintenance

8.1.1 Overview

Instructions: In this section, the electrical corporation must identify objectives for the next 3- and 10-year periods, targets, and performance metrics related to the following grid design, operations, and maintenance programmatic areas:

- *Grid design and system hardening*
- *Asset inspections*
- *Equipment maintenance and repair*
- *Asset management and inspection enterprise system(s)*
- *Quality assurance / quality control*
- *Open work orders*
- *Grid operations and procedures*
- *Workforce planning*

HWT's only asset is the Suncrest Facility which completed and entered operational service in Q1 2020. The Suncrest Facility was constructed with inherent fire-harden capabilities since it is hardscaped and surrounded by a concrete wall. The facility received upgrades in the 2020-2023 WMP cycle to underground its only overhead line, improve situational awareness capabilities, significantly enhanced seismic resiliency of its transformers and contracted firefighting resources. Given the aforementioned improvements to an as constructed fire-harden grid design and the limited scope of Suncrest's operations, HWT has no current plans for additional improvements to the Suncrest facility in the 2023-2025 WMP Cycle. HWT will monitor the effectiveness of its currently emplaced processes, procedures, and capabilities and assess changes or enhancements as needed. Additionally HWT will implement wildfire mitigation strategies and design criteria as soon as practical to any facility that HWT constructs or acquires during the 2023-2025 WMP cycle. HWT will provide an update to on new wildfire mitigation objective(s) or initiative(s) in Energy Safety required quarterly reporting, e.g. QDR, QUI, Wildfire Mitigation Data Tables Template: Tables 1 – 15. Additionally, HWT will provide a fulsome update annually update its WMP to include any new or acquired facilities along with any wildfire mitigation planning information pertaining to such new or acquired facilities.

8.1.1.1 Objectives

Instructions: Each electrical corporation must summarize the objectives for its 3-year and 10-year plans for implementing and improving its grid design, operations, and maintenance.²³ These summaries must include the following:

- Identification of which initiative(s) in the WMP the electrical corporation is implementing to achieve the stated objective, including Utility Initiative Tracking IDs
- Reference(s) to applicable codes, standards, and best practices/guidelines and an indication of whether the electrical corporation exceeds an applicable code, standard, or regulation
- Method of verifying achievement of each objective
- A target completion date
- Reference(s) to the WMP section(s) or appendix, including page numbers, where the details of the objective(s) are documented and substantiated

This information must be provided in Table 8-1 for the 3-year plan and Table 8-2 for the 10-year plan. Examples of the minimum acceptable level of information are provided below.

Table 8-1. Example of Grid Design, Operations, and Maintenance Objectives (3-year plan)

Objectives for Three Years (2023–2025)	Applicable Initiative(s), Tracking ID(s)	Applicable Regulations, Codes, Standards, and Best Practices (See Note)	Method of Verification (i.e., program)	Completion Date	Reference (section & page #)
Update all asset inspection protocols to include assessment of covered conductor condition	Distribution inspections - detailed, AI-1	GO 95, Detailed Distribution Inspection Protocol (Doc # XXXXX, version N)	Revised/ new version of protocols	February 2024	-

Note: An asterisk indicates that the electrical corporation exceeds a particular code, regulation, standard, or best practice. The electrical corporation must provide a reference to the appendix section and page providing further documentation and substantiation.

Table 8-2. Example of Grid Design, Operations, and Maintenance Objectives (10-year plan)

²³ Annual information included in this section must align with Tables 1 and 12 of the QDR.

Objectives for Ten Years (2026–2032)	Applicable Initiative(s), Tracking ID(s)	Applicable Regulations, Codes, Standards, and Best Practices (See Note)	Method of Verification (i.e., program)	Completion Date	Reference (section & page #)
Update all asset inspection protocols to include assessment of covered conductor condition	Distribution inspections - detailed, AI-1	GO 95, Detailed Distribution Inspection Protocol (Doc # XXXXX, version N)	Revised/ new version of protocols	February 2024	-

Note: An asterisk indicates that the electrical corporation exceeds a particular code, regulation, standard, or best practice. The electrical corporation must provide a reference to the appendix section and page providing further documentation, justification, and substantiation.

See HWT’s responses to Section 8.1.1. HWT has no current wildfire mitigation objectives for additional improvements to the Suncrest facility in the 2023-2025 WMP Cycle. HWT’s objective is to monitor the effectiveness of its currently emplaced processes, procedures, and capabilities and assess changes or enhancements as needed. HWT notes that it continues to conduct monthly asset inspections as part of its operations (See Section 8.1.3). Additionally HWT will implement wildfire mitigation strategies and design criteria as soon as practical to any facility that HWT constructs or acquires during the 2023-2025 WMP cycle and update Energy Safety accordingly. As a result, Table 8-1 and Table 8-2 are marked “N/A” meaning “Not Applicable”.

Table 8-1. Grid Design, Operations, and Maintenance Objectives (3-year plan)

Objectives for Three Years (2023–2025)	Applicable Initiative(s), Tracking ID(s)	Applicable Regulations, Codes, Standards, and Best Practices (See Note)	Method of Verification (i.e., program)	Completion Date	Reference (section & page #)
N/A					

Note: An asterisk indicates that the electrical corporation exceeds a particular code, regulation, standard, or best practice. The electrical corporation must provide a reference to the appendix section and page providing further documentation and substantiation.

Table 8-2. Grid Design, Operations, and Maintenance Objectives (10-year plan)

Objectives for Ten Years (2026–2032)	Applicable Initiative(s), Tracking ID(s)	Applicable Regulations, Codes, Standards, and Best Practices (See Note)	Method of Verification (i.e., program)	Completion Date	Reference (section & page #)
N/A					

Note: An asterisk indicates that the electrical corporation exceeds a particular code, regulation, standard, or best practice. The electrical corporation must provide a reference to the appendix section and page providing further documentation, justification, and substantiation.

8.1.1.2 Targets

Instructions: Initiative targets are forward-looking quantifiable measurements of activities identified by each electrical corporation in its WMP. Electrical corporations will show progress toward completing targets in subsequent reports, including QDRs and WMP Updates.

The electrical corporation must list all targets it will use to track progress on its grid design, operations, and maintenance for the three years of the Base WMP. Energy Safety’s Compliance Assurance Division and third parties must be able to track and audit each target.²⁴ For each initiative target, the electrical corporation must provide the following:

- Utility Initiative Tracking IDs.
- Projected targets for each of the three years of the Base WMP and relevant units.
- Quarterly, rolling targets for 2023 and 2024 (inspections only).
- The expected “x% risk impact” for each of the three years of the Base WMP. The expected x% risk impact is the expected percentage risk reduction per year, as described in Section 7.2.2.2.
- Method of verifying target completion.

The electrical corporation’s targets must provide enough detail to effectively inform efforts to improve the performance of the electrical corporation’s grid design, operations, and maintenance initiatives.

Table 8-3 and Table 8-4 below provide examples of the minimum acceptable level of information.

Table 8-3. Example of Grid Design, Operations, and Maintenance Targets by Year

Initiative Activity	Tracking ID	2023 Target & Unit	x% Risk Impact 2023	2024 Target & Unit	x% Risk Impact 2024	2025 Target & Unit	x% Risk Impact 2025	Method of Verification
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²⁴ Annual information included in this section must align with Table 1 of the QDR.

<i>Expulsion fuse replacement</i>	<i>GH-1</i>	<i>500 Fuses Replaced</i>	<i>20%</i>	<i>600 Fuses Replaced</i>	<i>20%</i>	<i>700 Fuses Replaced</i>	<i>20%</i>	<i>Completed work orders/ GIS Data Submission(s)</i>
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Table 8-4. Example of Asset Inspections Targets by Year

<i>Initiative Activity</i>	<i>Tracking ID</i>	<i>Target End of Q2 2023 & Unit</i>	<i>Target End of Q3 2023 & Unit</i>	<i>End of Year Target 2023 & Unit</i>	<i>x% Risk Impact 2023</i>	<i>Target End of Q2 2024 & Unit</i>	<i>Target End of Q3 2024 & Unit</i>	<i>End of Year Target 2024 & Unit</i>
<i>Discretionary patrols in HFTD</i>	<i>AI-02</i>	<i>300 circuit miles</i>	<i>500 circuit miles</i>	<i>700 circuit miles</i>	<i>3%</i>	<i>300 circuit miles inspected</i>	<i>500 circuit miles inspected</i>	<i>700 circuit miles inspected</i>

See HWT’s responses to Section 8.1.1. HWT has no current wildfire mitigation objectives for additional improvements to the Suncrest facility in the 2023-2025 WMP Cycle and therefore has no initiative targets. HWT’s objective is to monitor the effectiveness of its currently emplaced processes, procedures, and capabilities and assess changes or enhancements as needed. HWT notes that it continues to conduct monthly asset inspections as part of its operations (See Section 8.1.3). Additionally HWT will implement wildfire mitigation strategies and design criteria as soon as practical to any facility that HWT constructs or acquires during the 2023-2025 WMP cycle and update Energy Safety accordingly. As a result, Table 8-3 is noted as N/A meaning “Not Applicable” since HWT has no grid design, operations or maintenance initiatives for the 2023-2025 WMP cycle.

Table 8-3. Grid Design, Operations, and Maintenance Targets by Year

Initiative Activity	Tracking ID	2023 Target & Unit	x% Risk Impact 2023	2024 Target & Unit	x% Risk Impact 2024	2025 Target & Unit	x% Risk Impact 2025	Method of Verification
N/A								

HWT intends to continue its cadence of monthly assets inspections which is reflected in Table 8-4 below. HWT will continue conducting proactive asset inspections ahead of RFW conditions to minimize the risk of ignitions at the Suncrest Facility. However as these proactive inspections occur on an as-needed basis in response to RFW conditions specific targets cannot be calculated and therefore they are not represented in Table 8-4 below.

Table 8-4. Asset Inspections Targets by Year

Initia tive Activ ity	Trac king ID	Target End of Q2 2023 & Unit	Target End of Q3 2023 & Unit	End of Year Target 2023 & Unit	x% Risk Impa ct 2023	Target End of Q2 2024 & Unit	Target End of Q3 2024 & Unit	End of Year Target 2024 & Unit	Target End of Q2 2025 & Unit	Target End of Q3 2025 & Unit	End of Year Target 2025 & Unit	x% Risk Impac t 2025
Asset Inspe ction s	001	6 site inspect ions comple ted	9 site inspect ions comple ted	12 site inspect ions comple ted	N/A	6 site inspect ions comple ted	9 site inspect ions comple ted	12 site inspect ions comple ted	6 site inspect ions comple ted	9 site inspect ions comple ted	12 site inspec tions compl eted	N/A

8.1.1.3 Performance Metrics Identified by the Electrical Corporation

Instructions: Performance metrics indicate the extent to which an electrical corporation's Wildfire Mitigation Plan is driving performance outcomes. The electrical corporation must:

- List the performance metrics the electrical corporation uses to evaluate the effectiveness of its grid design, operations, and maintenance in reducing wildfire and PSPS risk²⁵

For each of these performance metrics listed, the electrical corporation must:

- Report the electrical corporation's performance since 2020 (if previously collected)
- Project performance for 2023-2025
- List method of verification

The electrical corporation must ensure that each metric's name and values are the same in its WMP reporting as its QDR reporting (specifically, QDR Table 2 and QDR Table 3). Metrics listed in this section that are the same as performance metrics required by Energy Safety and reported in QDR Table 2 (Performance Metrics)²⁶ must match those reported in QDR Table 2. Metrics listed in this section that are not the same as any of the performance metrics identified by Energy Safety and reported in QDR Table 2 must match those reported in QDR Table 3.

The electrical corporation must:

- Summarize its self-identified performance metrics in tabular form
- Provide a brief narrative that explains trends in the metrics

Table 8-5 provides an example of the minimum acceptable level of information.

²⁵ There may be overlap between the performance metrics the electrical corporation uses and performance metrics required by Energy Safety. The electrical corporation must list these overlapping metrics in this section in addition to any unique performance metrics it uses.

²⁶ The performance metrics identified by Energy Safety are included in Energy Safety's Data Guidelines.

Table 8-5. Example of Grid Design, Operations, and Maintenance Performance Metrics Results by Year

Performance Metrics	2020	2021	2022	2023 Projected	2024 Projected	2025 Projected	Method of Verification (e.g., third-party evaluation, QDR)
<i>Equipment-caused ignitions</i>							
<i>Equipment-caused outages</i>							
<i>Grid inspection findings</i>							
<i>Open work orders (tags)</i>							

HWT began commercial operations of the Suncrest Facility in Q1 2020. As such there is no reportable information prior to 2020. Since the start of commercial operations, HWT has had no instigation of ignition by utility equipment and no incidents of utility-equipment caused fire. HWT projects the trend of zero (0) utility-equipment instigated ignitions to continue through the 2023-2025 WMP cycle and beyond given (i) the fire-harden grid design of the Suncrest Facility, (ii) site improvements in the 2020-2023 WMP cycle, (iii) enhanced situational awareness capabilities, (iv) cadence of equipment and site inspections, and (v) limited scope of operations. The metrics cited below are the same as performance metrics required by Energy Safety and reported in QDR Table 2 and Table 3.

Table 8-5. Grid Design, Operations, and Maintenance Performance Metrics Results by Year

Performance Metrics	2020	2021	2022	2023 Projected	2024 Projected	2025 Projected	Method of Verification (e.g., third-party evaluation, QDR)
Equipment-caused ignitions	0	0	0	0	0	0	QDR reporting
Equipment-caused outages	0	0	0	0	0	0	QDR reporting
Grid inspection findings	0	0	0	0	0	0	QDR reporting
Open work orders (tags)	0	0	0	0	0	0	QDR reporting
Value of assets destroyed by utility-related	0	0	0	0	0	0	QDR reporting

ignitions, listed by asset type							
Structures damaged or destroyed by utility-related ignitions	0	0	0	0	0	0	QDR reporting
Acreage burned by utility-related ignitions	0	0	0	0	0	0	QDR reporting
Fatalities resulting from utility wildfire mitigation initiatives	0	0	0	0	0	0	QDR reporting
OSHA-reportable injuries from utility wildfire mitigation initiatives	0	0	0	0	0	0	QDR reporting
Number of reportable ignition incidents on RFW days	0	0	0	0	0	0	QDR reporting

8.1.2 Grid Design and System Hardening

Instructions: In this section the electrical corporation must discuss how it is designing its system to reduce ignition risk and what it is doing to strengthen its distribution, transmission, and substation infrastructure to reduce the risk of utility-related ignitions resulting in catastrophic wildfires.

The electrical corporation is required, at a minimum, to discuss grid design and system hardening for each of the following mitigation activities:

1. Covered conductor installation
2. Undergrounding of electric lines and/or equipment
3. Distribution pole replacements and reinforcements
4. Transmission pole/tower replacements and reinforcements
5. Traditional overhead hardening
6. Emerging grid hardening technology installations and pilots

7. *Microgrids*
8. *Installation of system automation equipment*
9. *Line removal (in the HFTD)*
10. *Other grid topology improvements to minimize risk of ignitions*
11. *Other grid topology improvements to mitigate or reduce PSPS events*
12. *Other technologies and systems not listed above*

In Sections 8.1.2.1 through 8.1.2.12, the electrical corporation must provide a narrative including the following information for each grid design and system hardening mitigation activity:

- ***Utility Initiative Tracking ID.***
- ***Overview of the activity:*** *A brief description of the activity including reference to related objectives and targets. Additionally, the overview must identify whether the activity is a program, project, pilot, or study.*
- ***Impact of the activity on wildfire risk.***
- ***Impact of the activity on PSPS risk.***
- ***Updates to the activity:*** *Changes to the initiative since the last WMP submission and a brief explanation as to why those change were made. Discuss any planned improvements or updates to the activity and the timeline for implementation.*

HWT's only asset is the Suncrest Facility which completed and entered operational service in Q1 2020. The Suncrest Facility was constructed with inherent fire-harden capabilities since it is hardscaped and surrounded by a concrete wall. The facility received upgrades in the 2020-2023 WMP cycle to underground its only overhead line, improve situational awareness capabilities, significantly enhance seismic resiliency of its transformers and contracted firefighting resources. Given the aforementioned improvements to an as-constructed fire-harden grid design and the limited scope of Suncrest's operations, HWT has no current plans for additional improvements to the Suncrest facility in the 2023-2025 WMP Cycle. HWT will monitor the effectiveness of its currently emplaced processes, procedures, and capabilities and assess changes or enhancements as needed. HWT will apply similar robust grid design and system hardening strategies that are being developed and implemented for the Suncrest Facility to any new facilities constructed or acquired, with any modifications as appropriate to take into account the specific characteristics of such new or acquired facilities. Below are images of grid design enhancement that HWT made during the 2020-2022 WMP cycle.

Figure HWT 8.1.2-1. Transformer Fire Barrier Wall



Figure HWT 8.1.2-2. Undergrounding of 0.02 mi overhead section of line



Figure HWT 8.1.2-3. Transformer Seismic Isolation Pad



Figure HWT 8.1.2-4. Suncrest SVC hardscape and perimeter wall



8.1.3 Asset Inspections

Instructions: In this section, the electrical corporation must provide an overview of its procedures for inspecting its assets.

The electrical corporation must first summarize details regarding its vegetation management inspections in Table 8-6. The table must include the following:

- **Type of inspection:** i.e., distribution, transmission, or substation
- **Inspection program name:** Identify various inspection programs within the electrical corporation

- **Frequency or trigger:** Identify the frequency or triggers, such as inputs from the risk model. Indicate differences in frequency or trigger by HTFD Tier, if applicable
- **Method of inspection:** Identify the methods used to perform the inspection (e.g., patrol, detailed, aerial, climbing, and LiDAR)
- **Governing standards and operating procedures:** Identify the regulatory requirements and the electrical corporation's procedures for addressing them

Table 8-6. Example of Asset Inspection Frequency, Method, and Criteria

Type	Inspection Program	Frequency or Trigger (Note 1)	Method of Inspection (Note 2)	Governing Standards & Operating Procedures
Transmission				
Distribution				
Substation				

Note 1: The electrical corporation must provide electrical corporation-specific risk-informed triggers used for asset inspections.

Note 2: The electrical corporation must provide electrical corporation-specific definitions of the different methods of inspection.

The electrical corporation must then provide a narrative overview of each vegetation inspection program identified in the above table; Sections 8.2.2.1. provides instructions for the overviews. The sections should be numbered 8.1.3.1 to Section 8.1.3.n (i.e., each vegetation inspection program is detailed in its own section). The electrical corporation must include inspection programs it is discontinuing or has discontinued since the last WMP submission; in these cases the electrical corporation must explain why the program is being discontinued or has been discontinued.

HWT has conducted regular monthly inspections of the Suncrest Facility in addition to extra inspections ahead of RFW conditions in the area of the Facility. HWT utilizes the same HWT Wildfire Condition Assessment Procedure to conduct its regular monthly inspections as it does for the inspections ahead of RFW conditions. HWT plans to continue its cadence of asset inspections. The inspections include general checks and measurements, visual inspections, general housekeeping, and vegetation control.

Table 8-6. Asset Inspection Frequency, Method, and Criteria

Type	Inspection Program	Frequency or Trigger (Note 1)	Method of Inspection (Note 2)	Governing Standards & Operating Procedures
Substation	Asset Inspection	<ul style="list-style-type: none"> • Routine Monthly Inspection/Assessment • Notification of expected RFW condition 	Patrol and visual inspection	HWT Wildfire Condition Assessment Procedure

8.1.3.1 [Asset Inspections Program]

Instructions:

Process

In this section, the electrical corporation must provide an overview of the individual asset inspection program, including inspection criteria and the various inspection methods used for each inspection program.

Include relevant visuals and graphics depicting the workflow and decision-making process the electrical corporation uses for the inspection program (see the example in Figure 8-1).

Frequency or Trigger

In this section, the electrical corporation must identify the frequency (including how frequency may differ by HFTD Tier or other risk designation[s]) or triggers used in the inspection program, such as inputs from the risk model.

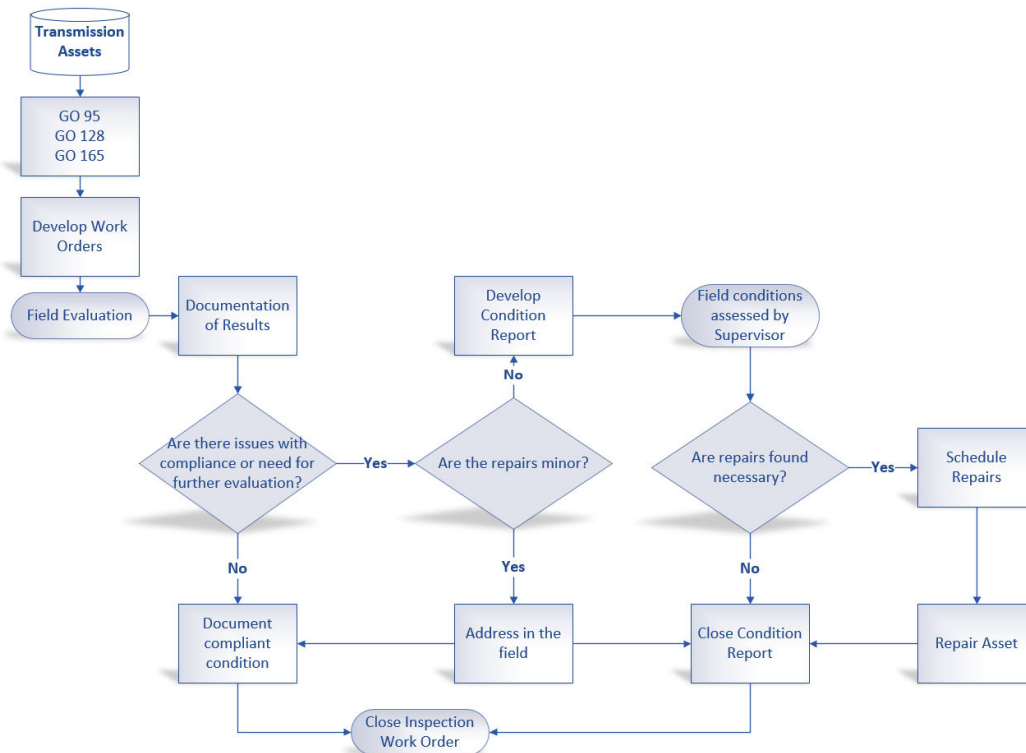
If the inspection program is schedule-based, the electrical corporation must explain how it uses risk prioritization in the scheduling of the inspection program to target high-risk areas. If the electrical corporation does not use risk prioritization in the scheduling of the inspection program, it must explain why.

Accomplishments, Roadblocks, and Updates

In this section, the electrical corporation must discuss:

- Noteworthy accomplishments for the inspection program since the last WMP submission*
- Roadblocks the electrical corporation has encountered while implementing the inspection program and how the electrical corporation has addressed the roadblocks*
- Changes/updates to the inspection program since the last WMP submission including known future plans (beyond the current year) and new/novel strategies the electrical corporation may implement in the next 5 years (e.g., references to and strategies from pilot projects and research)*

Figure 8-1. Example of Asset Management and Inspections Workflow



Process

Given its limited footprint and the size and scope of its operations, HWT’s inspection program is schedule-based. Asset management and inspections are conducted in accordance with manufacturer’s specification and applicable maintenance procedures.

Frequency or Trigger

The Suncrest Facility is HWT’s only operating asset, and it is sited in a Tier 3 HFTD. However, the Suncrest Facility is a transmission-only system with no overhead lines and no distribution elements. The Suncrest Facility is hardscaped and utilizes an underground cable which is monitored in real time. Given its limited footprint and the size and scope of its operations, HWT’s inspection program is schedule-based with additional inspections schedule in advance of real time events such as start of wildfire season, RFW days, fire event in the area, etc.

Accomplishments, Roadblocks, and Updates

As noted throughout this WMP, HWT’s operational assets are limited to the Suncrest Facility, which is a MVar SVC connected to an approximately one mile underground cable. The facility includes a substation which houses the majority of the transmission elements. The Suncrest Facility began commercial operations in Q1 2020. In view of HWT’s current limited footprint with one operational transmission asset, HWT has a small staff overseeing HWT operations, including dedicated on-site staff performing asset inspection and maintenance work, as well as remote system operators that remotely control the asset 24/7 from a North American Electric Reliability Corporation (NERC)-certified control center. All HWT maintenance work, including asset

inspections, is carried out by dedicated HWT Operations personnel and qualified contractors that, by reason of training, experience, and instruction, are qualified to perform the task.

There have been no material changes to HWT's inspection program since the last WMP submission. HWT not encountered any roadblocks in the implementation of its inspection program. There are no current plans to materially alter the inspection program. HWT will continue to monitor the effectiveness of the current inspection program as it gains operational experience and learns additional best practices.

8.1.4 Equipment Maintenance and Repair

Instructions: *In this section, in addition to the information described above regarding distribution, transmission, and substation inspections, the electrical corporation must provide a brief narrative of maintenance programs. As a narrative, the electrical corporation must include its strategy for maintenance, such as whether the electrical corporation replaces or upgrades facilities/equipment proactively (for example, an electrical corporation may monitor dissolved gases in its transformers to detect potential transformer failures to alert engineering and maintenance personnel or component lifecycle management) or if it runs its facilities/equipment to failure. The narrative must include, at minimum, the following types of equipment:*

- *Capacitors*
- *Circuit breakers*
- *Connectors, including hotline clamps*
- *Conductor, including covered conductor*
- *Fuses, including expulsion fuses*
- *Distribution poles*
- *Lightning arrestors*
- *Reclosers*
- *Splices*
- *Transmission poles/towers*
- *Transformers*
- *Other equipment not listed*

In view of HWT's current limited footprint with one operational transmission asset, HWT has a small staff overseeing HWT operations, including dedicated on-site staff performing asset inspection and maintenance work, as well as remote system operators that remotely control the asset 24/7 from a North American Electric Reliability Corporation (NERC)-certified control center. All HWT maintenance work, including asset inspections, is carried out by dedicated HWT Operations personnel and qualified contractors that, by reason of training, experience, and instruction, are qualified to perform the task. Operations personnel maintain and operate the HWT Facilities in accordance with good utility practice, sound engineering judgment, the guidelines as outlined in applicable NERC reliability standards, laws, and regulations. The HWT operations personnel take proper care to ensure the safety of personnel and the public in performing maintenance duties. Before placing facilities in service, HWT creates a suite of

customized facility-specific operations practices. Maintenance practices are approved and audited in accordance with the CAISO Transmission Maintenance Procedures (version 20th July 2017), and address the inspections, measurements, checks, tests, and analysis intended to identify any problems that may be either averted completely or can be rectified before resulting in a more serious failure to equipment or to the operation of the facility. Maintenance practices are also based on the recommendations of original equipment manufacturer and leveraged operational experience of HWT's affiliates.

8.1.5 Asset Management and Inspection Enterprise System

Instructions: In this section, the electrical corporation must provide an overview of inputs to, operation of, and support for centralized asset management and inspection enterprise system(s) updated based upon inspection results and activities such as hardening, maintenance, and remedial work. This overview must include discussion of:

- The electrical corporation's asset inventory and condition database.*
- Describe the electrical corporation's internal documentation of its database(s).*
- Integration with systems in other lines of business.*
- Integration with the auditing system(s) (see QA/QC section below).*
- Describe internal procedures for updating the enterprise system including database(s) and any planned updates.*
- Any changes to the initiative since the last WMP submission and a brief explanation as to why those changes were made. Include any planned improvements or updates to the initiative and the timeline for implementation.*

HWT's operational assets are limited to the Suncrest Facility, which is a MVar SVC connected to an approximately one mile underground cable which provides provide dynamic reactive power support to SDG&E's Suncrest Substation. The Facility includes a substation which houses the majority of the transmission elements. The substation is hardscaped and surrounded by a 10 foot concrete wall. The Suncrest Facility began commercial operations in Q1 2020. In view of HWT's current limited footprint with one operational transmission asset, HWT has a small staff overseeing HWT operations, including dedicated on-site staff performing asset inspection and maintenance work, as well as remote system operators that remotely control the asset 24/7 from a North American Electric Reliability Corporation (NERC)-certified control center. All HWT maintenance work, including asset inspections, is carried out by dedicated HWT Operations personnel and qualified contractors that, by reason of training, experience, and instruction, are qualified to perform the task. HWT Operations personnel are trained on all relevant HWT procedures, including regular monthly asset inspections (Wildfire Mitigation Condition Assessment Procedure), vegetation inspections (Wildlife and Vegetation Procedure), and emergency response (Emergency Operations Plan) which also contains HWT's PSPS protocols. Regular asset inspections enable HWT to closely monitor the health of its infrastructure and proactively identify potential issues and problems, allowing HWT to correct these issues and avoid potential equipment failure, which can contribute to a utility-caused ignition. HWT conducts monthly detailed inspections of the Suncrest Facility and utilizes a real-time cable

monitoring system to monitor the full approximately 1 mile of transmission line, all of which is underground. HWT also conducts additional asset inspections ahead of extreme weather events, such as RFW alerts. Based on the above and due to the limited scope and scale of operations, HWT currently does not employ an asset management and inspection enterprise system.

8.1.6 Quality Assurance and Quality Control System

Instructions: In this section, the electrical corporation must provide an overview of its quality assurance and quality control (QA/QC) activities for asset management and inspections. This overview must include:

- Reference to procedures documenting QA/QC activities.
- How the sample sizes are determined and how the electrical corporation ensures the samples are representative.
- Qualifications of the auditors.
- Documentation of findings and how lessons learned based on those findings are incorporated into trainings and/or procedures.
- Any changes to the initiative since the last WMP submission and a brief explanation as to why those changes were made. Include any planned improvements or updates to the initiative and the timeline for implementation.
- Tabular information that includes:
 - Sample sizes
 - Type of QA/QC performed (e.g., desktop or field)
 - Resulting pass rates, starting in 2022
 - Yearly target pass rate for the 2023-2025 WMP cycle

Table 8-7 provides an example of the appropriate level of detail.

Table 8-7. Example of Grid Design and Maintenance QA/QC Program

Activity Being Audited	Sample Size	Type of Audit	Audit Results 2022	Yearly Target Pass Rate for 2023-2025
<i>Patrol inspections</i>	<i>100% in HFTD Tier 2 and 3</i>	<i>Field</i>	<i>92%</i>	<i>95%</i>

Due to the limited scale and scope of HWT's operation, QA/QC activities are not as extensive as those utilities with large footprints..

Asset management and inspection tasks are tracked and reported as complete in HWT's asset management program. Field operations personnel review results of monthly equipment inspections. Any identified issues which need further mitigation will be discussed and addressed with the appropriate subject matter expert (SME) or the supervisor as required. Issues are documented and monitored by entering corresponding work tasks in the database. To ensure the procedures and processes are being followed, HWT has added a task item to formalize the

process of its field engineers to annually conducting a QA/QC review of at least one month's inspections report, that they did not originate, to confirm accuracy in completion in accordance with HWT's applicable operations procedures.

This review also to ensures sustainment of efforts to identify any potential sources of ignition and near misses. HWT has been conducting regular monthly inspections of the Suncrest Facility in addition to extra inspections ahead of RFW conditions in the area of the Facility. As HWT completed undergrounding of its only span of overhead transmission line in Q3 2021, HWT foresees RFW conditions have a reduced impact on operations but those conditions will still be monitored for enhanced situational awareness. HWT plans to continue its cadence of periodic asset inspections. As HWT gains more operational experience, it will evaluate making appropriate changes to its asset management and inspections procedures, including QA / QC processes. As a result Table 8-7 is marked "N/A" meaning "Not Applicable".

Table 8-7. Grid Design and Maintenance QA/QC Program

Activity Being Audited	Sample Size	Type of Audit	Audit Results 2022	Yearly Target Pass Rate for 2023-2025
N/A				

8.1.7 Open Work Orders

Instructions: In this section, the electrical corporation must provide an overview of the procedures it uses to manage its open work orders resulting from inspections that prescribe asset management activities. This overview must include a brief narrative that provides:

- Reference to procedures documenting the work order process. The electrical corporation must provide a summary of these procedures or provide a copy in the supporting documents location on its website.
- A description of how work orders are prioritized based on risk.
- A description of the plan for eliminating any backlog of work orders (i.e., open work orders that have passed remediation deadlines), if applicable.
- A discussion of trends with respect to open work orders.

In addition, each electrical corporation must:

- Graph open work orders over time as reported in the QDRs (Table 2, metrics 8.a and 8.b).
- Provide an aging report for work orders past due (Table 8-8 provides an example).

Table 8-8: Example of Number of Past Due Asset Work Orders Categorized by Age

HTFD Area	0-30 Days	31-90 Days	91-180 Days	181+ Days
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Non-HFTD				
HFTD Tier 2				
HFTD Tier 3				

Due to the limited scale and scope of HWT's operation, work orders are addressed with HWT's operations teams through the course of scheduled periodic maintenance inspections and activities. HWT has no past due asset work orders. In Table 8-8 "N/A" means "Not Applicable" as HWT has no assets in Non-HFTD or HFTD Tier 2 areas.

Table 8-8. Number of Past Due Asset Work Orders Categorized by Age

HFTD Area	0-30 Days	31-90 Days	91-180 Days	181+ Days
Non-HFTD	N/A	N/A	N/A	N/A
HFTD Tier 2	N/A	N/A	N/A	N/A
HFTD Tier 3	0	0	0	0

8.1.8 Grid Operations and Procedures

8.1.8.1 Equipment Settings to Reduce Wildfire Risk

Instructions: In this section, the electrical corporation must discuss the ways in which it operates its system to reduce wildfire risk. The equipment settings discussion must include the following:

- Protective equipment and device settings
- Automatic recloser settings
- Settings of other emerging technologies (e.g., rapid earth fault current limiters)

For each of the above, the electrical corporation must provide a narrative on the following:

- Settings to reduce wildfire risk
- Analysis of reliability/safety impacts for settings the electrical corporation uses
- Criteria for when the electrical corporation enables the settings
- Operational procedures for when the settings are enabled
- The number of circuit miles capable of these settings
- An estimate of the effectiveness of the settings

HWT's Suncrest Facility is MVar SVC facility with a rated real power output of 0 MW, and nominal terminal voltage of 230 kV, and approximately one mile underground 230 kV single-circuit transmission line, that collectively provides dynamic reactive power support at the

SDG&E's Suncrest Substation. The Suncrest Facility does not utilize equipment settings that are designed to reduce wildfire risk. The facility does not have any overhead lines, utilize recloser, or include any distribution assets.

8.1.8.2 Grid Response Procedures and Notifications

***Instructions:** The electrical corporation must provide a narrative on operational procedures it uses to respond to faults, ignitions, or other issues detected on its grid that may result in a wildfire including, at a minimum, how the electrical corporation:*

- *Locates the issues*
- *Prioritizes the issues*
- *Notifies relevant personnel and suppression resources to respond to issues*
- *Minimizes/optimizes response times to issues*

HWT's Suncrest Facility is MVar SVC facility with a rated real power output of 0 MW, and nominal terminal voltage of 230 kV, and approximately one mile undergrounded 230 kV single-circuit transmission line, that collectively provides dynamic reactive power support at the SDG&E's Suncrest Substation. As such the facility operations are limited in size, scale and footprint. HWT's facilities are remotely operated and monitored 24/7 from its affiliate Lone Star Transmission (Lone Star), LLC's NERC-certified control center located in Austin, Texas. Graphic displays and alarm processing ensure HWT transmission system operators have real-time situational awareness. Support personnel perform checks of the applications and hardware to ensure they are in proper working order. Any site anomalies are communicated to local personnel and Director of Operations, who will manage and undertake site corrective actions. HWT Operations personnel are trained on all relevant HWT procedures, including regular monthly asset inspections (Wildfire Mitigation Condition Assessment Procedure), vegetation inspections (Wildlife and Vegetation Procedure), and emergency response (Emergency Operations Plan) which also contains HWT's PSPS protocols. The Emergency Operations Plan is discussed in detail in Section 8.4.2.1.

8.1.8.3 Personnel Work Procedures and Training in Conditions of Elevated Fire Risk

***Instructions:** The electrical corporation must provide a narrative on the following:*

- *The electrical corporation's procedures that designate what type of work the electrical corporation allows (or does not allow) personnel to perform during operating conditions of different levels of wildfire risk, including:*
 - *What the electrical corporation allows (or does not allow) during each level of risk*
 - *How the electrical corporation defines each level of wildfire risk*
 - *How the electrical corporation trains its personnel on those procedures*
 - *How it notifies personnel when conditions change, warranting implementation of those procedures*
- *The electrical corporation's procedures regarding deployment of firefighting staff and equipment (e.g., fire suppression engines, hoses, water tenders, etc.) to worksites for site-specific fire prevention and ignition mitigation during on-site work*

HWT Operations personnel are trained on all relevant HWT procedures, including regular monthly asset inspections (Wildfire Mitigation Condition Assessment Procedure), vegetation inspections (Wildlife and Vegetation Procedure), and emergency response (Emergency Operations Plan). HWT contracted a private fire brigade to be on site during construction activities and facilitate daily safety briefings, including discussion of weather conditions and fire safety. This fire brigade is currently contracted to provide firefighting services to the Suncrest Facility in the event of a fire and has access to HWT's class B foam firefighting trailer and water tank.

In addition to monthly inspections of the Suncrest Facility by designated Operations personnel, HWT conducts facility inspections ahead of extreme fire weather periods when the National Weather Service issues Red Flag Warnings for the area of the facility. Inspections are conducted by experienced and trained individuals, who document their findings and submit them to the NextEra Energy Transmission, LLC (NEET) Director of Operations and other appropriate personnel. Since CAL FIRE estimates that 90% of the acreage burned occurs from the 10% of the fires that coincide with RFW conditions, HWT will continue conducting proactive asset inspections ahead of RFW conditions to minimize the risk of ignitions at the Suncrest Facility. The inspections include general check and measurements, visual inspections, general housekeeping, and vegetation control. As HWT completed undergrounding of its only span of overhead transmission line in Q3 2021, HWT foresees RFW conditions have a reduced impact on operations but those conditions will still be monitored for enhanced situational awareness.

8.1.9 Workforce Planning

Instructions: In this section, the electrical corporation must report on qualifications and training practices regarding wildfire and PSPS mitigation for workers in the following target roles:

- *Asset inspections.*
- *Grid hardening.*
- *Risk event inspection.*

For each of the target roles listed above, the electrical corporation must:

- *List all worker titles relevant to the target role.*
- *For each worker title, list and explain minimum qualifications, with an emphasis on qualifications relevant to wildfire and PSPS mitigation. Note if the job requirements include:*
 - *Going beyond a basic knowledge of GO 95 requirements to perform relevant types of inspections or activities.*
 - *Being a "Qualified Electrical Worker" (QEW). If so, define what is required by the electrical corporation for it to consider a worker to be a QEW in terms of certifications, qualifications, experience, etc.*
- *Report the percentage of electrical corporation and contractor full-time employees (FTEs) in the target role, with specific job titles.*

- Report plans to improve qualifications of workers relevant to wildfire and PSPS mitigation work. The electrical corporation must explain how it is developing training programs that teach electrical workers to identify hazards that could ignite wildfires.

Table 8-9, Table 8-10, and Table 8-11 are examples of the required information.

Table 8-9. Example of Workforce Planning, Asset Inspections

Worker Title	Minimum Qualifications for Target Role	Special Certification Requirements	Electrical Corporation % FTE Min Quals	Electrical Corporation % Special Certifications	Contractor % FTE Min Quals	Contractor % Special Certifications	Reference to Electrical Corporation Training/Qualification Programs
Transmission Lineman	<ul style="list-style-type: none"> • Journeyman Lineman having completed an accredited apprenticeship program • IBEW Journeyman Lineman status in good standing • Class A California driver's license 	<ul style="list-style-type: none"> • QEWS, Overhead and/or Underground Inspection Training 	x%	x%	x%	x%	
Thermographer	<ul style="list-style-type: none"> • Part 107 drone license or must obtain within first year • Level I Infrared Certification or must obtain within first year 	<ul style="list-style-type: none"> • QEWS or Electrician 	x%	x%	x%	x%	

Table 8-10. Example of Workforce Planning, Grid Hardening

Worker Title	Minimum Qualifications for Target Role	Special Certification Requirements	Electrical Corporation % FTE Min Quals	Electrical Corporation % Special Certifications	Contractor % FTE Min Quals	Contractor % Special Certifications	Reference to Electrical Corporation Training/Qualification Programs
Apprentice Lineman	<ul style="list-style-type: none"> • Nine months' experience as Line Assistant • Valid California driver's license • Must have held previous position 	<ul style="list-style-type: none"> • None 	x%	NA	x%	NA	

	<i>for at least nine months</i>						
<i>Electric Troubleshooter</i>	<ul style="list-style-type: none"> • Complete seven-week Relief Trouble Shooter (RETS) class and pass written and practical exams 	<ul style="list-style-type: none"> • Journeyman Lineman 	x%	x%	x%	x%	RETS Training

Table 8-11. Example of Workforce Planning, Risk Event Inspection

Worker Title	Minimum Qualifications for Target Role	Special Certification Requirements	Electrical Corporation % FTE Min Quals	Electrical Corporation % Special Certifications	Contractor % FTE Min Quals	Contractor % Special Certifications	Reference to Electrical Corporation Training/Qualification Programs
<i>Troubleshooter</i>	<ul style="list-style-type: none"> • Journeyman Lineman who completed an accredited apprenticeship program • IBEW Journeyman Lineman status in good standing • Complete seven-week RETS class and pass the associated written and practical exams 	<ul style="list-style-type: none"> • QEW 	x%	x%	x%	x%	RETS Training

The Suncrest Facility is a MVar SVC connected to an approximately one mile undergrounded 230 kV single-circuit transmission line. In view of HWT's current limited footprint with one operational transmission asset, HWT has a small staff overseeing HWT operations, including dedicated on-site staff performing asset inspection and maintenance work, as well as remote system operators that remotely control the asset 24/7 from a North American Electric Reliability Corporation (NERC)-certified control center. All maintenance work at Suncrest, including asset inspections, is carried out by dedicated HWT Operations personnel and qualified contractors that, by reason of training, experience, and instruction, are qualified to perform the task. Operations personnel maintain and operate the HWT Facilities in accordance with good utility practice, sound engineering judgment, the guidelines as outlined in applicable NERC reliability standards, laws, and regulations. The HWT operations personnel take proper care to ensure the safety of personnel and the public in performing maintenance duties.

Given HWT’s limited scope, HWT currently is not planning to hire and onboard new electric workers in the near-term. As HWT gains operational experience and grows its presence in California through addition of new transmission facilities, HWT will continue to evaluate the size of its workforce in California and expand that workforce as needed. Further, HWT engages qualified contractors for vegetation management projects and grid hardening.

Table 8-9. Workforce Planning, Asset Inspections

Worker Title	Minimum Qualifications for Target Role	Special Certification Requirements	Electrical Corporation % FTE Min Quals	Electrical Corporation % Special Certifications	Contractor % FTE Min Quals	Contractor % Special Certifications	Reference to Electrical Corporation Training/Qualification Programs
Operations Engineer	• Bachelor’s Degree in Engineering	• None	100%	100%	N/A%	N/A%	

Table 8-10. Workforce Planning, Grid Hardening

Worker Title	Minimum Qualifications for Target Role	Special Certification Requirements	Electrical Corporation % FTE Min Quals	Electrical Corporation % Special Certifications	Contractor % FTE Min Quals	Contractor % Special Certifications	Reference to Electrical Corporation Training/Qualification Programs
Operations Engineer	• Bachelor’s Degree in Engineering	• None	100%	100%	N/A%	N/A%	

Table 8-11. Workforce Planning, Risk Event Inspection

Worker Title	Minimum Qualifications for Target Role	Special Certification Requirements	Electrical Corporation % FTE Min Quals	Electrical Corporation % Special Certifications	Contractor % FTE Min Quals	Contractor % Special Certifications	Reference to Electrical Corporation Training/Qualification Programs
Operations Engineer	• Bachelor’s Degree in Engineering	• None	100%	100%	N/A%	N/A%	

8.2 Vegetation Management and Inspections

8.2.1 Overview

Instructions: In accordance with Public Utilities Code section 8386(c)(9), each electrical corporation's WMP must include plans for vegetation management.

In this section, the electrical corporation must identify objectives for the next 3- and 10-year periods, targets, and performance metrics related to the following vegetation management programmatic areas:

- Vegetation inspections
- Vegetation and fuels management
- Vegetation management enterprise system
- Environmental compliance and permitting
- Quality assurance / quality control
- Open work orders
- Workforce planning

8.2.1.1 Objectives

Instructions: Each electrical corporation must summarize the objectives for its 3-year and 10-year plans for implementing and improving its vegetation management and inspections.²⁷ These summaries must include the following:

- Identification of which initiative(s) in the WMP the electrical corporation is implementing to achieve the stated objective, including Utility Initiative Tracking IDs
- Reference(s) to applicable codes, standards, and best practices/guidelines and an indication of whether the electrical corporation exceeds an applicable code, standard, or regulation
- Method of verifying achievement of each objective
- A completion date for when the electrical corporation will achieve the objective
- Reference(s) to the WMP section(s) or appendix, including page numbers, where the details of the objective(s) are documented and substantiated
- Reference(s) to the WMP section(s) or appendix, including page numbers, where the details of the objective(s) are documented and substantiated

This information must be provided in Table 8-12 for the 3-year plan and Table 8-13 for the 10-year plan. Examples of the minimum acceptable level of information are provided below.

²⁷ Annual information included in this section must align with the QDR data.

Table 8-12. Example of Vegetation Management Implementation Objectives (3-year plan)

Objectives for Three Years (2023–2025)	Applicable Initiative(s), Tracking ID(s)	Applicable Regulations, Codes, Standards, and Best Practices (See Note)	Method of Verification (i.e., program)	Completion Date	Reference (section & page #)
Complete effectiveness of enhanced clearances study	Vegetation Clearances (VM-2)	GO 95, Rule 35, Tree Trimming Guidance	WMP reporting, report from 3rd party project manager	December 2025	

Note: An asterisk indicates that the electrical corporation exceeds a particular code, regulation, standard, or best practice. The electrical corporation must provide a reference to the appendix section and page providing further documentation, justification, and substantiation.

Table 8-13. Example of Vegetation Management Implementation Objectives (10-year plan)

Objectives for Three Years (2026–2032)	Applicable Initiative(s), Tracking ID(s)	Applicable Regulations, Codes, Standards, and Best Practices (See Note)	Method of Verification (i.e., program)	Completion Date	Reference (section & page #)
Optimize vegetation inspection cycles based on risk mitigation efficacy	All VM inspections (VM-3, VM-4, VM-5)	GO 95, Rule 35, Inspection Protocols for Vegetation in HFTD (Doc # XXXXX, version N)	Revised/updated vegetation inspection protocol with revised inspection schedule to account for risk analysis	2028	

Note: An asterisk indicates that the electrical corporation exceeds a particular code, regulation, standard, or best practice. The electrical corporation must provide a reference to the appendix section and page providing further documentation, justification, and substantiation.

HWT's only asset is the Suncrest Facility which completed and entered operational service in Q1 2020. The facility was designed to incorporate robust wildfire hardening measures to prevent ignitions, including inspected and maintained fuel management setbacks, non-combustible and ignition resistant equipment materials, both of which work to minimize fire effects on the facility and the likelihood that a facility fire would burn off-site into vegetation. The tactics for vegetation management included vegetation removal during grading within the fenced area and maintained throughout operations by placement of rock and treatments with herbicide, as necessary. HWT's vegetation management program consists of monitoring a defensible space outside the facility's

10 foot concrete walls, general weed abatement, and erosion control (See Section 8.2.2). Inspections at the station for vegetation encroachment are part of operations monthly assessments. General weed abatement, perimeter fuel modification areas are treated by removal of the highest flammability plants and maintenance in a thinned, low fuel condition are undertaken by a contracted third-party. Given the foregoing, HWT has no current plans for changes to its vegetation management program to the Suncrest facility in the 2023-2025 WMP Cycle. HWT will monitor the effectiveness of its currently emplaced processes, procedures, and capabilities and assess changes or enhancements as needed. Table 8-12 reflects the currently contracted weed abatement and defensible space management works.

Table 8-12. Vegetation Management Implementation Objectives (3-year plan)

Objectives for Three Years (2023–2025)	Applicable Initiative(s), Tracking ID(s)	Applicable Regulations, Codes, Standards, and Best Practices (See Note)	Method of Verification (i.e., program)	Completion Date	Reference (section & page #)
Vegetation Management	002		QDR	Q4 2025	8.2.1.1, pg. 94

Note: An asterisk indicates that the electrical corporation exceeds a particular code, regulation, standard, or best practice. The electrical corporation must provide a reference to the appendix section and page providing further documentation, justification, and substantiation.

HWT currently does not have any vegetation management implementation objectives beyond 2025 as such Table 8-13 is marked N/A meaning “Not Applicable”.

Table 8-13. Vegetation Management Implementation Objectives (10-year plan)

Objectives for Three Years (2026–2032)	Applicable Initiative(s), Tracking ID(s)	Applicable Regulations, Codes, Standards, and Best Practices (See Note)	Method of Verification (i.e., program)	Completion Date	Reference (section & page #)
N/A					

8.2.1.2 Targets

***Instructions:** Initiative targets are forward-looking quantifiable measurements of activities identified by each electrical corporation in its WMP. Electrical corporations will show progress toward completing targets in subsequent reports, including QDRs and WMP Updates.*

The electrical corporation must list all targets it will use to track progress on its vegetation management and inspections for the three years of the Base WMP. Energy Safety's Compliance Assurance Division and third parties must be able to track and audit each target.²⁸ For each initiative target, the electrical corporation must provide the following:

- Utility Initiative Tracking IDs.
- Projected targets for each of the three years of the Base WMP and relevant units.
- Quarterly, rolling targets for 2023 and 2024 (inspections only).
- The expected "x% risk impact" For each of the three years of the Base WMP. The expected x% risk impact is the expected percentage risk reduction per year, as described in Section 7.2.2.2.
- Method of verifying target completion.

The electrical corporation's targets must provide enough detail to effectively inform efforts to improve the performance (i.e., reduction in ignition probability or wildfire consequence) of the electrical corporation's vegetation management and inspections initiatives.

Table 8-14 and Table 8-15 provide examples of the minimum acceptable level of information.

Table 8-14. Example of Vegetation Management Initiative Targets by Year

Initiative Activity	Tracking ID	2023 Target & Unit	x% Risk Impact 2023	2024 Target & Unit	x% Risk Impact 2024	2025 Target & Unit	x% Risk Impact 2025	Method of Verification
Fuels management – Pole clearing beyond PRC 4292	VM-08	300 Poles brushed in non-SRA HFTD Tier 3 areas	1%	300 Poles brushed in non-SRA HFTD Tier 3 areas	1.2%	350 Poles brushed in non-SRA HFTD Tier 3 areas	1.2%	Work verification system, completed work orders, yearly internal audit, GIS Data Submission(s)

Table 8-15. Example of Vegetation Inspections Targets by Year

Initiative Activity	Tracking ID	Target End of Q2 2023 & Unit	Target End of Q3 2023 & Unit	End of Year Target 2023 & Unit	x% Risk Impact 2023	Target End of Q2 2024 & Unit	Target End of Q3 2024 & Unit	End of Year Target 2024 & Unit	x% Risk Impact 2024	Target 2025 & Unit	x% Risk Impact 2025	Method of Verification
Hazard tree inspections	VM-04	100 circuit miles inspected	130 circuit miles inspected	200 circuit miles inspected	3%	90 circuit miles inspected	120 circuit miles inspected	180 circuit miles inspected	2.6%	400 circuit miles inspected	3%	Inspection records, billing receipts, GIS Data

²⁸ Annual information included in this section must align with Table 1 of the QDR.

HWT's primary vegetation management activity consists of weed control which occurs bimonthly during winter and spring, and quarterly during summer and fall (See Section 8.2.2). Additional weed control activity may occur at the direction of HWT's operations personnel if needed based upon assessment after monthly asset inspections. HWT will monitor the effectiveness of its currently emplaced processes, procedures, and capabilities and assess changes or enhancements as needed. Table 8-14 reflects the 6 total weed abatement activities which occur bimonthly during winter and spring, and quarterly during summer and fall. HWT does not calculate percentage risk impact from this activity and therefore the input is reflected a N/A meaning "Not Applicable" in Table 8-14 below.

Table 8-14. Vegetation Management Initiative Targets by Year

Initiative Activity	Tracking ID	2023 Target & Unit	x% Risk Impact 2023	2024 Target & Unit	x% Risk Impact 2024	2025 Target & Unit	x% Risk Impact 2025	Method of Verification
Vegetation Management	002	6 site/area weed abatements	N/A	6 site/area weed abatements	N/A	6 site/area weed abatements	N/A	Completed work orders, QDR

HWT's operations staff conducts monthly vegetation inspections alongside the monthly asset inspections. The contracted vegetation management vendor conducts vegetation inspections in conjunction with weed abatement activities which occur bimonthly during winter and spring, and quarterly during summer and fall. Table 8-15 reflects HWT's internal vegetation inspections and those conducted by the vegetation management vendor. HWT does not calculate percentage risk impact from this activity and therefore the input is reflected a N/A meaning "Not Applicable" in Table 8-15 below.

Table 8-15. Vegetation Inspections Targets by Year

Initiative Activity	Tracking ID	Target End of Q2 2023 & Unit	Target End of Q3 2023 & Unit	End of Year Target 2023 & Unit	x% Risk Impact 2023	Target End of Q2 2024 & Unit	Target End of Q3 2024 & Unit	End of Year Target 2024 & Unit	x% Risk Impact 2024	Target End of Q2 2025 & Unit	Target End of Q3 2025 & Unit	End of Year Target 2025 & Unit	x% Risk Impact 2025	Method of Verification
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Vegetation Management	002	3	4	6 inspections	N/A	3	4	6 inspections	N/A	3	4	6 inspections	N/A	QDR
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8.2.1.3 Performance Metrics Identified by the Electrical Corporation

Instructions: Performance metrics indicate the extent to which an electrical corporation's Wildfire Mitigation Plan is driving performance outcomes. The electrical corporation must:

- List the performance metrics the electrical corporation uses to evaluate the effectiveness of its vegetation management and inspections in reducing wildfire and PSPS risk²⁹

For each of these performance metrics listed, the electrical corporation must:

- Report the electrical corporation's performance since 2020 (if previously collected)
- Project performance for 2023-2025
- List method of verification

The electrical corporation must ensure that each metric's name and values are the same in its WMP reporting as its QDR reporting (specifically, QDR Table 2 and QDR Table 3). Metrics listed in this section that are the same as performance metrics required by Energy Safety and reported in QDR Table 2 (Performance Metrics)³⁰ must match those reported in QDR Table 2. Metrics listed in this section that are not the same as any of the performance metrics identified by Energy Safety and reported in QDR Table 2 must match those reported in QDR Table 3.

The electrical corporation must:

- Summarize its self-identified performance metric(s) in tabular form
- Provide a brief narrative that explains trends in the metrics

Table 8-16 provide are examples of the minimum acceptable level of information. The electrical corporation must provide a brief narrative that explains its trends.

Table 8-16. Example of Vegetation Management and Inspection Performance Metrics Results by Year

Performance Metrics	2020	2021	2022	2023 Projected	2024 Projected	2025 Projected	Method of Verification (e.g., third-party evaluation, QDR)

²⁹ There may be overlap between the performance metrics the electrical corporation uses and performance metrics required by Energy Safety. The electrical corporation must list these overlapping metrics in this section in addition to any unique performance metrics it uses.

³⁰ The performance metrics identified by Energy Safety are included in Energy Safety's Data Guidelines.

<i>Vegetation-caused ignitions</i>							
<i>Vegetation-caused outages</i>							
<i>Open vegetation work orders</i>							

HWT began commercial operations of the Suncrest Facility in Q1 2020. As such there is no reportable information prior to 2020. Since the start of commercial operations, HWT has had no instigation of ignition by utility equipment and no incidents of utility-equipment caused fire. HWT projects the trend of zero (0) utility-equipment instigated ignitions to continue through the 2023-2025 WMP cycle and beyond given (i) the fire-harden grid design of the Suncrest Facility, (ii) site improvements in the 2020-2023 WMP cycle, (iii) enhanced situational awareness capabilities, (iv) cadence of equipment and site inspections, and (v) limited scope of operations. The metrics cited below are the same as performance metrics required by Energy Safety and reported in QDR Table 2 and Table 3.

Table 8-16. Vegetation Management and Inspection Performance Metrics Results by Year

Performance Metrics	2020	2021	2022	2023 Projected	2024 Projected	2025 Projected	Method of Verification (e.g., third-party evaluation, QDR)
Vegetation-caused ignitions	0	0	0	0	0	0	QDR
Vegetation-caused outages	0	0	0	0	0	0	QDR
Open vegetation work orders	0	0	0	0	0	0	QDR
Number of reportable	0	0	0	0	0	0	QDR

ignition incidents on RFW days							
Value of assets destroyed by utility-related ignitions, listed by asset type	0	0	0	0	0	0	QDR
Structures damaged or destroyed by utility-related ignitions	0	0	0	0	0	0	QDR
Acreage burned by utility-related ignitions	0	0	0	0	0	0	QDR
Fatalities resulting from utility wildfire mitigation initiatives	0	0	0	0	0	0	QDR
Number of utility-related ignitions	0	0	0	0	0	0	QDR
OSHA-reportable injuries from utility wildfire mitigation initiatives	0	0	0	0	0	0	QDR

8.2.2 Vegetation Management Inspections

Instructions: In this section, the electrical corporation must provide an overview of its procedures for vegetation management inspections.

The electrical corporation must first summarize details regarding its vegetation management inspections in Table 8-17. The table must include the following:

- **Type of inspection:** distribution, transmission, substation, etc.
- **Inspection program name:** Identify various inspection programs within the electrical corporation (e.g., routine, enhanced vegetation, high-risk species, and off-cycle)
- **Frequency or trigger:** Identify the frequency or triggers, such as inputs from the risk model. Indicate differences in frequency or trigger by HTFD Tier, if applicable
- **Method of inspection:** Identify the methods used to perform the inspection (e.g., patrol, detailed, sounding or root examination, aerial, and LiDAR)
- **Governing standards and operating procedures:** Identify the regulatory requirements and the electrical corporation's procedures for addressing them

Table 8-17. Example of Vegetation Management Inspection Frequency, Method, and Criteria

Type	Inspection Program	Frequency or Trigger (Note 1)	Method of Inspection (Note 2)	Governing Standards & Operating Procedures
<i>Transmission</i>				
<i>Distribution</i>				
<i>Substation</i>				

Note 1: The electrical corporation must provide electrical corporation-specific risk-informed triggers used for vegetation managements.

Note 2: The electrical corporation must provide electrical corporation-specific definitions of the different methods of inspection.

The electrical corporation must then provide a narrative overview of each vegetation inspection program identified in the above table; Sections 8.2.2.1. provides instructions for the overviews. The sections should be numbered 8.2.2.1 to Section 8.2.2.n (i.e., each vegetation inspection program is detailed in its own section). The electrical corporation must include inspection programs it is discontinuing or has discontinued since the last WMP submission; in these cases, the electrical corporation must explain why the program is being discontinued or has been discontinued.

HWT's primary vegetation management activity consists of weed control which occurs bimonthly during winter and spring and quarterly during summer and fall. Perimeter fuel modification areas will be treated by removal of the highest flammability plants and maintenance in a thinned, low fuel condition. Additional weed control activity may occur at the direction of HWT's operations personnel if needed based upon assessment after monthly asset inspections. HWT will monitor the effectiveness of its currently emplaced processes, procedures, and capabilities and assess changes or enhancements as needed.

Table 8-17. Vegetation Management Inspection Frequency, Method, and Criteria

Type	Inspection Program	Frequency or Trigger (Note 1)	Method of Inspection (Note 2)	Governing Standards & Operating Procedures
Substation	Wildlife and Vegetation Inspection	Monthly	Visual	Wildlife and Vegetation Procedure (HWT-42-01-21-A)
Substation	Weed Control	Bimonthly winter/Spring Quarterly summer/fall	Patrol/Detailed	Per third party contract

8.2.2.1 [Vegetation Management Inspections Program]

Instructions:

Process

In this section, the electrical corporation must provide an overview of the individual vegetation inspection program, including inspection criteria and the various inspection methods used for each inspection program.

Include relevant visuals and graphics depicting the workflow and decision-making process the electrical corporation uses for the inspection program (see the example in Figure 8-2).

Frequency or Triggers

In this section, the electrical corporation must identify the frequency or triggers used in the inspection program, such as inputs from the risk model. It must also identify how the frequency or trigger might differ by HFTD Tier or other risk designation.

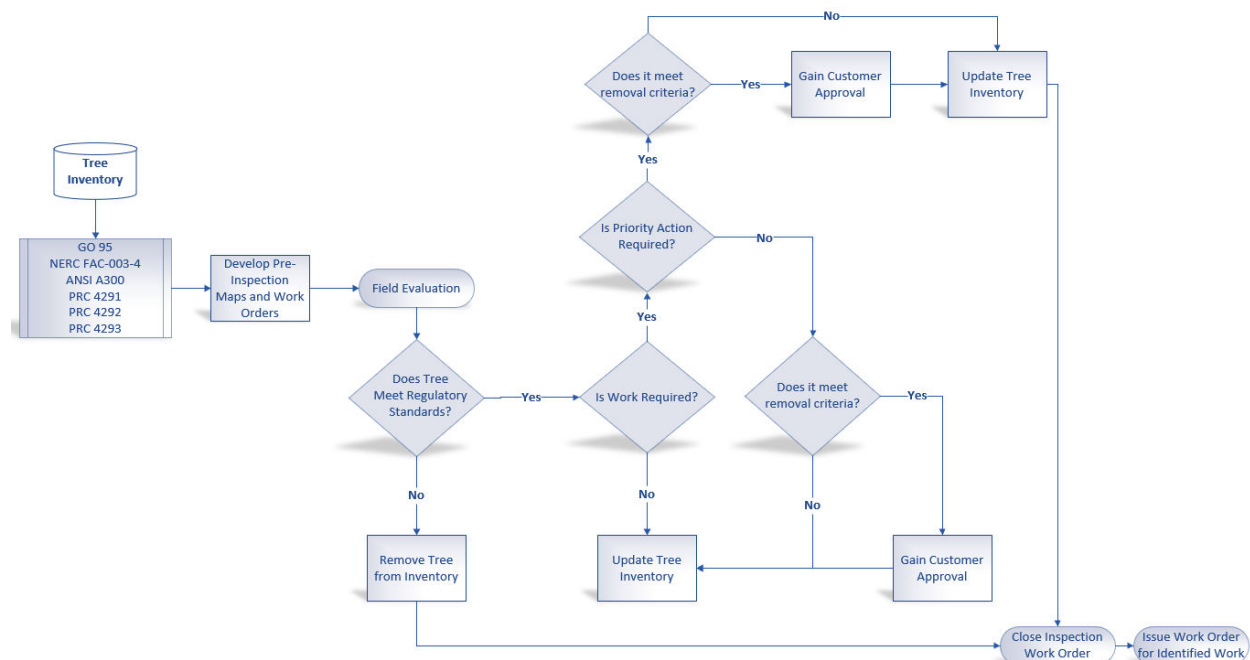
If the inspection program is based on a schedule, the electrical corporation must explain how it uses risk prioritization in the scheduling of the inspection program to target high-risk areas. If the electrical corporation does not use risk prioritization in the scheduling of the inspection program, it must explain why.

Accomplishments, Roadblocks, and Updates

In this section, the electrical corporation must discuss:

- Noteworthy accomplishments for the inspection program since the last WMP submission
- Roadblocks the electrical corporation has encountered while implementing the inspection program and how the electrical corporation has addressed the roadblocks
- Changes/updates to the inspection program since the last WMP submission including known future plans (beyond the current year) and new/novel strategies the electrical corporation may implement in the next 5 years (e.g., references to and strategies from pilot projects and research)

Figure 8-2. Example of Vegetation Management Inspection Overview



Process

There is very limited vegetation immediately around the Suncrest Facility, and the asset has hardscaped defensible space by design to reduce the need for vegetation management and potential contribution of surrounding vegetation as fuel for wildfire. HWT employs vegetation management strategies to remove all vegetation from within the perimeter wall area and maintain modified fuel zone outside the wall, resulting in a layered approach. Vegetation management included vegetation removal during grading and initial site construction within the fenced area and placement of rock and treatments with herbicide. Herbicide treatment and general weed and vegetation abatement occur as part of landscaping as necessary. Perimeter fuel modification areas are treated by removal of the highest flammability plants and maintained in a thinned, low fuel condition. Weed abatement is contractually scheduled to occur bimonthly during winter and spring and quarterly during summer and fall. HWT operations personnel conduct monthly asset inspections and in advance of wildfire season to assess any off-normal need for additional weed control activity.

Frequency or Triggers

HWT's primary vegetation management activity consists of weed control which occurs bimonthly during winter and spring and quarterly during summer and fall. Additional weed control activity may occur at the direction of HWT's operations personnel if needed based upon assessment after monthly asset inspections.

Accomplishments, Roadblocks, and Updates

There has been no material change to HWT's inspection program since the last WMP submission. There is very limited vegetation immediately around the Suncrest Facility, and the asset has hardscaped defensible space by design to reduce the need for vegetation management and potential contribution of surrounding vegetation as fuel for wildfire. HWT has successfully continued its cadence of monthly vegetation inspections which occur alongside of the monthly asset inspections. Additional vegetation inspections have occurred on an as-needed basis in response to notification of expected RFW days. HWT has maintained its program of weed abatement and maintenance of the defensible space immediately surrounding the Suncrest station without issue. As a result of the limited scope of vegetation works, HWT has not encountered any roadblocks in the implementation of its inspection program. There are no current plans to materially alter the inspection program. HWT will continue to monitor the effectiveness of the current inspection program as it gains operational experience and learns additional best practices.

8.2.3 Vegetation and Fuels Management

Instructions: In this section, the electrical corporation must discuss the following mitigation initiatives associated with vegetation and fuels management:

1. *Fuels management*

2. *Clearance*
3. *Fall-in mitigation*
4. *Substation defensible space*
5. *High-risk species*
6. *Fire-resilient right-of-way*
7. *Emergency response vegetation management*

In the following subsections, the electrical corporation must provide an overview of its vegetation and fuels management initiatives. These overviews should include figure(s) that depict the workflow and decision process used for vegetation and fuels management. Figure 8-3 provides an example of the appropriate level of detail for tree trimming and removal.

In addition to figure(s), the electrical corporation must provide a narrative overview of each vegetation and fuels management initiative. The discussion must include the following:

- ***Utility Initiative Tracking ID.***
- ***Overview of the initiative:*** A brief description of the initiative including reference to related objectives and targets .
- ***Governing standards and electrical corporation standard operating procedures:*** Reference to the appropriate code and electrical corporation procedure. If any standard exceeds regulatory requirements, the electrical corporation must reference the document that the electrical corporation uses as a basis for exceeding the regulatory requirements.
- ***Updates to the initiative:*** Changes to the initiative since the last WMP submission and a brief explanation as to why those change were made. Discuss any planned improvements or updates to the initiative and the timeline for implementation.

There is very limited vegetation immediately around the Suncrest Facility, and the asset has hardscaped defensible space by design to reduce the need for vegetation management and potential contribution of surrounding vegetation as fuel for wildfire. HWT employs vegetation management strategies to remove all vegetation from within the perimeter wall area and maintain modified fuel zone outside the wall, resulting in a layered approach. Vegetation management included vegetation removal during grading and initial site construction within the fenced area and placement of rock and treatments with herbicide. Herbicide treatment and general weed and vegetation abatement occur as part of landscaping as necessary. Weed abatement is contractually scheduled to occur bimonthly during winter and spring and quarterly during summer and fall. This work includes clearing the immediate area HWT's weather station. HWT operations personnel conduct monthly asset inspections and in advance of wildfire season to assess any off-normal need for additional weed control activity. There are no current plans to materially alter the inspection program. HWT will continue to monitor the effectiveness of the current inspection program as it gains operational experience and learns additional best practices.

8.2.3.1 Pole Clearing

Instructions: *In this subsection, the electrical corporation must provide an overview of pole clearing activities, including:*

- Pole clearing per Public Resources Code section 4292
- Pole clearing outside the requirements of Public Resources Code section 4292 (e.g., pole clearing performed outside of the State Responsibility Area)

HWT's Suncrest transmission system does not utilize overhead utility lines and thus pole clearing is not applicable to HWT's operations.

8.2.3.2 Wood and Slash Management

***Instructions:** In this subsection, the electrical corporation must provide an overview of how it manages all downed wood and "slash" generated from vegetation management activities, including references to applicable regulations, codes, and standards.*

HWT's Suncrest transmission system does not utilize overhead utility lines and thus wood and slash management is not applicable to HWT's operations.

8.2.3.3 Clearance

***Instructions:** In this subsection, the electrical corporation must provide an overview of clearance activities, including:*

- Clearances established in excess of the minimum clearances in Table 1 of GO 95
- The bases for the clearances established

HWT's Suncrest transmission system does not utilize overhead utility lines and thus clearance activities are not applicable to HWT's operations.

8.2.3.4 Fall-In Mitigation

***Instructions:** In this subsection, the electrical corporation must provide an overview of its actions taken to identify and remove or otherwise remediate trees that pose a high risk of failure or fracture that could potentially strike electrical equipment (e.g., danger trees or hazard trees).*

HWT's Suncrest transmission system does not utilize overhead utility lines and thus fall-in mitigation is not applicable to HWT's operations.

8.2.3.5 Substation Defensible Space

***Instructions:** In this subsection, the electrical corporation must provide an overview of its actions taken to reduce ignition probability and wildfire consequence due to contact with substation equipment.*

HWT's Suncrest transmission system does not utilize overhead utility lines. There is very limited vegetation immediately around the Suncrest Facility, and the asset has hardscaped defensible space by design to reduce the need for vegetation management and potential contribution of surrounding vegetation as fuel for wildfire. HWT employs vegetation management strategies to remove all vegetation from within the perimeter wall area and maintain modified fuel zone outside the wall, resulting in a layered approach. Perimeter fuel modification areas are treated

by removal of the highest flammability plants and maintained in a thinned, low fuel condition. This work includes clearing the immediate area HWT's weather station. Vegetation management included vegetation removal during grading and initial site construction within the fenced area and placement of rock and treatments with herbicide. Herbicide treatment and general weed and vegetation abatement occur as part of landscaping as necessary.

8.2.3.6 High-Risk Species

***Instructions:** In this subsection, the electrical corporation must provide an overview of its actions, such as trimming, removal, and replacement, taken to reduce the ignition probability and wildfire consequence attributable to high-risk species of vegetation.*

See HWT's responses to Subsection 8.2.3.5.

8.2.3.7 Fire-Resilient Right-of-Ways

***Instructions:** In this subsection, the electrical corporation must provide an overview of its actions taken to promote vegetation communities that are sustainable, fire-resilient, and compatible with the use of the land as an electrical corporation right-of-way. It must also provide an overview of its actions to control vegetation that is incompatible with electrical equipment and with the use of the land as an electrical corporation right-of-way. This may include, but is not limited to, the following activities: the strategic use of herbicides, growth regulators, or other chemical controls; tree-replacement programs; promotion of native shrubs; prescribed fire; or fuel treatment activities not covered by another initiative.*

HWT's Suncrest transmission system does not utilize overhead utility lines and therefore makes limited use of right-of-ways. See HWT's response to Subsection 8.2.3.5.

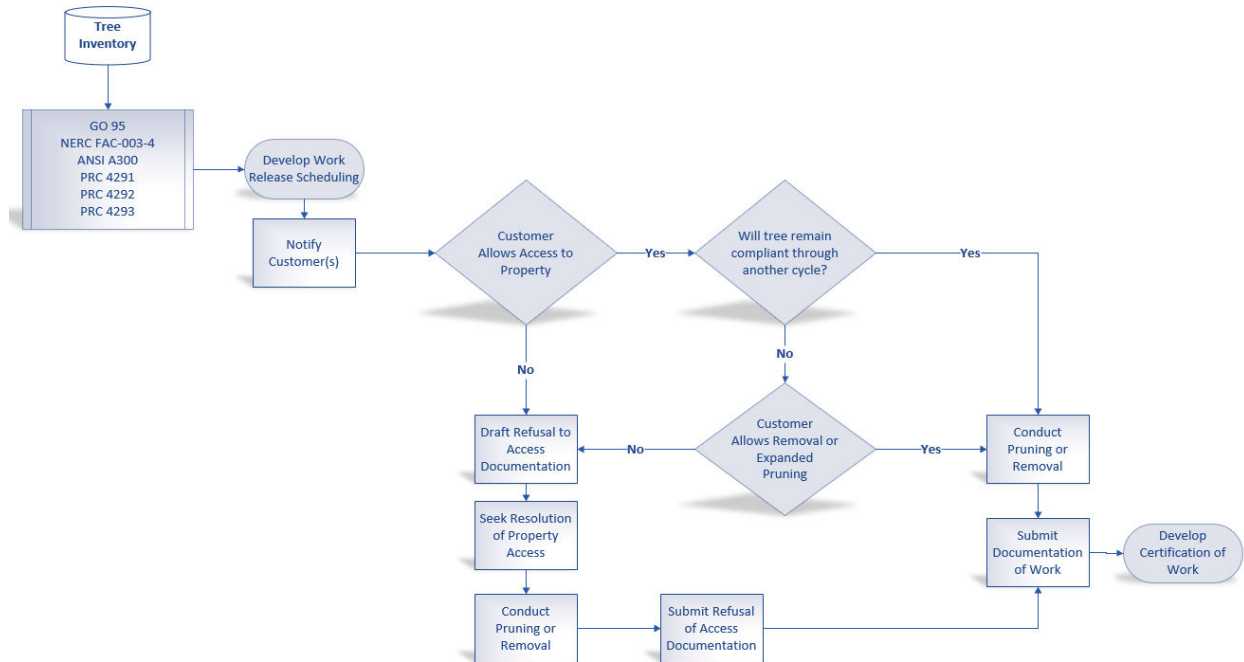
8.2.3.8 Emergency Response Vegetation Management

***Instructions:** In this subsection, the electrical corporation must provide an overview of the following emergency response vegetation management activities:*

- *Activities based on weather conditions:*
 - *Planning and execution of vegetation management activities, such as trimming or removal, executed based on and in advance of a Red Flag Warning or other weather condition forecast that indicates an elevated fire threat in terms of ignition probability and wildfire potential.*
- *Post-fire service restoration:*
 - *Vegetation management activities during post-fire service restoration, including, but not limited to, activities or protocols that differentiate post-fire vegetation management from programs described in other WMP initiatives; supporting documentation for the tool and/or standard the electrical corporation uses to assess the risk presented by vegetation after a fire; and how the electrical corporation includes fire-specific damage attributes in its assessment*

tool/standard. The description of such activities must differentiate between those emergency actions initiated to restore power while active fire suppression is ongoing and actions that occur following active fire suppression during the post-fire suppression repair and rehabilitation phases of fire protection operations.

Figure 8-3. Example of Tree Trimming and Removal Workflow



Activities based on weather conditions:

There is very limited vegetation immediately around the Suncrest Facility, and the asset has hardscaped defensible space by design to reduce the need for vegetation management and potential contribution of surrounding vegetation as fuel for wildfire. HWT performs additional inspections ahead of extreme weather events as detailed in its Wildfire Mitigation Condition Assessment procedure. These inspections are the same scope and procedures as regular monthly inspections. HWT operations personnel assess any off-normal need for additional weed control activity and schedule such work with HWT’s vegetation management service provider. As HWT completed undergrounding of its only span of overhead transmission line in Q3 2021, HWT foresees RFW conditions have a reduced impact on operations but those conditions are still monitored for enhanced situational awareness. All non-critical maintenance activities cease during RFW conditions and the asset is more closely monitored remotely by HWT’s 24/7 Operations Center.

Post-fire service restoration:

HWT has not experienced any ignition events in its operational history. HWT's post-fire service restoration would be similar to its power restoration procedures detailed in HWT's Emergency Operations Plan for its Suncrest Facility.

8.2.4 Vegetation Management Enterprise System

Instructions: *In this section, the electrical corporation must provide an overview of inputs to, operation of, and support for a centralized vegetation management enterprise system updated based upon inspection results and management activities such as trimming and removal of vegetation. This overview must include discussion of:*

- *The electrical corporation's vegetation inventory and condition database(s).*
- *Describe the electrical corporation's internal documentation of its database(s).*
- *Integration with systems in other lines of business.*
- *Integration with the auditing system(s) (see Section 8.2.5, "Quality Assurance and Quality Control").*
- *Describe internal procedures for updating the enterprise system including database(s) and any planned updates.*
- *Any changes to the initiative since the last WMP submission and a brief explanation as to why those changes were made. Include any planned improvements or updates to the initiative and the timeline for implementation.*

HWT's operational assets are limited to the Suncrest Facility, which is a MVar SVC connected to an approximately one mile underground cable which provides provide dynamic reactive power support to SDG&E's Suncrest Substation. The Facility includes a substation which houses the majority of the transmission elements. The substation is hardscaped and surrounded by a 10 foot concrete wall. There is very limited vegetation immediately around the Suncrest Facility, and the asset has hardscaped defensible space by design to reduce the need for vegetation management and potential contribution of surrounding vegetation as fuel for wildfire. HWT incorporates a vegetation management program at HWT facilities as an important component of its fire prevention strategy. The objective of the vegetation management program is to minimize the likelihood that an ignition on-site facilitates an off-site vegetation ignition. A secondary objective of the vegetation management program is the protection of equipment from wildfire encroachment. The vegetation management strategies are based on removal of all vegetation from within the perimeter fenced area and provision of a modified fuel zone outside the fence, resulting in a layered approach. The tactics for vegetation management include vegetation removal during grading within the fenced area and maintained throughout operations by placement of rock and treatments with herbicide, as necessary. Inspections at the station for vegetation encroachment are part of operations monthly assessments. Perimeter fuel modification areas are treated by removal of the highest flammability plants and maintenance in a thinned, low fuel condition. HWT's primary vegetation management activity consists of weed control which occurs bimonthly during winter and spring and quarterly during summer and fall. Additional weed control activity may occur at the direction of HWT's operations personnel if needed based upon assessment after monthly asset inspections. Based on the above and due to

the limited scope and scale of operations, HWT currently does not employ a vegetation management enterprise system.

8.2.5 Quality Assurance and Quality Control

Instructions: In this section, the electrical corporation must provide an outline of its quality assurance and quality control (QA/QC) activities for vegetation management. This overview must include:

- Reference to procedures documenting QA/QC activities.
- How the sample sizes are determined and how the electrical corporation ensures the samples are representative.
- Who performs QA/QC (internal or external, is there a dedicated team, etc.).
- Qualifications of the auditors.
- Documentation of findings and how the lessons learned from those findings are incorporated into trainings and/or procedures.
- Any changes to the procedures since the last WMP submission and a brief explanation as to why those changes were made. Include any planned improvements or updates to the initiative and the timeline for implementation.
- Tabular information:
 - Sample sizes
 - Type of QA/QC performed (e.g., desktop or field)
 - Resulting pass rates, starting in 2022
 - Yearly target pass rate for the 2023-2025 Base WMP cycle

Table 8-18 provides an example of the appropriate level of detail.

Table 8-18. Example of Vegetation Management QA/QC Program

Activity Being Audited	Sample Size	Type of Audit	Audit Results 2022	Yearly Target Pass Rate for 2023-2025
Hazard Tree Patrol Inspections	100% in HFTD Tiers 2 and 3	Field	92%	95%

There is very limited vegetation immediately around the Suncrest Facility, and the asset has hardscaped defensible space by design to reduce the need for vegetation management and potential contribution of surrounding vegetation as fuel for wildfire. HWT's general vegetation management consists of inspections of the area immediately outside the Suncrest Facility's perimeter wall and scheduled weed abatement and herbicide treatments to maintain the defensible space around the substation. Scheduled weed abatement and herbicide treatments are conducted by a third party contractor and the sufficiency of the work is reviewed by HWT's

operations teams. Asset management and inspection tasks are tracked and reported as complete in HWT's asset management program. Field operations personnel review results of monthly equipment inspections. Any identified issues which need further mitigation will be discussed and addressed with the appropriate subject matter expert (SME) or the supervisor as required. Issues are documented and monitored by entering corresponding work tasks in the database.

. This review also to ensures sustainment of efforts to identify any potential sources of ignition and near misses. Due to the limited scope and scale of operations, HWT currently does not employ an extensive vegetation management QA/QC program to effectively management vegetation control works. Due to the limited size and scale of HWT's vegetation program, HWT does not utilize pass rates or target pass rates. Vegetation works are limited to weed abatement and herbicide treatments which are conducted by a third party contractor at scheduled times throughout the year, with additional work as needed. HWT's operational staff can readily assess the performed vegetation abatement works due to the limited area being treated and as a result an extensive auditing process would be outsized given the limited scale of work. As a result Table 8-18 noted as N/A meaning "Not Applicable".

Table 8-18. Vegetation Management QA/QC Program

Activity Being Audited	Sample Size	Type of Audit	Audit Results 2022	Yearly Target Pass Rate for 2023-2025
N/A				

8.2.6 Open Work Orders

Instructions: In this section, the electrical corporation must provide an overview of the procedures it uses to manage its open work orders resulting from vegetation management inspections that prescribe vegetation management activities. This overview must include a brief narrative that provides:

- Reference to procedures documenting the work order process.
- A description of how work orders are prioritized based on risk.
- A description of the plan for eliminating work order backlogs (i.e., open work orders that have passed remediation deadlines), if applicable.
- A discussion of trends with respect to open work orders.

In addition, each electrical corporation must:

- Graph open work orders over time as reported in the QDRs (Table 2, metrics 7.a and 7.b).
- Provide an aging report for work orders past due (Table 8-19 provides an example).

Table 8-19: Example of Number of Past Due Vegetation Management Work Orders Categorized by Age

HTFD Area	0-30 Days	31-90 Days	91-180 Days	181+ Days	
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Non-HFTD					
HFTD Tier 2					
HFTD Tier 3					

Due to the limited scale and scope of HWT's operation, work orders are addressed by HWT's operations personnel's engagement with the vegetation management contractor through the course of scheduled periodic inspections and work activities. HWT has no past due vegetation management work orders. In Table 8-19, "N/A" means "Not Applicable".

Table 8-19. Number of Past Due Vegetation Management Work Orders Categorized by Age

HFTD Area	0-30 Days	31-90 Days	91-180 Days	181+ Days
Non-HFTD	N/A	N/A	N/A	N/A
HFTD Tier 2	N/A	N/A	N/A	N/A
HFTD Tier 3	0	0	0	0

8.2.7 Workforce Planning

Instructions: In this section, the electrical corporation must provide a brief overview of its recruiting practices for vegetation management personnel. It must also provide its worker qualifications and training practices for workers in the following target roles:

- Vegetation inspections
- Vegetation management projects

For each of the target roles listed above, the electrical corporation must:

- List all worker titles relevant to the target role.
- List and explain minimum qualifications for each worker title with an emphasis on qualifications relevant to vegetation management. Note if the job requirements include the following:
 - Special certification requirements, such as being an International Society of Arboriculture Certified Arborist with specialty certification as a Utility Specialist or a California-licensed Registered Professional Forester
 - Additional training on biological resources identification and protection (e.g., plant and animal species and habitats); and cultural prehistoric and historic resources identification and protection
- Report the percentage of electrical corporation and contractor full-time equivalents (FTEs) in target roles with specific job titles
- Report plans to improve qualifications of workers relevant to vegetation management. The electrical corporation must explain how it is developing more robust outreach and

onboarding training programs for new electric workers to identify hazards that could ignite wildfires

Table 8-20 provides an example of the required information.

Table 8-20. Example of Vegetation Management Qualifications and Training

Worker Title	Minimum Qualifications for Target Role	Special Certification Requirements	Electrical Corporation % FTE Min Quals	Electrical Corporation % Special Certifications	Contractor % FTE Min Quals	Contractor % Special Certifications	Reference to Electrical Corporation Training/Qualification Programs
<i>Pre-inspector</i>	<i>One year of arboriculture experience or degree in relevant field</i>	<i>Certified Arborist, as soon as eligible</i>	<i>x%</i>	<i>x%</i>	<i>x%</i>	<i>x%</i>	

There is very limited vegetation immediately around the Suncrest Facility, and the asset has hardscaped defensible space by design to reduce the need for vegetation management and potential contribution of surrounding vegetation as fuel for wildfire. Additionally, HWT's Suncrest Facility does not utilize overhead lines. HWT's vegetation management program consists of monitoring defensible space outside the facility's walls, general weed abatement, and erosion control. HWT contracts for these services and does not recruit for vegetation management personnel as its vegetation management program is limited in scope. As a result of the foregoing, Table 8-20 is marked "N/A" meaning "Not Applicable".

Table 8-20. Vegetation Management Qualifications and Training

Worker Title	Minimum Qualifications for Target Role	Special Certification Requirements	Electrical Corporation % FTE Min Quals	Electrical Corporation % Special Certifications	Contractor % FTE Min Quals	Contractor % Special Certifications	Reference to Electrical Corporation Training/Qualification Programs
N/A							

8.3 Situational Awareness and Forecasting

8.3.1 Overview

Instructions: In this section, the electrical corporation must identify objectives for the next 3- and 10-year periods, targets, and performance metrics related to the following situational awareness and forecasting programmatic areas:

- Environmental monitoring systems
- Grid monitoring systems
- Ignition detection systems
- Weather forecasting
- Ignition likelihood calculation
- Ignition consequence calculation

8.3.1.1 Objectives

Instructions: Each electrical corporation must summarize the objectives for its 3-year and 10-year plans for implementing and improving its situational awareness and forecasting.³¹ These summaries must include the following:

- Identification of which initiative(s) in the WMP the electrical corporation is implementing to achieve the stated objective, including Utility Initiative Tracking IDs
- Reference(s) to applicable codes, standards, and best practices/guidelines and an indication of whether the electrical corporation exceeds an applicable code, standard, or regulation
- Method of verifying achievement of each objective
- A completion date for when the electrical corporation will achieve the objective
- Reference(s) to the WMP section(s) or appendix, including page numbers, where the details of the objective(s) are documented and substantiated

This information must be provided in Table 8-21 for the 3-year plan and Table 8-22 for the 10-year plan. Examples of the minimum acceptable level of information are provided in Tables below.

Table 8-21. Example of Situational Awareness Initiative Objectives (3-year plan)

Objectives for Three Years (2023–2025)	Applicable Initiative(s), Tracking ID(s)	Applicable Regulations, Codes, Standards, and Best Practices (See Note)	Method of Verification (i.e., program)	Completion Date	Reference (section & page #)

³¹ Annual information included in this section must align with the QDR data

<i>Automate ignition detection using third-party software</i>	<i>Ignition detection, SA-03</i>	<i>Wildfire Prevention Guide</i>	<i>Contract w/ third-party and active license for software</i>	<i>March 2025</i>	
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Note: An asterisk indicates that the electrical corporation exceeds a particular code, regulation, standard, or best practice. The electrical corporation must provide a reference to the appendix section and page providing further documentation, justification, and substantiation.

Table 8-22. Example of Situational Awareness Initiative Objectives (10-year plan)

Objectives for Three Years (2023–2025)	Applicable Initiative(s), Tracking ID(s)	Applicable Regulations, Codes, Standards, and Best Practices (See Note)	Method of Verification (i.e., program)	Completion Date	Reference (section & page #)
<i>Create 1-km resolution of weather data across grid</i>	<i>Weather forecasting, SA-06</i>	<i>Weather Forecast Standard</i>	<i>Weather forecast outputs with 1-km resolution</i>	<i>December 2028</i>	

Note: An asterisk indicates that the electrical corporation exceeds a particular code, regulation, standard, or best practice. The electrical corporation must provide a reference to the appendix section and page providing further documentation, justification, and substantiation.

HWT's only asset is the Suncrest Facility which completed and entered operational service in Q1 2020. The Suncrest Facility is a hardscaped site with an inherent fire-hardened grid design, that also it does not utilize overhead lines. The facility is remotely operated and monitored 24/7 from its affiliate Lone Star's NERC-certified control center located in Austin, Texas. Graphic displays and alarm processing ensure HWT transmission system operators have real-time situational awareness. Support personnel perform checks of the applications and hardware to ensure they are in proper working order. Any site anomalies are communicated to local personnel and Director of Operations, who will manage and undertake site corrective actions. HWT implemented additional wildfire hardening measures at the Suncrest Facility between 2020 and 2022 to enhance situational awareness by installing high-definition cameras, a weather station, and transformer oil gas monitoring. HWT also completed development and enhancement of a proprietary fire risk index for its territory to increase awareness of fire threat and to help inform operational decisions and supplement third-party wildfire tracking tools. Lastly, HWT also installed a cable monitoring system for its underground cable. Given the foregoing, HWT has no currently planned situational awareness initiative objectives for the Suncrest facility in the 2023-2025 WMP Cycle. HWT will monitor the effectiveness of its currently emplaced processes,

procedures, and capabilities and assess changes or enhancements as needed. Based on the foregoing Table 8-21 is marked as N/A meaning “Not Applicable”.

Table 8-21. Situational Awareness Initiative Objectives (3-year plan)

Objectives for Three Years (2023–2025)	Applicable Initiative(s), Tracking ID(s)	Applicable Regulations, Codes, Standards, and Best Practices (See Note)	Method of Verification (i.e., program)	Completion Date	Reference (section & page #)
N/A					

Note: An asterisk indicates that the electrical corporation exceeds a particular code, regulation, standard, or best practice. The electrical corporation must provide a reference to the appendix section and page providing further documentation, justification, and substantiation.

HWT has no currently planned situational awareness initiative objectives for the Suncrest facility for the 2026-2032 time period. HWT will monitor the effectiveness of its currently emplaced processes, procedures, and capabilities and assess changes or enhancements as needed. Based on the foregoing Table 8-22 is marked as N/A meaning “Not Applicable”.

Table 8-22. Situational Awareness Initiative Objectives (10-year plan)

Objectives for Three Years (2026–2032)	Applicable Initiative(s), Tracking ID(s)	Applicable Regulations, Codes, Standards, and Best Practices (See Note)	Method of Verification (i.e., program)	Completion Date	Reference (section & page #)
N/A					

Note: An asterisk indicates that the electrical corporation exceeds a particular code, regulation, standard, or best practice. The electrical corporation must provide a reference to the appendix section and page providing further documentation, justification, and substantiation.

8.3.1.2 Targets

Instructions: Initiative targets are forward-looking quantifiable measurements of activities identified by each electrical corporation in its WMP. Electrical corporations will show progress toward completing targets in subsequent reports, including QDRs and WMP Updates.

The electrical corporation must list all targets it will use to track progress on its situational awareness and forecasting for the three years of the Base WMP. Energy Safety’s Compliance

Assurance Division and third parties must be able to track and audit each target.³² For each initiative target, the electrical corporation must provide the following:

- Utility Initiative Tracking IDs.
- Projected targets for each of the three years of the Base WMP and relevant units.
- The expected “x% risk impact” For each of the three years of the Base WMP. The expected x% risk impact is the expected percentage risk reduction per year, as described in Section 7.2.2.2.
- Method of verifying target completion.

The electrical corporation’s targets must provide enough detail to effectively inform efforts to improve the performance (i.e., reduction in ignition probability or wildfire consequence) of the electrical corporation’s situational awareness and forecasting initiatives.

Table 8-23 provides an example of the minimum acceptable level of information.

Table 8-23. Example of Situational Awareness Initiative Targets by Year

Initiative Activity	Tracking ID	2023 Target & Unit	x% Risk Impact 2023	2024 Target & Unit	x% Risk Impact 2024	2025 Target & Unit	x% Risk Impact 2025	Method of Verification
Install thermal cameras	SA-03	5 thermal cameras installed	0.5%	10 thermal cameras installed	1%	25 thermal cameras installed	2.5%	Completed work orders, GIS Data Submission(s)

See HWT’s response to Section 8.3.1.1. The facility is remotely operated and monitored 24/7 from its affiliate Lone Star’s NERC-certified control center located in Austin, Texas. Graphic displays and alarm processing ensure HWT transmission system operators have real-time situational awareness. Support personnel perform checks of the applications and hardware to ensure they are in proper working order. Any site anomalies are communicated to local personnel and Director of Operations, who will manage and undertake site corrective actions. HWT implemented measures at the Suncrest Facility between 2020 and 2022 to enhance situational awareness by installing high-definition cameras, a weather station, and transformer oil gas monitoring. HWT also completed development and enhancement of a proprietary fire risk index for its territory to increase awareness of fire threat and to help inform operational decisions and supplement third-party wildfire tracking tools. Lastly, HWT also installed a cable monitoring system for its underground cable. Given the foregoing, HWT has no current plans for changes to its situational awareness and forecasting capabilities at the Suncrest facility in the 2023-2025 WMP Cycle and beyond. HWT will monitor the effectiveness of its currently emplaced processes, procedures, and capabilities and assess changes or enhancements as needed. Therefore Table 8-23 is marked “N/A” meaning “Not Applicable”.

³² Annual information included in this section must align with Table 1 of the QDR.

Table 8-23. Situational Awareness Initiative Targets by Year

Initiative Activity	Tracking ID	2023 Target & Unit	x% Risk Impact 2023	2024 Target & Unit	x% Risk Impact 2024	2025 Target & Unit	x% Risk Impact 2025	Method of Verification
N/A								

8.3.1.3 Performance Metrics Identified by the Electrical Corporation

Instructions: Performance metrics indicate the extent to which an electrical corporation's Wildfire Mitigation Plan is driving performance outcomes. Each electrical corporation must:

- List the performance metrics the electrical corporation uses to evaluate the effectiveness of its situational awareness and forecasting in reducing wildfire and PSPS risk³³

For each of these performance metrics listed, the electrical corporation must:

- Report the electrical corporation's performance since 2020 (if previously collected)
- Projected performance for 2023-2025
- List method of verification

The electrical corporation must ensure that each metric's name and values are the same in its WMP reporting as its QDR reporting (specifically, QDR Table 2 and QDR Table 3). Metrics listed in this section that are the same as performance metrics required by Energy Safety and reported in QDR Table 2 (Performance Metrics)³⁴ must match those reported in QDR Table 2. Metrics listed in this section that are not the same as any of the performance metrics identified by Energy Safety and reported in QDR Table 2 must match those reported in QDR Table 3.

The electrical corporation must:

- Summarize its self-identified performance metric(s) in tabular form
- Provide a brief narrative that explains trends in the metrics

Table 8-24 provides an example of the minimum acceptable level of information.

Table 8-24. Example of Situational Awareness and Forecasting Performance Metrics Results by Year

Performance Metrics	2020	2021	2022	2023 Projected	2024 Projected	2025 Projected	Method of Verification (e.g., third-
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³³ There may be overlap between the performance metrics the electrical corporation uses and performance metrics required by Energy Safety. The electrical corporation must list these overlapping metrics in this section in addition to any unique performance metrics it uses.

³⁴ The performance metrics identified by Energy Safety are included in Energy Safety's Data Guidelines.

							<i>party evaluation, QDR)</i>

HWT began commercial operations of the Suncrest Facility in Q1 2020. As such there is no reportable information prior to 2020. Since the start of commercial operations, HWT has had no instigation of ignition by utility equipment and no incidents of utility-equipment caused fire. HWT projects the trend of zero (0) utility-equipment instigated ignitions to continue through the 2023-2025 WMP cycle and beyond given (i) the fire-harden grid design of the Suncrest Facility, (ii) site improvements in the 2020-2023 WMP cycle, (iii) enhanced situational awareness capabilities, (iv) cadence of equipment and site inspections, and (v) limited scope of operations. The metrics cited below are the same as performance metrics required by Energy Safety and reported in QDR Table 2 and Table 3.

Table 8-24. Situational Awareness and Forecasting Performance Metrics Results by Year

Performance Metrics	2020	2021	2022	2023 Projected	2024 Projected	2025 Projected	Method of Verification (e.g., third-party evaluation, QDR)
Vegetation-caused ignitions	0	0	0	0	0	0	QDR
Vegetation-caused outages	0	0	0	0	0	0	QDR
Open vegetation work orders	0	0	0	0	0	0	QDR
Number of reportable ignition incidents on RFW days	0	0	0	0	0	0	QDR
Value of assets	0	0	0	0	0	0	QDR

destroyed by utility-related ignitions, listed by asset type							
Structures damaged or destroyed by utility-related ignitions	0	0	0	0	0	0	QDR
Acreage burned by utility-related ignitions	0	0	0	0	0	0	QDR
Fatalities resulting from utility wildfire mitigation initiatives	0	0	0	0	0	0	QDR
Number of utility-related ignitions	0	0	0	0	0	0	QDR
OSHA-reportable injuries from utility wildfire mitigation initiatives	0	0	0	0	0	0	QDR

8.3.2 Environmental Monitoring Systems

Instructions: The electrical corporation must describe its systems and procedures for monitoring environmental conditions within its service territory. These observations should inform the electrical corporation's near-real-time risk assessment and weather forecast validation. The electrical corporation must document the following:

- Existing systems, technologies, and procedures
- How the need for additional systems is evaluated
- Implementation schedule for any planned additional systems
- How the efficacy of systems for reducing risk are monitored

Reference the Utility Initiative Tracking ID where appropriate.

There is very limited vegetation immediately around the Suncrest Facility, and the asset has hardscaped defensible space by design to reduce the need for vegetation management and potential contribution of surrounding vegetation as fuel for wildfire. HWT undergrounded its only section of overhead line in Q3 2021. As a result environmental factors do not have significant impact on the Suncrest Facility's operations. HWT implemented additional measures at the Suncrest Facility between 2020 and 2022 to enhance its environmental monitoring capabilities by installing high-definition cameras, a weather station, and completed development and enhancement of a proprietary fire risk index for its territory to increase awareness of fire threat and to help inform operational decisions and supplement third-party wildfire tracking tools. Given the foregoing, HWT has no current plans for changes to its environmental monitoring capabilities at the Suncrest facility in the 2023-2025 WMP Cycle and beyond. HWT will monitor the effectiveness of its currently emplaced processes, procedures, and capabilities and assess changes or enhancements as needed.

Figure HWT 8.3.2-1. Example of Site Camera



Figure HWT 8.3.2-2. Weather Station



8.3.2.1 Existing Systems, Technologies, and Procedures

***Instructions:** The electrical corporation must report on the environmental monitoring systems and related technologies and procedures currently in use, highlighting any improvements made since the last WMP submission. At a minimum, the electrical corporation must discuss systems, technologies, and procedures related to the reporting of the following:*

- *Current weather conditions:*
 - *Air temperature*
 - *Relative humidity*
 - *Wind velocity (speed and direction)*
- *Fuel characteristics:*
 - *Seasonal trends in fuel moisture*

Each system must be summarized in Table 8-25. The electrical corporation must provide the following additional information for each system in the accompanying narrative:

- Generalized location of the system / locations measured by the system (e.g., HTFD, entire service territory).
- Integration with the broader electrical corporation's system.
- How measurements from the system are verified.
- Frequency of maintenance.
- For intermittent systems (e.g., aerial imagery, line patrols), what triggers collection. This should include flow charts and equations as appropriate.
- For calculated quantities, how raw measurements are converted into calculated quantities. This should include flow charts and equations as appropriate.

Table 8-25. Example of Environmental Monitoring Systems

System	Measurement/ Observation	Frequency	Purpose and Integration
Weather stations	Steady wind velocity Gust wind velocity Air temperature Relative humidity	3,600 observations / hour	Improve weather forecasts through data assimilation Validate model
Remote sensing fuel moistures	Percentiles	Once a day	Calculate fuel moisture content

See HWT's response to Section 8.3.2. There is very limited vegetation immediately around the Suncrest Facility, and the asset has hardscaped defensible space by design to reduce the need for vegetation management and potential contribution of surrounding vegetation as fuel for wildfire. HWT undergrounded its only section of overhead line in Q3 2021. As a result environmental factors do not have significant impact on the Suncrest Facility's operations. However, HWT utilizes a weather station and its proprietary fire risk index, Firecaster, for environmental monitoring and situational awareness.

Table 8-25. Environmental Monitoring Systems

System	Measurement/ Observation	Frequency	Purpose and Integration
Weather station	Temperature Wind speed Wind direction Soil moisture Soil temperature Air quality index	Real-time data (constant measurement)	Provide localized data validation Situational awareness
Optos/Firecaster	Wildfire Risk Index	Real-time	Data model to predict the likelihood of a wildfire occurring and spreading taking into account current

			weather conditions, seasonality, and locale (Urban, rural, suburban, mountain, etc.)
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8.3.2.2 Evaluation and Selection of New Systems

Instructions: The electrical corporation must describe how it evaluates the need for additional environmental monitoring systems. This description must include:

- How the electrical corporation evaluates the impact of new systems on reducing risk (e.g., expected quantitative improvement in weather forecasting)
- How the electrical corporation evaluates the efficacy of new technologies

These descriptions should include flow charts as appropriate.

HWT's only asset is the Suncrest Facility which completed and entered operational service in Q1 2020. There is very limited vegetation immediately around the Suncrest Facility, and the asset has hardscaped defensible space by design to reduce the need for vegetation management and potential contribution of surrounding vegetation as fuel for wildfire. HWT undergrounded its only section of overhead line in Q3 2021. As a result environmental factors do not have significant impact on the Suncrest Facility's operations. HWT implemented additional measures at the Suncrest Facility between 2020 and 2022 to enhance its environmental monitoring capabilities by installing high-definition cameras, a weather station, and completed development and enhancement of a proprietary fire risk index for its territory to increase awareness of fire threat and to help inform operational decisions and supplement third-party wildfire tracking tools. Given the foregoing, HWT has no current plans for changes to its environmental monitoring capabilities at the Suncrest facility in the 2023-2025 WMP Cycle and beyond. HWT will monitor the effectiveness of its currently emplaced processes, procedures, and capabilities and assess changes or enhancements as needed.

8.3.2.3 Planned Improvements

Instructions: The electrical corporation must describe its planned improvements for its environmental monitoring systems.³⁵ This must include any plans for the following:

- Expansion of existing systems
- Establishment of new systems

For each planned improvement, the electrical corporation must provide the following in Table 8-26:

- **Description:** A description of the planned initiative activity

³⁵ Annual information included in this section must align with Tables 7 and 8 of the QDR.

- **Impact:** Reference to and description of the impact of the initiative activity on each risk and risk component
- **Prioritization:** A description of the x% risk impact (see Section 8.1.1.2 for explanation)
- **Schedule:** A description of the planned schedule for implementation

Table 8-26. Example of Planned Improvements to Environmental Monitoring Systems

System	Description	Impact	x% Risk Impact	Implementation Schedule

See HWT’s responses to Sections 8.3.2.1 and 8.3.2.2. HWT has no current plans for changes to its environmental monitoring capabilities at the Suncrest facility in the 2023-2025 WMP Cycle and beyond. HWT deems its current capabilities sufficient to meet the needs of its facility’s limited footprint and scale of operations. HWT will monitor the effectiveness of its currently emplaced processes, procedures, and capabilities and assess changes or enhancements as needed. As a result, Table 8-26 is marked “N/A” meaning “Not Applicable”.

Table 8-26. Planned Improvements to Environmental Monitoring Systems

System	Description	Impact	x% Risk Impact	Implementation Schedule
N/A				

8.3.2.4 Evaluating Mitigation Initiatives

Instructions: The electrical corporation must describe its procedures for the ongoing evaluation of the efficacy of its environmental monitoring program.

See response to Section 8.3.2.2. HWT’s Suncrest Facility has only been operational Q1 2020. The facility has hardscaped defensible space by design and utilizes no overhead lines which limits the impact of environmental factors on operations. HWT also added a weather station, cameras and developed a fire risk index for its territory to increase awareness of fire threat and to help inform operational decisions and supplement third-party wildfire tracking tools.

To inform appropriate wildfire hardening initiatives, HWT uses the FMEA process and support from third-party site wildfire assessments. The FMEA considers the potential failures from each HWT Facility component and assesses and prioritizes the potential risk, along with providing potential mitigations. A third-party wildfire assessment was utilized to supplement the initial FMEA and provides independent evaluation/assessment of wildfire risk at the facility and opportunities for risk mitigation. HWT utilized the combined information to target mitigation initiatives that provided meaningful impact to reducing the likelihood of utility equipment instigating a fire and the promulgation and impact of a fire if one occurred. HWT updates the FMEA annually to ensure controls and processes are functioning as intended, review potential failure modes and effects of any newly added or changed equipment, and assess new opportunities for risk reduction driven by new technologies, best practices, and experience of

affiliates, among other things. Given the limited scale and scope of the HWT current operations at the Suncrest Facility, HWT has no current plans for changes to its environmental monitoring capabilities at the Suncrest facility in the 2023-2025 WMP Cycle and beyond. HWT will monitor the effectiveness of its currently emplaced processes, procedures, and capabilities and assess changes or enhancements as needed.

8.3.3 Grid Monitoring Systems

***Instructions:** The electrical corporation must describe its systems and procedures used to monitor the operational conditions of its equipment. These observations should inform the electrical corporation's near-real-time risk assessment. The electrical corporation must document:*

- *Existing systems, technologies, and procedures*
- *Procedure used to evaluate the need for additional systems*
- *Implementation schedule for any planned additional systems*
- *How the efficacy of systems for reducing risk are monitored*

Reference the Utility Initiative Tracking ID where appropriate.

HWT's operational assets are limited to the Suncrest Facility, which is a MVar SVC connected to an approximately one mile underground cable. The Suncrest Facility is a transmission-only system with no overhead lines and no distribution elements. Given its limited footprint and the size and scope of its operations, HWT does not utilize a grid management system. The Suncrest Facility is remotely operated and monitored 24/7 from its affiliate Lone Star's NERC-certified control center located in Austin, Texas. Graphic displays and alarm processing ensure HWT transmission system operators have real-time situational awareness. Support personnel perform checks of the applications and hardware to ensure they are in proper working order. Any site anomalies are communicated to local personnel and Director of Operations, who will manage and undertake site corrective actions. HWT also performs monthly asset inspections which are conducted designated Operations personnel. The inspections include general checks and measurements, visual inspections, general housekeeping, and vegetation control. Operations personnel also utilize the real-time cable monitoring system to monitor the underground cable as well as real-time oil gas monitoring to support tracking of transformer health.

8.3.3.1 Existing Systems, Technologies, and Procedures

***Instructions:** The electrical corporation must report on the grid system monitoring systems and related technologies and procedures currently in use, highlighting any improvements made since the last WMP submission. At a minimum, the electrical corporation must discuss systems, technologies, and procedures related to the detection of:*

- *Faults (e.g., fault anticipators, rapid earth fault current limiters, etc.)*
- *Failures*
- *Recloser operations*

Each system must be summarized in Table 8-27 below. The electrical corporation must provide the following information for each system in the accompanying narrative:

- Location of the system / locations measured by the system
- Integration with the broader electrical corporation's system
- How measurements from the system are verified
- For intermittent systems (e.g., aerial imagery, line patrols), what triggers collection. This should include flow charts and equations as appropriate
- For calculated quantities, how raw measurements are converted to calculated quantities. This should include flow charts and equations as appropriate.

Table 8-27. Example of Grid Operation Monitoring Systems

System	Measurement/ Observation	Frequency	Purpose and Integration
<i>Line sensors</i>	<ul style="list-style-type: none"> • Electrical current • Electrical voltage • Waveform harmonics 	<ul style="list-style-type: none"> • 3,600 observations / hour 	<ul style="list-style-type: none"> • Early fault detection • Distribution fault anticipator (DFA)

Horizon West Transmission Overview:

Horizon West Transmission (HWT) consists of the Suncrest Static Var Compensator (SVC) located in Alpine, CA. The SVC is connected to SDG&E's (San Diego Gas & Electric) system via HWT's 230kV riser pole and an approximately one (1) mile long underground (UG) cable.

The primary purpose of the SVC system is to provide fast dynamic reactive power support in order to maintain system voltages within acceptable limits in response to disturbances, and other events causing loading and voltage concerns identified, and to automatically and smoothly regulate the bus voltage continuously, under normal and contingency conditions of the power system at the 230kV bus of the SDG&E Suncrest 500/230 kV substation.

Suncrest SVC Underground 230kV Transmission Cable Monitoring:

The UG 230kV XLPE transmission cable employs a monitoring system to detect abnormal temperatures and electrical discharges at the cable joint and terminations.

The monitoring system can also detect and locate partial discharges at the cable joint and terminations, which can be early indicators of potential faults or failures. The monitoring system is inspected on a routine basis to ensure the measurement equipment is functioning properly.

Suncrest SVC Transformer Monitoring:

The transformer monitoring system has real-time oil analysis to detect and prevent internal faults on the transformer. This system, which was installed in 2020, provides enhanced data that can

be utilized to assess transformer health and potentially predict transformer failure which has the potential for initiating an ignition event.

Suncrest SVC Protection & Control (P&C) Monitoring:

The Suncrest SVC is controlled by a microprocessor-based control system. The control and protection system is based on the Modular Architecture Control for HVDC & FACTS (MACH) concept, built around an industrial PC with add in circuit boards and I/O racks connected via standard type field buses. Voltage and current transformers provide the control system with network variables employed in the SVC control. The control system provides facilities for SVC control either from the Operator Workstation (OWS) or remotely via SCADA system.

Suncrest SVC Grid Management:

Early failure detection on an SVC transformer:

- Automatic oil dissolved gas analysis (DGA) monitors installed (Serveron TM8); (oil samples 1x every 4 hours)
- Infrared cameras aimed at the main and back-up transformer bushings + situational awareness camera view

Early failure detection on the 230kV underground (UG) cable:

- Partial Discharge (PD) + Distributed Temperature Sensing (DTS) along the UG cable (Pry-Cam Monitoring System). (frequency: at least 1x per hour)
 - Infrared and situational awareness cameras by HWT's 230kV riser pole

Table 8-27. Grid Operation Monitoring Systems

System	Measurement/ Observation	Frequency	Purpose and Integration
Hitachi MACH System SVC Protection & Control	Electrical Voltage AC Electrical Current AC Reactive Power (MVAR) AC Waveform Harmonics Temperature (ambient) Temperature, Flow & Pressure (cooling system)	Automatic (continuous)	SVC Control & Protection Sequence of Event Recording System Control Transient Fault Recording Alarming

Hitachi MACH System Human Machine Interface (HMI)	Electrical Voltage AC Electrical Current AC Reactive Power (MVAR) AC Waveform Harmonics Temperature (ambient) Temperature, Flow & Pressure (cooling system)	Automatic (continuous)	Process control and supervision Process data visualization Sequence of Event Recording display Alarming
AC Line Protection	Electrical Current AC Electrical Voltage AC	16 samples/cycle (or higher depending on relay)	AC Line Differential
Transformer and SVC Protection	Electrical Current AC Electrical Voltage AC	16 samples/cycle (or higher depending on relay)	Differential and Overcurrent protection
Pry-Cam Distributed Temperature Sensing (DTS)	Temperature along the UG cable	DTS = 1 time per hour (or more)	DTS process visualizes thermal energy in real time
Pry-Cam Partial Discharge Monitoring (PDM)	Electrical Current	PDM = 1 time per hour (or more)	Detect and locate partial discharge activity in real time
Serveron TM8	Dissolved Gasses in Oil	DGA = 1 time every 4 hours	Detect dissolved gasses in transformer oil. Provides alerts upon detection in excess of allowable thresholds

8.3.3.2 Evaluation and Selection of New Systems

Instructions: The electrical corporation must describe how it evaluates the need for additional grid operation monitoring systems. This description must include:

- How the electrical corporation evaluates the impact of new systems on reducing risk (e.g., expected reduction in ignitions from failures, expected reduction in failures)

- *How the electrical corporation evaluates the efficacy of new technologies*

These descriptions should include flow charts as appropriate.

HWT's operational assets are limited to the Suncrest Facility, which is a MVar SVC connected to an approximately one mile underground cable. The Suncrest Facility entered operational service in Q1 2020. HWT's facilities are remotely operated and monitored 24/7 from its affiliate Lone Star Transmission, LLC's NERC-certified control center located in Austin, Texas. Graphic displays and alarm processing ensure HWT transmission system operators have real-time situational awareness. Support personnel perform checks of the applications and hardware to ensure they are in proper working order. Any site anomalies are communicated to local personnel and Director of Operations, who manage and undertake site corrective actions. In 2020, HWT installed a transformer oil gas monitoring system. In 2021, HWT installed a cable monitoring system for its underground cable which provides thermal and partial discharge monitoring for the 230kV underground cable at the Suncrest Facility. HWT also leverages the operational experience of its affiliates and enterprise-level support providers to assess the efficacy of new technologies as applicable to operations at Suncrest. Additionally, as described in detail in Section 6 of this WMP, HWT uses the FMEA process to identify and mitigate wildfire-related risks at its Suncrest Facility. HWT updates the FMEA annually to ensure controls and processes are functioning as intended, review potential failure modes and effects of any newly added or changed equipment, and assess new opportunities for risk reduction driven by new technologies, best practices, and experience of affiliates, among other things. Given the limited scale and scope of the HWT current operations at the Suncrest Facility and the relative newness of the facility, HWT has no current plans for changes to its system monitoring capabilities at the Suncrest facility in the 2023-2025 WMP Cycle and beyond. HWT will monitor the effectiveness of its currently emplaced processes, procedures, and capabilities and assess changes or enhancements as needed.

8.3.3.3 Planned Improvements

Instructions: *The electrical corporation must describe its planned improvements in its grid operation monitoring systems. This must include any plans for the following:*

- *Expansion of existing systems*
- *Establishment of new systems*

For each planned improvement, the electrical corporation must provide the following in Table 8-28:

- *Description: A description of the planned initiative activity*
- *Impact: Reference to and description of the impact of the initiative activity on each risk and risk component*
- *Prioritization: A description of the x% risk impact (see Section 8.1.1.2 for explanation)*
- *Schedule: A description of the planned schedule for implementation*

Table 8-28. Example of Planning Improvements to Grid Operation Monitoring Systems

System	Description	Impact	x% Risk Impact	Implementation Schedule
<i>Line sensors on distribution lines</i>	<i>Installation of DFA sensors on circuit segments in distribution lines in HFTD</i>	<i>Early fault detection to prevent ignition from a line which had failure resulting from contact or equipment failure</i>	<i>80%</i>	<i>Pilot program, 2023–2025 Analysis of pilot, 2025–2026 Installation of systems, 2026–2029</i>

HWT’s operational assets are limited to the Suncrest Facility, which is a MVar SVC connected to an approximately one mile underground cable. The Suncrest Facility entered operational service in Q1 2020. HWT’s facilities are remotely operated and monitored 24/7 from its affiliate Lone Star Transmission, LLC’s NERC-certified control center located in Austin, Texas. Graphic displays and alarm processing ensure HWT transmission system operators have real-time situational awareness. Support personnel perform checks of the applications and hardware to ensure they are in proper working order. Any site anomalies are communicated to local personnel and Director of Operations, who manage and undertake site corrective actions. In 2020, HWT installed a transformer oil gas monitoring system. In 2021, HWT also installed a cable monitoring system for its underground cable which provides thermal and partial discharge monitoring for the 230kV underground cable at the Suncrest Facility. Given the limited scale and scope of the HWT current operations at the Suncrest Facility and the relative newness of the facility, HWT has no current plans for changes to grid monitoring capabilities at the Suncrest facility in the 2023-2025 WMP Cycle and beyond. HWT will monitor the effectiveness of its currently emplaced processes, procedures, and capabilities and assess changes or enhancements as needed. Therefore Table 8-28 is marked “N/A” meaning “Not Applicable”.

Table 8-28. Planning Improvements to Grid Operation Monitoring Systems

System	Description	Impact	x% Risk Impact	Implementation Schedule
N/A				

8.3.3.4 Evaluating Mitigation Initiatives

***Instructions:** The electrical corporation must describe its procedures for the ongoing evaluation of the efficacy of its grid operation monitoring program.*

To inform appropriate wildfire hardening initiatives, HWT uses the FMEA process and support from third-party site wildfire assessments. The FMEA considers the potential failures from each HWT Facility component and assesses and prioritizes the potential risk, along with providing potential mitigations. A third-party wildfire assessment was utilized to supplement the initial FMEA and provides independent evaluation/assessment of wildfire risk at the facility and opportunities for risk mitigation. HWT utilized the combined information to target mitigation initiatives that provided meaningful impact to reducing the likelihood of utility equipment instigating a fire and the promulgation and impact of a fire if one occurred. HWT updates the FMEA annually to ensure controls and processes are functioning as intended, review potential failure modes and effects of any newly added or changed equipment, and assess new opportunities for risk reduction driven by new technologies, best practices, and experience of affiliates, among other things. Given the limited scale and scope of the HWT current operations at the Suncrest Facility, HWT has no current plans for changes to grid monitoring capabilities at the Suncrest facility in the 2023-2025 WMP Cycle and beyond. HWT will monitor the effectiveness of its currently emplaced processes, procedures, and capabilities and assess changes or enhancements as needed.

8.3.3.5 Enterprise System for Grid Monitoring

Instructions: In this section, the electrical corporation must provide an overview of its enterprise system for grid monitoring. This overview must include discussion of:

- *Any database(s) used for storage*
- *Describe the electrical corporation's internal documentation of its database(s)*
- *Integration with systems in other lines of business*
- *Describe any QA/QC or auditing of its system*
- *Describe internal processes for updating the enterprise system including database(s)*
- *Any changes to the initiative since the last WMP submission and a brief explanation as to why those changes were made. Include any planned improvements or updates to the initiative and the timeline for implementation*

HWT's operational assets are limited to the Suncrest Facility, which is a MVar SVC connected to an approximately one mile underground cable. HWT's facilities are remotely operated and monitored 24/7 from its affiliate Lone Star's NERC-certified control center located in Austin, Texas. Graphic displays and alarm processing ensure HWT transmission system operators have real-time situational awareness. Asset management and inspection tasks are tracked and reported as complete in HWT's asset management program. Field operations personnel review results of monthly equipment inspections. Any identified issues which need further mitigation will be discussed and addressed with the appropriate subject matter expert (SME) or the supervisor as required. Issues are documented and monitored by entering corresponding work tasks in the database.

. This review also to ensures sustainment of efforts to identify any potential sources of ignition and near misses. Due to the limited scope and scale of operations, HWT currently does not employ an enterprise system for grid monitoring.

8.3.4 Ignition Detection Systems

Instructions: *The electrical corporation must describe its systems, technologies, and procedures used to detect ignitions within its service territory and gauge their size and growth rates.*

The electrical corporation must document the following:

- *Existing ignition detection sensors and systems*
- *Evaluation and selection of new ignition detection systems*
- *Planned integration of new ignition detection technologies*
- *Monitoring of mitigation improvements*

Reference the Utility Initiative Tracking ID where appropriate.

HWT's only asset is the Suncrest Facility which completed and entered operational service in Q1 2020. There is very limited vegetation immediately around the Suncrest Facility, and the asset has hardscaped defensible space by design to reduce the need for vegetation management and potential contribution of surrounding vegetation as fuel for wildfire. HWT undergrounded its only section of overhead line in Q3 2021. HWT Operations team monitors the asset 24/7 through the facility's remote sensors and monitors, on-site cameras, and third-party wildfire tracking tools. HWT implemented additional measures at the Suncrest Facility between 2020 and 2022 to enhance its ignition detection capabilities by installing high-definition cameras, a weather station, and completed development and enhancement of a proprietary fire risk index for its territory to increase awareness of fire threat and to help inform operational decisions and supplement third-party wildfire tracking tools. In 2020, HWT installed a transformer oil gas monitoring system. In 2021, HWT also installed a cable monitoring system for its underground cable which provides thermal and partial discharge monitoring for the 230kV underground cable at the Suncrest Facility. Lastly, HWT completed an enhancement to its fire risk index by getting access to a third-party granular real-time wildfire tracking tools that utilize satellite data to monitor and track propagation of wildfires to help evaluate proximity of fires to HWT's assets and inform appropriate operational response if a wildfire was to approach and directly threaten HWT facilities. Given the limited scale and scope of the HWT current operations at the Suncrest Facility, its fire hardened design and stated enhancements, HWT has no current plans for changes to its existing ignition detection systems and capabilities at the Suncrest facility in the 2023-2025 WMP Cycle and beyond. HWT will monitor the effectiveness of its currently emplaced processes, procedures, and capabilities and assess changes or enhancements as needed.

8.3.4.1 Existing Ignition Detection Sensors and Systems

Instructions: *The electrical corporation must report on the sensors and systems, technologies, and procedures for ignition detection that are currently in use, highlighting any improvements made since the last WMP submission. At a minimum, the electrical corporation must document the deployment of each of the following:*

- *Early fire detection including, for example:*
 - *Satellite infrared imagery*

- High-definition video
- Infrared cameras
- Fire growth potential software

The electrical corporation must summarize each system in Table 8-29 below. It must provide the following additional information for each system in an accompanying narrative:

- General location of detection sensors (e.g., HFTD or entire service territory)
- Resiliency of sensor communication pathways
- Integration of sensor data into machine learning or AI software
- Role of sensor data in risk response
- False positives filtering
- Time between detection and confirmation
- Security measures for network-based sensors

Table 8-29. Example of Fire Detection Systems Currently Deployed

Detection System	Capabilities	Companion Technologies	Contribution to Fire Detection and Confirmation
Video cameras	Real-time viewing of remote area to detect smoke and wildfires	Used with satellite imagery to verify fire detection	Video cameras allow fast and accurate detection or confirmation of wildfires and can help operators assess the scope of resource response needed.

There is very limited vegetation immediately around the Suncrest Facility, and the asset has hardscaped defensible space by design to reduce the need for vegetation management and potential contribution of surrounding vegetation as fuel for wildfire. HWT Operations team monitors the asset 24/7 through the facility's remote sensors and monitors, on-site cameras, and third-party wildfire tracking tools. HWT implemented additional measures at the Suncrest Facility between 2020 and 2022 to enhance its ignition detection capabilities by installing high-definition cameras and completed development and enhancement of a proprietary fire risk index for its territory to increase awareness of fire threat and to help inform operational decisions and supplement third-party wildfire tracking tools.

Table 8-29. Fire Detection Systems Currently Deployed

Detection System	Capabilities	Companion Technologies	Contribution to Fire Detection and Confirmation

Site Video cameras	Real-time viewing of Suncrest Facility and immediate surrounding area to detect smoke and wildfires	Used with Firecaster and SDG&E Fire Potential Index and cameras to verify fire detection	Video cameras allow fast and accurate detection or confirmation of wildfires and can help operators assess the scope of resource response needed.
Optos/Firecaster	Real time tracking of wildfire conditions Fire growth potential prediction and modeling	Site Cameras and SDG&E Fire Potential Index and cameras to verify fire detection	Data model to predict the likelihood of a wildfire occurring and spreading taking into account current weather conditions, seasonality, and locale (Urban, rural, suburban, mountain, etc.)

Below are images of the Valley Fire from the onsite cameras as an example for functionality.

Figure HWT 8.3.4-1. Smoke from Valley Fire Seen from Suncrest Facility On-site Camera

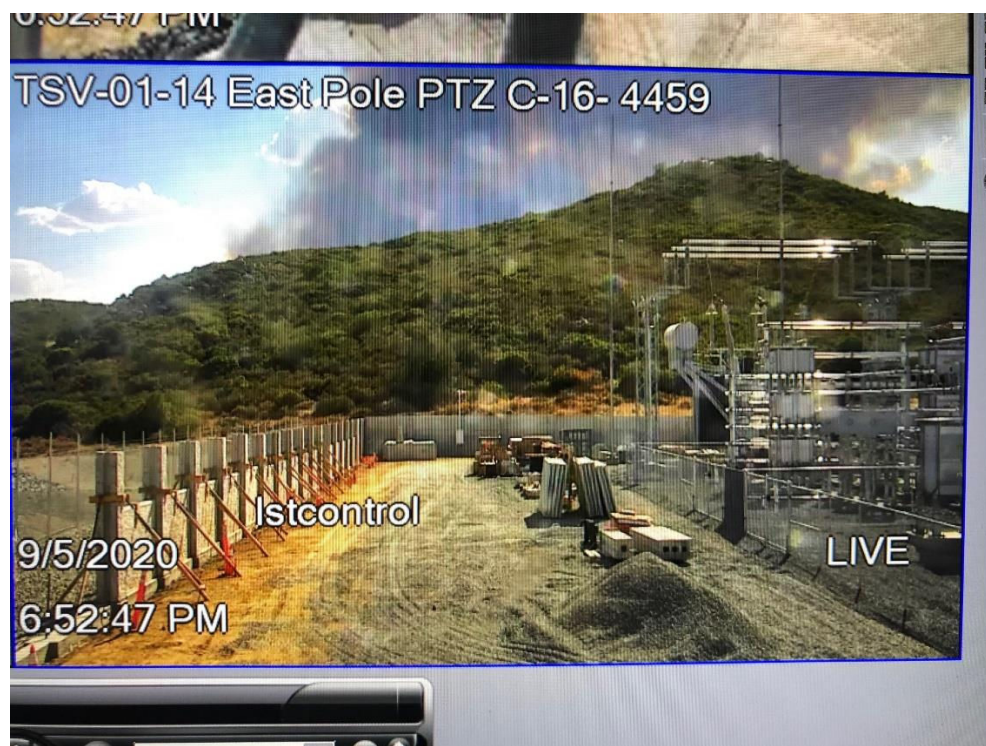
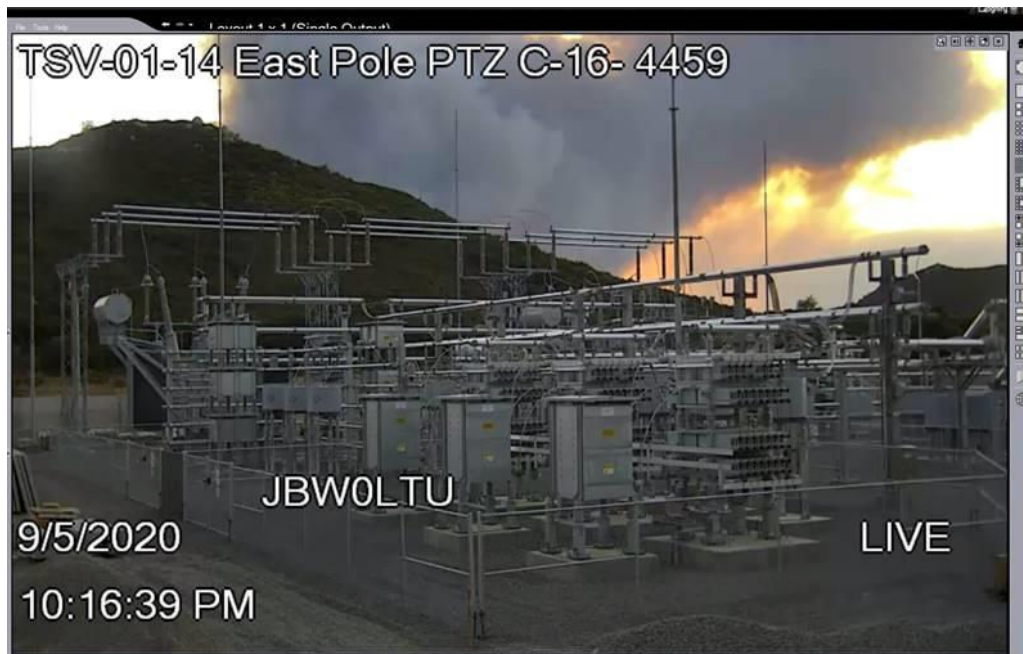


Figure HWT 8.3.4-2. Smoke from Valley Fire Seen from Suncrest Facility On-site Camera



8.3.4.2 Evaluation and Selection of New Detection Systems

Instructions: The electrical corporation must describe how it evaluates the need for additional ignition detection technologies. This description must include:

- How the electrical corporation evaluates the impact on new detection technologies on reducing and improving detection and response times
- How the electrical corporation evaluates the efficacy of new technologies
- The electrical corporation's budgeting process for new detection system purchases

To inform appropriate wildfire hardening initiatives, HWT uses the FMEA process and support from third-party site wildfire assessments. The FMEA considers the potential failures from each HWT Facility component and assesses and prioritizes the potential risk, along with providing potential mitigations. A third-party wildfire assessment was utilized to supplement the initial FMEA and provides independent evaluation/assessment of wildfire risk at the facility and opportunities for risk mitigation. HWT utilized the combined information to target mitigation initiatives that provided meaningful impact to reducing the likelihood of utility equipment instigating a fire and the promulgation and impact of a fire if one occurred. HWT updates the FMEA annually to ensure controls and processes are functioning as intended, review potential failure modes and effects of any newly added or changed equipment, and assess new opportunities for risk reduction driven by new technologies, best practices, and experience of affiliates, among other things. Given the limited scale and scope of the HWT current operations at the Suncrest Facility, HWT has no current plans for changes to grid monitoring capabilities at

the Suncrest facility in the 2023-2025 WMP Cycle and beyond. HWT will monitor the effectiveness of its currently emplaced processes, procedures, and capabilities and assess changes or enhancements as needed.

8.3.4.3 Planned Integration of New Ignition Detection Technologies

Instructions: The electrical corporation must provide an implementation schedule for new ignition detection and alarm system technologies. This must include any plans for the following:

- Integration of new systems into existing physical infrastructure
- Integration of new systems into existing data analysis
- Increases in budgets and staffing to support new systems

For each new technology system, the electrical corporation must provide the following in Table 8-30:

- **Description:** A description of the technology's capabilities
- **Impact:** A description of the impact the technology will have on each risk and risk component
- **Prioritization:** A description of the x% risk impact (see Section 8.1.1.2 for explanation)
- **Schedule:** A description of the planned schedule for implementation

Table 8-30. Example of Planning Improvements to Fire Detection and Alarm Systems

System	Description	Impact	x% Risk Impact	Implementation Schedule
High-definition cameras	Installation of high-definition cameras within the HFTD	Estimated reduction in average time to detection within HFTD from 4 hours to 1 hour	80%/10%	Installation of systems – 2024

There is very limited vegetation immediately around the Suncrest Facility, and the asset has hardscaped defensible space by design to reduce the need for vegetation management and potential contribution of surrounding vegetation as fuel for wildfire. HWT Operations team monitors the asset 24/7 through the facility's remote sensors and monitors, on-site cameras, and third-party wildfire tracking tools. HWT implemented additional measures at the Suncrest Facility between 2020 and 2022 to enhance its ignition detection capabilities by installing high-definition cameras and completed development and enhancement of a proprietary fire risk index for its territory to increase awareness of fire threat and to help inform operational decisions and supplement third-party wildfire tracking tools. HWT has no current plans for changes to its detection system capabilities at the Suncrest facility in the 2023-2025 WMP Cycle and beyond. HWT will monitor the effectiveness of its currently emplaced processes, procedures, and

capabilities and assess changes or enhancements as needed. As a result Table 8-30 is marked “N/A” meaning “Not Applicable”.

Table 8-30. Planning Improvements to Fire Detection and Alarm Systems

System	Description	Impact	x% Risk Impact	Implementation Schedule
N/A				

8.3.4.4 Evaluating Mitigation Initiatives

Instructions: The electrical corporation must describe its procedures for the ongoing evaluation of the efficacy of its fire detection systems.

To inform appropriate wildfire hardening initiatives, HWT uses the FMEA process and support from third-party site wildfire assessments. The FMEA considers the potential failures from each HWT Facility component and assesses and prioritizes the potential risk, along with providing potential mitigations. A third-party wildfire assessment was utilized to supplement the initial FMEA and provides independent evaluation/assessment of wildfire risk at the facility and opportunities for risk mitigation. HWT utilized the combined information to target mitigation initiatives that provided meaningful impact to reducing the likelihood of utility equipment instigating a fire and the promulgation and impact of a fire if one occurred. HWT updates the FMEA annually to ensure controls and processes are functioning as intended, review potential failure modes and effects of any newly added or changed equipment, and assess new opportunities for risk reduction driven by new technologies, best practices, and experience of affiliates, among other things. Given the limited scale and scope of the HWT current operations at the Suncrest Facility, HWT has no current plans for changes to its detection system capabilities at the Suncrest facility in the 2023-2025 WMP Cycle and beyond. HWT will monitor the effectiveness of its currently emplaced processes, procedures, and capabilities and assess changes or enhancements as needed.

8.3.4.5 Enterprise System for Ignition Detection

Instructions: In this section, the electrical corporation must provide an overview of its enterprise system for ignition detection. This overview must include discussion of:

- *Any database(s) used for storage.*
- *Describe the electrical corporation’s internal documentation of its database(s).*
- *Integration with systems in other lines of business.*
- *Describe any QA/QC or auditing of its system.*
- *Describe internal processes for updating the enterprise system including database(s).*
- *Any changes to the initiative since the last WMP submission and a brief explanation as to why those changes were made. Include any planned improvements or updates to the initiative and the timeline for implementation.*

There is very limited vegetation immediately around the Suncrest Facility, and the asset has hardscaped defensible space by design to reduce the need for vegetation management and potential contribution of surrounding vegetation as fuel for wildfire. HWT Operations team monitors the asset 24/7 through the facility's remote sensors and monitors, on-site cameras, and third-party wildfire tracking tools. HWT implemented additional measures at the Suncrest Facility between 2020 and 2022 to enhance its ignition detection capabilities by installing high-definition cameras and completed development and enhancement of a proprietary fire risk index for its territory to increase awareness of fire threat and to help inform operational decisions and supplement third-party wildfire tracking tools. Asset management and inspection tasks are tracked and reported as complete in HWT's asset management program. Field operations personnel review results of monthly equipment inspections. Any identified issues which need further mitigation will be discussed and addressed with the appropriate subject matter expert (SME) or the supervisor as required. Issues are documented and monitored by entering corresponding work tasks in the database. This review also ensures sustainment of efforts to identify any potential sources of ignition and near misses. Due to the limited scope and scale of operations, HWT currently does not employ an enterprise system for ignition detection.

8.3.5 Weather Forecasting

Instructions: The electrical corporation must describe its systems and procedures used to forecast weather within its service territory. These forecasts should inform the electrical corporation's near-real-time-risk assessment and PSPS decision-making processes. The electrical corporation must document the following:

- *Its existing modeling approach*
- *The known limitations of its existing approach*
- *Implementation schedule for any planned changes to the system*
- *How the efficacy of systems for reducing risk are monitored*

Reference the Utility Initiative Tracking ID where appropriate.

HWT is an independent transmission operator (ITO) that has transmission-only assets and does not have a service territory or end-use customers. As noted on page 10 of Energy Safety's ITO Supplement, ITOs have significantly less infrastructure than large investor-owned utilities and SMJUs and do not have service territories. Energy Safety notes that ITOs' weather forecasting systems, processes, and procedures do not have to be informed by modeling. However, Energy Safety states that ITOs must describe their approach to forecasting the weather.

Based on the foregoing, HWT's WMP does not include Sections 8.3.5.1 through 8.3.5.5. Instead HWT provides the following information pursuant to Energy Safety's direction on page 10 of Energy Safety's ITO Supplement.

HWT regularly monitors for the contribution of weather to ignition probability and estimated wildfire consequence by leveraging SDG&E's Fire Potential Index (FPI) for its Suncrest Facility.

SDG&E's FPI is uses a combination of weather parameters (wind speed, humidity, temperature), vegetation and fuel conditions, and other factors to judge current fire risk and to create a forecast indicative of fire risk. SDG&E's FPI and RFW alerts from NWS inform HWT's near-term operational decision-making. HWT's Operations Personnel and management get daily FPI notifications and are notified when NWS declares RFW conditions for the area of the Suncrest Facility. HWT is also utilizing its own proprietary real-time and near-term wildfire risk tools, Optos/Firecaster, to further increase awareness of fire threat, monitor propagation of wildfires in real-time, and to help inform operations decision-making. Optos/Firecaster provides a 7 day outlook of a wildfire risk index. HWT also leverages its own weather station as an additional real-time resource.

8.3.6 Fire Potential Index

Instructions: *The electrical corporation must describe its process for calculating its fire potential index (FPI) or a similar a landscape scale index used as a proxy for assessing real-time risk of a wildfire under current and forecasted weather conditions. The electrical corporation must document the following:*

- *Its existing calculation approach and how its FPI is used in its operations*
- *The known limitations of its existing approach*
- *Implementation schedule for any planned changes to the system*

Reference the Utility Initiative Tracking ID where appropriate.

8.3.6.1 Existing Calculation Approach and Use

Instructions: *The electrical corporation must describe:*

- *How it calculates its own FPI or if uses an external source, such as the United States Geological Survey³⁶*
- *How it uses its or an FPI in its operations*

Additionally, if the electrical corporation calculates its own FPI, it must provide tabular information regarding the features of its FPI. Table 8-32 provides a template for the required information.

Table 8-32: Example of Fire Potential Features

Feature Group	Feature	Altitude	Description	Source	Update Cadence	Spatial Granularity	Temporal Granularity
Weather	Temperature	Surface	Temperature at the surface in Fahrenheit	Weather model	6x per day	1 km	Hourly

³⁶ United States Geological Survey Fire Danger Map and Data Products Web Page (accessed Oct. 27, 2022): <https://firedanger.cr.usgs.gov/viewer/index.html>.

Fuel Moisture	Dead Fuel Moisture	Surface	Fuel moisture content	Weather model & third-party data set	Daily	2 km	Daily
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The Firecaster Wildfire Risk Index (WRI) uses multiple data sources to assess the relative risk of explosive wildfires near the Suncrest substation. The index considered wildfire growth based on vegetation, weather and active wildfires as factors. The resulting Wildfire Risk Index is displayed in the Optos user interface providing a scale of low, elevated, high and extreme risk of fire. The automated model produces visualizations that can be used internally for validation, refinement, and customer Q&A. Forecast emails are provided twice daily.

HWT also utilizes its proprietary wildfire spread model to increase awareness of real-time fire threats and to help inform operational decisions and supplement third-party wildfire tracking tools. In 2022 the wildfire spread model was enhanced with access to third-party granular real-time wildfire satellite data to monitor and track propagation of wildfires to help evaluate proximity of fires to HWT's assets and inform appropriate operational response if a wildfire was to approach and directly threaten HWT facilities. HWT's wildfire spread model sends email alerts to operational users if a wildfire is forecasted to approach HWT's facilities or a new fire has been detected by satellite close to a HWT facility. Additional recent improvements included improved handling of vegetation greenness, improved model response to recent and predicted rainfall.

Table 8-31. Fire Potential Features

Feature Group	Feature	Altitude	Description	Source	Update Cadence	Spatial Granularity	Temporal Granularity
Weather	Temperature , Wind Speed, Wind Direction, Humidity, Rainfall	Surface	Weather forecast data from NOAA models	AerisWeather	2x daily	5km	hourly
Weather	Recent rainfall	Surface	Recent rainfall from weather stations	AerisWeather	Daily	5km	hourly
Fuel	Soil Moisture	Top Soil	Modeled soil moisture from NOAA models	NOAA	daily	0.25 degrees	Daily
Fuel	Vegetation Greenness	Surface	Observed NDVI from	MODIS	14 days	500 meters	14 days

			MODIS satellites				
Fuel	Snow Cover	NOAA	Current snow cover	NOAA	Daily	~10km	Daily
Fires	Active Fire Hotspots	Surface	Active fire hotspots observed by NOAA20/VII RS satellites	FIRMS	6-8 hours	~300 meters	hourly

8.3.6.2 Known Limitations of Existing Approach

Instructions: The electrical corporation must describe any known limitations of current FPI calculation.

Given the limited scale and scope of HWT's operations, the current tool capabilities are deemed sufficient for the level of monitoring needed commensurate with the scale of operations. HWT has no planned improvements for its fire risk index.

8.3.6.3 Planned Improvements

Instructions: The electrical corporation must describe its planned improvements for its FPI including a description of the improvement and the planned schedule for implementation.

In the 2020-2022 WMP cycle, HWT completed development a proprietary fire risk index for its territory to increase awareness of fire threat and to help inform operational decisions and supplement third-party wildfire tracking tools. It later completed an enhancement to its fire risk index by getting access to a third-party granular real-time wildfire tracking tools that utilize satellite data to monitor and track propagation of wildfires to help evaluate proximity of fires to HWT's assets and inform appropriate operational response if a wildfire was to approach and directly threaten HWT facilities. HWT has no current plans for additional changes to its fire risk index in the 2023-2025 WMP Cycle. HWT deems its current capabilities sufficient to meet the needs of its facility's limited footprint and scale of operations. HWT will monitor the effectiveness of its currently emplaced processes, procedures, and capabilities and assess changes or enhancements as needed.

8.4 Emergency Preparedness

8.4.1 Overview

Instructions: Each electrical corporation must develop and adopt an emergency preparedness³⁷ plan in compliance with the standards established by the CPUC pursuant to Public Utilities Code section 768.6(a). Wildfires and PSPS events introduce unique risk management challenges requiring the electrical corporation to evaluate, develop, and implement wildfire- and PSPS-specific emergency preparedness activities as part of a holistic emergency preparedness strategy.

In this section, the electrical corporation must identify objectives for the next 3- and 10-year periods, targets, and performance metrics related to the following emergency preparedness programmatic areas:

- Wildfire and PSPS emergency preparedness plan
- Collaboration and coordination with public safety partners
- Public notification and communication strategy
- Preparedness and planning for service restoration
- Customer support in wildfire and PSPS emergencies
- Learning after wildfire and PSPS events

8.4.1.1 Objectives

Instructions: Each electrical corporation must summarize the objectives for its 3-year and 10-year plans for implementing and improving its emergency preparedness.³⁸ These summaries must include the following:

- Identification of which initiative(s) in the WMP the electrical corporation is implementing to achieve the stated objective, including Utility Initiative Tracking IDs
- Reference(s) to applicable codes, standards, and best practices/guidelines and an indication of whether the electrical corporation exceeds an applicable code, standard, or regulation
- Method of verifying achievement of each objective
- A completion date for when the electrical corporation will achieve the objective
- Reference(s) to the WMP section(s) or appendix, including page numbers, where the details of the objective(s) are documented and substantiated

This information must be provided in Table 8-33 for the 3-year plan and Table 8-34 for the 10-year plan. Examples of the minimum acceptable level of information are provided below.

Table 8-33. Example of Emergency Preparedness Initiative Objectives (3-year plan)

³⁷ “Emergency and Disaster Preparedness” from Public Utilities Code section 768.6 has been shortened here to Emergency Preparedness.

³⁸ Annual information included in this section must align with the QDR data.

Objectives for Three Years (2023–2025)	Applicable Initiative(s), Tracking ID(s)	Applicable Regulations, Codes, Standards, and Best Practices (See Note)	Method of Verification (i.e., program)	Completion Date	Reference (section & page #)
Update workforce training for emergency response	Emergency Preparedness Plan, EP-01	Emergency Readiness Training Portfolio; GO 166	Updated emergency response training curriculums; training records including pass rates	June 2024	

Note: An asterisk indicates that the electrical corporation exceeds a particular code, regulation, standard, or best practice. The electrical corporation must provide a reference to the appendix section and page providing further documentation and substantiation.

Table 8-34. Example of Emergency Preparedness Initiative Objectives (10-year plan)

Objectives for Ten Years (2026–2032)	Applicable Initiative(s), Tracking ID(s)	Applicable Regulations, Codes, Standards, and Best Practices (See Note)	Method of Verification (i.e., program)	Completion Date	Reference (section & page #)
Increase granularity and customization of response plans	Emergency Preparedness Plan, EP-01	Emergency Preparedness Plan	Existence of emergency plans based on region of service territory	January 2030	

Note: An asterisk indicates that the electrical corporation exceeds a particular code, regulation, standard, or best practice. The electrical corporation must provide a reference to the appendix section and page providing further documentation, justification, and substantiation.

HWT's only asset is the Suncrest Facility which completed and entered operational service in Q1 2020. According with good utility practice, HWT has developed an emergency operations plan for its only operating asset, the Suncrest Facility. All relevant HWT personnel, including the system operations team that remotely monitors the Suncrest Facility 24/7, are trained on HWT's emergency operations plan. In view of HWT's current limited footprint with one operational transmission asset, HWT has a small staff overseeing HWT operations, including dedicated on-

site staff performing all operations work including restoration as well as remote system operators that remotely control the asset 24/7 from a North American Electric Reliability Corporation (NERC)-certified control center.

HWT Operations personnel are trained on all relevant HWT procedures, including regular monthly asset inspections (Wildfire Mitigation Condition Assessment Procedure), vegetation inspections (Wildlife and Vegetation Procedure), and emergency response (Emergency Operations Plan) which also contains HWT's PSPS protocols. HWT also conducts an annual wildfire simulation to its wildfire mitigation procedures to be conducted in the spring/early summer ahead of increased frequency of RFW days in late summer and fall. This simulation is to ensure that emergency operations procedures, protocols, and roles and responsibilities are top of mind for HWT's Operations and other key personnel in advance of wildfire season. Given the foregoing, HWT has no current plans for changes to its emergency preparedness processes at the Suncrest facility in the 2023-2025 WMP Cycle and beyond. HWT will monitor the effectiveness of its currently emplaced processes, procedures, and capabilities and assess changes or enhancements as needed. Therefore Table 8-32 and Table 8-33 are marked "N/A" meaning "Not Applicable".

Table 8-32. Emergency Preparedness Initiative Objectives (3-year plan)

Objectives for Three Years (2023–2025)	Applicable Initiative(s), Tracking ID(s)	Applicable Regulations, Codes, Standards, and Best Practices (See Note)	Method of Verification (i.e., program)	Completion Date	Reference (section & page #)
N/A					

Note: An asterisk indicates that the electrical corporation exceeds a particular code, regulation, standard, or best practice. The electrical corporation must provide a reference to the appendix section and page providing further documentation and substantiation.

Table 8-33. Emergency Preparedness Initiative Objectives (10-year plan)

Objectives for Ten Years (2026–2032)	Applicable Initiative(s), Tracking ID(s)	Applicable Regulations, Codes, Standards, and Best Practices (See Note)	Method of Verification (i.e., program)	Completion Date	Reference (section & page #)
N/A					

Note: An asterisk indicates that the electrical corporation exceeds a particular code, regulation, standard, or best practice. The electrical corporation must provide a reference to the appendix section and page providing further documentation, justification, and substantiation.

8.4.1.2 Targets

Instructions: Initiative targets are forward-looking quantifiable measurements of activities identified by each electrical corporation in its WMP. Electrical corporations will show progress toward completing targets in subsequent reports, including QDRs and WMP Updates.

The electrical corporation must list all targets it will use to track progress on its emergency preparedness for the three years of the Base WMP. Energy Safety's Compliance Assurance Division and third parties must be able to track and audit each target.³⁸ For each initiative target, the electrical corporation must provide the following:

- Utility Initiative Tracking IDs.
- Projected targets for the three years of the Base WMP and relevant units.
- The expected "x% risk impact" for each of the three years of the Base WMP. The expected x% risk impact is the expected percentage risk reduction per year, as described in Section 7.2.2.2.
- Method of verifying target completion.

The electrical corporation's targets must provide enough detail to effectively inform efforts to improve the performance (i.e., reduction in wildfire consequence) of the electrical corporation's emergency preparedness initiatives.

Table provides an example of the minimum acceptable level of information.

Table 8-35. Example of Emergency Preparedness Initiative Targets by Year

Initiative Activity	Tracking ID	2023 Target & Unit	x% Risk Impact 2023	2024 Target & Unit	x% Risk Impact 2024	2025 Target & Unit	x% Risk Impact 2025	Method of Verification
Conduct emergency drills	EP-03	4 emergency drills conducted	0.5%	4 drills	0.5%	4 drills	0.5%	After drill reports

In view of HWT's current limited footprint with one operational transmission asset, HWT has a small staff overseeing HWT operations, including dedicated on-site staff performing all operations work including restoration as well as remote system operators that remotely control the asset 24/7 from a North American Electric Reliability Corporation (NERC)-certified control center. HWT Operations personnel are trained on all relevant HWT procedures, including regular monthly asset inspections (Wildfire Mitigation Condition Assessment Procedure), vegetation inspections (Wildlife and Vegetation Procedure), and emergency response (Emergency Operations Plan) which also contains HWT's PSPS protocols. HWT also conducts an annual wildfire simulation to its wildfire mitigation procedures to be conducted in the spring/early summer ahead of increased frequency of RFW days in late summer and fall. This simulation is to ensure that emergency operations procedures, protocols, and roles and responsibilities are top of mind for HWT's Operations and other key personnel in advance of wildfire season. Given the foregoing, HWT has no current plans for changes to its emergency preparedness processes and

therefore has no emergency preparedness initiative targets at the Suncrest facility in the 2023-2025 WMP Cycle and beyond. HWT will monitor the effectiveness of its currently emplaced processes, procedures, and capabilities and assess changes or enhancements as needed. As result Table 8-34 is marked “N/A” meaning “Not Applicable”.

Table 8-34. Emergency Preparedness Initiative Targets by Year

Initiative Activity	Tracking ID	2023 Target & Unit	x% Risk Impact 2023	2024 Target & Unit	x% Risk Impact 2024	2025 Target & Unit	x% Risk Impact 2025	Method of Verification
N/A								

8.4.1.3 Performance Metrics identified by the Electrical Corporation

***Instructions:** Performance metrics indicate the extent to which an electrical corporation’s Wildfire Mitigation Plan is driving performance outcomes. Each electrical corporation must:*

- *List the performance metrics the electrical corporation uses to evaluate the effectiveness of its emergency preparedness in reducing wildfire and PSPS risk³⁹*

For each of these performance metrics listed, the electrical corporation must:

- *Report the electrical corporation’s performance since 2020 (if previously collected)*
- *Project performance for 2023-2025*
- *List method of verification*

The electrical corporation must ensure that each metric’s name and values are the same in its WMP reporting as its QDR reporting (specifically, QDR Table 2 and QDR Table 3). Metrics listed in this section that are the same as performance metrics required by Energy Safety and reported in QDR Table 2 (Performance Metrics)⁴⁰ must match those reported in QDR Table 2. Metrics listed in this section that are not the same as any of the performance metrics identified by Energy Safety and reported in QDR Table 2 must match those reported in QDR Table 3.

The electrical corporation must:

- *Summarize its self-identified performance metric(s) in tabular form*
- *Provide a brief narrative that explains trends in the metrics*

Table 8-36 provides an example of the minimum acceptable level of information.

Table 8-36. Example of Emergency Preparedness Performance Metrics Results by Year

³⁹ There may be overlap between the performance metrics the electrical corporation uses and performance metrics required by Energy Safety. The electrical corporation must list these overlapping metrics in this section in addition to any unique performance metrics it uses.

⁴⁰ The performance metrics identified by Energy Safety are included in Energy Safety’s Data Guidelines.

<i>Performance Metrics</i>	<i>2020</i>	<i>2021</i>	<i>2022</i>	<i>2023 Projected</i>	<i>2024 Projected</i>	<i>2025 Projected</i>	<i>Method of Verification (e.g., third-party evaluation, QDR)</i>

HWT began commercial operations of the Suncrest Facility in Q1 2020. As such there is no reportable information prior to 2020. Since the start of commercial operations, HWT has had no instigation of ignition by utility equipment and no incidents of utility-equipment caused fire. HWT projects the trend of zero (0) utility-equipment instigated ignitions to continue through the 2023-2025 WMP cycle and beyond given (i) the fire-harden grid design of the Suncrest Facility, (ii) site improvements in the 2020-2023 WMP cycle, (iii) enhanced situational awareness capabilities, (iv) cadence of equipment and site inspections, and (v) limited scope of operations. The metrics cited below are the same as performance metrics required by Energy Safety and reported in QDR Table 2 and Table 3.

Table 8-35. Emergency Preparedness Performance Metrics Results by Year

Performance Metrics	2020	2021	2022	2023 Projected	2024 Projected	2025 Projected	Method of Verification (e.g., third-party evaluation, QDR)
Vegetation-caused ignitions	0	0	0	0	0	0	QDR
Vegetation-caused outages	0	0	0	0	0	0	QDR
Open vegetation work orders	0	0	0	0	0	0	QDR
Number of reportable ignition incidents on RFW days	0	0	0	0	0	0	QDR
Value of assets destroyed by	0	0	0	0	0	0	QDR

utility-related ignitions, listed by asset type							
Structures damaged or destroyed by utility-related ignitions	0	0	0	0	0	0	QDR
Acreage burned by utility-related ignitions	0	0	0	0	0	0	QDR
Fatalities resulting from utility wildfire mitigation initiatives	0	0	0	0	0	0	QDR
Number of utility-related ignitions	0	0	0	0	0	0	QDR
OSHA-reportable injuries from utility wildfire mitigation initiatives	0	0	0	0	0	0	QDR

8.4.2 Emergency Preparedness Plan

Instructions: In this section, the electrical corporation must provide an overview of how it has evaluated, developed, and integrated wildfire- and PSPS-specific emergency preparedness strategies, practices, policies, and procedures into its overall emergency plan based on the minimum standards described in GO 166. The electrical corporation must provide the title of its latest emergency preparedness report, the date of the report, and an indication of whether the plan complies with CPUC R. 15-06-009, D. 21-05-019, and GO 166. The overview must be no more than two paragraphs.

In addition, the electrical corporation must provide a list of any other relevant electrical corporation documents that govern its wildfire and PSPS emergency preparedness planning for

response and recovery efforts. This must be a bullet point list with document title, version (if applicable), and date. For example:

- *Electrical Corporation's Emergency Response Plan (ECERP), Third Edition, dated January 1, 2021*

Reference the Utility Initiative Tracking ID where appropriate.

According with good utility practice, HWT has developed an emergency operations plan for its only operating asset, the Suncrest Facility. Wildfire and PSPS-specific strategies were considered when HWT was developing its operational procedures due to the fact that the Suncrest Facility is sited in a Tier 3 HFTD. HWT Operations personnel are trained on all relevant HWT procedures, including regular monthly asset inspections (Wildfire Mitigation Condition Assessment Procedure), vegetation inspections (Wildlife and Vegetation Procedure), and emergency response (Emergency Operations Plan) which contains HWT's PSPS protocols. HWT's Suncrest Facility is a transmission-only system that does not contain any distribution assets. The facility is also under the operational control of the CAISO and is maintained to CAISO maintenance standards. HWT cites to the following specific procedures⁴¹:

- HWT-IP Emergency Operations Plan, Effective September 22, 2020
- Wildfire Mitigation Condition Assessment, V1.1, Effective October 24, 2019

8.4.2.1 Overview of Wildfire and PSPS Emergency Preparedness

Instructions: *In this section of the WMP, the electrical corporation must provide an overview of its wildfire- and PSPS-specific emergency preparedness plan. At a minimum, the overview must describe the following:*

- *Purpose and scope of the plan.*
- *Overview of protocols, policies, and procedures for responding to and recovering from a wildfire or PSPS event (e.g., means and methods for assessing conditions, decision-making framework, prioritizations). This must include:*
 - *An operational flow diagram illustrating key components of its wildfire- and PSPS-specific emergency response procedures from the moment of activation to response, recovery, and restoration of service.*
 - *Separate overviews and operational flow diagrams for wildfires and PSPS events.*
- *Key personnel, qualifications, and training.*
- *Resource planning and allocation (e.g., staffing).*
- *Drills, simulations, and tabletop exercises.*
- *Coordination and collaboration with public safety partners (e.g., emergency planning, interoperable communications).*
- *Notification of and communication to customers during and after a wildfire or PSPS event.*
- *Improvements/updates made since the last WMP submission.*

⁴¹ Both procedures are provided as confidential attachments to this WMP.

The overview must be no more than six pages.

In addition, the electrical corporation must provide a table with a list of current gaps and limitations in evaluating, developing, and integrating wildfire- and PSPS-specific preparedness and planning features into its overall emergency preparedness plan(s). Where gaps or limitations exist, the electrical corporation must provide a remedial action plan and the timeline for resolving the gaps or limitations. Table 8-37 provides an example of the minimum level of content and detail required

Table 8-37. Example of Key Gaps and Limitations in Integrating Wildfire- and PSPS-Specific Strategies into Emergency Plan

Gap or Limitation Subject	Remedial Brief Description	Remedial Action Plan
Limited feedback on wildfire-specific components of emergency plan	Limited coordination with local-level public safety partners in the review and development of the wildfire-specific emergency preparedness plan	<p>Strategy: Establish a community advisory panel in collaboration with local government and non-governmental organizations.</p> <p>• Target timeline: Develop a process for establishing a community advisory panel, including policies and procedures, by the end of 2023. Convene the advisory panel to review and provide feedback on the emergency preparedness plan for 50% of communities by end of 2024.</p>

The Suncrest Facility is a MVar SVC connected to an approximately one mile undergrounded 230 kV single-circuit transmission line. HWT does not serve end-use customers, have a traditional service territory or a distribution system. Additionally, based on the limited scale and scope of the Suncrest Facility, at this time, HWT believes that it will seldom, if ever, be necessary to issue a PSPS. The Interconnecting Transmission Owner, SDG&E, would be the main driver of a PSPS in the Suncrest Facility’s operational area. There is very limited vegetation immediately around the Suncrest Facility, and the asset has hardscaped defensible space by design to reduce the need for vegetation management and potential contribution of surrounding vegetation as fuel for wildfire. Given the foregoing, HWT does not have a specific wildfire/PSPS preparedness plan, but a general emergency operations plan (HWT-IP Emergency Operations Plan) (EOP) which also includes PSPS protocols. All HWT’s operations personnel are trained on all relevant HWT

procedures, including regular monthly asset inspections (Wildfire Mitigation Condition Assessment Procedure), vegetation inspections (Wildlife and Vegetation Procedure), and the EOP.

In view of HWT's current limited footprint with one operational transmission asset, HWT has a small staff of 2 field engineers overseeing HWT operations, performing asset inspection and maintenance work. Remote system operators remotely control the asset 24/7 from a North American Electric Reliability Corporation (NERC)-certified control center.

The purpose of the EOP is to establish a procedure for emergency response and coordination with first responders at the Suncrest Facility to address the response and defend against risk to the Facility. The scope of the EOP relates to emergency response and coordination with first responders. Section 1.3 of the EOP identifies the roles and responsibilities of HWT's operations engineer, Lone Star system operator who provides 24/7 remote monitoring of the Suncrest Facility, the NEET Operations Technical Services Manager, NEET Field Operations Manager, and Operations Senior Director who provide enterprise level oversight. At a high level the EOP (Section 3) provides protocols for responding to three types of events: a Facility event, a Facility "fire" event, and a non-Facility event. The 24/7 system operator monitors the Facility for any situation or condition that could disrupt normal operations or create any interruption to the bulk electric system. These situations or conditions include but are not limited to:

- Loss of telecommunications
- Unplanned change in equipment status or failure
- Loss of voltage/reactive devices
- Equipment reaching/exceeding operational rating
- Unknown operation state
- Failure of a protection system/device
- Fire event

Section 4 of the EOP describes HWT's PSPS policy. The policy is divided into two sections: SDG&E Initiated PSPS (Section 4.1) and HWT Initiated PSPS (Section 4.2). As noted above, based on the limited scale and scope of the Suncrest Facility, HWT believes that it will seldom, if ever, be necessary to issue a PSPS. The Interconnecting Transmission Owner, SDG&E, would be the main driver of a PSPS in the Suncrest Facility's operational area. HWT's objective is operate the Suncrest Facility and utilize PSPS as a last resort. Below is a diagram of the key components of HWT's PSPS protocols for the two situations described above.

Figure HWT 8.4.2-1. HWT Protocol for SDG&E Initiated PSPS

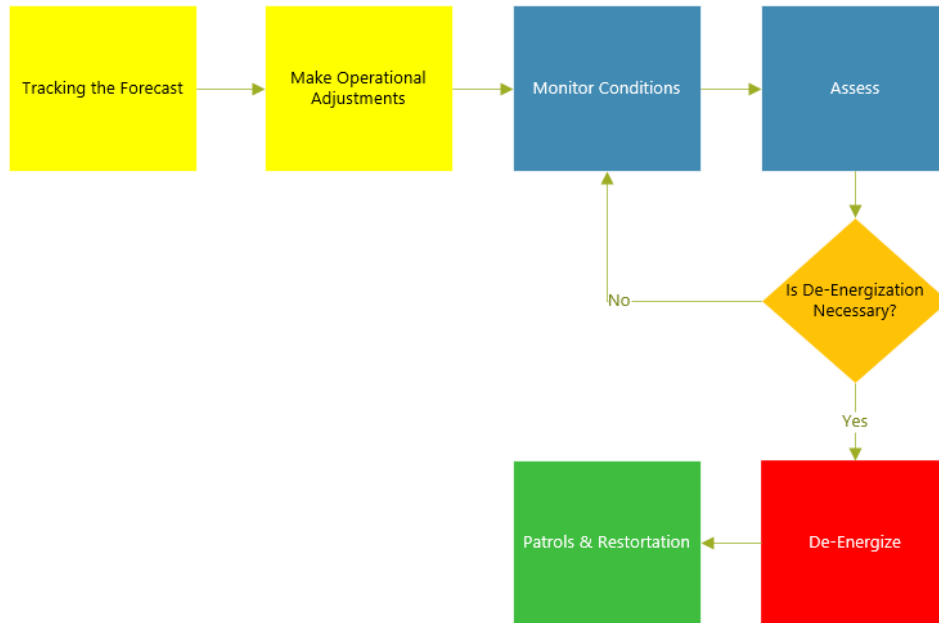
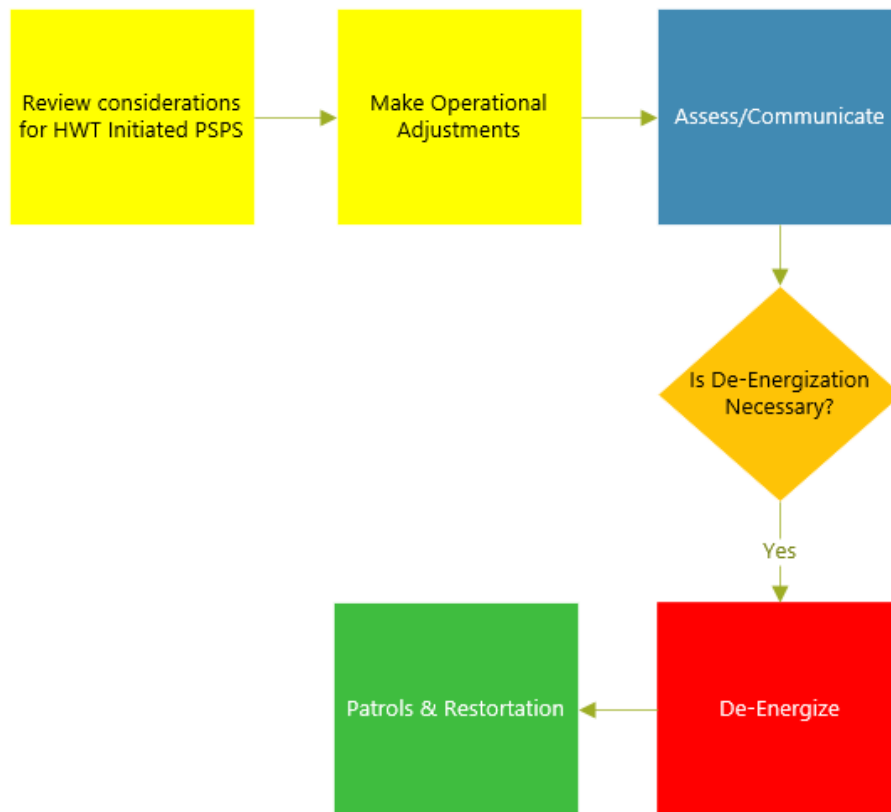


Figure HWT 8.4.2-2. HWT Protocol for HWT Initiated PSPS



Due to HWT’s limited scope of operations it does not conduct PSPS specific drills but HWT does conduct an annual wildfire simulation event at the Suncrest SVC with participation from its contracted suppression vendor.

Given that HWT does not have any retail customers is does not communication with the public but maintains communications and coordinates with the CAISO who has operational control of the Suncrest SVC and SDG&E who is the interconnecting utility in accordance with Section 4 of the EOP. For any fire incident that impacted Suncrest SVC, HWT would contact and coordinate with the San Diego County Fire Authority Descanso Fire Station 45.

Due to the limited scope and scale of operations, the footprint of the Suncrest Facility, and the unlikelihood that HWT would ever issue a PSPS for the Suncrest Facility, HWT currently does not have an action to materially alter its preparedness plans. HWT will monitor the effectiveness of its currently emplaced processes, procedures, and capabilities and assess changes or enhancements as needed. As a result Table 8-36 is marked “N/A” meaning “Not Applicable”.

Table 8-36. Key Gaps and Limitations in Integrating Wildfire- and PSPS-Specific Strategies into Emergency Plan

<i>Gap or Limitation Subject</i>	<i>Remedial Brief Description</i>	<i>Remedial Action Plan</i>
N/A		

8.4.2.2 Key Personnel, Qualifications, and Training

Instructions: In this section, the electrical corporation must provide an overview of the key personnel constituting its emergency planning, preparedness, response, and recovery team(s) for wildfire and PSPS events. This includes identifying key roles and responsibilities, personnel resource planning (internal and external staffing needs), personnel qualifications, and required training programs.

Personnel Qualifications

The electrical corporation must report on the various roles, responsibilities, and qualifications of electrical corporation and contract personnel tasked with wildfire emergency preparedness planning, preparedness, response, and recovery, and those tasked for PSPS-related events. This may include representatives from administration, information technology (IT), human resources, communications, electrical operations, facilities, and any other mission-critical units in the electrical corporation. As part of this section, the electrical corporation must provide a brief narrative describing its process for planning to meet its internal and external staffing needs for emergency preparedness planning, preparedness, response, and recovery related to wildfire and PSPS. The narrative must be no more than two to four pages.

Table 8-38 provides an example of the minimum level of content and detail required.

Table 8-38. Example of Emergency Preparedness Staffing and Qualifications

Role	Incident Type	Responsibilities	Qualifications	No. of Dedicated Staff Required	No. of Dedicated Staff Provided	No. of Contract Workers Required	No. of Contract Workers Provided
Program Director	Wildfires	<ul style="list-style-type: none"> • Lead, oversee, and coordinate emergency preparedness department • Oversee all functions related to preventing, mitigating, responding to, and recovering from emergencies due to all relevant hazards for the electrical corporation • Develop, maintain, and update the electrical corporation emergency preparedness plan with associated policies, practices, and procedures • Direct and manage emergency program managers and supervisors • Evaluate resources, equipment, and personnel available to respond to emergencies • Monitor program performance; recommend and implement modifications to systems and procedures • Develop and oversee the electrical corporation's emergency operations 	<ul style="list-style-type: none"> • Incident Command Certifications: ICS 100, 200, 300, 700, 800 • Master's in Disaster Risk Management • Minimum 15 years' experience in disaster risk management and/or emergency preparedness and planning 	1	1	NA	NA

		<i>center; evaluate regular and emergency communication systems; make recommendations as appropriate</i>					
<i>Grid Operations Manager</i>	<i>Wildfires, PSPS</i>	<ul style="list-style-type: none"> • Maintain facilities used during emergency operations 	-	3	3		
<i>Public Information Officer</i>	<i>Wildfires, PSPS</i>	<ul style="list-style-type: none"> • Plan and host press conferences to announce major news or address crises • Prepare press releases, speeches, articles, social media posts, and other materials for public consumption • Develop strategies and procedures for working effectively with the media • Maintain good working relationships with media organizations • Collaborate with executive management and marketing team to ensure a cohesive public image • Work with various teams to organize and host public events and promotions • Speak directly to the public or media to address questions and represent the organization 	<ul style="list-style-type: none"> • Bachelor's degree in communications, public relations, journalism, or related field • Prior experience in a public relations role • Exceptional written and verbal communication skills • Strong understanding of the media, including social media • Organized and detail-oriented work ethic • Ability to travel on short notice • Great public speaking and interpersonal skills 	1	1		

<i>Utility Incident Commander</i>	<i>Wildfires, PSPS</i>	<ul style="list-style-type: none"> • Leads emergency operations center • Serve as point of contact for all wildfire-related emergencies/disasters in conjunction with the Program Director • Command all emergency response functions at the field response level 		<i>1</i>	<i>1</i>		
<i>Public Safety Partner Liaison</i>	<i>Wildfires, PSPS</i>	<ul style="list-style-type: none"> • Develop relations with outside organizations, including local, state, and federal fire suppression organizations, the state Office of Emergency Services, the county sheriff's department, the Red Cross, school districts, etc.; maintain close working relationships to ensure rapid and coherent response in emergency situations • Coordinate with relevant public safety partners in electrical corporation's service territory (e.g., fire, law enforcement, OES, CPUC, Energy Safety, Emergency Management Systems, public health departments, public works) to coordinate emergency preparedness, response and recovery plans, roles and responsibilities, etc. 		<i>3</i>	<i>3</i>		

		<ul style="list-style-type: none"> • Meet with public safety officials, private companies, and the general public to get recommendations regarding emergency response plans • Coordinate with local public safety partners to assess damage to communities • Coordinate getting assistance and supplies into impacted community • Oversee and direct a variety of emergency-related community education programs, including disaster preparedness programs and AM radio classes 					
Trainer Officer	Wildfires, PSPS	<ul style="list-style-type: none"> • Run training courses and disaster exercises for staff, volunteers, and local agencies to ensure an effective and coordinated response to an emergency 					

Personnel Training

The electrical corporation must report on its internal personnel training program(s) for wildfire and PSPS emergency events. This training must include, at a minimum, training on relevant policies, practices, and procedures before, during, and after a wildfire or PSPS event. The reporting must include, at a minimum:

- *The name of each training program*
- *A brief narrative on the purpose and scope of each program*

- The type of training method
- The schedule and frequency of training programs
- The percentage of staff who have completed the most current training program
- How the electrical corporation tracks who has completed the training programs

Table 8-39 provides an example of the minimum acceptable level of information.

External Contractor Training

The electrical corporation must report on its external contractor training program(s) for wildfire and PSPS emergency events. This training must include, at a minimum, training on relevant policies, practices, and procedures before, during, and after a wildfire or PSPS event. The reporting must include, at a minimum:

- The name of each training program
- A brief narrative on the purpose and scope of each program
- The type of training method
- The schedule and frequency of training programs
- The percentage of contractors who have completed the most current training program
- How the electrical corporation tracks who has completed the training programs

Table 8-40 provides an example of the minimum acceptable level of information.

Table 8-39. Example of Electrical Corporation Personnel Training Program

Training Topic	Purpose and Scope	Training Method	Training Frequency	Position or Title of Personnel Required to Take Training	# Personnel Requiring Training	# Personnel Provided with Training	Form of Verification or Reference
Introduction to the electrical corporation's emergency preparedness plan	<ul style="list-style-type: none"> • The contents of emergency response plans, in particular those for wildfire- and PSPS-specific incidents • The electrical corporation's overall safety practices and those specific to wildfire and PSPS incidents 	Online course, workshop, or in-person training	Annually	All staff	4,100	3,800	Training materials and training logs

	<ul style="list-style-type: none"> • The organizational structure of how the electrical corporation responds to, manages, and recovers from incidents • The electrical corporation's and public safety partners' roles and responsibilities before, during, and after a wildfire or PSPS incident • The electrical corporation's notification and activation protocols for wildfires and PSPS incidents 						
Threats, hazards, and protection actions							
Notification, warning, and communication procedures							
Emergency response procedures during a wildfire							

<i>Emergency shutdown procedures</i>							
<i>Activating and deactivating mutual aid</i>							
<i>Practices, policies, and procedures for emergency response and service restoration for PSPS events</i>							
<i>Introduction to the electrical corporation's mutual aid agreement with aid partner</i>	<ul style="list-style-type: none"> • Familiarize aid partners with the concepts and actions in the mutual aid operations plan prior to implementation • Allow responding resources the opportunity to practice their procedures and responsibilities • Scope items include: <ul style="list-style-type: none"> o Contents of mutual aid operations plan, in particular those on wildfire- and PSPS-specific incidents o The electrical corporation's overall safety practices and those specific 	<i>Online course, workshop, or in-person training</i>	<i>Annually</i>	<i>All potential mutual aid resources</i>	<i>150</i>	<i>135</i>	<i>Training materials and training logs</i>

	<i>to wildfire and PSPS incidents</i> <ul style="list-style-type: none"> <i>o The organizational structure and interoperability of how the mutual aid partners and resources collaborate and coordinate</i> <i>o The electrical corporation's and public safety partners' roles and responsibilities before, during, and after a wildfire or PSPS incident</i> <i>o The electrical corporation's notification and activation protocols for wildfires and PSPS events</i> 						
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Table 8-40. Example of Contractor Training Program

<i>Training Topic</i>	<i>Purpose and Scope</i>	<i>Training Method</i>	<i>Training Frequency</i>	<i>Position or Title of Personnel Required to Take Training</i>	<i># Contractors Requiring Training</i>	<i># Contractors Completed Training</i>	<i>Form of Verification or Reference</i>
<i>Introduction to the electrical corporation's mutual aid agreement</i>	<ul style="list-style-type: none"> <i>• Familiarize aid partners with the concepts and actions in the mutual aid operations plan</i> 	<i>Online course, workshop, or in-</i>	<i>Annually</i>	<i>All potential mutual aid resources</i>	<i>150</i>	<i>135</i>	<i>Training materials and training logs</i>

<i>with aid partner</i>	<p><i>prior to implementation</i></p> <ul style="list-style-type: none"> • Allow responding resources the opportunity to practice their procedures and responsibilities • Scope items include: <ul style="list-style-type: none"> ○ Contents of mutual aid operations plan, in particular those on wildfire- and PSPS-specific incidents ○ The electrical corporation's overall safety practices and those specific to wildfire and PSPS incidents ○ The organizational structure and interoperability of how the mutual aid partners and resources collaborate and coordinate ○ The electrical corporation's and public safety partners' roles and responsibilities before, during, and after a wildfire or PSPS incident 	<i>person training</i>					
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	○ <i>The electrical corporation's notification and activation protocols for wildfires and PSPS events</i>						
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In view of HWT's current limited footprint with one operational transmission asset, HWT has a small staff overseeing HWT operations, including dedicated on-site staff performing asset inspection and maintenance work, as well as remote system operators that remotely control the asset 24/7 from a North American Electric Reliability Corporation (NERC)-certified control center. All HWT maintenance work, including asset inspections, is carried out by dedicated HWT Operations personnel and qualified contractors that, by reason of training, experience, and instruction, are qualified to perform the task. Operations personnel maintain and operate the HWT Facilities in accordance with good utility practice, sound engineering judgment, the guidelines as outlined in applicable NERC reliability standards, laws, and regulations. The HWT operations personnel take proper care to ensure the safety of personnel and the public in performing maintenance duties. The EOP identifies the roles and responsibilities of HWT's operations engineer, Lone Star system operator who provide 24/7 remote monitoring of the Suncrest Facility, and the System Operations Lead, NEET Operations Technical Services Manager, NEET Senior Director Operations who provide enterprise level oversight and approval of HWT-initiated power shutoffs.

Table 8-37. Emergency Preparedness Staffing and Qualifications

Role	Incident Type	Responsibilities	Qualifications	No. of Dedicated Staff Required	No. of Dedicated Staff Provided	No. of Contract Workers Required	No. of Contract Workers Provided
Suncrest Operations Engineer	Wildfire/ PSPS	On-site primary point of contact for any event affecting the Facility		1	1	NA	NA
Lone Star System Operator	Wildfire/ PSPS	Responsible for all operations of the Facility 24/7, immediate system shutdown if required	NERC qualified system operator	1	1	NA	NA
Lone Star Operations Lead	Wildfire/ PSPS	Oversees Lone Star Operations team and has authority over the scope and content of the Facility's procedures	NERC qualified system operator	1	1	NA	NA
NEET Operations	Wildfire/ PSPS	Provide technical services support and		1	1	NA	NA

Technical Services Manager		expertise to Suncrest Operations Engineer and Lone Star Operations staff in support of the Facility					
NEET Senior Operations Director	Wildfire/ PSPS	Executive leadership and oversight of Facility operations, approval of HWT-initiated power shutoffs		1	1	NA	NA

All HWT's operations personnel are trained on all relevant HWT procedures during onboarding, including regular monthly asset inspections (Wildfire Mitigation Condition Assessment Procedure), vegetation inspections (Wildlife and Vegetation Procedure), and the EOP. The EOP is reviewed at least once a year during the annual wildfire simulation event. Due to the limited scope and scale of operations, HWT does not have an internal training program specifically in connection with wildfire or PSPS events. Therefore Table 8-38 is marked "N/A" meaning "Not Applicable"

Table 8-38. Electrical Corporation Personnel Training Program

Training Topic	Purpose and Scope	Training Method	Training Frequency	Position or Title of Personnel Required to Take Training	# Personnel Requiring Training	# Personnel Provided with Training	Form of Verification or Reference
N/A							

Due the limited size and scope of HWT's operations, and that it does not have any distribution assets or retail customers, HWT does not have a contractor training program specifically in connection with wildfire or PSPS events. Therefore Table 8-39 is marked "N/A" meaning "Not Applicable".

Table 8-39. Contractor Training Program

Training Topic	Purpose and Scope	Training Method	Training Frequency	Position or Title of Personnel Required	# Contractors Requiring Training	# Contractors Completed Training	Form of Verification or Reference

				to Take Training			
N/A							

All HWT's operations personnel are trained on all relevant HWT procedures during onboarding, including regular monthly asset inspections (Wildfire Mitigation Condition Assessment Procedure), vegetation inspections (Wildlife and Vegetation Procedure), and the EOP. The EOP is reviewed at least once a year during the annual wildfire simulation event.

8.4.2.3 Drills, Simulations, and Tabletop Exercises

***Instructions:** Discussion-based and operational-based exercises enhance knowledge of plans, allow personnel to improve their own performance, and identify opportunities to improve capabilities to respond to real wildfire emergency events and PSPS events. Exercises also provide a method to evaluate an electrical corporation's emergency preparedness plan and identify planning and/or procedural deficiencies.*

Internal Exercises

The electrical corporation must report on its program(s) for conducting internal discussion-based and operations-based exercises for both wildfire and PSPS emergency events. This must include, at a minimum:

- *The types of discussion-based exercises (e.g., seminars, workshops, tabletop exercises, games) and operations-based exercises (e.g., drills, functional exercises, full-scale exercises)*
- *The purpose of the exercises*
- *The schedule and frequency of exercise programs*
- *The percentage of staff who have completed/participated in exercises*
- *How the electrical corporation tracks who has completed the exercises*

Table 8-41 provides an example of the minimum acceptable level of information.

External Exercises

The electrical corporation must report on its program(s) for conducting external discussion-based and operations-based exercises for both wildfire and PSPS emergency events. This must include, at a minimum:

- *The types of discussion-based exercises (e.g., seminars, workshops, tabletop exercises, games) and operations-based exercises (e.g., drills, functional exercises, full-scale exercises)*
- *The schedule and frequency of exercise programs*
- *The percentage of public safety partners who have participated in these exercises*
- *How the electrical corporation tracks who has completed the exercises*

Table 8-41 provides an example of the minimum acceptable level of information.

Table 8-41. Example of Internal Drill, Simulation, and Tabletop Exercise Program

Category	Exercise Title and Type	Purpose	Exercise Frequency	Position of Title of Personnel Required to Participate	Personnel Required	Personnel Completed	Form of Verification or Reference
<i>Discussion-based</i>	<i>PSPS event tabletop exercise</i>	<ul style="list-style-type: none"> • Provide electrical corporation a way to determine its readiness to respond to a PSPS event • Clarify gaps or problems with existing policies and plans • Help administration and staff understand their roles during a PSPS event. • Serve as a training tool • Help identify needs for other resources • Serve as a tool for modifying and improving existing PSPS plans based on the lessons learned during the exercise 	<i>Annually</i>	<ul style="list-style-type: none"> • Program Director of Emergency Planning • Grid Operations Program Manager and supervisors • Emergency Operations Center Supervisor • Public Information Officer 	<i>10</i>	<i>10</i>	<i>Exercise scoping materials and completion logs</i>
<i>Operations-based</i>	<i>Wildfire emergency drill</i>		<i>Annually (before September 1)</i>	<ul style="list-style-type: none"> • Program Director of Emergency Planning • Grid Operations Program 	<i>20</i>	<i>19</i>	<i>Exercise scoping materials and completion logs</i>

				<i>Manager and supervisors</i> <ul style="list-style-type: none"> • <i>Emergency Operations Center Supervisor and staff</i> • <i>Public Information Officer</i> • <i>Electrical corporation fire chief</i> 			
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Table 8-42. Example of External Drill, Simulation, and Tabletop Exercise Program

Category	Exercise Title and Type	Purpose	Exercise Frequency	Position of Title of Personnel Required to Participate	Personnel Required	Personnel Completed	Form of Verification or Reference
<i>Discussion-based</i>	<i>PSPS event tabletop exercise</i>	<ul style="list-style-type: none"> • <i>Provide electrical corporation and public safety partners a way to determine their readiness to respond and recover from a PSPS event</i> • <i>Clarify gaps or problems with existing MAAs and MOAs, policies, and plans</i> • <i>Help electrical corporation and public safety partners understand their roles during a PSPS event</i> 	<i>Annually</i>	<ul style="list-style-type: none"> • <i>Program Director of Emergency Planning</i> • <i>Grid Operations Program Manager and supervisors</i> • <i>Emergency Operations Center Supervisor</i> • <i>Fire chief(s) or liaison</i> • <i>Police, sheriff, and CHP chief(s) or liaisons</i> 	<i>20</i>	<i>18</i>	<i>Exercise scoping materials and completion logs</i>

		<ul style="list-style-type: none"> • Serve as a training tool • Help identify needs for other resources • Serve as a tool for modifying and improving existing PSPS coordination and emergency response plans based on the lessons learned during the exercise 		<ul style="list-style-type: none"> • County Health liaison • American Red Cross liaison • Emergency Operations Supervisor(s) for relevant city/county jurisdictions 			
Operations-based	Wildfire emergency drill		Annually (before September 1)	<ul style="list-style-type: none"> • Program Director of Emergency Planning • Grid Operations Program Manager and supervisors • Emergency Operations Center Supervisor • Electrical corporation fire chief and fire marshal • Fire chief(s) or liaison • Police, sheriff, and CHP chiefs or liaisons 	20	19	Exercise scoping materials and completion logs

In view of HWT’s current limited footprint with one operational transmission asset, HWT only conducts an external wildfire simulation event. HWT added the annual wildfire simulation to its wildfire mitigation procedures to be conducted in the spring/early summer ahead of increased frequency of RFW days in late summer and fall. This is to ensure that emergency operations procedures, protocols, and roles and responsibilities are top of mind for HWT’s Operations and other key personnel. HWT’s contracted fire brigade also participates in the simulation.

Table 8-40. Internal Drill, Simulation, and Tabletop Exercise Program

Category	Exercise Title and Type	Purpose	Exercise Frequency	Position of Title of Personnel Required to Participate	Personnel Required	Personnel Completed	Form of Verification or Reference
Operations -based	Wildfire emergency drill	Maintain staff familiarity with processes and procedures in response to a wildfire event	Annually	<ul style="list-style-type: none"> Operations Engineers Contracted Fire brigade 	<ul style="list-style-type: none"> Operations Engineers: 1 Contracted Fire brigade: Varies 	<ul style="list-style-type: none"> Operations Engineers: 1 Contracted Fire brigade: 5 	Completion log and pictorial evidence

As a result of HWT’s limited footprint, HWT does not conduct external fire drills. Therefore Table 8-41 is marked “N/A” meaning “Not Applicable”

Table 8-41. External Drill, Simulation, and Tabletop Exercise Program

Category	Exercise Title and Type	Purpose	Exercise Frequency	Position of Title of Personnel Required to Participate	Personnel Required	Personnel Completed	Form of Verification or Reference
N/A							

8.4.2.4 Schedule for Updating and Revising Plan

Instructions: *The electrical corporation must provide a log of the updates to its emergency preparedness plan since 2019 and the date of its next planned update.*

Updates should occur every two years, per R. 15-06-009 and D. 21-05-019. For each update, the electrical corporation must provide the following:

- Year of updated plan*
- Revision type (e.g., addition, modification, elimination)*
- Component modified (e.g., communications, training, drills/exercises, protocols/procedures, MOAs)*
- A brief description of the lesson learned that informed the revision*
- A brief description of the specific addition, modification, or elimination*

Table 8-43 provides an example of the minimum acceptable level of information.

Table 8-43. Example of Wildfire-Specific Updates to the Emergency Preparedness Plan

ID #	Year of Updated Plan	Revision Type	Lesson Learned	Revision Description	Reference Section
1	2022	Addition	Statutory change due to CPUC R. 15-06-009, D. 21-05-019	Updated plan to comply with California Standardized Emergency Management Systems (SEMS) per GO 166	Sections 3–8, pp. xx–yy
2	2022	Modification	In a public survey administered after the three-day PSPS on MM/DD/YYYY, numerous customers complained of not being able to visually understand which neighborhoods were going to be impacted and when the power was planned to be out and then restored. The electrical corporation website only provided tabulated information.	An additional data layer was added to the interactive PSPS customer interface portal. At least three days in advance of a planned event, this identifies the exact date and time of the planned PSPS, the estimated time of planned power restoration, and specific neighborhoods that will be impacted.	Section X, p. 15

HWT’s only operation asset, the Suncrest Facility, entered operations in Q1 2020. The nature of the operations at the Suncrest Facility has not material changed since the start of commercial operations. Based on HWT’s limited footprint, scope of operations, and completed initiatives in the 2020-2022 WMP cycle, HWT does not have any planned updates to its Emergency Operations Plan in the 2023-2025 WMP Cycle. As a result Table 8-42 is marked “N/A” meaning “Not Applicable”.

Table 8-42. Wildfire-Specific Updates to the Emergency Preparedness Plan

ID #	Year of Updated Plan	Revision Type	Lesson Learned	Revision Description	Reference Section
N/A					

8.4.3 External Collaboration and Coordination

8.4.3.1 Emergency Planning

Instructions: *In this section, the electrical corporation must provide a high-level description of its wildfire and PSPS emergency preparedness coordination with relevant public safety partners at state, county, city, and tribal levels within its service territory. The electrical corporation must indicate if its coordination efforts follow California’s SEMS or, where relevant for multi-jurisdictional electrical corporations (e.g., PacifiCorp), the Federal Emergency Management Agency (FEMA) National Incident Management Systems (NIMS), as permitted by GO 166. The description must be no more than a page.*

In addition, the electrical corporation must provide the following information in tabular form, with no more than one page of information in the main body of the WMP and a full table, if needed, in an appendix:

- *List of relevant state, city, county, and tribal agencies within the electrical corporation’s service territory and key point(s) of contact, with associated contact information. Where necessary, contact information can be redacted for the public version of the WMP.*
- *For each agency, whether the agency has provided consultation and/or verbal or written comments in preparation of the most current wildfire- and PSPS-specific emergency preparedness plan. If so, the electrical corporation should provide the date, time, and location of the meeting at which the agency’s feedback was received.*
- *For each agency, whether it has an MOA with the electrical corporation on wildfire and/or PSPS emergency preparedness, response, and recovery activities. The electrical corporation must provide a brief summary of the MOA, including the agreed role(s) and responsibilities of the external agency before, during, and after a wildfire or PSPS emergency.*
- *In a separate table, a list of current gaps and limitations in the electrical corporation’s existing collaboration efforts with relevant state, county, city, and tribal agencies within*

its territory. Where gaps or limitations exist, the electrical corporation must indicate the remedial action plan and the timeline for resolving the gaps or limitations.

- For all requested information, a form of verification that can be provided upon request for compliance assurance.

The electrical corporation must reference the Utility Initiative Tracking ID where appropriate.

Table 8-44 and Table 8-45 provide examples of the minimum level of content and detail required.

Table 8-44. Example of State and Local Agency Collaboration(s)

Name of State or Local Agency	Point of Contact and Information	Emergency Preparedness Plan Collaboration – Last Version of Plan Agency Collaborated	Emergency Preparedness Plan Collaboration – Collaborative Role	Memorandum of Agreement (MOA)?	Brief Description of MOA
Local Municipal Fire Department	John Doe, Fire Marshal John.Doe@city.gov	2022 Version (06/2021)	Attended a virtual meeting on 02/02/2022 at 1 pm PDT Provided written comments	Yes	Wildfire incidents: • Before • During • After PSPS events: • Before • During • After

Table 8-45. Example of Key Gaps and Limitations in Collaboration Activities with State and Local Agencies

Gap or Limitation Subject	Remedial Brief Description	Remedial Action Plan
Limited feedback on wildfire and PSPS emergency plan	Less than 10% of the state and local government stakeholders have been able to provide feedback and collaborate on review, development, and/or improvement of the	Strategy: Convene a 1.5-day workshop with relevant state and local agencies to review the key elements of the electrical corporation's wildfire- and PSPS-specific emergency preparedness plan. Solicit verbal and written comments from the stakeholders. Assign a government liaison to conduct follow-up meetings to obtain

	<i>emergency preparedness plan.</i>	<i>and discuss any comments, proposed modifications, additions, etc.</i> Target timeline: <i>Develop workshop scoping plan by June 2023 and convene workshop by end of 2023. Aim to host workshops with 50% of government stakeholders by end of 2025.</i>
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HWT does not serve end-use customers, have a traditional service territory or a distribution system. HWT's emergency preparedness planning and response is conducted in close coordination with CAISO and SDG&E in addition to local emergency service providers appropriate to the limited scale and scope of HWT's operations. Based on the limited scale of HWT's operations and the lack of retail/direct customers, HWT's emergency plans do not follow California's Standardized Emergency Management Systems. However, HWT maintains that its Emergency Action and Emergency Operations procedures are sufficient for the limited size and scope of its operations.

Based on the limited scale and scope of the Suncrest Facility, at this time, HWT believes that it will seldom, if ever, be necessary to issue a PSPS. The Interconnecting Transmission Owner, SDG&E, would be the main driver of a PSPS in the Suncrest Facility's operational area. HWT does not anticipate engaging with communities during an emergency. However, HWT has developed a protocol for communication and coordination with its primary stakeholders, including the CAISO and Interconnecting Transmission Owner, and local firefighting agencies. HWT's President or designee would be the lead in implementing this communications protocol during an emergency. HWT also developed PSPS protocol (See Section 8.4.2.1) in the unlikely event it needed to issue a PSPS. HWT will reassess its current outlook in the event of a change in its operations which necessitates engagement of and/or outreach to additional public safety partners. Critical stakeholders are identified below in Table 8-43. State and Local Agency Collaboration(s). HWT notes that certain contact information is being provided confidentially.

Table 8-43. State and Local Agency Collaboration(s)

Name of State or Local Agency	Point of Contact and Information	Emergency Preparedness Plan Collaboration – Last Version of Plan Agency Collaborated	Emergency Preparedness Plan Collaboration – Collaborative Role	Memorandum of Agreement (MOA)?	Brief Description of MOA
CAISO – Emergency Response Coordinator	erc@caiso.com	N/A	N/A	No	N/A

(ERC) – Event Reporting					
CAISO - Real Time Desk	Confidential	N/A	N/A	No	N/A
SDG&E	Confidential	N/A	N/A	No	N/A
San Diego County Fire Authority Descanso Fire Station 45	619-445-4731 (Non-Emergency) 911 (Emergency)	N/A	N/A	No	N/A

Given the limited scale of HWT’s operations, HWT maintains that its Emergency Operations procedure (provided in the as a confidential attachment herein) is sufficient for the limited size and scope of its operations. Based on the foregoing, Table 8-44 is marked “N/A” meaning “Not Applicable”.

Table 8-44. Key Gaps and Limitations in Collaboration Activities with State and Local Agencies

Gap or Limitation Subject	Remedial Brief Description	Remedial Action Plan
N/A		

8.4.3.2 Communication and Strategy with Public Partners

Instructions: The electrical corporation must describe at a high level its communication strategy to inform external public safety partners and other interconnected electrical corporation partners of wildfire, PSPS, and re-energization events as required by GO 166 and Public Utilities Code section 768.6. This must include a brief description of the policies, practices, and procedures the electrical corporation adopts to establish appropriate communication protocols with public safety partners for both wildfire- and PSPS-specific incidents to ensure timely, accurate, and complete communications. The electrical corporation must refer to its emergency preparedness plan as needed to provide more detail. The narrative must be no more than two pages.

As each public safety partner will have its own unique communication protocols, procedures, and systems, the electrical corporation must coordinate with each entity individually. The electrical corporation must summarize the following information in tabulated format:

- All relevant public safety partner groups (e.g., fire, law enforcement, OES, municipal governments, Energy Safety, CPUC, other electrical corporations) at every level of administration (state, county, city, or tribe) as needed.
- The names of individual public safety entities.

- For each entity, the point of contact for emergency communications coordination, and the contact information. Information may be redacted as needed.
- Key protocols for ensuring the necessary level of voice and data communications (e.g., interoperability channels, methods for information exchange, format for each data typology, communication capabilities, data management systems, backup systems, common alerting protocols, messaging), and associated references in the emergency plan for more details.
- Frequency of prearranged communication review and updates.
- Date of last discussion-based or operations-based exercise(s) on public safety partner communication.

In a separate table, the electrical corporation must list the current gaps and limitations in its public safety partner communication strategy coordination. Where gaps or limitations exist, the electrical corporation must indicate the remedial action plan and the timeline for resolving the gaps or limitations. For all requested information, the electrical corporation must indicate a form of verification that can be provided upon request for compliance assurance.

Table 8-46 and Table 8-47 provide examples of the minimum level of content and detail required.

Table 8-46. Example of High-Level Communication Protocols, Procedures, and Systems with Public Safety Partners

Public Safety Partner Group	Name of Entity	Point of Contact and Information	Key Protocols	Frequency of Prearranged Communication Review and Update	Communication Exercise(s): Date of Last Completed	Communication Exercise(s): Date of Planned Next
Fire	Local County Fire Department	Jane Smith, Unit Manager Jane.Smith@county.org	<ul style="list-style-type: none"> • Communication capabilities (e.g., staffing, resources, technologies) • Methods for information exchange • Format for each data typology • Data management strategy • Backup systems • Common alerting protocols • Messaging 	Annually (April)	Tabletop exercise, 04/02/2022 at 1 pm PDT	Workshop, 04/02/2023 at 2 pm PDT

			<ul style="list-style-type: none"> • Refer to Sections x, y, and z in electrical corporation's Emergency Preparedness Plan and to the MOA entitled "xxxxx," dated MM/DD/YYYY. 			
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Table 8-47. Example of Key Gaps and Limitations in Communication Coordination with Public Safety Partners

Gap or Limitation Subject	Remedial Brief Description	Remedial Action Plan
<i>Limited feedback on wildfire and PSPS emergency plan</i>	<i>Less than 10% of the state and local government stakeholders have been able to provide feedback and collaborate on review, development, and/or improvement of the emergency preparedness plan.</i>	<p>Strategy: Convene a 1.5-day workshop with relevant state and local agencies to review the key elements of the electrical corporation's wildfire- and PSPS-specific emergency preparedness plan. Solicit verbal and written comments from the stakeholders. Assign a government liaison to conduct follow-up meetings to obtain and discuss any comments, proposed modifications, additions, etc.</p> <p>Target timeline: Develop workshop scoping plan by June 2023 and convene workshop by end of 2023. Aim to host workshops with 50% of government stakeholders by end of 2025.</p>
<i>Uncertainty of emergency communications being received by government agencies</i>	<i>More than 50% of the partner government agencies have independent and different communication systems and associated protocols. Consistency and timing of notification and</i>	<p>Strategy: Create an integrated, multi-channel communication system that provides for immediate notification of an event through text, email, or broadcast with secondary</p>

	<p><i>receipt notification is not standardized.</i></p>	<p><i>communication to confirm receipt. Assess current notification systems and communications protocols at the electrical corporation's monitoring center and create priority communication matrices that support the most resilient channels for sending emergency alert messages. Create a survey to be sent to all responding stakeholders to collect information on their communications capabilities and preferences. Align the electrical corporation's capabilities with each responding stakeholder and then create operating standards for dispatchers and responders to follow.</i></p> <p>Target timeline: Complete assessment of current systems and protocols by end of first quarter 2023. Create survey to be sent to all responding stakeholders by end of second quarter 2023. Complete alignment and testing by end of first quarter 2024.</p>
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HWT does not serve end-use customers, have a traditional service territory or a distribution system. Additionally, based on the limited scale and scope of the Suncrest Facility, at this time, HWT believes that it will seldom, if ever, be necessary to issue a PSPS. The Interconnecting Transmission Owner, SDG&E, would be the main driver of a PSPS in the Suncrest Facility's operational area. Therefore, HWT does not anticipate engaging with the public during an emergency. The Suncrest SVC is under the operational control of the CAISO and provides reactive power to the neighboring SDG&E substation. HWT has developed a protocol for communication and coordination with these primary stakeholders and local firefighting agencies. HWT's protocol for communicating with the CAISO and SDG&E follows CAISO protocols and NERC COMM standards for communicating with neighboring entities. HWT's President or designee would be the lead in implementing this communications protocol during an emergency. See also HWT's

response to Section 8.4.4.1. Table 8-45 is completed based on the aforementioned information. Fields marked as “N/A” mean “Not Available” because HWT does not participate in specific wildfire and/or PSPS communication exercises.

Table 8-45. High-Level Communication Protocols, Procedures, and Systems with Public Safety Partners

Public Safety Partner Group	Name of Entity	Point of Contact and Information	Key Protocols	Frequency of Prearranged Communication Review and Update	Communication Exercise(s): Date of Last Completed	Communication Exercise(s): Date of Planned Next
Event Reporting	CAISO – Emergency Response Coordinator (ERC) – Event Reporting	erc@caiso.com	<ul style="list-style-type: none"> • CAISO communication protocols • NERC communication standards 	N/A	N/A	N/A
Outage/ PSPS	SDG&E	Confidential	<ul style="list-style-type: none"> • CAISO communication protocols • SDG&E communication protocols • NERC communication standards 	N/A	N/A	N/A
Fire	San Diego County Fire Authority Descanso Fire Station 45	619-445-4731 (Non-Emergency) 911 (Emergency)	N/A	N/A	N/A	N/A

Given the limited scale of HWT’s operations, HWT maintains that its Emergency Operations procedure is sufficient for the limited size and scope of its operations. Based on the foregoing, Table 8-46 is marked “N/A” meaning “Not Applicable”.

Table 8-46. Key Gaps and Limitations in Communication Coordination with Public Safety Partners

Gap or Limitation Subject	Remedial Brief Description	Remedial Action Plan
N/A		

8.4.3.3 Mutual Aid Agreements

***Instructions:** In this section, the electrical corporation must provide a brief overview of the Mutual Aid Agreements (MAA) it has entered into regarding wildfire emergencies and/or disasters, as well as PSPS events. The overview narrative must be no more than one page.*

In addition, the electrical corporation must provide the following wildfire emergency information in tabulated format:

- *List of entities with which the electrical corporation has entered into an MAA*
- *Scope of the MAA*
- *Resources available from the MAA partner*

Table 8-48 provides an example of the minimum level of content and detail required.

Table 8-48. Example of High-Level Mutual Aid Agreement for Resources During a Wildfire or De-Energization Incident

<i>Mutual Aid Partner</i>	<i>Scope of Mutual Aid Agreement</i>	<i>Available Resources from Mutual Aid Partner</i>

HWT’s the Suncrest Facility is a MVar SVC connected to an approximately one mile undergrounded 230 kV single-circuit transmission line. Base on the limited footprint of HWT’s operations HWT does not have any mutual aid agreements for resources during a wildfire or de-energization incident. Instead HWT relies on its vendors who are contracted to provided maintenance/outage support and allowed enterprise-level corporate resources and support services through an affiliate support services agreement(s). As a result Table 8-47 is marked “N/A” meaning “Not Applicable”.

Table 8-47. High-Level Mutual Aid Agreement for Resources During a Wildfire or De-Energization Incident

Mutual Aid Partner	Scope of Mutual Aid Agreement	Available Resources from Mutual Aid Partner
N/A		

8.4.4 Public Emergency Communication Strategy

Instructions: *The electrical corporation must describe at a high level its comprehensive communication strategy to inform essential customers and other stakeholder groups of wildfires, outages due to wildfires, and PSPS and service restoration, as required by Public Utilities Code section 768.6. This should include a discussion of the policies, practices, and procedures the electrical corporation adopts to establish appropriate communication protocols to ensure timely, accurate, and complete communications. The electrical corporation may refer to its Public Utilities Code section 768.6 emergency preparedness plan to provide more detail. The narrative must be no more than one page.*

In the following sections, the electrical corporation must provide an overview of the following components of an effective and comprehensive communication strategy:

- *Protocols for emergency communications*
- *Messaging*
- *Current gaps and limitations*

Reference the Utility Initiative Tracking ID where appropriate.

HWT does not serve end-use customers, have a traditional service territory or a distribution system. Additionally, based on the limited scale and scope of the Suncrest Facility, at this time, HWT believes that it will seldom, if ever, be necessary to issue a PSPS. The Interconnecting Transmission Owner, SDG&E, would be the main driver of a PSPS in the Suncrest Facility's operational area. Therefore, HWT does not anticipate providing customer support or engaging with communities during an emergency. However, HWT has developed a protocol for communication and coordination with its primary stakeholders, including the CAISO and Interconnecting Transmission Owner, local fire agencies, etc. HWT's President or designee would be the lead in implementing this communications protocol during an emergency. HWT also maintains its WMP filings and related information on its website which is publicly available at the following link: <https://www.horizonwesttransmission.com/wildfire.html>. HWT will reassess its current community outreach and engagement outlook in the event of a change in its operations which necessitates engagement of and/or outreach to customers.

8.4.4.1 Protocols for Emergency Communications

Instructions: *The electrical corporation must identify the relevant stakeholder groups in its service territory and describe the protocols, practices, and procedures used to provide notification of wildfires, outages due to wildfires and PSPS, and service restoration before, during, and after each incident type. Stakeholder groups include, but are not limited to, the general public, priority essential services, AFN populations, populations with limited English proficiency, tribes, and people in remote areas. The narrative must include a brief discussion of the decision-making process and use of best practices to ensure timely, accurate, and complete communications. The narrative must be no more than one page.*

The electrical corporation must also provide, in tabular form, details of the following:

- *Communication methods*
- *Message receipt verification mechanisms*

Table 8-49 provides an example of the minimum level of content and detail required.

Table 8-49. Example of Protocols for Emergency Communication to Stakeholder Groups

<i>Stakeholder Group</i>	<i>Event Type</i>	<i>Method(s) for Communicating</i>	<i>Means to Verify Message Receipt</i>
<i>General public</i>	<i>Wildfire</i>		
<i>General public</i>	<i>Wildfire-related outage</i>		
<i>General public</i>	<i>PSPS-related outage</i>		
<i>General public</i>	<i>Restoration of service</i>		
<i>Priority essential services</i>	<i>Wildfire</i>		
<i>Priority essential services</i>	<i>Wildfire-related outage</i>		
<i>Priority essential services</i>	<i>PSPS-related outage</i>		
<i>Priority essential services</i>	<i>Restoration of service</i>		
<i>AFN populations</i>			
<i>Populations with limited English proficiency</i>			
<i>Tribes</i>			
<i>People in remote areas</i>			

See HWT’s response to Section 8.4.4. HWT does not serve end-use customers, have a traditional service territory or a distribution system. Additionally, based on the limited scale and scope of the Suncrest Facility, at this time, HWT believes that it will seldom, if ever, be necessary to issue a PSPS. Therefore, HWT does not anticipate providing customer support or engaging with

communities during an emergency. However, HWT has developed a protocol for communication and coordination with its primary stakeholders, including the CAISO and Interconnecting Transmission Owner, local fire agencies, etc. HWT's President or designee would be the lead in implementing this communications protocol during an emergency.

Table 8-48. Protocols for Emergency Communication to Stakeholder Groups

Stakeholder Group	Event Type	Method(s) for Communicating	Means to Verify Message Receipt
Priority essential services	Wildfire	Telephone Email	Realtime response Reply message
Priority essential services	Wildfire-related outage	Telephone Email	Realtime response Reply message
Priority essential services	PSPS-related outage	Telephone Email	Realtime response Reply message
Priority essential services	Restoration of service	Telephone Email	Realtime response Reply message
Interconnecting Utility	Wildfire	Telephone Email	Realtime response Reply message
Interconnecting Utility	Wildfire-related outage	Telephone Email	Realtime response Reply message
Interconnecting Utility	PSPS-related outage	Telephone Email	Realtime response Reply message
Interconnecting Utility	Restoration of service	Telephone Email	Realtime response Reply message
CAISO	Wildfire	Telephone Email	Realtime response Reply message
CAISO	Wildfire-related outage	Telephone Email	Realtime response Reply message

CAISO	PSPS-related outage	Telephone Email	Realtime response Reply message
CAISO	Restoration of service	Telephone Email	Realtime response Reply message

8.4.4.2 Messaging

Instructions: In this section, the electrical corporation must describe its procedures for developing effective messaging to reach the largest percentage of stakeholders in its service territory before, during, and after a wildfire, an outage due to wildfire, or a PSPS event.

In addition, the electrical corporation must provide an overview of the development of the following aspects of its communication messaging strategy:

- Features to maximize accessibility of the messaging (e.g., font size, color contrast analyzer)
- Alert and notification schedules
- Translation of notifications
- Messaging tone and language
- Key components and order of messaging content (e.g., hazard, location, time)

The narrative must be no more than one page.

See HWT’s response to Section 8.4.4. HWT does not serve end-use customers, have a traditional service territory or a distribution system. Additionally, based on the limited scale and scope of the Suncrest Facility, at this time, HWT believes that it will seldom, if ever, be necessary to issue a PSPS. Therefore, HWT does not anticipate providing customer support or engaging with communities during an emergency.

8.4.4.3 Current Gaps and Limitations

Instructions: In tabulated format, the electrical corporation must provide a list of current gaps and limitations in its public communication strategy. Where gaps or limitations exist, the electrical corporation must indicate the remedial action plan and the timeline for resolving the gaps or limitations. For all requested information, the electrical corporation should indicate a form of verification that can be provided upon request for compliance assurance. Table 8-50 provides an example of the minimum level of content and detail required.

Table 8-50. Example of Key Gaps and Limitations in Public Emergency Communication Strategy

Gap or Limitation Subject	Remedial Brief Description	Remedial Action Plan
Limited feedback on wildfire and	Less than 10% of the state and local government	Strategy: Convene a 1.5-day workshop with relevant state and local agencies to

<i>PSPS emergency plan</i>	<i>stakeholders have been able to provide feedback and collaborate on review, development, and/or improvement of the emergency preparedness plan.</i>	<i>review the key elements of the electrical corporation’s wildfire- and PSPS-specific emergency preparedness plan. Solicit verbal and written comments from the stakeholders. Assign a government liaison to conduct follow-up meetings to obtain and discuss any comments, proposed modifications, additions, etc.</i> Target timeline: <i>Develop workshop scoping plan by June 2023 and convene workshop by end of 2023. Aim to host workshops with 50% of government stakeholders by end of 2025.</i>
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See HWT’s response to Section 8.4.4. HWT does not serve end-use customers, have a traditional service territory or a distribution system. Additionally, based on the limited scale and scope of the Suncrest Facility, at this time, HWT believes that it will seldom, if ever, be necessary to issue a PSPS. Therefore, HWT does not anticipate providing customer support or engaging with communities during an emergency. As a result Table 8-49 is marked “N/A” meaning “Not Applicable”.

Table 8-49. Key Gaps and Limitations in Public Emergency Communication Strategy

Gap or Limitation Subject	Remedial Brief Description	Remedial Action Plan
N/A		

8.4.5 Preparedness and Planning for Service Restoration

8.4.5.1 Overview of Service Restoration

Instructions: *In this section of the WMP, the electrical corporation must provide an overview of its plan to restore service after an outage due to a wildfire or PSPS event. At a minimum, the overview must include a brief description of the following:*

- *Purpose and scope of the restoration plan.*
- *Overview of protocols, policies, and procedures for service restoration (e.g., means and methods for assessing conditions, decision-making framework, prioritizations, degree of customization). This must include:*
 - *An operational flow diagram illustrating key components of the service restoration procedures from the moment of the incident to response, recovery, and restoration of service.*
- *Resource planning and allocation (e.g., staffing, equipment).*
- *Drills, simulations, and tabletop exercises.*

- *Coordination and collaboration with public safety partners (e.g., interoperable communications).*
- *Notification of and communication to customers during and after a wildfire- or PSPS-related outage.*

The electrical corporation may refer to its Public Utilities Code section 768.6 emergency preparedness plan to provide more detail. Where the electrical corporation has already reported the requested information in another section of the WMP, it must provide a cross-reference with a hyperlink to that section. The overview must be no more than one page.

Reference the Utility Initiative Tracking ID where appropriate.

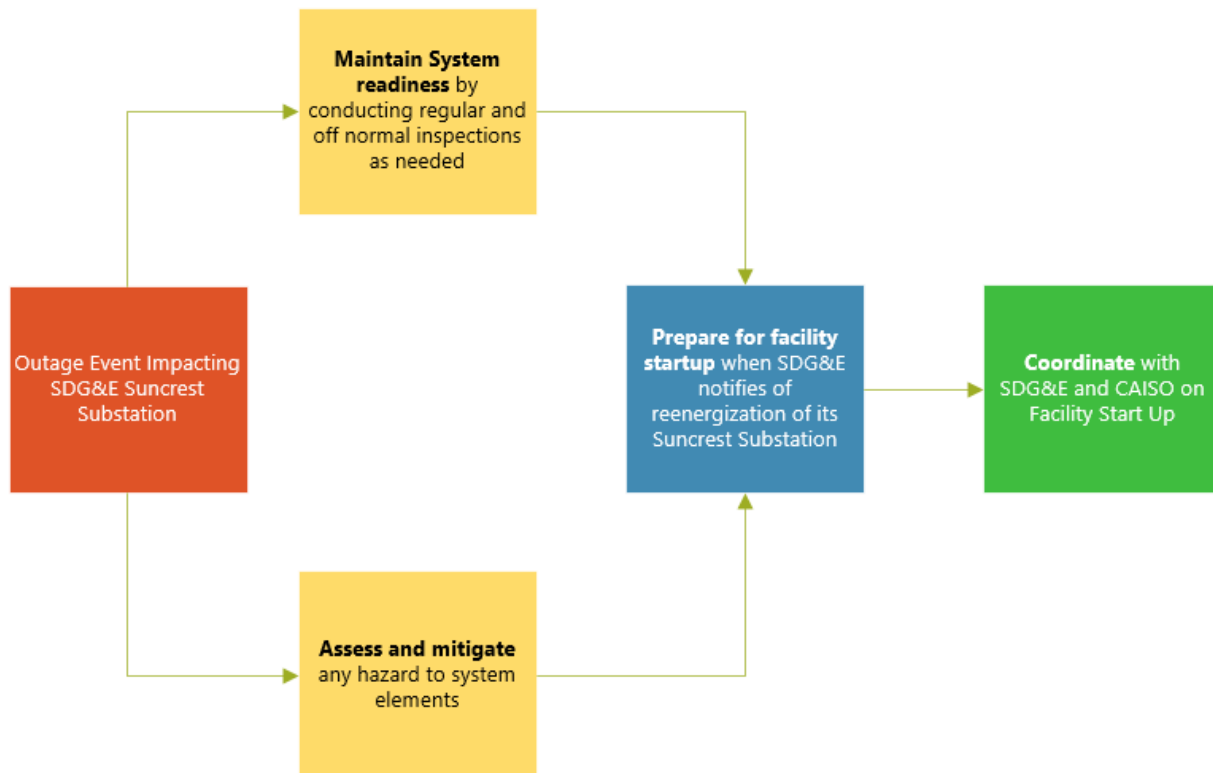
Although HWT has limited operations and no retail customers, because its Suncrest SVC is wholly sited in a Tier 3 HFTD, HWT has maintains PSPS protocols. However, given that HWT does have a limited scope and scale of operations, HWT does not maintain plans for restoration of service after an outage specifically due to a wildfire or PSPS. Instead HWT would follow its standard Restoration Plan (HWT- Black Start Restoration Plan⁴²) to restore service in the event of an outage caused by wildfire or PSPS event.

The purpose of the restoration plan is to provide guidelines for the coordination and communication of restoring the Suncrest SVC during a major system disturbance of the bulk electric system. The scope is to prepare the Suncrest SVC to receive automatic reactive power dispatch instructions from the CAISO to support the SDG&E Suncrest substation and the local grid. Given that the Suncrest SVC is under the operational control of the CAISO and is interconnected to SDG&E, HWT's restoration process is closely coordinated with the CAISO and SDG&E.

HWT anticipates that it will never be necessary to issue a PSPS. The Interconnecting Transmission Owner, SDG&E, would be the main driver of a PSPS in the Suncrest SVC's operational area. Any PSPS issued by SDG&E that impacted its Suncrest Substation would directly impact the Suncrest SVC resulting in it automatically going offline. HWT would reenergize once power to its interconnection was restored. The figure below reflects the key components of the service restoration procedures from the start of the incident to response, recovery, and restoration of service.

⁴² The procedure is provided as confidential attachments to this WMP.

Figure HWT 8.4.5-1. HWT Restoration Flow Diagram



Considering HWT’s limited footprint with one transmission asset which is an unmanned facility, HWT has a small staff of 2 field engineers, who oversee all aspects of onsite operations, including onsite emergency response. A remote system operator operates the Suncrest SVC and can take emergency action to support system shutdown. (See EOP Section 3.1) As such it is the same staff that conducts regular operations and maintenance that responds to emergency events. Initial response and coordination to any emergency condition begins with the System Operator unless a field engineer is onsite. Section 3.1 of the EOP authorizes the System Operator to take such actions as deem appropriate to allow for recovery of or shutdown of the Suncrest SVC. The System Operator is supported by the LST System Operations Leader, HWT’s field engineers for onsite support, and the NEET Senior Director for executive level guidance and direction. Additional corporate/affiliate resources would be called upon as needed.

Given HWT’s limited scope and scale of operations, HWT does not conduct specific restoration drills for service restoration after wildfire or PSPS outages. As noted above HWT’s affiliate LST performs the System Operator function for HWT. LST operations staff do participate in the CAISO’s annual restoration drill, which simulates recovery of the CAISO managed transmission network after a significant system wide disruption. LST system operators also receive annual training on HWT Restoration Plan.

Given that HWT does not have any retail customers is does not communication with the public but maintains communications and coordinates with the CAISO who has operational control of the Suncrest SVC and SDG&E who is the interconnecting utility in accordance with Section 4.2 of the Restoration Plan. For any fire incident that impacted HWT’s Suncrest SVC, HWT would contact and coordinate with the San Diego County Fire Authority Descanso Fire Station 45 for support.

8.4.5.2 Planning and Allocation of Resources

Instructions: The electrical corporation must briefly describe its methods for planning appropriate resources (e.g., equipment, specialized workers), and allocating those resources to assure the safety of the public during service restoration.

In addition, the electrical corporation must provide an overview of its plans for contingency measures regarding the resources required to respond to an increased number of reports concerning unsafe conditions and expedite a response to a wildfire- or PSPS-related power outage.

This must include a brief narrative on how the electrical corporation:

- *Uses weather reports to pre-position manpower and equipment before anticipated severe weather that could result in an outage*
- *Sets priorities*
- *Facilitates internal and external communications*
- *Restores service*

The narrative for this section must be no more than two pages.

As noted in Section 8.4.5.1, HWT does not maintain service restoration plans specific to wildfire or PSPS. Instead, HWT would follow its standard Restoration (HWT- Black Start Restoration Plan) to restore service in the event of an outage caused by wildfire or PSPS event. Given the limited scale and scope of HWT’s operations, its two Operations Engineers provide sufficient resources to insure the safe startup of the Suncrest SVC. The Restoration Plan requires coordination with the CAISO and SDG&E before the Suncrest SVC is ready for commercial dispatch. Additionally, the System cannot provide reactive power until, the CAISO provides automatic dispatch instructions.

The Suncrest SVC is an unmanned site, but is monitored 24/7 by a System Operator. In the event of a RFW or observation of a wildfire in the vicinity of the Suncrest SVC, one of the two Operations Engineers would be dispatched to conduct a site inspection in accordance with Section 4.0 of HWT’s Wildfire Mitigation Condition Assessment Procedure. One of the Operations Engineers may be sent to the Facility in advance of a pending PSPS or approach wildfire on an as needed basis to support emergency operations or system shutdown as per the Emergency Operations Plan. Due to the limited scope and scale of operations and the lack of overhead infrastructure, HWT does not engage in the pre-positioning of equipment. As stated in HWT’s Emergency Operations Plan the priority is to keep the system online which shutdown as a last resort option.

If shutdown occurred, HWT priority would be to maintain the Suncrest SVC in a state of readiness to be able to reenergize when notified by the CASIO and/or SDG&E.

As HWT does not have a distribution system or retail customers, communication for restoration occurs between HWT, CAISO and SDG&E as per CAISO, SDG&E and NERC COMM protocols. The Emergency Operations Plan outlines communications between internal personnel tasked with emergency operations and service restoration.

8.4.5.3 Drills, Simulations, and Tabletop Exercises

***Instructions:** Discussion-based and operational-based exercises enhance knowledge of plans, allow personnel to improve their own performance, and identify opportunities to improve capabilities to respond to wildfire- and PSPS-related service outages. Exercises also provide a method to evaluate an electrical corporation's emergency preparedness plan and identify planning and/or procedural deficiencies.*

Internal Exercises

The electrical corporation must report on its program(s) for conducting internal discussion-based and operations-based exercises for service restoration. This must include, at a minimum:

- The types of discussion-based exercises (e.g., seminars, workshops, tabletop exercises, games) and operations-based exercises (e.g., drills, functional exercises, full-scale exercises)*
- The purpose of the exercises*
- The schedule and frequency of exercise programs*
- The percentage of staff who have completed/participated in exercises*
- How the electrical corporation tracks who has completed the exercises*

Table 8-51 provides an example of the minimum acceptable level of information.

External Exercises

The electrical corporation must report on its program(s) for conducting external discussion-based and operations-based exercises for service restoration due to wildfire. This must include, at a minimum:

- The types of discussion-based exercises (e.g., seminars, workshops, tabletop exercises, games) and operations-based exercises (e.g., drills, functional exercises, full-scale exercises)*
- The schedule and frequency of exercise programs*
- The percentage of public safety partners who have participated in these exercises*
- How the electrical corporation tracks who has completed the exercises*

Table 8-52 provides an example of the minimum acceptable level of information.

Table 8-51. Example of Internal Drill, Simulation, and Tabletop Exercise Program for Service Restoration

Category	Exercise Title and Type	Purpose	Exercise Frequency	Position of Title of Personnel Required to Participate	Personnel Required	Personnel Completed	Form of Verification or Reference
<i>Discussion-based</i>	<i>PSPS event tabletop exercise</i>	<ul style="list-style-type: none"> • Provide electrical corporation a way to determine its readiness to respond to a PSPS event • Clarify gaps or problems with existing policies and plans • Help administration and staff understand their roles during a PSPS event. • Serve as a training tool • Help identify needs for other resources • Serve as a tool for modifying and improving existing PSPS plans based on the lessons learned during the exercise 	<i>Annually</i>	<ul style="list-style-type: none"> • Program Director of Emergency Planning • Grid Operations Program Manager and supervisors • Emergency Operations Center Supervisor • Public Information Officer 	<i>10</i>	<i>10</i>	<i>Exercise scoping materials and completion logs</i>
<i>Operations-based</i>	<i>Wildfire emergency drill</i>		<i>Annually (before September 1)</i>	<ul style="list-style-type: none"> • Program Director of Emergency Planning • Grid Operations Program Manager 	<i>20</i>	<i>19</i>	<i>Exercise scoping materials and completion logs</i>

				<i>and supervisors</i> <ul style="list-style-type: none"> • <i>Emergency Operations Center Supervisor and staff</i> • <i>Public Information Officer</i> • <i>Electrical corporation fire chief</i> 			
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Table 8-52. Example of External Drill, Simulation, and Tabletop Exercise Program for Service Restoration

Category	Exercise Title and Type	Purpose	Exercise Frequency	Position of Title of Personnel Required to Participate	Personnel Required	Personnel Completed	Form of Verification or Reference
<i>Discussion-based</i>	<i>PSPS event tabletop exercise</i>	<ul style="list-style-type: none"> • <i>Provide electrical corporation and public safety partners a way to determine their readiness to respond and recover from a PSPS event</i> • <i>Clarify gaps or problems with existing MAAs and MOAs, policies, and plans</i> • <i>Help electrical corporation and public safety partners understand their roles during a PSPS event</i> 	<i>Annually</i>	<ul style="list-style-type: none"> • <i>Program Director of Emergency Planning</i> • <i>Grid Operations Program Manager and supervisors</i> • <i>Emergency Operations Center Supervisor</i> • <i>Fire chief(s) or liaison</i> • <i>Police, sheriff, and CHP chief(s) or liaisons</i> 	<i>20</i>	<i>18</i>	<i>Exercise scoping materials and completion logs</i>

		<ul style="list-style-type: none"> • Serve as a training tool • Help identify needs for other resources • Serve as a tool for modifying and improving existing PSPS coordination and emergency response plans based on the lessons learned during the exercise 		<ul style="list-style-type: none"> • County Health liaison • American Red Cross liaison • Emergency Operations Supervisor(s) for relevant city/county jurisdictions 			
Operations-based	Wildfire emergency drill		Annually (before September 1)	<ul style="list-style-type: none"> • Program Director of Emergency Planning • Grid Operations Program Manager and supervisors • Emergency Operations Center Supervisor • Electrical corporation fire chief and fire marshal • Fire chief(s) or liaison • Police, sheriff, and CHP chiefs or liaisons 	20	19	Exercise scoping materials and completion logs

As noted in Section 8.4.5.1, HWT’s affiliate LST performs the System Operator function for HWT. LST system operators receive annual training on HWT Restoration Plan. However, as a result of HWT’s limited footprint and scale of non-retail serving operations, HWT does not conduct specific internal exercises for service restoration due to wildfire. Therefore Table 8-50 is marked “N/A” meaning “Not Applicable”.

Table 8-50. Internal Drill, Simulation, and Tabletop Exercise Program for Service Restoration

Category	Exercise Title and Type	Purpose	Exercise Frequency	Position of Title of Personnel Required to Participate	Personnel Required	Personnel Completed	Form of Verification or Reference
N/A							

As a result of HWT’s limited footprint and scale of operations, HWT does not conduct specific external exercises for service restoration due to wildfire. Therefore Table 8-51 is marked “N/A” meaning “Not Applicable”.

Table 8-51. External Drill, Simulation, and Tabletop Exercise Program for Service Restoration

Category	Exercise Title and Type	Purpose	Exercise Frequency	Position of Title of Personnel Required to Participate	Personnel Required	Personnel Completed	Form of Verification or Reference
N/A							

8.4.6 Customer Support in Wildfire and PSPS Emergencies

Instructions: In this section of the WMP, the electrical corporation must provide an overview of its programs, systems, and protocols to support residential and non-residential customers in wildfire emergencies and PSPS events. The overview for each emergency service must be no more than one page. At a minimum, the overview must cover the following customer emergency services, per Public Utilities Code section 8386(c)(21):

- Outage reporting
- Support for low-income customers
- Billing adjustments
- Deposit waivers
- Extended payment plans
- Suspension of disconnection and nonpayment fees
- Repair processing and timing
- List and description of community assistance locations and services
- Medical Baseline support services
- Access to electrical corporation representatives

Reference the Utility Initiative Tracking ID where appropriate.

As noted on page 11 of Energy Safety's ITO Supplement, ITOs do not have end-use customers. Energy Safety notes that ITOs must comply with Public Utilities Code section 8386(c)(21)⁴³. However, beyond that, reporting requirements associated with Section 8.4.6 of the 2023-2025 WMP Technical Guidelines are inapplicable to ITOs.

Based on the foregoing, HWT's WMP does not include Customer Support in Wildfire and PSPS Emergencies information for Section 8.4.6. Instead HWT provides the following information pursuant to Energy Safety's direction on page 11 of Energy Safety's ITO Supplement.

Compliance with Public Utilities Code sections 8386(c)(21)

HWT does not serve end-use customers, have a traditional service territory or a distribution system. Additionally, based on the limited scale and scope of the Suncrest Facility, at this time, HWT believes that it will seldom, if ever, be necessary to issue a PSPS. The Interconnecting Transmission Owner, SDG&E, would be the main driver of a PSPS in the Suncrest Facility's operational area. Therefore, HWT does not anticipate providing customer support or engaging with communities during an emergency. HWT will reassess its current approach in the event of a change in its operations which necessitates engagement of and/or outreach to customers.

8.5 Community Outreach and Engagement

8.5.1 Overview

Instructions: *In accordance with California Public Utilities Code section 8386(c)(19)(B) each electrical corporation must provide its plans for community outreach and engagement before, during, and after a wildfire. The electrical corporation must also provide its plans for outreach and engagement related to PSPS, outages from protective equipment and device settings, and vegetation management.*

In this section, the electrical corporation must identify objectives for the next 3- and 10-year periods, targets, and performance metrics related to the following community outreach and engagement mitigation initiatives:

- *Public outreach and education awareness for wildfires, PSPS, outages from protective equipment and device settings, and vegetation management*

⁴³ (21) "Protocols for compliance with requirements adopted by the commission regarding activities to support customers during and after a wildfire, outage reporting, support for low-income customers, billing adjustments, deposit waivers, extended payment plans, suspension of disconnection and nonpayment fees, repair processing and timing, access to electrical corporation representatives, and emergency communications."

- *Public engagement in the WMP decision-making process*
- *Engagement with AFN populations, local governments, and tribal communities*
- *Collaboration on local wildfire mitigation and planning*
- *Best practice sharing with other electrical corporations from within and outside of California*

HWT does not serve end-use customers, have a traditional service territory or a distribution system. Additionally, based on the limited scale and scope of the Suncrest Facility, at this time, HWT believes that it will seldom, if ever, be necessary to issue a PSPS. The Interconnecting Transmission Owner, SDG&E, would be the main driver of a PSPS in the Suncrest Facility’s operational area. Therefore, HWT does not anticipate providing customer support or engaging with communities during an emergency. However, HWT has developed a protocol for communication and coordination with its primary stakeholders, including the CAISO and Interconnecting Transmission Owner. HWT’s President or designee would be the lead in implementing this communications protocol during an emergency. Given the above, HWT does not have an objectives, plans, targets or performance metrics related to community outreach or engagement for the 2023-2025 WMP cycle and beyond. HWT will reassess its current community outreach and engagement outlook in the event of a change in its operations which necessitates engagement of and/or outreach to customers.

8.5.1.1 Objectives

***Instructions:** Each electrical corporation must summarize the objectives for its 3-year and 10-year plans for implementing and improving its community outreach and engagement.⁴¹ These summaries must include the following:*

- *Identification of which initiative(s) in the WMP the electrical corporation is implementing to achieve the stated objective, including Utility Initiative Tracking IDs*
- *Reference(s) to applicable codes, standards, and best practices/guidelines and an indication of whether the electrical corporation exceeds an applicable code, standard, or regulation*
- *Method of verifying achievement of each objective*
- *A completion date for when the electrical corporation will achieve the objective*
- *Reference(s) to the WMP section(s) or appendix, including page numbers, where the details of the objective(s) are documented and substantiated*

This information must be provided in Table 8-53 for the 3-year plan and Table 8-54 for the 10-year plan. Examples of the minimum acceptable level of information are provided below.

Table 8-53. Example of Community Outreach and Engagement Initiative Objectives (3-year plan)

<i>Objectives for Three Years (2023–2025)</i>	<i>Applicable Initiative(s), Tracking ID(s)</i>	<i>Applicable Regulations, Codes, Standards, and Best</i>	<i>Method of Verification (i.e., program)</i>	<i>Completion Date</i>	<i>Reference (section & page #)</i>

		Practices (See Note)			
<i>Assess and resolve any customer issues identified through mobile application within 1 week</i>	<i>Public outreach and engagement, PE-01</i>	<i>Customer support guidance document</i>	<i>Records of open and closed customer tickets including dates</i>	<i>May 2024</i>	

Note: An asterisk indicates that the electrical corporation exceeds a particular code, regulation, standard, or best practice. The electrical corporation must provide a reference to the appendix section and page providing further documentation and substantiation.

Table 8-54. Example of Community Outreach and Engagement Initiative Objectives (10-year plan)

Objectives for Ten Years (2026–2032)	Applicable Initiative(s), Tracking ID(s)	Applicable Regulations, Codes, Standards, and Best Practices (See Note)	Method of Verification (i.e., program)	Completion Date	Reference (section & page #)
<i>Formalize mechanism to share lessons learned among peers in and outside the state</i>	<i>Best practice sharing, CO-01</i>	<i>Guidance document for sharing data and information externally</i>	<i>Documented instances of collaboration between the electrical corporation and outside entities, including agendas, meeting minutes, and participant lists</i>	<i>June 2026</i>	

Note: An asterisk indicates that the electrical corporation exceeds a particular code, regulation, standard, or best practice. The electrical corporation must provide a reference to the appendix section and page providing further documentation, justification, and substantiation.

See HWT’s responses to Section 8.5.1. HWT does not serve end-use customers, have a traditional service territory or a distribution system. Additionally, based on the limited scale and scope of the Suncrest Facility, at this time, HWT believes that it will seldom, if ever, be necessary to issue a PSPS. The Interconnecting Transmission Owner, SDG&E, would be the main driver of a PSPS in the Suncrest Facility’s operational area. Therefore, HWT does not anticipate providing customer support or engaging with communities during an emergency. HWT has no current community outreach and engagement objectives in the 2023-2025 WMP Cycle and beyond. HWT will reassess its current community outreach and engagement outlook in the event of a change in its operations which necessitates engagement of and/or outreach to customers. As a result Table 8-52 and Table 8-53 are marked “N/A” meaning “Not Applicable”.

Table 8-52. Community Outreach and Engagement Initiative Objectives (3-year plan)

Objectives for Three Years (2023–2025)	Applicable Initiative(s), Tracking ID(s)	Applicable Regulations, Codes, Standards, and Best Practices (See Note)	Method of Verification (i.e., program)	Completion Date	Reference (section & page #)
N/A					

Note: An asterisk indicates that the electrical corporation exceeds a particular code, regulation, standard, or best practice. The electrical corporation must provide a reference to the appendix section and page providing further documentation and substantiation.

Table 8-53. Community Outreach and Engagement Initiative Objectives (10-year plan)

Objectives for Ten Years (2026–2032)	Applicable Initiative(s), Tracking ID(s)	Applicable Regulations, Codes, Standards, and Best Practices (See Note)	Method of Verification (i.e., program)	Completion Date	Reference (section & page #)
N/A					

Note: An asterisk indicates that the electrical corporation exceeds a particular code, regulation, standard, or best practice. The electrical corporation must provide a reference to the appendix section and page providing further documentation, justification, and substantiation.

8.5.1.2 Targets

***Instructions:** Initiative targets are forward-looking quantifiable measurements of activities identified by each electrical corporation in its WMP. Electrical corporations will show progress toward completing targets in subsequent reports, including QDRs and WMP Updates.*

The electrical corporation must list all targets it will use to track progress on its community outreach and engagement for the three years of its Base WMP. Energy Safety’s Compliance

Assurance Division and third parties must be able to track and audit each target.⁴⁴ For each initiative target, the electrical corporation must provide the following:

- Utility Initiative Tracking IDs.
- Projected targets for each of the three years of the Base WMP and relevant units.
- Quarterly, rolling targets for 2023 and 2024 (PSPS outreach only).
- The expected “x% risk impact” for each of the three years of the Base WMP. The expected x% risk impact is the expected percentage risk reduction per year, as described in Section 7.2.2.2.
- Method of verifying target completion.

The electrical corporation’s targets must provide enough detail to effectively inform efforts to improve the performance (i.e., reduction in ignition probability or wildfire consequence) of the electrical corporation’s community outreach and engagement initiatives.

Table 8-55 and Table 8-56 provide examples of the minimum acceptable level of information.

Table 8-55. Example of Community Outreach and Engagement Initiative Targets by Year

Initiative Activity	Tracking ID	2023 Target & Unit	x% Risk Impact 2023	2024 Target & Unit	x% Risk Impact 2024	2025 Target & Unit	x% Risk Impact 2025	Method of Verification
Hire additional customer support	PO-02	2 additional supervisors hired	0.01%	4 additional agents hired	0.01%	3 additional agents hired	0.01%	Hiring records and number of positions in workforce tracking platform showing before and after results

Table 8-56. Example of PSPS Outreach and Engagement Initiative Targets by Year

Initiative Activity	Tracking ID	Target End of Q2 2023 & Unit	Target End of Q3 2023 & Unit	End of Year Target 2023 & Unit	x% Risk Impact 2023	Target End of Q2 2024 & Unit	Target End of Q3 2024 & Unit	End of Year Target 2024 & Unit	x% Risk Impact 2024	Target 2025 & Unit	x% Risk Impact 2025	Method of Verification
Hold public meetings in high PSPS risk areas	PO-03	1 meeting	10 meetings	12 meetings	0.05%	3 meetings	15 meetings	20 meetings	0.1%	20 meetings	0.1%	Meeting agendas, meeting materials and attendance

⁴⁴ Annual information included in this section must align with Tables 1 and 12 of the QDR.

												ce records
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HWT does not serve end-use customers, have a traditional service territory or a distribution system. Additionally, based on the limited scale and scope of the Suncrest Facility, at this time, HWT believes that it will seldom, if ever, be necessary to issue a PSPS. The Interconnecting Transmission Owner, SDG&E, would be the main driver of a PSPS in the Suncrest Facility's operational area. Therefore, HWT does not anticipate providing customer support or engaging with communities during an emergency. HWT has no current community outreach and engagement objectives in the 2023-2025 WMP Cycle and beyond and therefore has no initiative targets. HWT will reassess its current community outreach and engagement outlook in the event of a change in its operations which necessitates engagement of and/or outreach to customers. As a result Table 8-54 and Table 8-55 are marked "N/A" meaning "Not Applicable".

Table 8-54. Community Outreach and Engagement Initiative Targets by Year

Initiative Activity	Tracking ID	2023 Target & Unit	x% Risk Impact 2023	2024 Target & Unit	x% Risk Impact 2024	2025 Target & Unit	x% Risk Impact 2025	Method of Verification
N/A								

Table 8-55. PSPS Outreach and Engagement Initiative Targets by Year

Initiative Activity	Tracking ID	Target End of Q2 2023 & Unit	Target End of Q3 2023 & Unit	End of Year Target 2023 & Unit	x% Risk Impact 2023	Target End of Q2 2024 & Unit	Target End of Q3 2024 & Unit	End of Year Target 2024 & Unit	x% Risk Impact 2024	Target 2025 & Unit	x% Risk Impact 2025	Method of Verification
N/A												

8.5.1.3 Performance Metrics Identified by the Electrical Corporation

Instructions: Performance metrics indicate the extent to which an electrical corporation's Wildfire Mitigation Plan is driving performance outcomes. Each electrical corporation must:

- List the performance metrics the electrical corporation uses to evaluate the effectiveness of its community outreach and engagement in reducing wildfire and PSPS risk⁴³

For each of those performance metrics listed, the electrical corporation must:

- Report the electrical corporation's performance since 2020 (if previously collected)
- Project performance for 2023-2025
- List method of verification

The electrical corporation must ensure that each metric's name and values are the same in its WMP reporting as its QDR reporting (specifically, QDR Table 2 and QDR Table 3). Metrics listed in this section that are the same as performance metrics required by Energy Safety and reported in

QDR Table 2 (Performance Metrics)⁴⁴ must match those reported in QDR Table 2. Metrics listed in this section that are not the same as any of the performance metrics identified by Energy Safety and reported in QDR Table 2 must match those reported in QDR Table 3.

The electrical corporation must:

- *Summarize its self-identified performance metric(s) in tabular form*
- *Provide a brief narrative that explains trends in the metrics*

Table 8-57 provides an example of the minimum acceptable level of information.

Table 8-57. Example of Community Outreach and Engagement Performance Metrics Results by Year

<i>Performance Metrics</i>	<i>2020</i>	<i>2021</i>	<i>2022</i>	<i>2023 Projected</i>	<i>2024 Projected</i>	<i>2025 Projected</i>	<i>Method of Verification (e.g., third-party evaluation, QDR)</i>

HWT does not serve end-use customers, have a traditional service territory or a distribution system. Additionally, based on the limited scale and scope of the Suncrest Facility, at this time, HWT believes that it will seldom, if ever, be necessary to issue a PSPS. The Interconnecting Transmission Owner, SDG&E, would be the main driver of a PSPS in the Suncrest Facility’s operational area. Therefore, HWT does not anticipate providing customer support or engaging with communities during an emergency. HWT has no current community outreach and engagement objectives in the 2023-2025 WMP Cycle and beyond and therefore has no performance metrics. HWT will reassess its current community outreach and engagement outlook in the event of a change in its operations which necessitates engagement of and/or outreach to customers. As a result Table 8-56 is marked “N/A” meaning “Not Applicable”.

Table 8-56. Community Outreach and Engagement Performance Metrics Results by Year

Performance Metrics	2020	2021	2022	2023 Projected	2024 Projected	2025 Projected	Method of Verification (e.g., third-party evaluation, QDR)
N/A							

8.5.2 Public Outreach and Education Awareness Program

Instructions: *The electrical corporation must provide a high-level overview of its public outreach and education awareness program(s) for wildfires; outages due to wildfires, PSPS events, and protective equipment and device settings; service restoration before, during, and after the incidents (as required by Public Utilities Code section 8386[c][19][B]); and vegetation management. This includes outreach efforts in English, Spanish, Chinese (including Cantonese,*

Mandarin, and other Chinese languages), Tagalog, and Vietnamese, as well as Korean and Russian where those languages are prevalent within the service territory.

At a minimum, the overview must include the following:

- A description of the purpose and scope of the program(s).
- References to the Utility Initiative Tracking ID where appropriate.
- A brief narrative followed by a tabulated list of all the different target communities it is trying to reach across the electrical corporation's service territory. The target communities list must include AFN and other vulnerable or marginalized populations, but they may also include other target populations, such as communities in different geographic locations (e.g., urban areas, rural areas), age groups, language and ethnic groups, transient populations, or Medical Baseline customers. In addition, the electrical corporation must summarize the interests or concerns each community may have before, during, or after a wildfire or PSPS event to help inform outreach and education awareness needs. Table 8-58 provides an example of the minimum acceptable level of information.
- A tabulated list of community partners the electrical corporation is working with or intends to work with to support its community outreach and education programs. Table 8-59 provides an example of the minimum acceptable level of information.
- A table of the various outreach and education awareness programs (i.e., campaigns, informal education, grant programs, participatory learning) that the electrical corporation implements before, during, and after wildfire, vegetation management, and PSPS events, including efforts to engage with partners in developing and exercising these programs. In addition, the electrical corporation must describe how it implements its overall program, including staff and volunteer needs, other resource needs, method for implementation (e.g., industry best practice, latest research in methods for risk communication, social marketing), long-term monitoring and evaluation of each program's success, need for improvement, etc. The narrative for this section is limited to two to three pages. The electrical corporation must also provide the information on its outreach and education awareness programs in tabulated format. Table 8-58 provides an example of the minimum acceptable level of information.

Table 8-58. Example of a List of Target Communities

Target Community	Interests or Concerns Before, During, and After Wildfire and PSPS events
<i>Populations with limited English proficiency</i>	<i>Limited access to understand electrical corporation wildfire hazards and risks, specific actions that can be taken to reduce risk, and awareness of emergency services, resources, etc.</i>
<i>People in remote areas</i>	<i>[Electrical corporation to add description here]</i>

<i>Elderly</i>	<i>[Electrical corporation to add description here]</i>
<i>People with limited technology</i>	<i>[Electrical corporation to add description here]</i>

Table 8-59. Example of a List of Community Partners

Community Partners	County	City
<i>Regional Fire Safe Council</i>	<i>Local County</i>	<i>Local City</i>
<i>Emergency Relief Organization</i>	<i>Local County</i>	<i>Local City</i>
<i>Local City Government</i>	<i>Local County</i>	<i>Local City</i>

Table 8-60. Example of Community Outreach and Education Programs

Core Activity	Event Type	Period of Application (Before, During, After Incident)	Name of Outreach or Education Program	Description of Program	Target Audience	Reference/ Link
<i>Website information</i>	<i>Wildfire</i>	<i>Before</i>	<i>General Wildfire Safety</i>	<i>[Electrical corporation to insert description]</i>	<i>General public</i>	<i>http://www.corporation.com/wildfire-safety</i>
<i>Website information</i>	<i>PSPS</i>	<i>Before</i>	<i>Public Safety Power Shutoff</i>	<i>[Electrical corporation to insert description]</i>	<i>General public</i>	
<i>Website information</i>	<i>Wildfire</i>	<i>Before</i>	<i>Wildfire Safety Advancements</i>	<i>[Electrical corporation to insert description]</i>	<i>General public</i>	
<i>Website information</i>	<i>Vegetation Management</i>	<i>Before</i>	<i>Pre-inspection Notification</i>	<i>[Electrical corporation to insert description]</i>	<i>Customers along inspection route</i>	
<i>Website information</i>	<i>Wildfire and PSPS</i>	<i>Before</i>	<i>Community Resources</i>	<i>This website provides customers and the general public with locations of community resource centers throughout the service territory to provide support to customers affected by PSPS.</i>	<i>General public</i>	

<i>Safety webinars</i>	<i>Wildfire</i>	<i>Before</i>	<i>Community Wildfire Safety Program</i>	<i>These virtual gatherings allow community members to learn more about wildfire safety and emergency preparedness, meet with electrical corporation representatives, ask questions, and share feedback. Webinars are available in English, Spanish, Chinese, and Tagalog, as well as accessible versions for AFN customers, blind/low vision customers, deaf/hard of hearing customers, etc.</i>	<i>General public, AFN population, limited English proficiency (LEP) population</i>	
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As noted on page 12 of Energy Safety’s ITO Supplement, ITOs do not have end-use customers. Energy Safety notes that ITOs must comply with Public Utilities Code section 8386(c)(19)(B)⁴⁵. However, beyond that, reporting requirements associated with Section 8.5.2 of the 2023-2025 WMP Technical Guidelines are inapplicable to ITOs.

Based on the foregoing, HWT’s WMP does not include a Public Outreach and Education Awareness Program for Section 8.5.2. Instead HWT provides the following information pursuant to Energy Safety’s direction on page 12 of Energy Safety’s ITO Supplement.

Compliance with Public Utilities Code sections 8386(c)19(B)

HWT does not serve end-use customers, have a traditional service territory or a distribution system. Additionally, based on the limited scale and scope of the Suncrest Facility, at this time, HWT believes that it will seldom, if ever, be necessary to issue a PSPS. The Interconnecting Transmission Owner, SDG&E, would be the main driver of a PSPS in the Suncrest Facility’s operational area. Therefore, HWT does not anticipate providing customer support or engaging with communities during an emergency. However, HWT has developed a protocol for communication and coordination with its primary stakeholders, including the CAISO and Interconnecting Transmission Owner, local fire agencies, etc. HWT’s President or designee would be the lead in implementing this communications protocol during an emergency. HWT also

⁴⁵ (19)(B) “Plans for community outreach and public awareness before, during, and after a wildfire, including language notification in English, Spanish, and the top three primary languages used in the state other than English or Spanish, as determined by the commission based on the United States Census data.”

maintains its WMP filings and related information on its website which is publicly available at the following link: <https://www.horizonwesttransmission.com/wildfire.html>. Given the above, HWT does not have an objectives, plans, targets or performance metrics related to community outreach or engagement for the 2023-2025 WMP cycle and beyond. HWT will reassess its current community outreach and engagement outlook in the event of a change in its operations which necessitates engagement of and/or outreach to customers.

8.5.3 Engagement with Access and Functional Needs Populations

Instructions: *In this section, the electrical corporation must provide an overview of its process for understanding, evaluating, designing, and implementing wildfire and PSPS risk mitigation strategies, policies, and procedures specific to AFN customers across its territory. The electrical corporation must also report, at a minimum, on the following:*

- *Summary of key AFN demographics, distribution, and percentage of total customer base.*
- *Evaluation of the specific challenges and needs during a wildfire or PSPS event of the electrical corporation's AFN customer base.*
- *Plans to address specific needs of the AFN customer base throughout the service territory specific to the unique threats that wildfires and PSPS events may pose for those populations before, during, and after the incidents. This should include high-level strategies, policies, programs, and procedures for outreach, engagement in the development and implementation of the AFN-specific risk mitigation strategies, and ongoing feedback practices.*

Reference the Utility Initiative Tracking ID where appropriate.

As noted on page 13 of Energy Safety's ITO Supplement, ITOs do not have end-use customers. Energy Safety notes that ITOs must comply with Public Utilities Code section 8386(c)(19)(B). However, beyond that, reporting requirements associated with Section 8.5.3 of the 2023-2025 WMP Technical Guidelines are inapplicable to ITOs.

Based on the foregoing, HWT's WMP does not include information regarding the Engagement with Access and Functional Needs Populations for Section 8.5.3. Instead HWT provides the following information pursuant to Energy Safety's direction on page 13 of Energy Safety's ITO Supplement.

Compliance with Public Utilities Code sections 8386(c)19(B)

See HWT's Response to 8.5.2.

8.5.4 Collaboration on Local Wildfire Mitigation Planning

Instructions: *In this section, the electrical corporation must provide a high-level overview of its plans, programs, and/or policies for collaborating with communities on local wildfire mitigation*

planning (e.g., wildfire safety elements in general plans, community wildfire protection plans, local multi-hazard mitigation plans) within its service territory. The narrative must be no more than one page.

In addition, the electrical corporation must provide the following information in tabular form, providing no more than one page of tabulated information in the main body of the WMP and the full table in an Appendix as needed.

- List of county, city, and tribal agencies and non-governmental organizations (e.g., nonprofits, fire safe councils) within the service territory with which the electrical corporation has collaborated or intends to collaborate on local wildfire mitigation planning efforts (i.e., non-wildfire emergency planning activities)
 - For each entity, the local wildfire mitigation planning program/plan/document, level of collaboration (e.g., meeting attendance, verbal or written comments), and date the electrical corporation provided its last feedback. Table 8-61 provides an example of the minimum acceptable level of information. Reference the Utility Initiative Tracking ID where appropriate.
- In a separate table, the electrical corporation must provide a list of current gaps and limitations in its collaboration efforts with local partners on local wildfire planning efforts. Where gaps or limitations exist, the electrical corporation must indicate proposed means and methods to increase collaborative efforts. Table 8-62 provides an example of the minimum acceptable level of information.

Table 8-61. Example of Collaboration in Local Wildfire Mitigation Planning

Name of County, City, or Tribal Agency or Civil Society Organization (e.g., nongovernmental organization, fire safe council)	Program, Plan, or Document	Last Version of Collaboration	Level of Collaboration
Local County Resource Management Agency	Local County General Plan, Safety Element, Wildfires	2022 version (06/2021)	Attended a virtual meeting on 02/02/2022 at 1 pm PDT Provided verbal comments and input
Local Fire Safe Council	Structural hardening grant program	2021/2022	Financier
Local County Resource Conservation District	Chipper program	Planned for 12/2023	Financier
Local Tribal Agency	Tribal Government Wildfire Safety Plan	2022 version (06/2021)	Attended a virtual meeting on

			02/02/2022 at 1 pm PDT Provided verbal comments and input
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Table 8-62. Example of Key Gaps and Limitations in Collaborating on Local Wildfire Mitigation Planning

Subject of Gap or Limitation	Brief Description of Gap or Limitation	Strategy for Improvement
Low collaboration requests	Less than 5% of local government and civil society stakeholder groups seek collaboration activities.	Strategy: Create web content notifying the public, local government, and civil society organizations of the electrical corporation's resources to provide support on local wildfire mitigation planning efforts. Assign a local wildfire planning liaison to be available as needed for local planning efforts. Target timeline: Develop and post web content by May 2023 and hire two local wildfire planning liaisons by March 2023.

HWT's only asset is the Suncrest Facility which entered operational service in Q1 2020. There is very limited vegetation immediately around the Suncrest Facility, and the asset has hardscaped defensible space by design to reduce the need for vegetation management and potential contribution of surrounding vegetation as fuel for wildfire. The Suncrest SVC is also an unmanned station that under the operational control of the CAISO providing automatic dispatch of reactive power to the neighboring SDG&E substation. HWT does not serve end-use customers, have a traditional service territory or a distribution system. Based on HWT's limited footprint and operations, HWT does not collaborate with any communities, or other parties, on local wildfire mitigation planning. HWT does maintain communications with the CAISO, who has operation control of the Suncrest SVC and SDG&E, who is the interconnecting utility. In the event of a fire, HWT would contact the San Diego County Fire Authority Descanso Fire Station 45 for support services, in addition to HWT's contracted fire suppression service.

Based on the foregoing, HWT identifies the parties with whom it communicates with in Table 8.61 but marks the categories for collaboration as "N/A" meaning "Not Applicable" since HWT does not participate in any local wildfire mitigation planning.

Table 8.61. Collaboration in Local Wildfire Mitigation Planning

Name of County, City, or Tribal Agency or Civil Society Organization (e.g., nongovernmental)	Program, Plan, or Document	Last Version of Collaboration	Level of Collaboration

organization, fire safe council)			
CAISO	N/A	N/A	N/A
SDG&E	N/A	N/A	N/A
San Diego County Fire Authority Descanso Fire Station 45	N/A	N/A	N/A

Given HWT’s limited footprint and scale of operations, HWT does not have any plans to participate in local wildfire mitigation planning. As a result Table 8.62 is marked “N/A” meaning “Not Applicable”.

Table 8.62. Key Gaps and Limitations in Collaborating on Local Wildfire Mitigation Planning

Subject of Gap or Limitation	Brief Description of Gap or Limitation	Strategy for Improvement
N/A		

8.5.5 Best Practice Sharing with Other Electrical Corporations

Instructions: In this section, the electrical corporation must provide a high-level overview of its policy for sharing best practices and collaborating with other electrical corporations on technical and programmatic aspects of its WMP program. The narrative must be no more than one page.

In addition, the electrical corporation must provide a list in tabular form of relevant electrical corporations and other entities it has shared or collaborated, or intends to continue to share or collaborate or begin sharing or collaborating, with on best practices for technical or programmatic aspects of its WMP program.

For each entity, the best practice subject, date(s) of collaboration, whether the collaboration is technical or programmatic, list of electrical corporation partners, a description of the best practice sharing/collaborative activity with a reference, and any outcomes from that sharing or activity.

Reference the Utility Initiative Tracking ID where appropriate.

The overview and table must be no longer than two pages in the main body of the WMP. The full table can be included as an appendix as needed.

Table 8-63 provides an example of the minimum acceptable level of information.

Table 8-63. Example of Best Practice Sharing with Other Electrical Corporations

Best Practice Subject	Dates of Collaboration (YYYY–YYYY)	Technical or Programmatic	Electrical Corporation Partner(s)	Description of Best Practice Sharing or Collaborating	Outcome
<i>Covered conductor effectiveness</i>	<i>2020–Current</i>	<i>Technical</i>	<i>PGE, SCE, SDGE, Liberty, PacifiCorp, BVES</i>	<i>The IOUs commissioned a joint study to assess the effectiveness and reliability of covered conductors (CCs) for overhead distribution system hardening. The aim is to develop consistent criteria and measurements for evaluating effectiveness of CCs. Refer to the report entitled “Effectiveness of Covered Conductors: Failure Mode Identification and Literature Review,” dated December 22, 2021, for more details.</i>	<p><i>Ongoing</i></p> <ul style="list-style-type: none"> <i>• CCs are a mature technology (in use since the 1970s) and have the potential to mitigate several safety, reliability, and wildfire risks inherent to bare conductors. This is due to the reduced vulnerability to arcing/faults afforded by the multi-layered polymeric insulating sheath material.</i> <i>• Of the 10 hazards that affect bare conductors, CCs have the potential to mitigate six (tree/vegetation contact, wind-induced contact, third-party damage, animal-related damage, public/worker impact, and moisture).</i> <i>• Laboratory studies and field experience have shown that CCs largely mitigated arcing due to external contact.</i> <i>• Several CC-specific failure modes exist that require operators to consider additional personnel training, augmented installation practices, and adoption of new mitigation strategies (e.g., additional lightning arrestors, conductor washing programs).</i>

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HWT’s only operational asset is the Suncrest Facility, a MVar SVC connected to an approximately one mile undergrounded 230 kV single-circuit transmission line. HWT is a transmission-only utility and does not own, operate, or maintain electric distribution facilities. Given HWT’s limited footprint and scale of operations, many of the substantial and warranted efforts undertaken by larger utilities with services territories and distribution systems are not specifically applicable to HWT. HWT does not have a formal process on sharing best practices with its affiliates, but shares information on an ad hoc basis as various capital improvements are developed that may have applicable fire risk reduction benefits. HWT reviews and shares fire risk reduction best practices and information with its affiliates across its corporate enterprise particularly, Trans Bay Cable (“TBC”), which is a similarly situated transmission-only utility in California. TBC’s experiences are invaluable as it has over 10 years of operational experience in California. HWT also leverages the operational experience and best practices from other affiliates which manage wildfire risk and other weather related risks across the United States, particularly in the Southwest, Midwest and Southeast. HWT anticipates joining two industry groups focused on wildfire mitigation in 2025 and will document its participation in its 2026-2028 WMP. As HWT does not have a formal process/program for best practice sharing it does not specifically document such occurrences. As a result, there no specific information which can be included in Table 8.63 and therefore the table is marked as N/A meaning “Not Applicable”.

Table 8.63. Best Practice Sharing with Other Electrical Corporations

Best Practice Subject	Dates of Collaboration (YYYY–YYYY)	Technical or Programmatic	Electrical Corporation Partner(s)	Description of Best Practice Sharing or Collaborating	Outcome
N/A					

9 PUBLIC SAFETY POWER SHUTOFF

9.1 Overview

Instructions: In Sections 9.1–9.5 of the WMP,⁴⁶ the electrical corporation must:

- Provide a high-level overview of key PSPS statistics
- Identify circuits that have been frequently de-energized and provide measures for how the electrical corporation will reduce the need for, and impact of, future PSPS implementation on those circuits
- Describe expectations for how the electrical corporation’s PSPS program will evolve over the next 3 and 10 years
- Describe any lessons learned for PSPS events occurring since the electrical corporation’s last WMP submission
- Describe the electrical corporation’s protocols for PSPS implementation

9.1.1 Key PSPS Statistics

Instructions: In this section, the electrical corporation must include a summary table of PSPS event data. These data must be calculated from the same source used in the GIS data submission (i.e., they should be internally consistent). If it is not possible to provide these data from the same source, the electrical corporation must explain why. Table 9-1 provides an example of the minimum acceptable level of information for a summary of PSPS event data.

Table 9-1. Example of PPS Event Statistics

	No. of Events	Total Circuits De-energized	Total Customers⁴⁷ Impacted	Total Customer Minutes of Interruption
[Beginning in first year of PSPS implementation by the electrical corporation]				

⁴⁶ Annual information included in the following sections must align with Table 10 of the QDR.

⁴⁷ Here, “customers” is customer accounts. The electrical corporation may use electric meters as a proxy for customers.

2020				
2021				
2022				

HWT is a transmission-only utility and does not own, operate, or maintain electric distribution facilities. The Suncrest Facility does not include distribution reclosers. Additionally, HWT has never deployed a PSPS since it commenced operations of the Suncrest Facility. Based on the limited scale and scope of the HWT Facilities, at this time, HWT believes that it will seldom, if ever, be necessary to issue a PSPS. HWT is an ITO and has no retail/direct customers. As noted on page 13 of Energy Safety’s ITO Supplement, ITOs do not have end-use customers. Energy Safety notes that ITOs must comply with Public Utilities Code section 8386(c)(8). However, beyond that, reporting requirements associated with Section 9.1.1 of the 2023-2025 WMP Technical Guidelines are inapplicable to ITOs.

Based on the foregoing, HWT’s WMP does not include Key PSPS Statistics for Section 9.1.1. Instead HWT provides the following information pursuant to Energy Safety’s direction on page 13 of Energy Safety’s ITO Supplement.

Compliance with Public Utilities Code sections 8386(c)8

The Suncrest Facility is a MVar SVC connected to an approximately one mile undergrounded 230 kV single-circuit transmission line. Since the beginning of its commercial operations, HWT has not deenergized any circuits to mitigate the risk of wildfire.

9.1.2 Identification of Frequently De-energized Circuits

Instructions: Public Utilities Code section 8386(c)(8) requires the “[i]dentification of circuits that have frequently been de-energized pursuant to a PSPS event to mitigate the risk from wildfire and the measures taken, or planned to be taken, by the electrical corporation to reduce the need for, and impact of, future PSPS of those circuits, including, but not limited to, the estimated annual decline in circuit PSPS and PSPS impact on customers, and replacing, hardening, or undergrounding any portion of the circuit or of upstream transmission or distribution lines.” To comply, the electrical corporation is required to populate Table 9-2 and provide a map showing the frequently de-energized circuits.

The map must show the following:

- *All circuits listed in Table 9-2, colored or weighted by frequency of PSPS*
- *HFTD Tiers 2 and 3 contour overlay*

Examples of the minimum acceptable level of information are provided in Table 9-2.

Table 9-2. Example of Frequently De-energized Circuits

Entry #	Circuit ID	Name of Circuit	Dates of Outages	Number of Customers Served by Circuit	Number of Customers Affected	Measures Taken, or Planned to Be Taken, to Reduce the Need for and Impact of Future PSPS of Circuit
1	157	Panama	Dec 2–4, 2021 Dec 7–9, 2022 Dec 23–24, 2022	1,500	1,220 600 500	<ul style="list-style-type: none"> • 34.26 miles of overhead hardening completed; 33 miles in scope for 2022/2023 • Eight SCADA (supervisory control and data acquisition) sectionalizing devices added or replaced
2	1215	Costa	Oct 27, 2018 Nov 12–14, 2020 Dec 2–4, 2021 Jan 28–29, 2022	1,200	300 250 542 600	<ul style="list-style-type: none"> • 0.78 miles of overhead hardening completed • Backup resiliency programs that have benefited 18 customers

Note: Once populated, if this table is longer than two pages, the electrical corporation must append the table.

The Suncrest Facility is a MVar SVC connected to an approximately one mile undergrounded 230 kV single-circuit transmission line. Since the beginning of its commercial operations, HWT has not deenergized any circuits to mitigate the risk of wildfire. As a result HWT has no frequently de-energized circuits to identify and

Table 9-1 is marked “N/A” meaning “Not Applicable”.

Table 9-1. Frequently De-energized Circuits

Entry #	Circuit ID	Name of Circuit	Dates of Outages	Number of Customers Served by Circuit	Number of Customers Affected	Measures Taken, or Planned to Be Taken, to Reduce the Need for and
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						Impact of Future PPS of Circuit
N/A						

9.1.3 Objectives

Instructions: Each electrical corporation must summarize the objectives for its 3-year and 10-year plans to reduce the scale, scope, and frequency of PPS events.⁴⁷ These summaries must include the following:

- Identification of which initiative(s) in the WMP the electrical corporation is implementing to achieve the stated objective, including Utility Initiative Tracking IDs
- Reference(s) to applicable codes, standards, and best practices/guidelines and an indication of whether the electrical corporation exceeds an applicable code, standard, or regulation
- Method of verifying achievement of each objective
- A completion date for when the electrical corporation will achieve the objective
- Reference(s) to the WMP section(s) or appendix, including page numbers, where the details of the objective(s) are documented and substantiated

This information must be provided in Table 9-3. Example of PPS Objectives (3-year plan) for the 3-year plan and Table 9-4. Example of PPS Objectives (10-year plan) for the 10-year plan. Examples of the minimum acceptable level of information are provided below.

Table 9-3. Example of PPS Objectives (3-year plan)

Objectives for Three Years (2023–2025)	Applicable Initiative(s) & Tracking ID(s)	Applicable Regulations, Codes, Standards, and Best Practices (See Note)	Method of Verification (i.e., program)	Completion Date	Reference (section & page #)
Automate PPS notifications to customers	Communication strategy for PPS, PPS-02	CPUC's PPS guidelines and rules	Contract with communications firm to automate notifications; demonstration of automated process; post-event reports	September 2023	

Note: An asterisk indicates that the electrical corporation exceeds a particular code, regulation, standard, or best practice. The electrical corporation must provide a reference to the appendix section and page providing further documentation, justification, and substantiation.

Table 9-4. Example of PSPS Objectives (10-year plan)

Objectives for Three Years (2023–2025)	Applicable Initiative(s) & Tracking ID(s)	Applicable Regulations, Codes, Standards, and Best Practices (See Note)	Method of Verification (i.e., program)	Completion Date	Reference (section & page #)
<i>Eliminate use of PSPS</i>	<i>Protocols on PSPS, PSPS-01</i>	<i>CPUC’s PSPS guidelines and rules</i>	<i>Statement from executive officers; revised operational protocols</i>	<i>September 2030</i>	

Note: An asterisk indicates that the electrical corporation exceeds a particular code, regulation, standard, or best practice. The electrical corporation must provide a reference to the appendix section and page providing further documentation, justification, and substantiation.

HWT is a transmission-only utility and does not own, operate, or maintain electric distribution facilities. The Suncrest Facility does not include distribution reclosers. Additionally, HWT has never deployed a PSPS since it commenced operations of the Suncrest Facility. Based on the limited scale and scope of the HWT Facilities, at this time, HWT believes that it will seldom, if ever, be necessary to issue a PSPS. HWT is an ITO and has no retail/direct customers. As noted on page 14 of Energy Safety’s ITO Supplement, ITOs do not have end-use customers. Energy Safety notes that ITOs must comply with Public Utilities Code section 8386(c)(8). However, beyond that, reporting requirements associated with Section 9.1.3 of the 2023-2025 WMP Technical Guidelines are inapplicable to ITOs.

Based on the foregoing, HWT’s WMP does not include Objectives for Section 9.1.3. Instead HWT provides the following information pursuant to Energy Safety’s direction on page 14 of Energy Safety’s ITO Supplement.

Compliance with Public Utilities Code sections 8386(c)8

The Suncrest Facility is a MVar SVC connected to an approximately one mile undergrounded 230 kV single-circuit transmission line. Since the beginning of its commercial operations, HWT has not deenergized any circuits to mitigate the risk of wildfire.

9.1.4 Targets

Instructions: Initiative targets are forward-looking quantifiable measurements of activities identified by each electrical corporation in its WMP. Electrical corporations will show progress toward completing targets in subsequent reports, including QDRs and WMP Updates.

The electrical corporation must list all targets it uses to track progress on reducing the scope, scale, and frequency of PSPS for the three years of the Base WMP. Energy Safety's Compliance Assurance Division and third parties must be able to track and audit each target.⁴⁸ For each initiative target, the electrical corporation must provide the following:

- Utility Initiative Tracking IDs.
- Projected targets for the three years of the Base WMP and relevant units.
- The expected "x% risk impact" for each of the three years of the Base WMP. The expected x% risk impact is the expected percentage risk reduction per year, as described in Section 7.2.2.2.
- Method of verifying target completion.

The electrical corporation's targets must provide enough detail to effectively inform efforts to improve the performance of the electrical corporation's initiatives aimed at reducing the scope, scale, and frequency of its PSPS events.

Table 9-5 is an example of the minimum acceptable level of information.

Table 9-5. Example of PSPS Targets

Initiative Activity	Tracking ID	2023 Target & Unit	x% Risk Impact 2023	2024 Target & Unit	x% Risk Impact 2024	2025 Target & Unit	x% Risk Impact 2025	Method of Verification
Install sectionalizing devices	PSPS-05	10 sectionalizing devices installed	2%	5 sectionalizing devices installed	1%	5 sectionalizing devices installed	1%	Completed work orders, GIS Data Submissions

HWT is a transmission-only utility and does not own, operate, or maintain electric distribution facilities. The Suncrest Facility does not include distribution reclosers. Additionally, HWT has never deployed a PSPS since it commenced operations of the Suncrest Facility. Based on the limited scale and scope of the HWT Facilities, at this time, HWT believes that it will seldom, if ever, be necessary to issue a PSPS. HWT is an ITO and has no retail/direct customers. As noted on page 14 of Energy Safety's ITO Supplement, ITOs do not have end-use customers. Energy Safety notes that ITOs must comply with Public Utilities Code section 8386(c)(8). However, beyond that, reporting requirements associated with Section 9.1.4 of the 2023-2025 WMP Technical Guidelines are inapplicable to ITOs.

Based on the foregoing, HWT's WMP does not include Targets for Section 9.1.4. Instead HWT provides the following information pursuant to Energy Safety's direction on page 14 of Energy Safety's ITO Supplement.

Compliance with Public Utilities Code sections 8386(c)8

⁴⁸ Annual information included in this section must align with Tables 1 and 12 of the QDR.

The Suncrest Facility is a MVar SVC connected to an approximately one mile underground 230 kV single-circuit transmission line. Since the beginning of its commercial operations, HWT has not deenergized any circuits to mitigate the risk of wildfire.

9.1.5 Performance Metrics Identified by the Electrical Corporations

Instructions: Performance metrics indicate the extent to which an electrical corporation's Wildfire Mitigation Plan is driving performance outcomes. Each electrical corporation must:

- List the performance metrics the electrical corporation uses to evaluate the effectiveness of reducing reliance on PSPS⁴⁹

For each of these performance metrics listed, the electrical corporation must:

- Report the electrical corporation's performance since 2020 (if previously collected)
- Project performance for 2023-2025
- List method of verification

The electrical corporation must ensure that each metric's name and values are the same in its WMP reporting as its QDR reporting (specifically, QDR Table 2 and QDR Table 3). Metrics listed in this section that are the same as performance metrics required by Energy Safety and reported in QDR Table 2 (Performance Metrics)⁵⁰ must match those reported in QDR Table 2. Metrics listed in this section that are not the same as any of the performance metrics identified by Energy Safety and reported in QDR Table 2 must match those reported in QDR Table 3.

The electrical corporation must:

- Summarize its self-identified performance metric(s) in tabular form
- Provide a brief narrative that explains trends in the metrics

Table 9-6 provides an example of the minimum acceptable level of information.

In addition to the table, the electrical corporation must provide a narrative (two pages maximum) explaining its method for determining its projected performance on these metrics (e.g., PSPS consequence modeling, retrospective analysis).

Table 9-6. Example of PSPS Performance Metrics Results by Year

Performance Metrics	2020	2021	2022	2023 Projected	2024 Projected	2025 Projected	Method of Verification (e.g., third-party)

⁴⁹ There may be overlap between the performance metrics the electrical corporation uses and performance metrics required by Energy Safety. The electrical corporation must list these overlapping metrics in this section in addition to any unique performance metrics it uses.

⁵⁰ The performance metrics identified by Energy Safety are included in Energy Safety's Data Guidelines.

							<i>evaluation, QDR)</i>
<i>Percentage of impacted customers notified at least 24 hours before a PSPS event</i>							
<i>Numbers of circuits de-energized</i>							
<i>Numbers of customers impacted</i>							

HWT is a transmission-only utility and does not own, operate, or maintain electric distribution facilities. The Suncrest Facility does not include distribution reclosers. Additionally, HWT has never deployed a PSPS since it commenced operations of the Suncrest Facility. Based on the limited scale and scope of the HWT Facilities, at this time, HWT believes that it will seldom, if ever, be necessary to issue a PSPS. HWT is an ITO and has no retail/direct customers. As noted on page 14 of Energy Safety's ITO Supplement, ITOs do not have end-use customers. Energy Safety notes that ITOs must comply with Public Utilities Code section 8386(c)(8). However, beyond that, reporting requirements associated with Section 9.1.5 of the 2023-2025 WMP Technical Guidelines are inapplicable to ITOs.

Based on the foregoing, HWT's WMP does not include Performance Metrics for Section 9.1.5. Instead HWT provides the following information pursuant to Energy Safety's direction on page 14 of Energy Safety's ITO Supplement.

Compliance with Public Utilities Code sections 8386(c)8

The Suncrest Facility is a MVar SVC connected to an approximately one mile undergrounded 230 kV single-circuit transmission line. Since the beginning of its commercial operations, HWT has not deenergized any circuits to mitigate the risk of wildfire.

9.2 Protocols on Public Safety Power Shut-off

Instructions: The electrical corporation must describe its protocols on PPS implementation including:

- *Risk thresholds (e.g., wind speed, FPI, etc.) and decision-making process that determine the need for a PSPS. Where the electrical corporation provides this information in another section of the WMP, it must provide a cross-reference here rather than duplicating responses.*
- *Method used to compare and evaluate the relative consequences of PSPS and wildfires.*
- *Outline of the strategic decision-making process for initiating a PSPS (e.g., a decision tree). Where the electrical corporation provides this information in another section of the WMP, it must provide a cross-reference here rather than duplicating responses.*
- *Protocols for mitigating the public safety impacts of PSPS, including impacts on first responders, health care facilities, operators of telecommunications infrastructure, and water electrical corporations/agencies.*

HWT is a transmission-only utility and does not own, operate, or maintain electric distribution facilities. The Suncrest Facility does not include distribution reclosers. Additionally, HWT has not deployed PSPS since 2020 WMP. Based on the limited scale and scope of the Suncrest Facility, at this time, HWT believes that it will seldom, if ever, be necessary to issue a PSPS. The Interconnecting Transmission Owner, SDG&E, would be the main driver of a PSPS in the Suncrest Facility's operational area. Given the foregoing HWT is unlikely to be in position to evaluate the relative consequence of PSPS and wildfire as it relates to impact to customers as SDG&E would be the main decision maker in declaring a PSPS for HWT's operational area.

Nonetheless, HWT has developed the PSPS protocol described below to be prepared in the event a PSPS of HWT's facilities becomes necessary to protect the public as. HWT is subject to operating instructions from the CAISO and Interconnecting Transmission Owners, and HWT will also communicate directly with these entities before, during, and after any PSPS event.

HWT – Initiated Power Shut-off

HWT may employ the use of PSPS as a last resort, if essential to minimize the possibility of the Suncrest Facility becoming the source of an ignition that may endanger local residents and communities. HWT has the responsibility to shut off power if it becomes necessary as a last resort to protect the public. Determining factors for consideration might include, but not limited to:

- If the CAISO instructs HWT to de-energize its facilities, HWT will comply with those instructions.
- If an Interconnecting Transmission Owner determines it is necessary for a PSPS of its interconnected or nearby facilities, HWT will use that decision as input to inform the consideration for a PSPS of the HWT Facilities.
- The HWT System Operator will communicate any current and predicted fire weather conditions, fire safety concerns, required mitigations for planned work operations to HWT Senior Director of Operations and make the determination if a PSPS is necessary.

- Based on the conditions collected in the bullet above, the HWT Operations Engineer will perform an on-site inspection for fire ignition conditions.
- In the event that a non-HWT-related fire in the surrounding area has the potential to cut off access and/or directly impact operations of the HWT Facilities, the HWT Field Operations Engineer will notify the HWT System Operator for a determination of whether a PSPS is necessary.

HWT Safety Power Shutoff Protocol

PSPS is a last resort measure to ensure public safety. Every reasonable attempt will be made to prevent the implementation of Power Shutoff to the HWT Facilities. Actions could include, but not be limited to Operational adjustments, including evaluation of the HWT Facilities and modifications made, such as, reducing or cancelling at-risk field work and increasing monitoring.

But should additional action be required, HWT system operations staff will undertake the following process summarized from Section 4.2.3 of HWT's EOP:

- Assess
 - HWT system operator will take appropriate actions to protect public safety and mitigate threats
- De-Energize
 - As a last resort, HWT Facility will be de-energized remotely by opening circuit breakers until conditions are safe.
- Patrols & Restoration
 - The restoration process requires that the risk for fire ignition and wind speeds for a sustained period are reduced to allow HWT crews to inspect station and transmission elements to be free and clear for re-energization. Once equipment and conditions are confirmed safe by the field operations team, the HWT Facility system operator will initiate the systematic restoration of power.

Determining factors HWT might consider in issuing a Public Safety Power Shutoff are outlined in Section 4.2.2 of HWT's EOP. These include:

- On-site observation by Operations engineer that conditions for a fire ignition are imminent
 - Dry conditions, low humidity, winds greater than 85 mph and the unavailability of contracted suppression resource
- Observation by Operations engineers that a non-HWT related fire in the surrounding area is within 1-mile of the station and has the potential to cut-off access and/or directly impact operations

- Loss of communication/visibility to the Suncrest SVC, which is an unmanned facility, and a wildfire within 1-mile of the facility
- Notification from the System Operator that SDG&E is implementing a PSPS

HWT has a detailed protocol for communication and coordination with its primary stakeholders in an emergency situation (e.g., CAISO, Interconnecting Transmission Owners, local fire agencies and first responders, and HWT's emergency response support team) and power restoration procedures as detailed in HWT's Emergency Operations Plan for its Suncrest SVC facility.

9.3 Communication of Strategy for PSPS

Instructions: In Section 8.4.4 of the WMP, the electrical corporation must discuss all public communication strategies for wildfires, outages due to wildfires and PSPS, and service restoration. Thus, in this section, the electrical corporation is only required to provide a cross-reference to Section 8.4.4 and any other section of the WMP providing details of the emergency public communication strategy for PSPS implementation.

As explained above, as a transmission-only utility, HWT does not serve end-use customers or have a traditional service territory. Therefore, HWT does not anticipate providing customer support or engaging with communities during an emergency. However, HWT does have a protocol for engaging with other critical stakeholders (e.g., CAISO, Interconnecting Transmission Owners, local fire agencies, etc.) regarding a potential PSPS event, as detailed in HWT's Emergency Operations Plan. HWT's President or designee would be the lead in implementing this communications protocol during an emergency.

9.4 Key Personnel, Qualifications, and Training for PSPS

Instructions: In Section 8.4.2.2 of the WMP, the electrical corporation must discuss all key personnel planning, qualifications, and training for wildfires, outages due to wildfires, and PSPS, and service restoration. Thus, in this section, the electrical corporation is only required to provide a cross-reference to Section 8.4.2.2 and any other section of the WMP providing details of key personnel, qualifications, and training for PSPS implementation.

HWT is a transmission-only utility and does not own, operate, or maintain electric distribution facilities. Based on the limited scale and scope of the Suncrest Facility, HWT believes that it will seldom, if ever, be necessary to issue a PSPS. The Interconnecting Transmission Owner, SDG&E, would be the main driver of a PSPS in the Suncrest Facility's operational area.

Nonetheless, HWT has developed the PSPS protocol described below to be prepared in the event a PSPS of HWT's facilities becomes necessary to protect the public. As identified in Section 9.2, the key personnel involved in PSPS implementation would be the:

- System Operator who monitors current and predicted fire weather conditions, fire safety concerns, required mitigations for planned work operations,
- Operations Engineer who assesses the impact of any fire incident on operations at Suncrest, and
- Senior Direction Operations who has the authority to declare a HWT-initiated power shut off.

9.5 Planning and Allocation of Resources for Service Restoration due to PSPS

Instructions: In Section 8.4.5.2 of the WMP, the electrical corporation must address planning of appropriate resources (e.g., equipment, specialized workers) and allocation of those resources to assure the safety of the public during service restoration. Thus, in this section, the electrical corporation is only required to provide a cross-reference to Section 8.4.5.2 and any other section of the WMP providing details of resource planning for PSPS implementation.

HWT is a transmission-only utility and does not own, operate, or maintain electric distribution facilities. The Suncrest Facility does not include distribution reclosers. Additionally, HWT has never deployed a PSPS since it commenced operations of the Suncrest Facility. Based on the limited scale and scope of the HWT Facilities, at this time, HWT believes that it will seldom, if ever, be necessary to issue a PSPS. HWT is an ITO and has no retail/direct customers. As noted on page 15 of Energy Safety's ITO Supplement, ITOs do not have end-use customers. Energy Safety notes that ITOs must comply with Public Utilities Code section 8386(c)(16)⁵¹. However, beyond that, reporting requirements associated with Section 9.5 of the 2023-2025 WMP Technical Guidelines are inapplicable to ITOs.

Based on the foregoing, HWT's WMP does not include Planning and Allocation of Resources for Service Restoration due to PSPS for Section 9.1.5. Instead HWT provides the following information pursuant to Energy Safety's direction on page 15 of Energy Safety's ITO Supplement.

Compliance with Public Utilities Code sections 8386(c)16

The Suncrest Facility is a MVar SVC connected to an approximately one mile undergrounded 230 kV single-circuit transmission line. In view of HWT's current limited footprint with one operational transmission asset, HWT has a small staff overseeing HWT operations, including dedicated on-site staff performing asset inspection and maintenance work, as well as remote system operators that remotely control the asset 24/7 from a North American Electric Reliability

⁵¹ (16) "A showing that the electrical corporation has an adequately sized and trained workforce to promptly restore service after a major event, taking into account employees of other utilities pursuant to mutual aid agreements and employees of entities that have entered into contracts with the electrical corporation."

Corporation (NERC)-certified control center. All HWT maintenance work, including asset inspections, is carried out by dedicated HWT Operations personnel and qualified contractors that, by reason of training, experience, and instruction, are qualified to perform the task. Operations personnel maintain and operate the HWT Facilities in accordance with good utility practice, sound engineering judgment, the guidelines as outlined in applicable NERC reliability standards, laws, and regulations. The HWT operations personnel take proper care to ensure the safety of personnel and the public in performing maintenance duties.

Regarding service restoration after PSPS, as noted in Section 9.2, HWT believes that it will seldom, if ever, be necessary to issue a PSPS and that the Interconnecting Transmission Owner, SDG&E, would be the main driving of any PSPS in the Suncrest Facility's operating area. Nevertheless, HWT also developed its PSPS protocol (See Section 9.2). HWT Operations personnel are trained on all relevant HWT procedures, including regular monthly asset inspections (Wildfire Mitigation Condition Assessment Procedure), vegetation inspections (Wildlife and Vegetation Procedure), and emergency response (Emergency Operations Plan). Additionally, HWT conducts an annual wildfire simulation at the Suncrest Facility, including participation of relevant HWT Operations Personnel, to ensure that all relevant procedures and processes are top of mind for HWT Personnel. As HWT gains operational experience and learns additional best practices relevant to wildfire mitigation, it will update its personnel training, processes and procedures accordingly.

10 LESSONS LEARNED

Instructions: An electrical corporation must use lessons learned to drive continuous improvement in its WMP. Electrical corporations must include lessons learned due to ongoing monitoring and evaluation initiatives, collaboration with other electrical corporations and industry experts, and feedback from Energy Safety and other regulators.

The electrical corporation must provide a summary of new lessons learned since its most recent WMP submission, and any ongoing improvements to address existing lessons learned. This must include a brief narrative describing the new key lessons learned and a status update on any ongoing improvements due to existing lessons learned. The narrative should be limited to two pages.

The electrical corporation must also provide a summary of how it continuously monitors and evaluates its wildfire mitigation efforts to identify lessons learned. This must include various policies, programs, and procedures for incorporating feedback to make improvements.

Lessons learned can be divided into the three main categories: (1) internal monitoring and evaluation, (2) external collaboration with other electrical corporations, and (3) feedback from Energy Safety or other authoritative bodies. The following are examples of specific potential sources of lessons learned:

- Internal monitoring and evaluation initiatives:
 - Tracking of risk events
 - Findings from root cause analyses and after-action reviews
 - Drills and exercises
 - Feedback from community engagement
 - PSPS events
- Feedback from Energy Safety or other authoritative bodies:
 - Areas for continued improvement identified by Energy Safety in the previous WMP evaluation period
 - Findings from wildfire investigations
 - Findings from Energy Safety Compliance Division assessments
- Collaborations with other electrical corporations

In addition to the above potential sources of lessons learned, the electric corporation must detail lessons learned from any and each catastrophic wildfire ignited by its facilities or equipment in the past 20 years, as listed in Section 5.3.2. The electric corporation must also detail specific mitigation measures implemented as a result of these lessons learned and demonstrate how the mitigation measures are being integrated into the electric corporation's wildfire mitigation strategy.

For each lesson learned, the electrical corporation must identify the following in Table 10-1:

- *Year the lesson learned was identified*
- *Subject of the lesson learned*
- *Specific type or source of lesson learned (as identified in the bullet lists above)*
- *Brief description of the lesson learned that informed improvement to the WMP*
- *Brief description of the proposed improvement to the WMP and which initiative(s) or activity(s) the electrical corporation intends to add or modify*
- *Estimated timeline for implementing the proposed improvement*
- *Reference to the documentation that describes and substantiates the need for improvement including:*
 - *Where relevant, a hyperlinked section and page number in the appendix of the WMP*
 - *Where relevant, the title of the report, date of report, and link to the electrical corporation web page where the report can be downloaded*
 - *If any lessons learned were derived from quantifiable data, visual/graphical representations of these lessons learned in the supporting documentation*

Table 10-1 provides an example of the minimum acceptable level of information.

Table 10-1. Example of Lessons Learned

ID #	Year of Lesson Learned	Subject	Type or Source of Lesson Learned	Description of Lesson Learned	Proposed WMP Improvement	Timeline for Implementation	Reference
1	2020	Collaboration with other electrical corporations	Risk modeling working group	Wildfire risk models need to establish standard weather and vegetative coverage scenarios, as well as extreme-event conditions, for design purposes and long-term contingency planning.	Continue ongoing engagement in wildfire risk modeling working group. Commission research at leading research and academic institutes to help inform standard key assumptions as the basis for long-term design of capital improvements and wildfire risk mitigation initiatives, as well as contingency planning for unexpected, extreme events and/or potential changes to environmental settings and other assumptions due to climate change.	Ongoing Concept design by 12/2022 Detailed design by 2025 Draft report by 2026 Final report by 2027	Weblink to wildfire risk modeling working group and summary report Weblink to electrical corporation's proposed research

2	2022	Feedback from Energy Safety	Area of continuous improvement	Fire risk models need updated ignition and consequence data; covered conductor research needs to be provided.	Cooperate and share best practices with agencies outside California. Increase efforts to disseminate data and update risk models to include actual ignition and consequence data and incorporation of fire suppression. Distribute benchmarking surveys to understand current state of covered conductor.	Operationalized by 12/2023	Title of covered conductor analysis report, dated MM/DD/YYYY; title of risk model analysis report, dated MM/DD/YYYY
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During the first year of Suncrest’s operation in 2020, at least three wildfires occurred in close proximity to the asset. The most significant was the Valley Fire which occurred on September 5, 2020 during a National Weather Service (NWS) Red Flag Warning (RFW). The Valley Fire was mostly contained by September 14, but not before consuming over 17,000 acres and coming within for miles of the Suncrest Facility. The facility could have been threatened if prevailing winds had change as the fire spread. During the event, HWT’s Operations Team reviewed all relevant procedures and completed an onsite Wildfire Mitigation Assessment. HWT drew on this experience during subsequent fire seasons to remain prepared and vigilant of fires within its service territory. HWT reviewed the response to the wildfire to record lessons learned and further enhance its systems and processes. These lessons learned provided operations personnel with improved methods for monitoring and assessing subsequent wildfire related events, such as the 2021 Road Fire.

Table 10-1. Lessons Learned

ID #	Year of Lesson Learned	Subject	Type or Source of Lesson Learned	Description of Lesson Learned	Proposed WMP Improvement	Timeline for Implementation	Reference
1	2020	Proactive asset inspections when RFW conditions are issued	Response to potential Fire Event	Significant acreage burn occurs coincide with RFW conditions per CAL Fire	None. HWT makes it a practice to conduct proactive asset inspections ahead of RFW conditions to minimize the risk of ignitions at the Suncrest Facility.	N/A	N/A
2	2020	Wildfire modeling	Response to	In RFW conditions	None. To enhance situational	N/A	N/A

		capabilities and real-time tracking	potential Fire Event	changes in wind speed and direction can materially impact path of wildfire	awareness and better inform operational decision-making during extreme fire weather events, HWT developed a proprietary fire risk index to determine real-time fire risk. Additionally, HWT procured to access third-party granular real-time wildfire tracking tools that utilizes satellite data to monitor and track propagation of wildfires to help evaluate proximity of fires to HWT's assets and inform appropriate operational response		
3	2020	Situational Awareness	Response to potential Fire Event	Real-time video surveillance allows for enhanced situational awareness and corroboration of wildfire tracking and modelling capabilities	None. HWT recognized the value of its onsite cameras in providing real-time coverage of the area around the Suncrest Facility and added more cameras in the 2020-2022 WMP Cycle	N/A	N/A
4	2020	Simulated Response	Response to potential Fire Event	As a utility with limited operational history with wildfire events,	None. HWT added an annual wildfire simulation to its wildfire mitigation procedures to be conducted in the	N/A	N/A

				simulated fire response provided value added method to ensure employee familiarity with emergency operations procedures, protocols, and roles and responsibilities	spring/early summer ahead of increased frequency of RFW days in late summer and fall		
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11 CORRECTIVE ACTION PROGRAM

Instructions: *In this section, the electrical corporation must describe its corrective action program. The electrical corporation must present a summary description of the relevant portions of its existing procedures.*

The electrical corporation must report on how it maintains a corrective action program to track formal actions and activities undertaken to:

- *Prevent recurrence of risk events*
- *Address findings from wildfire investigations (both internal and external)*
- *Address findings from Energy Safety's Compliance Assurance Division (i.e., audits and notices of defect and violation)*
- *Address areas for continued improvement identified by Energy Safety as part of the WMP evaluation*

The electrical corporation must report on how it reviews each improvement area in accordance with its corrective action program. At a minimum, the electrical corporation must:

- **Identify insufficient occurrence and response:** *Identify targeted corrective actions for areas where the event occurrence, response, or feature was insufficient.*
- **Identify actions to reduce recurrence:** *Identify improvement actions (as applicable) to reduce the likelihood of recurrence, improve response/mitigation actions, or improve operational procedures or practices.*
- **Track implementation:** *Track the improvement action plan and schedule in the electrical corporation's action tracking system.*
- **Improve external communication:** *For areas where weaknesses were identified in the response of external agencies, develop a communication plan to share the information and conclusion with the responsible agency. The completion of this action and the agency's response must be documented.*
- **Integrate lessons learned from across the industry:** *Identify applicable generic lessons learned to improve the overall effectiveness of the electrical corporation WMP.*
- **Share lessons learned with others:** *Identify and communicate any significant generic lessons learned that should be disseminated broadly (i.e., to other electrical corporations and responsible regulatory authorities, such as Energy Safety or CAL FIRE).*

The WMP should not include detailed corrective action plans for each risk event, finding, and/or improvement area. However, this documentation must be made available to Energy Safety upon request.

- A. Monitoring and auditing the implementation of the plan.** Per the established roles and responsibilities, the HWT President is responsible for WMP Compliance Assurance to ensure that the WMP obligations are met, including implementing predictive, detective, and corrective controls to mitigate the compliance risk. These controls are used to identify any deficiencies in WMP implementation.

- B. Identifying and correcting deficiencies in the plan.** HWT Operations Engineers are responsible for implementing the WMP and any corrective actions in the field and reporting to the Director of Operations and HWT President, who address any WMP deficiencies identified. The Director of Operations shall review any changes in the WMP, and annual WMP updates are approved by the HWT President. HWT WMP's filed to date have been approved by the without conditions, and no deficiencies have been identified any in HWT's wildfire-related compliance.
- C. Monitoring and auditing the effectiveness of inspections.** The HWT Operations Engineer documents scheduled and completed inspections of facilities and equipment along with line inspections. The Director of Operations monitors and reviews inspections conducted by operational staff to ensure sustainment of efforts to identify any potential sources of ignition and near misses. Facility inspections are limited to the Suncrest Facility, HWT's only operational asset at the time of this report. Inspection reports would be submitted to HWT's Operations Engineer for inclusion in the overall facility documentation.
- D. Ensuring that utility reports in a format that matches across WMPs, Quarterly Reports, Quarterly Advice Letters, and annual compliance assessment.** HWT President is responsible for ensuring that HWT timely meets all WMP milestones (including annual WMP updates, quarterly reports, field inspections data, annual Maturity Model updates, responding to requests from the Wildfire Safety Division (WSD), etc.) in WSD-specified format. HWT closely monitors all wildfire-related developments and updates released by the WSD to ensure timely and accurate compliance. HWT President reviews HWT's WMP ahead of submission to the CPUC and/or OEIS.

12 NOTICES OF VIOLATION AND DEFECT

Instructions: Within a Notice of Violation (NOV) or Notice of Defect (NOD), Energy Safety directs an electrical corporation to correct a violation or defect within a specific timeline, depending on the risk category of the violation or defect. The electrical corporation has 30 days to respond to the NOV or NOD and provide a plan for corrective action. Following completion of the corrective action, the electrical corporation must provide Energy Safety with documentation validating the resolution or correction of the identified violation or defect. Energy Safety includes the electrical corporation's response and the resolution status of any violations or defects in the summaries it provides to the CPUC.

In Table 12-1 of the WMP, the electrical corporation must provide a list of all open violations and defects as of January 1, 2023.

Table 12-1. Example of a List of Open Compliance Violations and Defects

ID	Type	Severity	Date of Notice	Date of Response	Summary Description of Violation/Defect	Estimated Completion Date ¹	Summary Description of Correction
NOD_ES_ATJ_20220101-01	Defect	Minor	1/31/2022	2/21/2022	Vegetation contacting guy wire on poles 123456789 and 987654321	1/31/2023	Vegetation to be removed from guy wires.
NOV_ES_ATJ_20220201-01	Violation	Moderate	3/14/2022	4/8/2022	QDR stated covered conductor installed on pole 123456789, but Energy Safety inspection found no covered conductor installed	5/3/2022	Error in reporting procedure led to inaccurate data in QDR. Procedure has been corrected.

¹ Estimated date for completion of correction of NOV or NOD.

HWT has received no Notice of Violation or Notice of Defect from Energy Safety to date. As a result Table 12-1 marked "N/A" meaning "Not Applicable".

Table 12-1. List of Open Compliance Violations and Defects

ID	Type	Severity	Date of Notice	Date of Response	Summary Description of Violation/Defect	Estimated Completion Date	Summary Description of Correction
N/A							

APPENDIX A: DEFINITIONS

Instructions: Unless otherwise expressly stated, the following words and terms, for the purposes of these Guidelines, have the meanings shown in this chapter.

Terms Defined in Other Codes

Where terms are not defined in these Guidelines and are defined in the Government Code, Public Utilities Code, or California Public Resources Code, such terms have the meanings ascribed to them in those codes.

Terms Not Defined

Where terms are not defined through the methods authorized by this section, such terms have ordinarily accepted meanings such as the context implies.

Definition of Terms

Term	Definition
Access and functional needs population (AFN)	Individuals, including, but not limited to, those who have developmental or intellectual disabilities, physical disabilities, chronic conditions, or injuries; who have limited English proficiency or are non-English speaking; who are older adults, children, or people living in institutionalized settings; or who are low income, homeless, or transportation disadvantaged, including, but not limited to, those who are dependent on public transit or are pregnant. (California Government Code 8593.3(f)(1) and
Asset (utility)	Electric lines, equipment, or supporting hardware.
At-risk species	See “high-risk species.”
Benchmarking	A comparison between one electrical corporation’s protocols, technologies used, or mitigations implemented, and other electrical corporations’ similar endeavors.
Calibration	Adjustment of a set of code input parameters to maximize the resulting agreement of the code calculations with observations in a specific scenario. ⁵²
Catastrophic wildfire	A fire that caused at least one death, damaged over 500 structures, or burned over 5,000 acres.
Circuit miles	The total length in miles of separate transmission and/or distribution circuits, regardless of the number of conductors used per circuit (i.e., different phases).

⁵² Adapted from T. G. Trucano, L. P. Swiler, T. Igusa, W. L. Oberkampf, and M. Pilch, 2006, “Calibration, validation, and sensitivity analysis: What’s what,” Reliability Engineering and System Safety, vol. 91, no. 10–11, pp. 1331–1357.

Term	Definition
Consequence	The adverse effects from an event, considering the hazard intensity, community exposure, and local vulnerability.
Contact by object ignition likelihood	The likelihood that a non-vegetative object (such as a balloon or vehicle) will contact utility-owned equipment and result in an ignition.
Contact by vegetation ignition likelihood	The likelihood that vegetation will contact utility-owned equipment and result in an ignition.
Contractor	Any individual in the temporary and/or indirect employ of the electrical corporation whose limited hours and/or time-bound term of employment are not considered “full-time” for tax and/or any other purposes.
Critical facilities and infrastructure	<p>Facilities and infrastructure that are essential to public safety and that require additional assistance and advance planning to ensure resiliency during PSPS events. These include the following:</p> <p>Emergency services sector:</p> <ul style="list-style-type: none"> • Police stations • Fire stations • Emergency operations centers • Public safety answering points (e.g., 9-1-1 emergency services) <p>Government facilities sector:</p> <ul style="list-style-type: none"> • Schools • Jails and prisons <p>Health care and public health sector:</p> <ul style="list-style-type: none"> • Public health departments • Medical facilities, including hospitals, skilled nursing facilities, nursing homes, blood banks, health care facilities, dialysis centers, and hospice facilities (excluding doctors' offices and other non-essential medical facilities) <p>Energy sector:</p> <ul style="list-style-type: none"> • Public and private utility facilities vital to maintaining or restoring normal service, including, but not limited to, interconnected publicly owned electrical corporations and electric cooperatives <p>Water and wastewater systems sector:</p>

Term	Definition
	<ul style="list-style-type: none"> • Facilities associated with provision of drinking water or processing of wastewater, including facilities that pump, divert, transport, store, treat, and deliver water or wastewater <p>Communications sector:</p> <ul style="list-style-type: none"> • Communication carrier infrastructure, including selective routers, central offices, head ends, cellular switches, remote terminals, and cellular sites <p>Chemical sector:</p> <ul style="list-style-type: none"> • Facilities associated with manufacturing, maintaining, or distributing hazardous materials and chemicals (including Category N-Customers as defined in D.01-06- 085) <p>Transportation sector:</p> <ul style="list-style-type: none"> • Facilities associated with transportation for civilian and military purposes: automotive, rail, aviation, maritime, or major public transportation <p>(D.19-05-042 and D.20-05-051)</p>
Customer hours	Total number of customers, multiplied by average number of hours (e.g., of power outage).
Danger tree	Any tree located on or adjacent to a utility right-of-way or facility that could damage utility facilities should it fall where (1) the tree leans toward the right-of-way, or (2) the tree is defective because of any cause, such as: heart or root rot, shallow roots, excavation, bad crotch, dead or with dead top, deformity, cracks or splits, or any other reason that could result in the tree or main lateral of the tree falling. (California Code of Regulation Title 14 § 895.1)
Data cleaning	Calibration of raw data to remove errors (including typographical and numerical mistakes).
Dead fuel moisture content	Moisture content of dead vegetation, which responds solely to current environmental conditions and is critical in determining fire potential.
Detailed inspection	In accordance with General Order (GO) 165, an inspection where individual pieces of equipment and structures are carefully examined, visually and through routine diagnostic testing, as appropriate, and (if practical and if useful information can be so gathered) opened, and the condition of each is rated and recorded.
Disaster	A serious disruption of the functioning of a community or a

Term	Definition
	society at any scale due to hazardous events interacting with conditions of exposure, vulnerability, and capacity, leading to one or more of the following: human, material, economic, and environmental losses and impacts. The effect of the disaster can be immediate and localized but is often widespread and could last a long time. The effect may test or exceed the capacity of a community or society to cope using its own resources. Therefore, it may require assistance from external sources, which could include neighboring jurisdictions or those at the national or international levels. (United Nations Office for Disaster Risk Reduction [UNDRR].)
Discussion-based exercise	Exercise used to familiarize participants with current plans, policies, agreements, and procedures or to develop new plans, policies, agreements, and procedures. Often includes seminars, workshops, tabletop exercises, and games.
Electrical corporation	Every corporation or person owning, controlling, operating, or managing any electric plant for compensation within California, except where the producer generates electricity on or distributes it through private property solely for its own use or the use of its tenants and not for sale or transmission to others.
Emergency	Any incident, whether natural, technological, or human caused, that requires responsive action to protect life or property but does not result in serious disruption of the functioning of a community or society. (FEMA/UNDRR.)
Enhanced inspection	Inspection whose frequency and thoroughness exceed the requirements of a detailed inspection, particularly if driven by risk calculations.
Equipment ignition likelihood	The likelihood that utility-owned equipment will cause an ignition through either normal operation (such as arcing) or failure.
Exercise	An instrument to train for, assess, practice, and improve performance in prevention, protection, response, and recovery capabilities in a risk-free environment. (FEMA.)
Exposure	The presence of people, infrastructure, livelihoods, environmental services and resources, and other high-value assets in places that could be adversely affected by a hazard.
Fire ecology	A scientific discipline concerned with natural processes involving fire in an ecosystem and its ecological effects, the interactions between fire and the abiotic and biotic components of an ecosystem, and the role of fire as an ecosystem process.

Term	Definition
Fire Potential Index (FPI)	Landscape scale index used as a proxy for assessing real-time risk of a wildfire under current and forecasted weather conditions.
Fire season	The time of year when wildfires are most likely for a given geographic region due to historical weather conditions, vegetative characteristics, and impacts of climate change. Each electrical corporation defines the fire season(s) across its service territory based on a recognized fire agency definition for the specific region(s) in California.
Frequency	The anticipated number of occurrences of an event or hazard over time.
Frequent PSPS events	Three or more PPS events per calendar year per line circuit.
Fuel density	Mass of fuel (vegetation) per area that could combust in a wildfire.
Fuel management	Removal or thinning of vegetation to reduce the potential rate of propagation or intensity of wildfires.
Fuel moisture content	Amount of moisture in a given mass of fuel (vegetation), measured as a percentage of its dry weight.
Full-time employee (FTE)	Any individual in the ongoing and/or direct employ of the electrical corporation whose hours and/or term of employment are considered “full-time” for tax and/or any other purposes.
Game	A simulation of operations that often involves two or more teams, usually in a competitive environment, using rules, data, and procedures designed to depict an actual or assumed real-life situation.
Goals	The electrical corporation’s general intentions and ambitions.
GO 95 nonconformance	Condition of a utility asset that does not meet standards established by GO 95.
Grid hardening	Actions (such as equipment upgrades, maintenance, and planning for more resilient infrastructure) taken in response to the risk of undesirable events (such as outages) or undesirable conditions of the electrical system to reduce or mitigate those events and conditions, informed by an assessment of the relevant risk drivers or factors.
Grid topology	General design of an electric grid, whether looped or radial, with consequences for reliability and ability to support PPS (e.g., ability to deliver electricity from an additional source).
Hazard	A condition, situation, or behavior that presents the potential for harm or damage to people, property, the environment, or other valued resources. ³
Hazard tree	See danger tree

Term	Definition
High Fire Threat District (HFTD)	Areas of the state designated by the CPUC as having elevated wildfire risk, where each utility must take additional action (per GO 95, GO 165, and GO 166) to mitigate wildfire risk. (D.17-01- 009.)
High Fire Risk Area (HFRA)	Areas that the electrical corporation has deemed at high risk from wildfire, independent of HFTD designation.
Highly rural region	In accordance with 38 CFR 17.701, area with a population of less than seven persons per square mile, as determined by the United States Bureau of the Census. For purposes of the WMP, “area” must be defined as a census tract.
High-risk species	Species of vegetation that (1) have a higher risk of either coming into contact with powerlines or causing an outage or ignition, or (2) are easily ignitable and within close proximity to potential arcing, sparks, and/or other utility equipment thermal failures. The status of species as “high-risk” must be a function of species-specific characteristics, including growth rate; failure rates of limbs, trunk, and/or roots (as compared to other species); height at maturity; flammability; and vulnerability to disease or insects.
High Wind Warning (HWW)	Level of wind risk from weather conditions, as declared by the National Weather Service (NWS). For historical NWS data, refer to the Iowa State University archive of NWS watches/warnings. ⁵³
HWW overhead (OH) circuit mile day	Sum of OH circuit miles of utility grid subject to a HWW each day within a given time period, calculated as the number of OH circuit miles under a HWW multiplied by the number of days those miles are under said HWW. For example, if 100 OH circuit miles are under a HWW for one day, and 10 of those miles are under the HWW for an additional day, then the total HWW OH circuit mile days would be 110.
Ignition consequence	The total anticipated adverse effects from an ignition at each location in the electrical corporation service territory. This considers the likelihood that an ignition will transition into a wildfire (wildfire spread likelihood) and the consequences that the wildfire will have on each community it reaches (wildfire consequence).
Ignition likelihood	The total anticipated annualized number of ignitions resulting from utility-owned assets at each location in the electrical corporation service territory. This considers probabilistic weather conditions, type and age of equipment, and potential

⁵³ <https://mesonet.agron.iastate.edu/request/gis/watchwarn.phtml>.

Term	Definition
	contact of vegetation and other objects with utility assets.
Ignition probability	The relative possibility that an ignition will occur, quantified as a number between 0 percent (impossibility) and 100 percent (certainty). The higher the probability of an event, the more certainty there is that the event will occur. (Often informally referred to as likelihood or chance.)
Ignition risk	The total anticipated annualized impacts from ignitions at a specific location. This considers the likelihood that an ignition will occur, the likelihood the ignition will transition into a wildfire, and the potential consequences – considering hazard intensity, exposure potential, and vulnerability – the wildfire will have on each community it reaches.
Impact/consequence of ignition	The effect or outcome of a wildfire ignition upon objectives that may be expressed by terms including, although not limited to, maintaining health and safety, ensuring reliability, and minimizing economic and/or environmental damage.
Incident command system (ICS)	A standardized on-scene emergency management construct. It is specifically designed to provide an integrated organizational structure that reflects the complexity and demands of single or multiple incidents, without being hindered by jurisdictional boundaries. The ICS is the combination of facilities, equipment, personnel, procedures, and communications operating within a common organizational structure, designed to aid in the management of resources during incidents.
Initiative	Measure or activity, either proposed or in process, designed to reduce the consequences and/or probability of wildfire or PSPS.
Integrated public alert warning system (IPAWS)	System allowing the President to send a message to the American people quickly and simultaneously through multiple communications pathways in a national emergency. IPAWS also is available to United States federal, state, local, territorial, and tribal government officials to alert the public via the Emergency Alert System (EAS), Wireless Emergency Alerts (WEA), National Oceanic and Atmospheric Administration (NOAA) Weather Radio, and other NWS dissemination channels; the internet; existing unique warning systems; and emerging distribution technologies.
Invasive species	A species (1) that is non-native (or alien) to the ecosystem under consideration and (2) whose introduction causes or is likely to cause economic or environmental harm or harm to human health.
Level 1 finding	In accordance with GO 95, an immediate safety and/or

Term	Definition
	reliability risk with high probability for significant impact.
Level 2 finding	In accordance with GO 95, a variable safety and/or reliability risk (non-immediate and with high to low probability for significant impact).
Level 3 finding	In accordance with GO 95, an acceptable safety and/or reliability risk.
Limited English proficiency (LEP) population	Population with limited English working proficiency based on the International Language Roundtable scale.
Line miles	The number of miles of transmission and/or distribution conductors, including the length of each phase and parallel conductor segment.
Live fuel moisture content	Moisture content within living vegetation, which can retain water longer than dead fuel.
Locally relevant	In disaster risk management, generally understood as the scale at which disaster risk strategies and initiatives are considered the most effective at achieving desired outcomes. This tends to be the level closest to impacting residents and communities, reducing existing risks, and building capacity, knowledge, and normative support. Locally relevant scales, conditions, and perspectives depend on the context of application.
Match-drop simulation	Wildfire simulation method forecasting propagation and consequence/impact based on an arbitrary ignition.
Memorandum of Agreement (MOA)	A document of agreement between two or more agencies establishing reciprocal assistance to be provided upon request (and if available from the supplying agency) and laying out the guidelines under which this assistance will operate. It can also be a cooperative document in which parties agree to work together on an agreed-upon project or meet an agreed objective.
Mitigation	Activities to reduce the loss of life and property from natural and/or human-caused disasters by avoiding or lessening the impact of a disaster and providing value to the public by creating safer communities.
Model uncertainty	The amount by which a calculated value might differ from the true value when the input parameters are known (i.e., limitation of the model itself based on assumptions). ⁵⁴
Multi-attribute value function (MAVF)	Risk calculation methodology introduced during CPUC's Safety Model Assessment Proceedings (S-MAP) and Risk Assessment and Mitigation Phase (RAMP) proceedings. This methodology

⁵⁴ Adapted from SFPE, 2010, "Substantiating a Fire Model for a Given Application," Society of Fire Protection Engineers Engineering Guides.

Term	Definition
	is established in D.18-12-014 but may be subject to change pursuant to R.20-07-013.
Mutual aid	Voluntary aid and assistance by the provision of services and facilities, including but not limited to electrical corporations, communication, and transportation. Mutual aid is intended to provide adequate resources, facilities, and other support to electrical corporations whenever their own resources prove inadequate to cope with a given situation.
National Incident Management System (NIMS)	A systematic, proactive approach to guide all levels of government, nongovernment organizations, and the private sector to work together to prevent, protect against, mitigate, respond to, and recover from the effects of incidents. NIMS provides stakeholders across the whole community with the shared vocabulary, systems, and processes to successfully deliver the capabilities described in the National Preparedness System. NIMS provides a consistent foundation for dealing with all incidents, ranging from daily occurrences to incidents requiring a coordinated federal response.
Near miss	Term previously used for an event with probability of ignition (now “Risk event”).
Objectives	Specific, measurable, achievable, realistic, and timely outcomes for the overall WMP strategy, or mitigation initiatives and activities that a utility can implement to satisfy the primary goals and subgoals of the WMP program.
Operations-based exercise	Type of exercise that validates plans, policies, agreements, and procedures; clarifies roles and responsibilities; and identifies resource gaps in an operational environment. Often includes drills, functional exercises (FEs), and full-scale exercises (FSEs).
Overall utility risk	The comprehensive risk due to both wildfire and PSPS incidents across a utility’s territory; the aggregate potential of adverse impacts to people, property, critical infrastructure, or other valued assets in society.
Overall utility risk, ignition risk	See Ignition risk.
Overall utility risk, PSPS risk	See PSPS risk.
Parameter uncertainty	The amount by which a calculated value might differ from the true value based on unknown input parameters. (Adapted from Society of Fire Protection Engineers [SFPE] guidance.)
Patrol inspection	In accordance with GO 165, a simple visual inspection of applicable utility equipment and structures designed to identify obvious structural problems and hazards. Patrol

Term	Definition
	inspections may be carried out in the course of other company business.
Performance metric	A quantifiable measurement that is used by an electrical corporation to indicate the extent to which its WMP is driving performance outcomes.
Population density	Population density is calculated using the American Community Survey (ACS) one-year estimate for the corresponding year or, for years with no such ACS estimate available, the estimate for the immediately preceding year.
Preparedness	A continuous cycle of planning, organizing, training, equipping, exercising, evaluating, and taking corrective action in an effort to ensure effective coordination during incident response. Within the NIMS, preparedness focuses on planning, procedures and protocols, training and exercises, personnel qualification and certification, and equipment certification.
Priority essential services	Critical first responders, public safety partners, critical facilities and infrastructure, operators of telecommunications infrastructure, and water electrical corporations/agencies.
Property	Private and public property, buildings and structures, infrastructure, and other items of value that may be destroyed by wildfire, including both third-party property and utility assets.
Protective equipment and device settings	The electrical corporation's procedures for adjusting the sensitivity of grid elements to reduce wildfire risk, other than automatic reclosers (such as circuit breakers, switches, etc.). For example, PG&E's "Enhanced Powerline Safety Settings" (EPSS).
PSPS consequence	The total anticipated adverse effects of a PSPS for a community. This considers the PSPS exposure potential and inherent PSPS vulnerabilities of communities at risk.
PSPS event	The period from notification of the first public safety partner of a planned public safety PSPS to re-energization of the final customer.
PSPS exposure potential	The potential physical, social, or economic impact of a PSPS event on people, property, critical infrastructure, livelihoods, health, local economies, and other high-value assets.
PSPS likelihood	The likelihood of a PSPS being required by a utility given a probabilistic set of environmental conditions.
PSPS risk	The total anticipated annualized impacts from a PSPS event at a specific location. This considers the likelihood a PSPS event will be required due to environmental conditions exceeding design conditions and the potential consequences –

Term	Definition
	considering exposure potential and vulnerability – of the PSPS event for each affected community.
Public safety partners	First/emergency responders at the local, state, and federal levels; water, wastewater, and communication service providers; community choice aggregators (CCAs); affected publicly owned electrical corporations/electrical cooperatives; tribal governments; Energy Safety; the Commission; the California Office of Emergency Services; and CAL FIRE.
Red Flag Warning (RFW)	Level of wildfire risk from weather conditions, as declared by the NWS. For historical NWS data, refer to the Iowa State University archive of NWS watches/warnings. ⁵⁵
RFW OH circuit mile day	Sum of OH circuit miles of utility grid subject to RFW each day within a given time period, calculated as the number of OH circuit miles under RFW multiplied by the number of days those miles are under said RFW. For example, if 100 OH circuit miles are under RFW for one day, and 10 of those miles are under RFW for an additional day, then the total RFW OH circuit mile days would be 110.
Risk	A measure of the anticipated adverse effects from a hazard considering the consequences and frequency of the hazard occurring. ⁵⁶
Risk component	A part of an electric corporation's risk analysis framework used to determine overall utility risk.
Risk evaluation	The process of comparing the results of a risk analysis with risk criteria to determine whether the risk and/or its magnitude is acceptable or tolerable. (ISO 31000:2009.)
Risk event	An event with probability of ignition, such as wire down, contact with objects, line slap, event with evidence of heat generation, or other event that causes sparking or has the potential to cause ignition. The following all qualify as risk events: <ul style="list-style-type: none"> • Ignitions • Outages not caused by vegetation • Outages caused by vegetation • Wire-down events • Faults • Other events with potential to cause ignition
Risk management	Systematic application of management policies, procedures,

⁵⁵ <https://mesonet.agron.iastate.edu/request/gis/watchwarn.phtml>.

⁵⁶ Adapted from D. Coppola, 2020, "Risk and Vulnerability," Introduction to International Disaster Management, 4th ed.

Term	Definition
	and practices to the tasks of communication, consultation, establishment of context, and identification, analysis, evaluation, treatment, monitoring, and review of risk. (ISO 31000.)
Rule	Section of Public Utilities Code requiring a particular activity or establishing a particular threshold.
Rural region	In accordance with GO 165, area with a population of less than 1,000 persons per square mile, as determined by the U.S. Bureau of the Census. ⁵⁷ For purposes of the WMP, “area” must be defined as a census tract.
Seminar	An informal discussion, designed to orient participants to new or updated plans, policies, or procedures (e.g., to review a new external communications standard operating procedure).
Sensitivity analysis	Process used to determine the relationships between the uncertainty in the independent variables (“input”) used in an analysis and the uncertainty in the resultant dependent variables (“output”). (SFPE guidance.)
Slash	Branches or limbs less than four inches in diameter, and bark and split products debris left on the ground as a result of utility vegetation management. (This definition is consistent with California Public Resources Code section 4525.7.)
Span	The space between adjacent supporting poles or structures on a circuit consisting of electric lines and equipment. “Span level” refers to asset-scale granularity.
Tabletop exercise (TTX)	A discussion-based exercise intended to stimulate discussion of various issues regarding a hypothetical situation. Tabletop exercises can be used to assess plans, policies, and procedures or to assess types of systems needed to guide the prevention of, response to, or recovery from a defined incident.
Target	A forward-looking, quantifiable measurement of work to which an electrical corporation commits to in its WMP. Electrical corporations will show progress toward completing targets in subsequent reports, including QDRs and WMP Updates.
Trees with strike potential	Trees that could either “fall in” to a power line or have branches detach and “fly in” to contact a power line in high-wind conditions.
Uncertainty	The amount by which an observed or calculated value might differ from the true value. For an observed value, the difference is “experimental uncertainty”; for a calculated value, it is “model” or “parameter uncertainty.” (Adapted from

⁵⁷ https://www.cpuc.ca.gov/gos/GO95/go_95_rule_18.htm

Term	Definition
	SFPE guidance.)
Urban region	In accordance with GO 165, area with a population of more than 1,000 persons per square mile, as determined by the U.S. Bureau of the Census. For purposes of the WMP, “area” must be defined as a census tract.
Utility-related ignition	See reportable ignition.
Validation	Process of determining the degree to which a calculation method accurately represents the real world from the perspective of the intended uses of the calculation method without modifying input parameters based on observations in a specific scenario. (Adapted from ASTM E 1355.)
Vegetation management (VM)	Trimming and removal of trees and other vegetation at risk of contact with electric equipment.
Verification	Process to ensure that a model is working as designed, that is, that the equations are being properly solved. Verification is essentially a check of the mathematics. (SFPE guidance.)
Vulnerability	The propensity or predisposition of a community to be adversely affected by a hazard, including the characteristics of a person, group, or service and their situation that influences their capacity to anticipate, cope with, resist, and recover from the adverse effects of a hazard.
Wildfire consequence	The total anticipated adverse effects from a wildfire on a community that is reached. This considers the wildfire hazard intensity, the wildfire exposure potential, and the inherent wildfire vulnerabilities of communities at risk.
Wildfire exposure potential	The potential physical, social, or economic impact of wildfire on people, property, critical infrastructure, livelihoods, health, environmental services, local economies, cultural/historical resources, and other high-value assets. This may include direct or indirect impacts, as well as short- and long-term impacts.
Wildfire intensity	The potential intensity of a wildfire at a specific location within the service territory given a probabilistic set of weather profiles, vegetation, and topography.
Wildfire mitigation strategy	Overview of the key mitigation initiatives at enterprise level and component level across the electrical corporation’s service territory, including interim strategies where long-term mitigation initiatives have long implementation timelines. This includes a description of the enterprise-level monitoring and evaluation strategy for assessing overall effectiveness of the WMP.
Wildfire risk	See Ignition risk.
Wildfire spread likelihood	The likelihood that a fire with a nearby but unknown ignition

Term	Definition
	point will transition into a wildfire and will spread to a location in the service territory based on a probabilistic set of weather profiles, vegetation, and topography.
Wildland-urban interface (WUI)	The line, area, or zone where structures and other human development meet or intermingle with undeveloped wildland or vegetation fuels (National Wildfire Coordinating Group). Enforcement agencies also designate the WUI as the area at significant risk from wildfires, established pursuant to Title 24, Part 2, Chapter 7A.
Wire down	Instance where an electric transmission or distribution conductor is broken and falls from its intended position to rest on the ground or a foreign object.
Work order	A prescription for asset or vegetation management activities resulting from asset or vegetation management inspection findings.
Workshop	Discussion that resembles a seminar but is employed to build specific products, such as a draft plan or policy (e.g., a multi-year training and exercise plan).

Definitions of Initiatives by Category

Category	Section #	Initiative	Definition
Overview of the Service Territory	5.4.5	Environmental compliance and permitting	Development and implementation of process and procedures to ensure compliance with applicable environmental laws, regulations, and permitting related to the implementation of the WMP.
Risk Methodology and Assessment	6	Risk Methodology and Assessment	Development and use of tools and processes to assess the risk of wildfire and PSPS across an electrical corporation's service territory.
Wildfire Mitigation Strategy Development	7	Wildfire Mitigation Strategy Development	Development and use of processes for deciding on a portfolio of mitigation initiatives to achieve maximum feasible risk reduction and that meet the goals of the WMP.
Grid Design, Operations, and Maintenance	8.1.2.1	Covered conductor installation	Installation of covered or insulated conductors to replace standard bare or unprotected conductors (defined in accordance with GO 95 as supply conductors, including but not limited to lead wires, not enclosed in a grounded metal pole or not covered by: a "suitable protective covering" (in accordance with Rule 22.8), grounded metal conduit, or grounded metal sheath or shield). In accordance with GO 95, conductor is defined as a material suitable for: (1) carrying electric current, usually in the form of a wire, cable or bus bar, or (2) transmitting light in the case of fiber optics; insulated conductors as those which are surrounded by an insulating material (in accordance with Rule 21.6), the dielectric strength of which is sufficient to withstand the maximum difference of potential at normal operating voltages of the circuit without breakdown or puncture; and suitable protective

			covering as a covering of wood or other non-conductive material having the electrical insulating efficiency (12kV/in. dry) and impact strength (20ft.-lbs) of 1.5 inches of redwood or other material meeting the requirements of Rule 22.8-A, 22.8-B, 22.8-C or 22.8-D.
Grid Design, Operations, and Maintenance	8.1.2.2	Undergrounding of electric lines and/or equipment	Actions taken to convert overhead electric lines and/or equipment to underground electric lines and/or equipment (i.e., located underground and in accordance with GO 128).
Grid Design, Operations, and Maintenance	8.1.2.3	Distribution pole replacements and reinforcements	Remediation, adjustments, or installations of new equipment to improve or replace existing distribution poles (i.e., those supporting lines under 65kV), including with equipment such as composite poles manufactured with materials reduce ignition probability by increasing pole lifespan and resilience against failure from object contact and other events.
Grid Design, Operations, and Maintenance	8.1.2.4	Transmission pole/tower replacements and reinforcements	Remediation, adjustments, or installations of new equipment to improve or replace existing transmission towers (e.g., structures such as lattice steel towers or tubular steel poles that support lines at or above 65kV).
Grid Design, Operations, and Maintenance	8.1.2.5	Traditional overhead hardening	Maintenance, repair, and replacement of capacitors, circuit breakers, cross-arms, transformers, fuses, and connectors (e.g., hot line clamps) with the intention of minimizing the risk of ignition.
Grid Design, Operations, and Maintenance	8.1.2.6	Emerging grid hardening technology installations and pilots	Development, deployment, and piloting of novel grid hardening technology.

Grid Design, Operations, and Maintenance	8.1.2.7	Microgrids	Development and deployment of microgrids that may reduce the risk of ignition, risk from PSPS, and wildfire consequence. "Microgrid" is defined by Public Utilities Code section 8370(d).
Grid Design, Operations, and Maintenance	8.1.2.8	Installation of system automation equipment	Installation of electric equipment that increases the ability of the electrical corporation to automate system operation and monitoring, including equipment that can be adjusted remotely such as automatic reclosers (switching devices designed to detect and interrupt momentary faults that can reclose automatically and detect if a fault remains, remaining open if so).
Grid Design, Operations, and Maintenance	8.1.2.9	Line removals (in HFTD)	Removal of overhead lines to minimize the risk of ignition due to the design, location, or configuration of electric equipment in HFTDs.
Grid Design, Operations, and Maintenance	8.1.2.10	Other grid topology improvements to minimize risk of ignitions	Actions taken to minimize the risk of ignition due to the design, location, or configuration of electric equipment in HFTDs not covered by another initiative.
Grid Design, Operations, and Maintenance	8.1.2.11	Other grid topology improvements to mitigate or reduce PSPS events	Actions taken to mitigate or reduce PSPS events in terms of geographic scope and number of customers affected not covered by another initiative.
Grid Design, Operations, and Maintenance	8.1.2.12	Other technologies and systems not listed above	Other grid design and system hardening actions which the electrical corporation takes to reduce its ignition and PSPS risk not otherwise covered by other initiatives in this section.
Grid Design, Operations, and Maintenance	8.1.3.1	Asset inspections	Inspections of overhead electric transmission lines, equipment, and right-of-way.
Grid Design, Operations, and Maintenance	8.1.4	Equipment maintenance	Remediation, adjustments, or installations of new equipment to

Maintenance		and repair	improve or replace existing connector equipment, such as hotline clamps.
Grid Design, Operations, and Maintenance	8.1.5	Asset management and inspection enterprise system(s)	Operation of and support for centralized asset management and inspection enterprise system(s) updated based upon inspection results and activities such as hardening, maintenance, and remedial work.
Grid Design, Operations, and Maintenance	8.1.6	Quality assurance / quality control	Establishment and function of audit process to manage and confirm work completed by employees or contractors, including packaging QA/QC information for input to decision-making and related integrated workforce management processes.
Grid Design, Operations, and Maintenance	8.1.7	Open work orders	Actions taken to manage the electrical corporation's open work orders resulting from inspections that prescribe asset management activities.
Grid Design, Operations, and Maintenance	8.1.8.1	Equipment Settings to Reduce Wildfire Risk	The electrical corporation's procedures for adjusting the sensitivity of grid elements to reduce wildfire risk.
Grid Design, Operations, and Maintenance	8.1.8.2	Grid Response Procedures and Notifications	The electrical corporation's procedures it uses to respond to faults, ignitions, or other issues detected on its grid that may result in a wildfire.
Grid Design, Operations, and Maintenance	8.1.8.3	Personnel Work Procedures and Training in Conditions of Elevated Fire Risk	Work activity guidelines that designate what type of work can be performed during operating conditions of different levels of wildfire risk. Training for personnel on these guidelines and the procedures they prescribe, from normal operating procedures to increased mitigation measures to constraints on work performed.
Grid Design,	8.1.9	Workforce	Programs to ensure that the

Operations, and Maintenance		Planning	electrical corporation has qualified asset personnel and to ensure that both employees and contractors tasked with asset management responsibilities are adequately trained to perform relevant work.
Vegetation Management and Inspection	8.2.2.1	Vegetation inspections	Inspections of vegetation around and adjacent to electrical facilities and equipment that may be hazardous by growing, blowing, or falling into electrical facilities or equipment.
Vegetation Management and Inspection	8.2.3.1	Pole clearing	Plan and execution of vegetation removal around poles per Public Resources Code section 4292 and outside the requirements of Public Resources Code section 4292 (e.g., pole clearing performed outside of the State Responsibility Area).
Vegetation Management and Inspection	8.2.3.2	Wood and slash management	Actions taken to manage all downed wood and “slash” generated from vegetation management activities.
Vegetation Management and Inspection	8.2.3.3	Clearance	Actions taken after inspection to ensure that vegetation does not encroach upon electrical equipment and facilities, such as tree trimming.
Vegetation Management and Inspection	8.2.3.4	Fall-in mitigation	Actions taken to identify and remove or otherwise remediate trees that pose a high risk of failure
Vegetation Management and Inspection	8.2.3.5	Substation defensible space	Actions taken to reduce ignition probability and wildfire consequence due to contact with substation equipment.
Vegetation Management and Inspection	8.2.3.6	High-risk species	Actions taken to reduce the ignition probability and wildfire consequence attributable to high- risk species of vegetation.
Vegetation Management and Inspection	8.2.3.7	Fire-resilient rights-of-way	Actions taken to promote vegetation communities that are sustainable, fire-resilient, and compatible with the use of the land as an electrical corporation right-of- way.
Vegetation Management and	8.2.3.8	Emergency response	Planning and execution of vegetation activities in response to emergency

Inspection		vegetation management	situations including weather conditions that indicate an elevated fire threat and post- wildfire service restoration.
Vegetation Management and Inspection	8.2.4	Vegetation management enterprise system	Operation of and support for centralized vegetation management and inspection enterprise system(s) updated based upon inspection results and activities such as hardening, maintenance, and remedial work.
Vegetation Management and Inspection	8.2.5	Quality assurance / quality control	Establishment and function of audit process to manage and confirm work completed by employees or contractors, including packaging QA/QC information for input to decision-making and related integrated workforce management processes.
Vegetation Management and Inspection	8.2.6	Open work orders	Actions taken to manage the electrical corporation's open work orders resulting from inspections that prescribe vegetation management activities.
Vegetation Management and Inspection	8.2.7	Workforce planning	Programs to ensure that the electrical corporation has qualified vegetation management personnel and to ensure that both employees and contractors tasked with vegetation management responsibilities are adequately trained to perform relevant work.
Situational Awareness and Forecasting	8.3.2	Environmental monitoring systems	Development and deployment of systems which measure environmental characteristics, such as fuel moisture, air temperature, and velocity.
Situational Awareness and Forecasting	8.3.3	Grid monitoring systems	Development and deployment of systems that checks the operational conditions of electrical facilities and equipment and detects such things as faults, failures, and recloser operations.

Situational Awareness and Forecasting	8.3.4	Ignition detection systems	Development and deployment of systems which discover or identify the presence or existence of an ignition, such as cameras.
Situational Awareness and Forecasting	8.3.5	Weather forecasting	Development methodology for forecast of weather conditions relevant to electrical corporation operations, forecasting weather conditions and conducting analysis to incorporate into utility decision-making, learning and updates to reduce false positives and false negatives of forecast PSPS conditions.
Situational Awareness and Forecasting	8.3.6	Fire potential index	Calculation and application of a landscape scale index used as a proxy for assessing real-time risk of a wildfire under current and forecasted weather conditions.
Emergency Preparedness	8.4.2	Emergency preparedness plan	Development and integration of wildfire- and PSPS-specific emergency strategies, practices, policies, and procedures into the electrical corporation's overall emergency plan based on the minimum standards described in GO 166.
Emergency Preparedness	8.4.3	External collaboration and coordination	Actions taken to coordinate wildfire and PSPS emergency preparedness with relevant public safety partners including the state, cities, counties, and tribes.
Emergency Preparedness	8.4.4	Public emergency communication strategy	Development and integration of a comprehensive communication strategy to inform essential customers and other stakeholder groups of wildfires, outages due to wildfires, and PSPS and service restoration, as required by Public Utilities Code section 768.6.
Emergency Preparedness	8.4.5	Preparedness and planning for service	Development and integration of the electrical corporation's plan to restore service after an outage due

		restoration	to a wildfire or PSPS event.
Emergency Preparedness	8.4.6	Customer support in wildfire and PSPS emergencies	Development and deployment of programs, systems, and protocols to support residential and non-residential customers in wildfire emergencies and PSPS events.
Community Outreach and Engagement	8.5.2	Public outreach and education awareness program	Development and deployment of public outreach and education awareness program(s) for wildfires; outages due to wildfires, PSPS events, and protective equipment and device settings; service restoration before, during, and after the incidents and vegetation management.
Community Outreach and Engagement	8.5.3	Engagement with access and functional needs populations	Actions taken understand, evaluate, design, and implement wildfire and PSPS risk mitigation strategies, policies, and procedures specific to access and functional needs customers.
Community Outreach and Engagement	8.5.4	Collaboration on local wildfire mitigation planning	Development and integration of plans, programs, and/or policies for collaborating with communities on local wildfire mitigation planning, such as wildfire safety elements in general plans, community wildfire protection plans, and local multi-hazard mitigation plans.
Community Outreach and Engagement	8.5.5	Best practice sharing with other utilities	Development and integration of an electrical corporation's policy for sharing best practices and collaborating with other electrical corporations on technical and programmatic aspects of its WMP program.

APPENDIX B: SUPPORTING DOCUMENTATION FOR RISK METHODOLOGY AND ASSESSMENT

***Instructions:** Note: As part of its 2023-2025 WMP, the electrical corporation is required to provide the “Summary Documentation” as defined by this appendix. For all other requirements in this appendix, the electrical corporation must be readily able to provide the defined documentation in response to a data request by Energy Safety or designated stakeholders. The risk modeling and assessment in the main body of these Guidelines and electrical corporation’s WMP are focused on providing a streamlined overview of the electrical corporation risk framework and key findings from the assessment necessary to understand the wildfire mitigation strategy presented in Section 7.*

HWT is an independent transmission operator (ITO) that has transmission-only assets and does not have a service territory or end-use customers. As noted on page 8 of Energy Safety’s ITO Supplement, ITOs have significantly less infrastructure than large IOUs and SMJUs and do not have end-use customers. Energy Safety notes that the level of detail required by Section 6 of the 2023-2025 WMP Guidelines regarding risk modeling is not required for ITOs. Instead ITOs must describe their own methods to determine risk. As further noted on page 9 of Energy Safety’s ITO Supplement, ITOs do not have service areas. Energy Safety, therefore, modified the ITO reporting requirement so state that ITOs do not have to use modeling to develop their wildfire mitigation strategy, however, they must describe their wildfire mitigation strategy, including the process they use to select mitigations in Section 7 of the WMP. Based on the foregoing and owing to the limited size, scope and scale of HWT’s operations, HWT has no supporting documentation for risk modelling as it does not utilize risk modeling to develop its wildfire mitigation strategy.

APPENDIX C: ADDITIONAL MAPS

Instructions: In this appendix, the electrical corporation must provide the additional maps required by the Guidelines. As stated in the General Directions, if any additional maps needed for clarity (e.g., the scale is insufficiently large to show useful detail), the electrical corporation must either provide those additional maps in this appendix or host applicable geospatial layers on a publicly accessible web viewer. If the electrical corporation chooses the latter option, it must refer to the specific web address in appropriate places throughout its WMP. Additionally, the electrical corporation must host these layers until the submission of its 2026-2028 WMP or until otherwise directed by Energy Safety. The electrical corporation may not modify these publicly available layers without cause or without notifying Energy Safety.

Below is a list of the WMP Guidelines sections which require additional maps:

Section Number	Section Title
5.3.2	Fire History
5.4.3.3	Social Vulnerability and Exposure to Electrical Corporation Wildfire Risk
6.4.1.1	Geospatial Maps of Top Risk Areas within the HFRA

HWT has no additional maps to provide. HWT entered commercial operations in February 2020. HWT has never had an ignited catastrophic fire, or any fire, instigated by its utility equipment.

APPENDIX D: AREAS FOR CONTINUED IMPROVEMENTS

Instructions: *In this appendix, the electrical corporation must provide responses to its areas for continued improvement as identified in the Decisions on the 2022 WMP Updates in the following format:*

Code and Title:

Description:

Required Progress:

[Electrical Corporation] Response:

Energy did not find any areas for continued improvement in its evaluation of HWT's 2022 WMP update. As a result there are no areas of continued improvement to identify in this Appendix D.

APPENDIX E: REFERENCED REGULATIONS, CODES AND STANDARDS

Instructions: In this appendix, the electrical corporation must provide in tabulated format a list of referenced codes, regulations, and standards. An example follows.

<i>NAME OF REGULATION, CODE, OR STANDARD</i>	<i>BRIEF DESCRIPTION</i>
<i>PUBLIC UTILITIES CODE SECTION 768.6</i>	<i>STATUTE RELATED TO EMERGENCY AND DISASTER PREPAREDNESS PLANS</i>
<i>GENERAL ORDER 166</i>	<i>STANDARDS FOR OPERATION, RELIABILITY, AND SAFETY DURING EMERGENCIES AND DISASTERS</i>
<i>CALIFORNIA STANDARDIZED EMERGENCY MANAGEMENT SYSTEMS (SEMS)</i>	
<i>NATIONAL INCIDENT MANAGEMENT SYSTEM (NIMS)</i>	
<i>GOVERNMENT CODE SECTION 8593.3</i>	

Table E-1. Referenced Regulations, Codes and Standards

<i>NAME OF REGULATION, CODE, OR STANDARD</i>	<i>BRIEF DESCRIPTION</i>
PUBLIC UTILITIES CODE SECTION 8386	STATUTE RELATED TO WILDFIRE MITIGATION REQUIREMENTS FOR ELECTRIC UTILITIES
GENERAL ORDER 95	RULES FOR OVERHEAD ELECTRIC LINE CONSTRUCTION
PUBLIC UTILITIES CODE SECTION 768.6	STATUTE RELATED TO EMERGENCY AND DISASTER PREPAREDNESS PLANS

**Horizon West Transmission, LLC
WILDFIRE MITIGATION PLAN UPDATE 2025**

for Submittal to:

**OFFICE OF ENERGY INFRASTRUCTURE SAFETY
WILDFIRE SAFETY DIVISION
CALIFORNIA NATURAL RESOURCES AGENCY
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ATTACHMENTS

- Attachment A (Confidential): HWT-20-03-02-WMP: Wildfire Mitigation Condition Assessment Procedure
- Attachment B (Confidential): HWT-41-01-01-A: Underground System Operation and Maintenance Manual for H Solid Dielectric (XLPE)
- Attachment C (Confidential): HWT-20-03-02-WMP: Wildfire Mitigation Condition Assessment Procedure Form
- Attachment D (Confidential): HWT-42-01-21-A: Wildlife and Vegetation Procedure
- Attachment E (Confidential): Substation Condition Assessment Program
- Attachment F (Confidential): Suncrest SVC Condition Assessment Form

1 UPDATES TO RISK MODELS

Instructions: *The electrical corporation must report on updates to its risk models. The collective updates to risk models are categorized as either “significant” or “non-significant.” The electrical corporation must categorize the collective changes to its risk models as either significant updates or non-significant updates, not both. The proceeding subsections outline the thresholds to determine if updates to risk models are “significant” or “non-significant.”*

When determining if updates to risk models are “significant” (Section 1.1.1) or “non-significant” (Section 1.1.2), the electrical corporation’s analysis must be independent of risk reduction resulting from deployed mitigations described in the approved 2023-2025 Base WMP. For example, if a circuit was undergrounded in late 2023, the analysis would not take that risk reduction into account and would evaluate the risk for that circuit consistent with the point in time represented by WMP Table 6-5¹ in the approved 2023-2025 Base WMP.

An electrical corporation must analyze its top 5 percent of highest risk circuits, segments, or spans² to determine whether updates to its risk models are significant. An electrical corporation’s top ignition risk circuits, segments, or spans are the top 5 percent of highest ignition risk circuits, segments, or spans when the circuits, segments or spans are ranked individually from highest to lowest circuit-mile-weighted ignition risk. An electrical corporation’s top Public Safety Power Shutoff (PSPS) risk circuits, segments or spans are the top 5 percent of highest PSPS risk circuits, segments, or spans when the circuits, segments or spans are ranked individually from highest to lowest circuit-mile-weighted PSPS risk.³

1.1 Significant Updates

Instructions: *If an electrical corporation’s updates to its risk models are significant, it must:*

- *Discuss its updated methodology and models (e.g., using a new machine learning algorithm, changing how wildfire consequences are calculated, or changes to assumptions);*
- *Provide justification for the updates;*
- *Show how risk has shifted as a result of the updates; and*

¹ In accordance with the 2023-2025 WMP Technical Guidelines, Table 6-5 “Summary of Top-Risk Circuits, Segments, or Spans.”

² Electrical corporations must use the granularity – circuit, segment, or span – it used to report its “Top Risk-Contribution Circuits/Segments/Spans” in accordance with the 2023-2025 WMP Technical Guidelines, Section 6.4.2.

³ “Ignition risk” and “PSPS risk” are defined in the 2023-2025 WMP Technical Guidelines, Appendix A.

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- *Report any resulting changes to prioritization of mitigation initiatives and scheduling and workplans for the implementation of mitigation initiatives resulting from these updates.*

The electrical corporation must use the format established by Tables 1-1 and 1-2 of these 2025 WMP Update Guidelines to summarize the updated top 5 percent of highest-risk circuits, segments, or spans.⁴ If one or both tables are more than 20 lines, then an electrical corporation may submit a spreadsheet as an attachment to the 2025 WMP Update rather than a table to provide the information. Discussions of significant updates to risk models must be limited to 20 pages total. Figures and tables are excluded from the 20-page limit.

1.1.1 Top Risk-Contributing Circuit, Segments, or Spans

Instructions: *Significant updates to risk models are defined as:*

- *Any change or combination of changes to a risk model that moves 10 percent or more of ignition risk into or out of the top ignition risk circuits, segments, or spans,⁵ and/or*
- *Any change or combination of changes to a risk model that moves 10 percent or more of PSPS risk into or out of the top PSPS risk circuits, segments, or spans.⁶*

The electrical corporation must use the format established by Tables 1-1 and 1-2 of these 2025 WMP Update Guidelines to summarize the updated top 5 percent of highest risk circuits, segments, or spans. If one or both tables are more than 20 lines, then an electrical corporation may submit a spreadsheet as an attachment to the 2025 WMP Update rather than a table to provide the information. Discussions of significant updates to risk models must be limited to 20 pages. Figures and tables are excluded from the 20-page limit.

This section of the 2025 WMP Update is not applicable to Horizon West (HWT) as HWT did not make significant updates to its risk model.

⁴ The updated list must be independent of risk reduction resulting from deployed mitigations described in the approved 2023-2025 Base WMP. For an updated list that is inclusive of all deployed mitigation, refer to electrical corporation submissions pursuant to Energy Safety's Data Guidelines, Section 4.3.15.

⁵ Electrical corporations must use the granularity – circuit, segment, or span – it used to report its “Top Risk-Contribution Circuits/Segments/Spans” in accordance with the 2023-2025 WMP Technical Guidelines, Section 6.4.2.

⁶ Electrical corporations must use the granularity – circuit, segment, or span – it used to report its “Top Risk-Contribution Circuits/Segments/Spans” in accordance with the 2023-2025 WMP Technical Guidelines, Section 6.4.2.

1.1.2 Qualitative Updates

Instructions: Updates to risk models are also considered significant if any of the following qualitative updates are made:

- Introduction of a new model.
- Discontinuation of an existing model.
- Any change in existing model application or use-case. For example, newly applying an existing vegetation risk model to PSPS decision-making.
- Introduction of new data types. For example, incorporating additional risk drivers into newer versions of a model.
- Changes to data sources. For example, using a new source of data to measure vegetation moisture content.
- Changes to third-party vendors for risk modeling or inputs to risk modeling.

Examples of qualitative updates that are not considered significant updates to risk models include, but are not limited to, the following:

- Updating an existing dataset (e.g., augmenting ignition and outage datasets with 2023 data).
- Fixing code errors.
- Cleaning input data.

This section of the 2025 WMP Update is not applicable to HWT as HWT did not make qualitative updates to its risk model.

1.2 Non-Significant Updates

Instructions: If an electrical corporation's updates to its risk models do not meet the "significant" criteria of Section 1.1.1, the electrical corporation must provide a tabulated summary of changes in risk ranking of the top 5 percent ignition risk and PSPS risk circuits, segments, or spans.

The electrical corporation must use the format established by Tables 1-1 and 1-2 of these 2025 WMP Update Guidelines to summarize the updated top 5 percent of highest risk circuits,

segments, or spans.⁷ If one or both tables are more than 20 lines, then an electrical corporation may submit a spreadsheet as an attachment to the 2025 WMP Update rather than a table to provide the information.

Energy Safety defines a non-significant update as:

- Any change or combination of changes to the risk model that moves less than 10 percent of ignition risk into or out of the top ignition risk circuits, segments, or spans and less than 10 percent PSPS risk into or out of the top PSPS risk circuits, segments, or spans; or*
- Any change that only moves ignition and PSPS risk within the top risk segments.*

This section of the 2025 WMP Update is not applicable to HWT as HWT did not make non-significant updates to its risk model.

⁷ The updated list must be independent of risk reduction resulting from deployed mitigations described in the approved 2023-2025 Base WMP. For an updated list that is inclusive of all deployed mitigation, refer to electrical corporation submissions pursuant to Energy Safety's Data Guidelines, Section 4.3.15.

2 CHANGES TO APPROVED TARGETS, OBJECTIVES, AND EXPENDITURES

Instructions: The electrical corporation must report qualifying changes to targets, objectives, and expenditures from its approved 2023-2025 Base WMP. Each change must be justified by lessons learned,⁸ internal policy changes, new laws or regulations, corrective actions resulting from Energy Safety's compliance process,⁹ or other explanations for the change. Thresholds for qualifying changes to targets, objectives, and expenditures are set forth below.

2.1 2025 Targets or Target Completion Dates

Instructions: For large volume work (equal to or greater than 100 units), the electrical corporation must report changes of 10 percent or greater to a 2025 target from the electrical corporation's approved 2023-2025 Base WMP.

For small volume work (less than 100 units), the electrical corporation must report changes of 20 percent or greater to a 2025 target from the electrical corporation's approved 2023-2025 Base WMP.

This section of the 2025 WMP Update is not applicable to HWT as HWT did not make any reportable changes to any 2025 targets.

2.2 Initiative Objectives

Instructions: The electrical corporation must report any changes to forecasted initiative objective completion dates in its approved 2023-2025 Base WMP that shift an objective's completion to a different compliance period.¹⁰

⁸ "Lessons learned" should be interpreted broadly and is not limited by any definitions, categorizations, or examples presented in the 2023-2025 WMP Technical Guidelines, Section 10: Lessons Learned.

⁹ Including, but not limited to, any compliance assessment, audit, determination, evaluation, investigation, notice, or report pursuant to Government Code sections 15475.1 et seq., Public Utilities Code section 8386.3, or other applicable law, regulation, or guidelines.

¹⁰ "Compliance period" is defined as January 1 to December 31 of each calendar year. Office of Energy Infrastructure Safety Compliance Guidelines, page 3 (<https://efiling.energy.ca.gov/eFiling/Getfile.aspx?fileid=55586&shareable=true>, accessed September 28, 2023).

The electrical corporation may not add or delete 3- and 10-year objectives set forth in its approved 2023-2025 Base WMPs.

HWT does not propose any changes to forecasted initiative objective completion dates in its approved 2023-2025 Base WMP that would shift an objective's completion to a different compliance period.

2.3 Expenditure Changes

Instructions: The electrical corporation must report any changes to 2025 projected expenditures in its approved 2023-2025 Base WMP that result in an increase or decrease of more than \$10 million or constitute a greater than 20 percent change in an initiative's planned total expenditure in the 2025 compliance period.

HWT does not propose any changes to 2025 projected expenditures in its approved 2023-2025 Base WMP that result in an increase or decrease of more than \$10 million. However, HWT does propose a new initiative for Community Outreach and Engagement specifically under the WMP Initiative Activity of "Best Practices Sharing with Other Utilities" to be effective in the 2025 calendar year. This initiative addresses a required improvement identified by Energy Safety which HWT must report on in its 2026-2028 Base WMP (See Section 5 below). HWT anticipates joining two industry groups focused on wildfire mitigation in 2025. The industry groups are identified as follows:

- International Wildfire Risk Mitigation Consortium: International consortium, which is designed to facilitate the sharing of wildfire risk mitigation insights and the discovery of innovative and unique practices from across the global utility industry.
- Wildfire Interdisciplinary Research Center: California industry group with high-impact interdisciplinary wildfire research to help California and the world manage a growing crisis of increasing wildfire frequency and intensity.

HWT forecasts the total expenditure for participation in the industry groups to be approximately \$80,000. Since this is a new expenditure for 2025 it constitutes a greater than 20 percent change in an initiative's planned total expenditure in the 2025 compliance period. The change is reflected on pages 30 and 213 of HWT's 2023-2025 WMP updated as of July 8, 2024.

3 QUARTERLY INSPECTION TARGETS FOR 2025

Instructions: The electrical corporation must define quarterly targets (end of Q2 and end of Q3) for 2025 asset and vegetation inspection targets established as end-of-year targets in its approved 2023-2025 Base WMP. The electrical corporation must use the format established by Table 3-1 to report these quarterly targets. Changes to end-of-year 2025 targets must be reported and explained pursuant to Section 2: Changes to Targets, Objectives, and Expenditures, above.

For its redlined and clean 2023-2025 Base WMP, the electrical corporation must add columns for end of Q2 2025 and end of Q3 2025 targets to its asset inspection and vegetation inspection target tables.¹¹

Table 3-1. Example of Asset Inspections and Vegetation Management Targets for 2025

<i>Initiative Activity</i>	<i>Tracking ID</i>	<i>Target End of Q2 2025 & Unit</i>	<i>Target End of Q3 2025 & Unit</i>	<i>End of Year Target 2025 & Unit</i>	<i>x% Risk Impact 2025</i>
<i>Discretionary patrols in High Fire Threat District</i>	<i>AI-02</i>	<i>300 circuit miles</i>	<i>500 circuit miles</i>	<i>700 circuit miles</i>	<i>3%</i>
<i>Hazard tree inspections</i>	<i>VM-04</i>	<i>100 circuit miles inspected</i>	<i>130 circuit miles inspected</i>	<i>200 circuit miles inspected</i>	<i>3%</i>

Table 3- 1. Asset Inspections and Vegetation Management Targets for 2025

Initiative Activity	Tracking ID	Target End of Q2 2025 & Unit	Target End of Q3 2025 & Unit	End of Year Target 2025 & Unit	x% Risk Impact 2025
Asset Inspections	001	6 site inspections completed	9 site inspections completed	12 site inspections completed	N/A

¹¹ The tables populated in accordance with the 2023-2025 WMP Technical Guidelines, Tables 8-4 and 8-15.

Vegetation Management	002	3	4	6 inspections	N/A
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HWT does not anticipate any changes to its end-of-year 2025 targets.

4 NEW OR DISCONTINUED PROGRAMS

Instructions: *The electrical corporation must report on the creation of a new program or the discontinuance of a program described in its approved 2023-2025 Base WMP. Each change must be justified by lessons learned,¹² internal policy changes, new laws or regulations, corrective actions resulting from Energy Safety’s compliance process,¹³ or other explanations for the change.*

An electrical corporation’s discussion on new or discontinued programs must be limited to 20 pages total. Figures and tables are excluded from the 20-page limit.

HWT did not create or discontinue any program described in its approved 2023-2025 Base WMP within the reporting time period.

¹² “Lessons learned” should be interpreted broadly and is not limited by any definitions, categorizations, or examples presented in the 2023-2025 WMP Technical Guidelines, Section 10: Lessons Learned.

¹³ Including, but not limited to, any compliance assessment, audit, determination, evaluation, investigation, notice, or report pursuant to Government Code sections 15475.1 et seq., Public Utilities Code section 8386.3, or other applicable law, regulation, or guidelines.

5 PROGRESS ON AREAS FOR CONTINUED IMPROVEMENT

The electrical corporation must report on progress required by the areas for continued improvement identified in Energy Safety’s Decision on the electrical corporation’s 2023-2025 WMP.¹⁴ The electrical corporation must provide narrative responses to each required progress that specified reporting in the 2025 WMP Update. This narrative response must include:

- *Code and title of the area for continued improvement,*
- *Description of the area for continued improvement,*
- *Required progress, and*
- *The electrical corporation’s response to the required progress.*

The electrical corporation may refer to other sections of its 2025 WMP Update when reporting on areas for continued improvement if there is a duplication of reporting.

HWT-23-01. QA/QC Process Description

- **Description:** HWT states that it has procedures and checklists that provide additional detail about its QA/QC process and is evaluating changes to its QA/QC program as its operational experience grows. HWT does not provide the documents related to QA/QC or provide details on the QA/QC evaluation process.
- **Required Progress:** In its 2025 Update, HWT must provide:
 - All QA/QC “procedures and checklists” referenced in response to Data Request P-WMP_2023-HWT-002.¹⁵
 - An analysis demonstrating the current QA/QC process effectively mitigates wildfire risk.

Required Progress Item No. 1: All QA/QC “procedures and checklists” referenced in response to Data Request P-WMP_2023-HWT-002

HWT identifies the following procedures and checklists which are provided as confidential attachments to this Plan Update.

- HWT-20-03-02-WMP: Wildfire Mitigation Condition Assessment Procedure
- HWT-41-01-01-A: Underground System Operation and Maintenance Manual for H Solid Dielectric (XLPE)

¹⁴ See 2023 – 2025 Wildfire Mitigation Plan Process and Evaluation Guidelines, Section 4.7: Decision.

¹⁵ Data Request OEIS-P-WMP_2023-HWT-002 (Question 2) (<https://efiling.energy.ca.gov/eFiling/Getfile.aspx?fileid=55635&shareable=true>), accessed November 13, 2023).

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- HWT-20-03-02-WMP: Wildfire Mitigation Condition Assessment Procedure Form
 - HWT-42-01-21-A: Wildlife and Vegetation Procedure
 - HWT-20-023-02: Substation Condition Assessment Program
 - HWT-20-023-02: Suncrest SVC Condition Assessment Form

Required Progress Item No. 2: An analysis demonstrating the current QA/QC process effectively mitigates wildfire risk.

Due to the limited scale and scope of HWT's operation, QA/QC activities are not as extensive as those utilities with large footprints. HWT has a small staff of two (2) field engineers overseeing HWT operations, performing asset inspection and maintenance work. Both engineers are subject matter experts on HWT's Suncrest Substation's equipment and operations. The engineers are trained to abide by all relevant procedures, including the (i) Wildfire Mitigation Condition Assessment Procedure, (ii) Underground System Operation and Maintenance Manual, (iii) Wildlife and Vegetation Procedure, and (iv) Substation Condition Assessment Program to conduct site and vegetation inspections on a monthly basis and to complete the Wildfire Mitigation Condition Assessment Procedure Form and Suncrest SVC Condition Assessment Form which document site conditions. The aforementioned procedures provide thorough guidelines for assessing equipment condition and performance, and assessment of contractor compliance with vegetation management requirements. The assessment forms are utilized to document observed conditions and identify conditions that are off normal which require correction.

Generally, the engineers perform the monthly inspections on an alternating basis and either address identified issues during the inspection or input them as work orders to be addressed utilizing the appropriate corporate or contracted resources, as specified in the procedures. The frequency of the inspections, subject matter expertise of those conducting the inspections, and rigor of the procedures and forms, serve to identify issues early helping to ensure that equipment is in optimal operation condition which inherently reduces the risk of potential ignition. To ensure the procedures and processes are being followed, HWT has added a task item to formalize the process of its field engineers annually conducting a QA/QC review of at least one month's inspections report, that they did not originate, to confirm accuracy in completion in accordance with HWT's applicable operations procedures. This addition is reflected on page 87 of HWT's 2023-2025 WMP updated as of July 8, 2024.

HWT-23-02. 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).

Required Progress Item:

Not required until 2026-2028 Base WMP submission and therefore no information is submitted pursuant to 2025 WMP Update requirement to only update information relevant to 2025 calendar year.