



April 1, 2026

Via E-Filing

Tony Marino
Acting Director
Office of Energy Infrastructure Safety
715 P Street, 20th Floor
Sacramento, CA 95814

Docket: #2025 EC AIR

Subject: Trans Bay Cable LLC 2025 Annual Implementation Report Pursuant to Public Utilities Code Section 8386.3(b)(1)

Dear Acting Director Marino:

Pursuant to Public Utilities Code section 8386.3(b)(1), each electrical corporation is required to annually file with Energy Safety a self-evaluation report addressing implementation of its approved Wildfire Mitigation Plan (WMP) during the applicable implementation period. In accordance with this requirement, Trans Bay Cable hereby submits the attached Annual Implementation Report reflecting its WMP compliance activities for the 2025 calendar year.

Please direct any questions to the undersigned at [lenneal.gardner@transbaycable.com](mailto: lenneal.gardner@transbaycable.com).

Sincerely,

/s/Lenneal K. Gardner

Lenneal K. Gardner
Senior Manager Regulatory Affairs

**Trans Bay Cable LLC
ANNUAL IMPLEMENTATION REPORT FOR 2025**

for Submittal to:

**CALIFORNIA OFFICE OF ENERGY
INFRASTRUCTURE SAFETY**

California Natural Resources Agency
715 P Street, 20th Floor
Sacramento, California 95814



P.O. Box 666
Pittsburg, California 94565

April 2026

1. Written Narrative

a. Progress Description Summary

Trans Bay Cable LLC (U934-E) (Trans Bay) is a transmission-only utility with no retail/end-use customers. Trans Bay is the owner and operator of a 53-mile, approximately 400 MW, high voltage, direct-current (HVDC) submarine transmission cable buried at various depths beneath the San Francisco Bay Waters¹ (Bay Waters), with AC/DC converter stations (or substations) at each end (the Trans Bay System). The Trans Bay System's eastern converter station is located in Pittsburg, CA which is adjacent to an area designated as a Tier 2 (Elevated) Fire-Threat Area based on the California Public Utilities Commission's (CPUC or Commission) Fire-Threat Map. All other transmission elements are located fully outside and not adjacent to any Fire-Threat Area. All aboveground transmission infrastructure is fully contained within the walls of the systems converter stations. Given the limited scope and scale of TBC's operations and the inherent fire-hardened attributes of the Trans Bay System — including its fully underground and submerged transmission infrastructure, urban substation locations outside of wildland and wildland-urban interface zones, absence of distribution or retail customers, and 24/7 certified System Operator oversight, TBC's approved objectives were limited to the following 2023-2025 plan cycle objectives, each addressed individually below. No ten-year program objectives were identified.

TBC completed all three plan objectives identified in Section 4.2 of its 2023-2025 Wildfire Mitigation Plan (WMP)². Objective 1 was to complete the installation of a fire suppression system in the spare parts building and an outdoor enclosure for compressed gas cylinders at the Pittsburg Converter Station. These two initiatives represent carry-forward work from TBC's 2020–2022 WMP cycle. Both projects were completed in 2023.

Objective 2 was to maintain currently emplaced processes and procedures with respect to fire safety, mitigation, and preparedness to minimize the likelihood of an ignition event. TBC continued to maintain all existing fire safety processes and procedures at the Pittsburg Converter Station throughout the 2023–2025 implementation period. TBC's 24/7 System Operator protocols remain in full effect, with qualified personnel retaining authority to initiate Emergency Shut-Off as a measure of last resort.

Objective 3 was to periodically evaluate new technologies, materials, and methods for further reducing fire risk at the Pittsburg Converter Station. TBC has continued its practice of periodically evaluating emerging fire risk reduction technologies, materials, and methodologies. During the 2023-2025 plan cycle, representatives from TBC participated in industry conferences and seminars, and a benchmarking meeting with another California utility, all with a focus on wildfire mitigation, providing exposure to emerging technologies, means and methods for assessing and mitigating fire risk, and lessons learned from operational experience across the industry.

¹ San Francisco Bay Waters is defined as the continuous waterway that includes the San Francisco Bay, San Pablo Bay, Carquinez Strait, Suisan Bay and Sacramento River delta.

² See TBC 2023-2025 WMP, pg. 30.

b. Progress Description Detail

TBC identified two Grid Design/System Hardening initiatives which represented carry-forward work from TBC's 2020–2022 WMP cycle. Both projects were completed in 2023. TBC did not identify any further three- or ten-year detailed objectives in the tables in Section 8 of its 2023-2025 WMP.

Utility Initiative Tracking ID	Initiative Name	Reference to WMP	Completion Date	Summary of Progress
002	Compressed gas cylinder housing	Section 8.1.1; pg. 73	June 30, 2023	No action needed in 2025 as the project was completed in 2023.
007	Spare Parts Building Suppression System	Section 8.1.1; pg. 73	June 30, 2023	No action needed in 2025 as the project was completed in 2023.



c. Completion Assessment

TBC identified two Grid Design/System Hardening initiatives which represented carry-forward work from TBC's 2020–2022 WMP cycle. TBC did not fail to complete any applicable objectives, as both projects were successfully placed into service in 2023. Accordingly, no corrective actions were necessary. TBC did not identify any further three- or ten-year detailed objectives in the tables in Section 8 of its 2023-2025 WMP.

Utility Initiative Tracking ID	Initiative Name	Reference to WMP	Completion Date	Actual Completion Date	Method of Verification	Summary of Completion Assessment
002	Compressed gas cylinder housing	Section 8.1.1; pg. 73	June 30, 2023	April 2023	The identified Method of Verification for this objective was <i>Project In Service</i> . Completion of the objective was assessed by confirming that the associated project had been placed into service, thereby demonstrating that all requisite planning, construction, and commissioning activities were successfully completed.	The outdoor compressed gas cylinder housing was constructed and the on-site supply of compressed gas cylinders was successfully relocated to the new location. This assessment was supported by project in-service documentation and site records confirming completion of all associated construction and relocation activities.
007	Spare Parts Building Suppression System	Section 8.1.1; pg. 73	June 30, 2023	October 2023	The identified Method of Verification for this objective was <i>Project In Service</i> . Completion of	Construction plans were finalized, the fire suppression system was installed, and final acceptance testing and



					<p>the objective was assessed by confirming that the associated project had been placed into service, thereby demonstrating that all requisite planning, construction, and commissioning activities were successfully completed.</p>	<p>commissioning were successfully completed. This assessment was supported by project in-service documentation and site records confirming completion of all associated construction, installation, and commissioning activities.</p>
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d. Target Completion Assessment

TBC did not have any initiatives listed in Section 8 of its WMP with target completion dates within the 2025 implementation period. Accordingly, no assessment is required under this section.

2. Approved Petition to Amend Filings

TBC did not file any petition to amend filings for modification of its WMP.

3. Initiative Expenditure Summary

TBC identifies the following initiatives which were implemented during the 2023-2025 WMP cycle. However, TBC notes that both initiatives were completed prior to 2025 and TBC did not forecast or have any initiative expenditures for 2025.

Utility Initiative Tracking ID	Initiative Name	Planned Budget (per WMP or Approved Change Order)	Actual Expenditure	Variance >10%? (Y/N)	Explanation of Variance (if >10%)
002	Compressed gas cylinder housing	N/A*	\$2,500	N	N/A
007	Spare Parts Building Suppression System	N/A*	\$425,948	N	N/A

**TBC reported a planned total spend in the WMP but did not provide a budget allocation for individual initiatives.*