

R.18-10-007

Trans Bay Cable (TBC)

CPUC Wildfire Mitigation Plan Team Data Request to TBC

Date Received: February 27, 2019

Date Responded: March 1, 2019

1. Please provide TBC's plan regarding vegetation management for nearby vegetative fuels.

As noted in section 4.3.9 of TBC's Wildfire Mitigation Plan, TBC's facilities are in an urban/industrial environment and its transmission facilities are either buried or submerged beneath Bay Area waters. TBC's facilities utilize no overhead transmission lines. As a result, TBC does not have a Vegetation Management Plan ("VMP") and is not required to maintain a VMP under NERC Reliability Standards or any CASIO maintenance requirements.

However, TBC did comment that its Pittsburg Converter Substation borders an area with vegetative fuels consisting of various native and non-native species of trees, shrubs and grasses. All the vegetative fuels exist on property owned by NRG Energy. The bulk of the biomass of these fuels results from the water catch coincident with a U.S. Army Corps of Engineers emplaced drainage infrastructure that serves the City of Pittsburg located on that property. The entire area is approximate five (5) acres (20,200 m²) of which the Substation shares a border of three hundred fifty-four (354) feet. TBC observes that Substation is surrounded on all sides by a twelve (12) foot high concrete wall.

TBC's underground cable infrastructure in Pittsburg passes underneath areas proximate to vegetative fuels consisting of primarily marsh scrub. The cable is buried at a nominal depth of three (3) to eleven (11) feet and in concrete vaults covered with fluidized thermal backfill and appropriate markings to warn excavators. These transmission lines are contained within XLPE insulating materials and steel cable armor that prevent contact with combustible materials.

Based on the foregoing, TBC's plan is as follows:

- **Substation Border:**
TBC substation is surrounded on all sides by a twelve (12) foot high concrete wall. There is a minimal number of trees/or branches of trees that reach the height of the concrete wall, but no trees abut the concrete wall. Nevertheless, TBC is communication with NRG Energy Site Superintendent of the neighboring property upon which the trees exist. TBC notes that the interior of the concrete wall is bordered by a fire lane with a minimum width of twenty-three (23) feet and the distance of the wall to any above ground electrical equipment is thirty-five (35) feet.

TBC reiterates that it has no site control of the neighboring NRG Energy property.

- **Underground cable:**

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As the cable is buried at a nominal depth of three (3) to eleven (11) feet and in concrete vaults covered with fluidized thermal backfill and appropriate markings to warn excavators, vegetation management will not materially enhance cable protection, therefore no vegetation management is planned. TBC will, however, continue its current practice of utilizing its Geographic Information System to plot dig notifications from Underground Service Alert of Northern California and Nevada to minimize the likelihood of derangement due to uncoordinated excavations all the cable route.

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- 2. Although TBC anticipates issues will be “fully mitigated” within 5 years, please identify anything in the WMP that will be reoccurring, including a timeline and frequency for reoccurrence.**

TBC conducts annual review of its fire prevention and wildfire plans. Physical site inspections are conducted by TBC staff on a weekly basis and staff site safety inspections occur monthly. Monitoring of cable route, via TBC’s GIS, is 24/7.

Subsequent to the emplacement of the infrastructure-based mitigations indicated in the WMP, TBC anticipates no additional recurrent activities that would be specifically undertaken for wildfire mitigation. TBC will continue to conduct routine operational assessment and maintenance activity for fire prevention and safety activities appropriate for facilities fully located outside wildlands and in wildland urban interface areas. TBC notes that “fully mitigated” relates to areas which it has site control and responsibility.

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3. On page 10 of the WMP, what does TBC mean by “all future timelines”?

“All future timeframes” (quote corrected, “timelines” not present in text) means the timeframes set forth in Section 4.1.1 [Upcoming Fire Season], Section 4.1.2 [Prior to Next Plan Filing (2020)] and Section 4.1.3 [End of 5 Years (2024)].

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- 4. Please provide a list of names and contact information for personnel accountable for the WMP.**

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