

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

Order Instituting Rulemaking to Implement
Electric Utility Wildfire Mitigation Plans
Pursuant to Senate Bill 901 (2018).

Rulemaking 18-10-007

**WILDFIRE MITIGATION PLAN OF
NEXTERA ENERGY TRANSMISSION WEST, LLC (U 222-E)**

Lisa A. Cottle
Winston & Strawn LLP
101 California Street, 35th Floor
San Francisco, California 94111-5840
Telephone: (415) 591-1579
Facsimile: (415) 591-1400
Email: lcottle@winston.com

Tracy C. Davis
NextEra Energy Transmission, LLC
5920 W. William Cannon Dr., Building 2
Austin, Texas 78749
Telephone: (512) 236-3141
Email: tracy.c.davis@nee.com

*Attorneys for NextEra Energy Transmission
West, LLC*

February 6, 2019

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Pursuant to the Assigned Commissioner’s Scoping Memo and Ruling issued December 7, 2018 and the Administrative Law Judge’s Ruling on Wildfire Mitigation Plan Template, and Adding Additional Parties as Respondents issued January 17, 2019 (“ALJ Ruling”), NextEra Energy Transmission West, LLC (U 222-E) (“NEET West”) submits its Wildfire Mitigation Plan (“NEET West WMP”). The NEET West WMP is submitted as an Appendix to this filing. Below is a brief overview of NEET West and certain elements of the NEET West WMP, followed by a clarification regarding the status of NEET West’s parent, NextEra Energy Transmission, LLC (“NEET”).

1. Overview of NEET West

As described in NEET West’s previous filing in this proceeding,¹ NEET West is an indirect, wholly-owned subsidiary of NextEra Energy, Inc. and a newly certificated, transmission-only public utility in California. NEET West is submitting the NEET West WMP due to its status as an electrical corporation and a public utility, following the Commission’s approval of NEET West’s application for a certificate of public convenience and necessity (“CPCN”) for the Suncrest

¹ On January 10, 2019, NEET West filed comments in response to the utility WMP outlines filed on January 3, 2019 pursuant to the Administrative Law Judge’s Ruling Requiring Filing of Wildfire Mitigation Plan Templates and Allowing Comment (“NEET West January 10th Comments”).

Dynamic Reactive Power Support Project (“Suncrest Project”) in Decision (“D.”) 18-10-030.² The Suncrest Project includes two primary components: (1) a +300/-100 Megavar static var compensator with a nominal terminal voltage of 230 kilovolts (“kV”); and (2) an approximately one-mile 230 kV single-circuit transmission line that will be installed underground. The Suncrest Project will be constructed in San Diego County, California and interconnected via steel riser and intermediate poles to the existing Suncrest Substation owned by San Diego Gas and Electric Company. On December 12, 2018 the Commission issued NEET West a Notice to Proceed for the Suncrest Project. NEET West will commence construction in the first quarter of 2019 and expects to place the Suncrest Project into service by approximately December 2019.

Once constructed, the Suncrest Project will be placed under the operational control of the California Independent System Operator Corporation (“CAISO”) and NEET West will operate and maintain the Suncrest Project as a Participating Transmission Owner in accordance with the CAISO Tariff. NEET West thus will be a transmission-only public utility and will not have a service territory or its own customers. NEET West’s rates are regulated by the Federal Energy Regulatory Commission (“FERC”) pursuant to FERC’s exclusive authority under the Federal Power Act over transmission rates. FERC has accepted NEET West’s transmission owner tariff, approved its formula transmission rate design, and granted its requests for recovery of certain

² D.18-10-030 at 54-55, n. 85 (“The Commission has generally found that entities applying for a CPCN are generally ‘certificated’ as public utilities if and when the project is approved. (See D.11-07-036 ‘Nevada Hydro Decision’ at 19 and D.00-05-048 (‘Lodi Gas Storage Decision’).”

transmission rate incentives.³ NEET West is developing a second transmission project that is under review in a separate proceeding.⁴

2. NEET West WMP

The NEET West WMP is organized according to the template provided in Attachment A to the ALJ Ruling (the “WMP Template”). Because NEET West currently holds approval to build a single transmission project, the NEET West WMP is generally focused on compliance in the context of the Suncrest Project. The NEET West WMP also utilizes and incorporates the existing construction Fire Prevention Plan and operational Fire Protection Plan developed in support of NEET West’s CPCN application for the Suncrest Project. Both were reviewed and approved by San Diego County, California Department of Forestry and Fire Protection (CAL FIRE), and the Commission’s Energy Division Staff. NEET West anticipates updating the NEET West WMP over time to include the Estrella Substation Project once it is approved, as well as future NEET West projects.

In view of NEET West’s status as a newly certificated, transmission-only public utility that is just beginning construction of its first project, it is important to note that certain identified items in the WMP Template do not apply to NEET West. For example:

- There are references in the WMP Template to risks or mitigation measures identified in utilities’ Risk Assessment Mitigation Phases (“RAMP”) or Safety Model and Assessment Proceedings (“S-MAP”). As noted above, NEET West’s

³ *NextEra Energy Transmission West, LLC*, 154 FERC ¶ 61,009 (2016), *order accepting settlement agreement*, 157 FERC ¶ 61,110 (2016).

⁴ NEET West has filed jointly with Pacific Gas and Electric Company a Permit to Construct application for approval of a second project, the Estrella Substation Project, which is a 230 kV/70 kV substation and transmission project located in San Luis Obispo County, California. This joint application is currently pending in Docket No. A.17-01-023.

rates and cost recovery are regulated exclusively by FERC. NEET West does not have a RAMP or S-MAP and the NEET West WMP therefore does not include references to the RAMP or S-MAP processes.

- Due to the fact that NEET West is just beginning construction of its first project, NEET West does not have prior plans to which to compare and contrast the NEET West WMP. Further, NEET West has limited information regarding future hardening efforts that it may undertake, although it has identified certain potential future hardening initiatives for further evaluation. This is explained in the NEET West WMP.
- NEET West is a transmission-only utility and does not own, operate, or maintain electric distribution facilities. Accordingly, the portions of the WMP Template addressing use of distribution blocking reclosers, fast-curve settings, and sensitive relay setting are not applicable to NEET West's facilities.
- As a transmission-only utility, NEET West does not have any distribution facilities or retail customers. As a result, the NEET West WMP does not include information regarding direct customer communications or support activities.

The NEET West WMP also addresses the requirements of the table provided in Attachment B to the ALJ Ruling (the "Cost Table Template"). Section 7, Table 5 of the NEET West WMP includes the information requested in the Cost Table Template. Section 7 of the NEET West WMP also explains that some categories of information requested in the Cost Table Template either do not directly apply, or cannot yet be completed, due to NEET West's status as a FERC-jurisdictional transmission-only public utility and the pre-operational status of the Suncrest Project.

3. Clarification Regarding NEET

NEET West seeks to clarify the status of its parent, NEET. The ALJ Ruling was served on NEET and stated that NEET “plans to file a WMP because it is a current applicant to acquire the TransBay cable.”⁵ However, NEET West, and not its parent entity NEET, is the entity submitting a WMP.⁶ NEET is not an electrical corporation or a public utility in California. Further, while NEET is seeking to acquire indirect ownership of Trans Bay Cable, LLC (“TBC”), if that transaction is approved, TBC will continue to operate as it does today and the acquisition will not result in NEET becoming an electrical corporation or a public utility under California law.

NEET West looks forward to working with the Commission and parties in this proceeding.

February 6, 2019

Respectfully submitted,

/s/ Lisa A. Cottle

Lisa A. Cottle
Winston & Strawn LLP

*Attorney for NextEra Energy Transmission
West, LLC*

⁵ ALJ Ruling at 1.

⁶ NEET West January 10th Comments at 3.

APPENDIX

NextEra Energy Transmission West, LLC

Wildfire Mitigation Plan

February 2019

NextEra Energy Transmission West, LLC
WILDFIRE MITIGATION PLAN

for Submittal to:

CALIFORNIA PUBLIC UTILITIES COMMISSION
505 Van Ness Avenue
San Francisco, California 94102

NextEra Energy Transmission West, LLC
One Post Street, Suite 2550
San Francisco, California 94104

FEBRUARY 2019

**NextEra Energy Transmission West, LLC
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LIST OF ACRONYMS AND ABBREVIATIONS

AMSL	Above Mean Sea Level
CAISO	California Independent System Operator Corporation
CAL FIRE	California Department of Forestry and Fire Protection
CCR	California Code of Regulations
CFC	California Fire Code (2016)
CPUC	California Public Utilities Commission
FERC	Federal Energy Regulatory Commission
FHSZ	Fire Hazard Severity Zone
FPP	Fire Protection Plan
FMEA	Failure Modes and Effects Analysis
FPA	Federal Power Act
IC	Incident Command or Incident Commander
ICS	Incident Command System
kV	Kilovolt
MVar	Megavar
MW	Megawatts
NEET West	NextEra Energy Transmission West, LLC
NERC	North American Electric Reliability Corporation
NFPA	National Fire Protection Association
OSHA	Occupational Safety and Health Administration
PRC	California Public Resources Code
RAMP	Risk Assessment Mitigation Phase
RFW	Red Flag Warning
ROW	Right(s)-of-way
RPN	Risk Priority Number
RRO	Regional Reliability Organizations
SCADA	Supervisory Control and Data Acquisition
SDCFA	San Diego County Fire Authority
SDG&E	San Diego Gas and Electric Company
S-MAP	Safety Model and Assessment Proceedings
SME	Subject Matter Expert
SSO	Site Safety Officer
Suncrest Project	Suncrest Dynamic Reactive Power Support Project
SVC	Static Volt-ampere reactive Compensator
TOP	Transmission Operator
VHFHSZ	Very High Fire Hazard Severity Zone
WUI	Wildland Urban Interface

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DEFINITIONS

1. **Activity Risk:** Activity risks are actions that present a risk of igniting a wildfire.
2. **Fire Patrol:** Fire Patrol is a NEET West site employee or representative that will be assigned as “Fire Patrol” specifically to monitor work activities when an Activity Risk exists for fire compliance. The Fire Patrol personnel shall regularly patrol the area on foot and monitor the area for any signs of fire or unsafe practices. They shall have no other duties and shall not be sitting in a vehicle or using a cell phone or computer except for emergency-related calls or for checking for Red Flag Warnings or other fire hazard or weather conditions. They will have the ability to stop work until an identified hazard has been mitigated.
3. **Fire Protection Plan (FPP):** A plan prepared by a San Diego County qualified fire protection planner that evaluates projects and their specific: fire environments, fire risk and hazards, and compliance with applicable fire codes. FPPs also provide justifications for increased fire protection measures where considered necessary.
4. **Fire Season:** Fire season is no longer officially designated by the wildland fire agencies. CAL FIRE adjusts their staffing patterns as fire conditions moderate or escalate and this can be used as an indicator of potential fire activity.
5. **Fire Tools:** Fire Tools are firefighting tools to be staged near work activities consisting of a Pulaski, McLeod, 5-gallon “Indian” Backpack hand pump water extinguisher, and minimum 20 pound, 2-A, 10-BC Dry Chemical Fire extinguisher.
6. **Fuel modification zone:** Fire modification zone is a modified fuel area where vegetation is either removed or is limited in terms of species, density, spacing, and required to be maintained so that it does not present a situation where fire is readily transmitted into a protected asset.
7. **Hot Work:** Hot Work has the meaning assigned in the California Fire Code (CFC), which defines Hot Work as operations involving cutting, welding, Thermit welding, brazing, soldering, grinding, thermal spraying, thawing pipe, or other similar operations. Hot Work areas are defined as the areas exposed to sparks, hot slag, radiant heat, or convective heat because of the Hot Work.
8. **Incident Commander (IC):** The IC is the person responsible for all aspects of an emergency response, including quickly developing incident objectives, managing all incident operations, application of resources, as well as responsibility for all persons involved. The IC sets priorities and defines the organization of the incident response teams and the overall incident action plan.

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- 9. Incident Command System (ICS):** The ICS “a systematic tool used for the command, control, and coordination of emergency response” according to the United States Federal Highway Administration. A more detailed definition of an ICS according to the United States Center for Excellence in Disaster Management & Humanitarian Assistance is “a set of personnel, policies, procedures, facilities, and equipment, integrated into a common organizational structure designed to improve emergency response operations of all types and complexities.” Responding emergency service providers would establish the ICS and designate an Incident Commander.
- 10. NEET West Facilities:** The NEET West Facilities collectively are all facilities constructed, operated or maintained by NEET West that are covered by this WMP. The NEET West Facilities currently consist of the Suncrest Project, which is also referred to as the NEET West Facility.
- 11. Red Flag Warning (RFW):** An RFW is a warning issued for a stated period of time by the National Weather Service using pre-determined criteria to identify particularly critical wildfire danger in a particular geographic area. All construction and maintenance activities shall temporarily cease during RFWs, unless the risk of not conducting specific site activities is determined to be higher than the RFW risk. The Site Safety Officer (SSO) will coordinate with personnel to determine which low fire hazard activities may occur during an RFW. Should a local fire agency declare a RFW affecting NEET West Facilities, the same work activity restrictions occurring during National Weather Service RFW periods would apply.
- 12. San Diego County Fire Authority (SDCFA):** The SDCFA is the department of San Diego County that supports the delivery of high-quality emergency medical and fire services to a 1.5 million-acre area of unincorporated San Diego County. The emergency services are provided by a combination of professionally trained volunteer and career staff. Additionally, SDCFA coordinates regional fire prevention for unincorporated San Diego County.
- 13. Senate Bill 901 (SB 901):** SB 901 is legislation enacted as of September 21, 2018 that, among other changes and requirements, amended California Public Utilities Code Section 8386 to provide in subpart (b) that each electrical corporation shall annually prepare and submit a wildfire mitigation plan to the CPUC for review and approval, and to specify in subpart (c) the elements that must be included in such wildfire mitigation plan. As used herein, SB 901 refers to the requirements of California Public Utilities Code Section 8386(c).
- 14. Site Safety Officer (SSO):** The SSO will be a NEET West employee or representative who serves as a liaison to the emergency service agencies and all contractors or inspectors on the jobsite for NEET West on emergency incidents and construction-related activities. The SSO has the authority to stop any project work that appears to pose a particular fire risk or hazard.

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15. Suncrest Dynamic Reactive Power Support Project (Suncrest Project): The Suncrest Project is a +300/-100 Megavar (MVar) static var compensator (SVC) facility with a rated real power output of 0 MW, and nominal terminal voltage of 230 kV, and an approximately one-mile 230 kV single-circuit underground transmission line, that collectively will provide dynamic reactive power support at the existing San Diego Gas & Electric Company (SDG&E) Suncrest Substation, a 500 kV and 230 kV-level regional substation near Alpine, San Diego County, California. The Suncrest Project will: (a) facilitate the importation and use of renewable energy to fulfill California's energy policies and goals; (b) provide cost-effective voltage control and other electric transmission grid benefits; and (c) support the provision of safe, reliable, and adequate electricity service in the greater San Diego and Los Angeles metropolitan areas. The CPUC issued a certificate of public convenience and necessity (CPCN) for and authorized construction of the Suncrest Project in Decision (D.) 18-10-030.

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Wildfire Mitigation Plan

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Wildfire Mitigation Plan

1 PLAN OBJECTIVES

This Wildfire Mitigation Plan (WMP) provides direction for complying with the applicable sections of SB 901 and for guiding fire safety awareness and prevention at the NEET West Facilities. In 2019, the NEET West Facilities will consist of the Suncrest Project (see Figures 1 and 2). NEET West plans to commence construction of the Suncrest Project in February 2019 and plans to place the Suncrest Project into service by approximately December 2019. Table 1 summarizes the 20 sections included in SB 901 (Public Utilities Code Section 8386(c)) and where each is addressed within this WMP. This is NEET West's first submitted WMP or related fire prevention document. As such, there are no prior plans for comparison with this WMP. Such comparisons will be included in future WMP submittals.

This WMP is prepared according to an adaptive management approach. It is anticipated that the Suncrest Project site and equipment modifications, protocol evaluation and adjustments, and NEET West's California asset profile will expand over time. Because this WMP will be actively reviewed and adaptively managed, future WMPs may include variations in content, format, covered assets, and/or approach.

This WMP is organized according to the template provided in Attachment A (WMP Template) to the Administrative Law Judge's Ruling on Wildfire Mitigation Plan Template, and Adding Additional Parties as Respondents issued January 17, 2019 in CPUC Docket No. R.18-10-007 (ALJ Ruling). Certain provisions in SB 901 and the WMP Template, such as those addressing communications with customers and protocols for disconnecting service to customers, do not apply to a transmission-only utility such as NEET West. This WMP addresses provisions in SB 901 and the WMP Template as they relate to the Suncrest Project.

Table 1
SB 901 Sections Addressed in the NEET West WMP

Section	SB 901 (PU Code Section 8386(c))	Page Number(s) Addressed
1	Accounting of the responsibilities of the persons responsible for executing the Plan	66-69
2	Plan Objectives	1, 9
3	Description of the preventative 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	13-15, 33-54
4	A description of the metrics the electrical corporation plans to use to evaluate the Plan's performance and the assumptions made that underlie the use of those metrics	63-66

NextEra Energy Transmission West, LLC Wildfire Mitigation Plan

Table 1
SB 901 Sections Addressed in the NEET West WMP

Section	SB 901 (PU Code Section 8386(c))	Page Number(s) Addressed
5	A discussion of how the application of previously identified metrics to previous plan performances has informed the plan	66
6	Protocols for disabling reclosers and deenergizing portions of the electrical distribution system that consider the associated impacts on public safety, as well as protocols related to mitigating the public safety impacts of those protocols, including impacts on critical first responders and on health and communication infrastructure	50-53
7	Appropriate and feasible procedures for notifying a customer who may be impacted by the deenergizing of electric lines. The procedures shall consider the need to notify, as a priority, critical first responders, health care facilities, and operators of telecommunications infrastructure	59
8	Plans for vegetation management	45-48
9	Plans for inspections of the electrical corporation's electrical infrastructure.	38-42
10	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 Safety Model Assessment Proceeding and 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; and (B) Particular risks and risk drivers associated with topographic and climatological risk factors throughout the different parts of the electrical corporation's service territory	21-32
11	A description of how the plan accounts for the wildfire risk identified in the electrical corporation's Risk Assessment Mitigation Phase filing	22, 72
12	A description of the actions of 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	13-15,33-54

NextEra Energy Transmission West, LLC Wildfire Mitigation Plan

Table 1
SB 901 Sections Addressed in the NEET West WMP

Section	SB 901 (PU Code Section 8386(c))	Page Number(s) Addressed
13	A showing that the utility has adequate 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 utility	53
14	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	32
15	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	21-24
16	A description of how the Plan is consistent with the electrical corporation's disaster and emergency preparedness plan prepared and pursuant to Section 768.6, including both of the following: (A) Plans to prepare for, and restore service after, a wildfire, including workforce mobilization and prepositioning equipment and employees; and (B) Plans for community outreach and public awareness before, during, and after wildfire, including languages 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 U.S. Census data	55-59
17	A statement of how the electrical corporation will restore service after a wildfire	53-54
18	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 utility representatives, and emergency communications	4, 59
19	A description of the processes and procedures the electric corporation will use to do all of the following: (A) Monitor and audit the Plan; (B) Identify any deficiencies in the Plan or the Plan's implementation and correct those deficiencies; and (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	66-68
20	Any other information that the commission may require	71-75

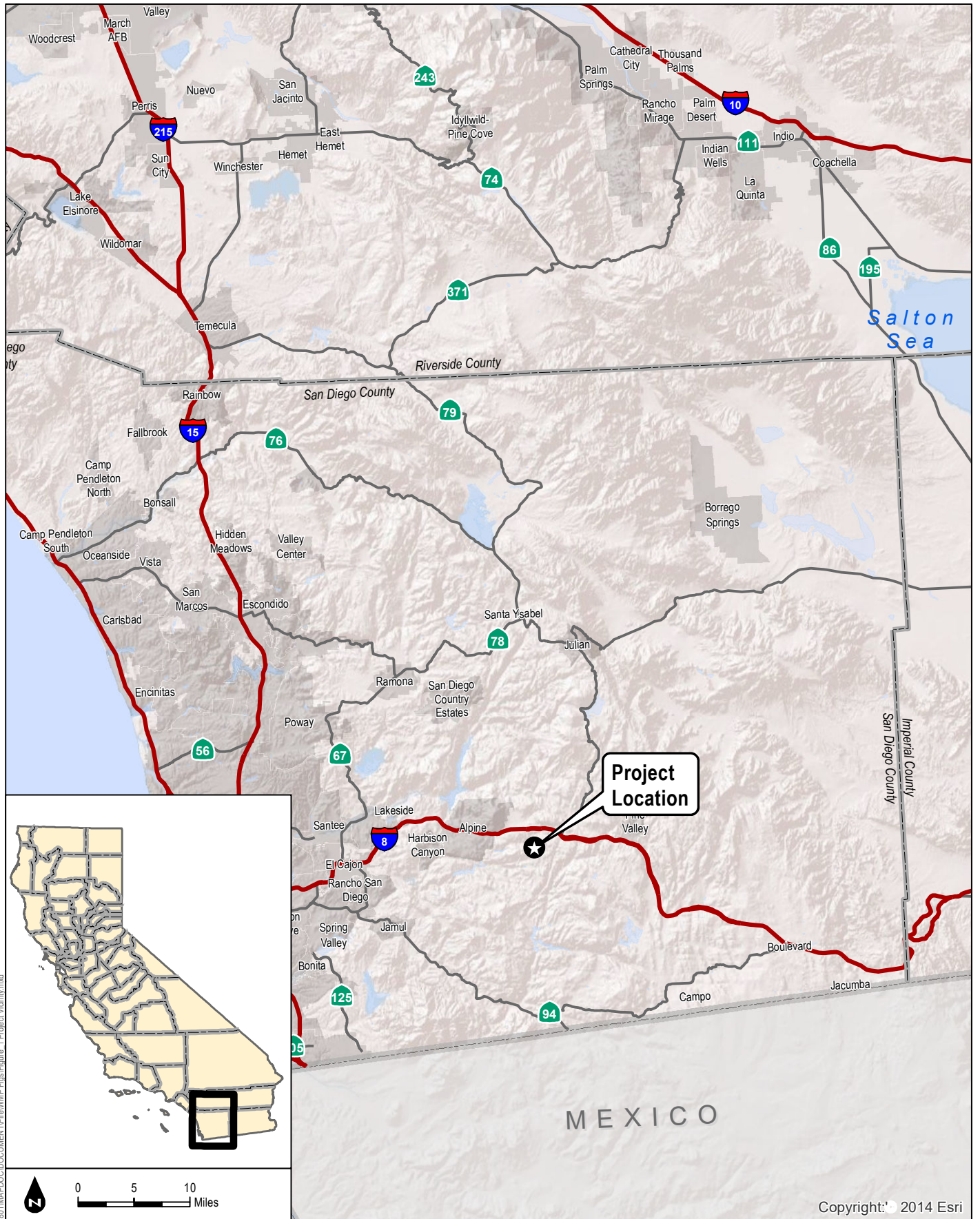
NextEra Energy Transmission West, LLC

Wildfire Mitigation Plan

1.1 NEET West Background Information

NEET West is an indirect, wholly-owned subsidiary of NextEra Energy, Inc. and NextEra Energy Transmission, LLC and a newly certificated, transmission-only public utility in California. NEET West's utility identification number is U-222E. The CPUC issued D.18-09-030 granting NEET West a CPCN for the Suncrest Project, effective October 2, 2018. The Suncrest Project originated in the California Independent System Operator Corporation (CAISO) transmission planning process. In 2013-2014, the CAISO transmission planning process identified a policy-driven need for a 300 Megavar (MVar) dynamic reactive power support device connecting to the existing SDG&E Suncrest 230 kilovolt bus. This device is required to provide continuous or quasi-continuous reactive power response following system disturbances. A static volt-ampere reactive compensator (SVC) technology was chosen for the dynamic reactive solution. NEET West will construct the Suncrest Project in 2019. The Suncrest Project includes two primary components: (a) a +300/-100 MVar SVC with a nominal terminal voltage of 230 kV and a rated real power output of 0 MW; and (b) an approximately one-mile 230 kV single-circuit transmission line that will be installed underground. The Suncrest Project will be constructed in San Diego County, California and interconnected to the existing Suncrest Substation owned by SDG&E. On December 12, 2018, the CPUC issued NEET West a Notice to Proceed for the Suncrest Project. NEET West will commence construction in February 2019 and expects to place the Suncrest Project into service by approximately December 2019.

Once it is constructed, the Suncrest Project will be placed under the CAISO's operational control, and NEET West will operate and maintain the Suncrest Project as a Participating Transmission Owner in accordance with the CAISO Tariff. NEET West thus will be a transmission-only public utility and will not have a service territory or customers. NEET West's rates are regulated by the Federal Energy Regulatory Commission (FERC) pursuant to FERC's exclusive authority under the Federal Power Act (FPA) over transmission rates.



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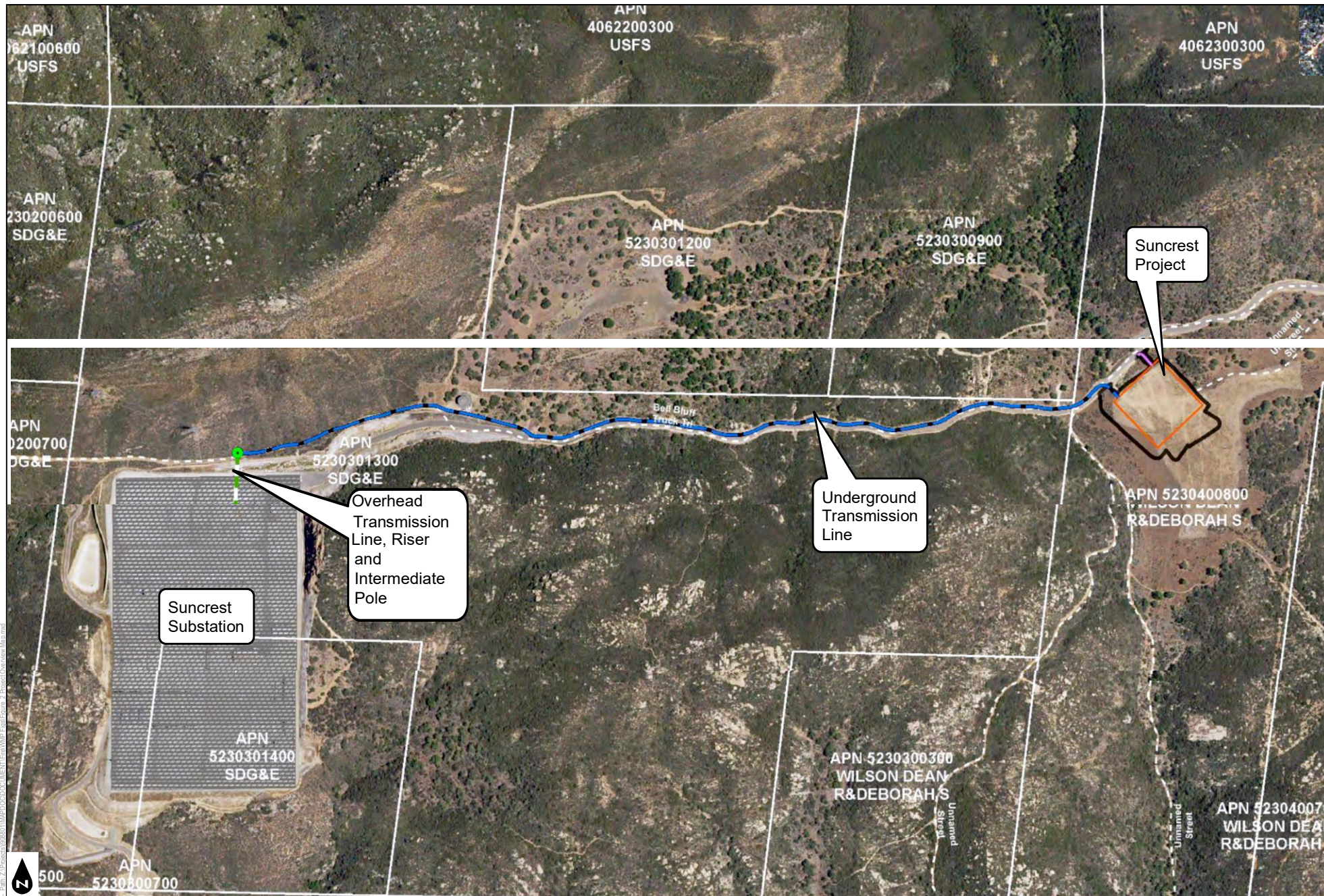
DUDEK

Suncrest Dynamic Reactive Power Support WMP

FIGURE 1
Project Vicinity Map

NextEra Energy Transmission West, LLC
Wildfire Mitigation Plan

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DUDEK

SOURCE: Nextera Energy

Suncrest Dynamic Reactive Power Support WMP

FIGURE 2
Project Overview Map

NextEra Energy Transmission West, LLC
Wildfire Mitigation Plan

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NextEra Energy Transmission West, LLC

Wildfire Mitigation Plan

1.2 NEET West WMP Objectives

The overarching objective of this WMP is to comply with applicable provisions of SB 901 at the NEET West Facilities, which currently consist of the Suncrest Project. The Suncrest Project is located within a Tier 3 classification area (Figure 3). NEET West's Suncrest Project will be under construction during 2019, which is expected to be the majority of the period covered by this WMP.

Objective Timeframes: Before the Next Plan Filing:

NEET West's primary objective is to build, operate, and maintain the NEET West Facilities according to established fire prevention procedures and strategies, which will minimize the potential for a managed asset to ignite a wildfire. This objective will be achieved through the fire prevention strategies and specific measures detailed in Section 4.

A secondary NEET West objective is to periodically evaluate new technologies, materials, and methods for further reducing fire risk at NEET West Facilities. This objective will be achieved through NEET West's internal programs described in Section 4.9 and a team that will be empowered and encouraged to evaluate and improve protocols and procedures.

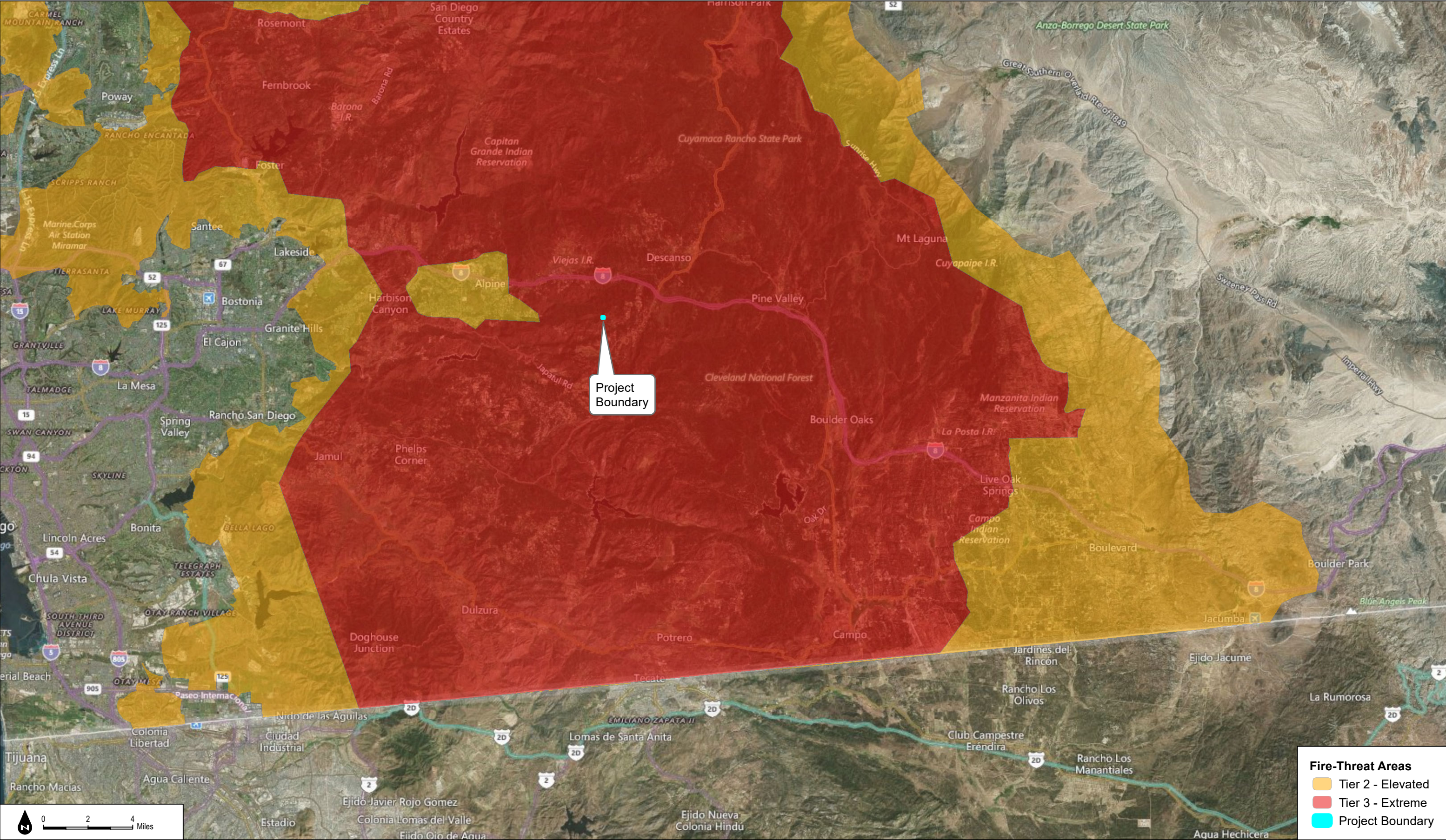
This WMP focuses its objectives on fire risk reduction and prevention for the period between WMP filings with the CPUC, resulting in year-round coverage. There is no differentiation between non-fire season and fire season in this WMP, as it is assumed that fires and fire weather can occur during any season, and fire safety precautions will be implemented year-round, with heightened restrictions and precautions during declared RFW periods.

Objective Timeframe: Next Five Years:

As a newly designed and constructed facility, NEET West considers the Suncrest Project to be significantly fire hardened and technologically advanced. However, following placing the Suncrest Project into service and over the next five-year period, NEET West's objective is to identify and evaluate additional facility hardening measures. The measures that NEET West has identified at the time of filing are provided in Section 4.7.1, below.

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Fire-Threat Areas

- Tier 2 - Elevated
- Tier 3 - Extreme
- Project Boundary

FIGURE 3
CPUC Fire Threat Map

0 2 4 Miles

DUDEK

SOURCE: AERIAL-BING MAPPING SERVICE 2017; FIRE-THREAT-CPUC 2018

Suncrest Dynamic Reactive Power Support WMP

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2 FIRE PREVENTATIVE STRATEGY SUMMARY

NEET West's strategy for preventing wildfires at the NEET West Facilities (currently the Suncrest Project) includes attention to fire prevention during planning, design, construction, operation, and maintenance periods. Because NEET West is a new public utility constructing its first project, the programs described in this WMP are all new programs undergoing initial implementation. The goal is for the NEET West Facilities to have minimal risk of starting vegetation fires and to be able to withstand significant wildfire threat without damage, as described in detail in following sections. The Suncrest Project will have a layered system of prevention measures that work together in a redundant manner to minimize the potential for on-site fire ignition occurrence or the spread of fire to off-site vegetation. Some of these protections are illustrated in Figure 4, the Suncrest Project Fire Safety Plan.

San Diego County and SDCFA require extensive fire prevention and protection planning review and evaluation for new energy projects. To that end, the Suncrest Project has been extensively reviewed and approved by SDCFA and CAL FIRE. Review and approval of the Fire Protection Plan prepared for the Suncrest Project included detailed evaluations of site fire environment, fire risks, hazards, and mitigation measures to reduce risks below levels of significance.

In addition, NEET West's maintenance practices address the inspections, measurements, checks, tests and analysis intended to identify problems that may be either averted completely or rectified before resulting in a more serious failure to equipment or to the operation of NEET West Facilities. NEET West's maintenance practices are created, approved, and audited in accordance with the CAISO Transmission Maintenance Procedures (version 20th July, 2017) and are summarized in Sections 4 and 5.

The NEET West fire prevention strategies and programs consider and address the following primary fire safety categories at the Suncrest Project:

1. Facility Design and Construction Fire Prevention Measures:

- Facility Hardening: Integrate design, materials, and construction methods and programs to minimize equipment failure probability
 - Install steel riser and intermediate poles
 - Install one-mile, underground electrical transmission line, and an aboveground portion that is a less than 300 feet total length span from the riser and intermediate poles into the SDG&E substation
 - Position equipment with fuel-free setbacks from nearest unmaintained vegetation to reduce potential for ignition

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- Utilize high-quality, proven electrical equipment and components with low incidents of failure
- Follow an internal construction fire prevention program applicable to all facility construction crew and contractors
- RFW protocol limits activities during construction
- Implement Failure Modes and Effects Analysis (FMEA) to identify risk of failures and guide necessary mitigations
- Site security features
- Contracted fire brigade on-site during high ignition potential activities

2. Inspection and Maintenance Fire Prevention Strategies/Programs

- At minimum, conduct monthly inspections of the facility, equipment, and fuel modification areas by site staff
- Implement site-wide vegetation management/fuel modification zones
- Conduct annual fuel modification inspection by a third-party expert
- Employ an on-site third-party compliance monitor during construction
- Implement Equipment Inspection and Maintenance Program
- Implement site staff maintenance of minor vegetation reduction
- Conduct contractor maintenance of annual fuel modification areas

3. Operational Practices Fire Prevention Strategies/Programs

- RFW Protocol limits activities during extent of extreme weather event
- Implement Operations Plan
- Implement Maintenance Plan
- Monthly operations meetings for ongoing WMP oversight and review
- Adopt a system closure/shut down protocol
- Contract fire brigade for equipment fire response

4. Situational/Condition Awareness Fire Prevention Strategies/Programs

- Use remote equipment monitoring (SCADA) for automatic alerts with system component malfunction
- Maintain on-site personnel presence during site inspections and maintenance periods

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- Utilize site security cameras that provide real-time views of electrical equipment which can help identify if a fault has been caused by a flame or heat-producing event
- Conduct weather monitoring via the National Weather Service and coordinate with other agencies and third parties in the area

5. Response and Recovery Fire Prevention Strategies/Programs

- Engage Emergency Response Plan during an emergency
- Set up Incident Command System (ICS) during extended emergencies
- Ensure that necessary personnel and expertise, including contractors, are trained regarding NEET West's program for fast response and recovery
- Coordinate with SDCFA and CAL FIRE
- Engage private fire brigade for facility response

2.1 Fire Prevention Strategy Timeframes

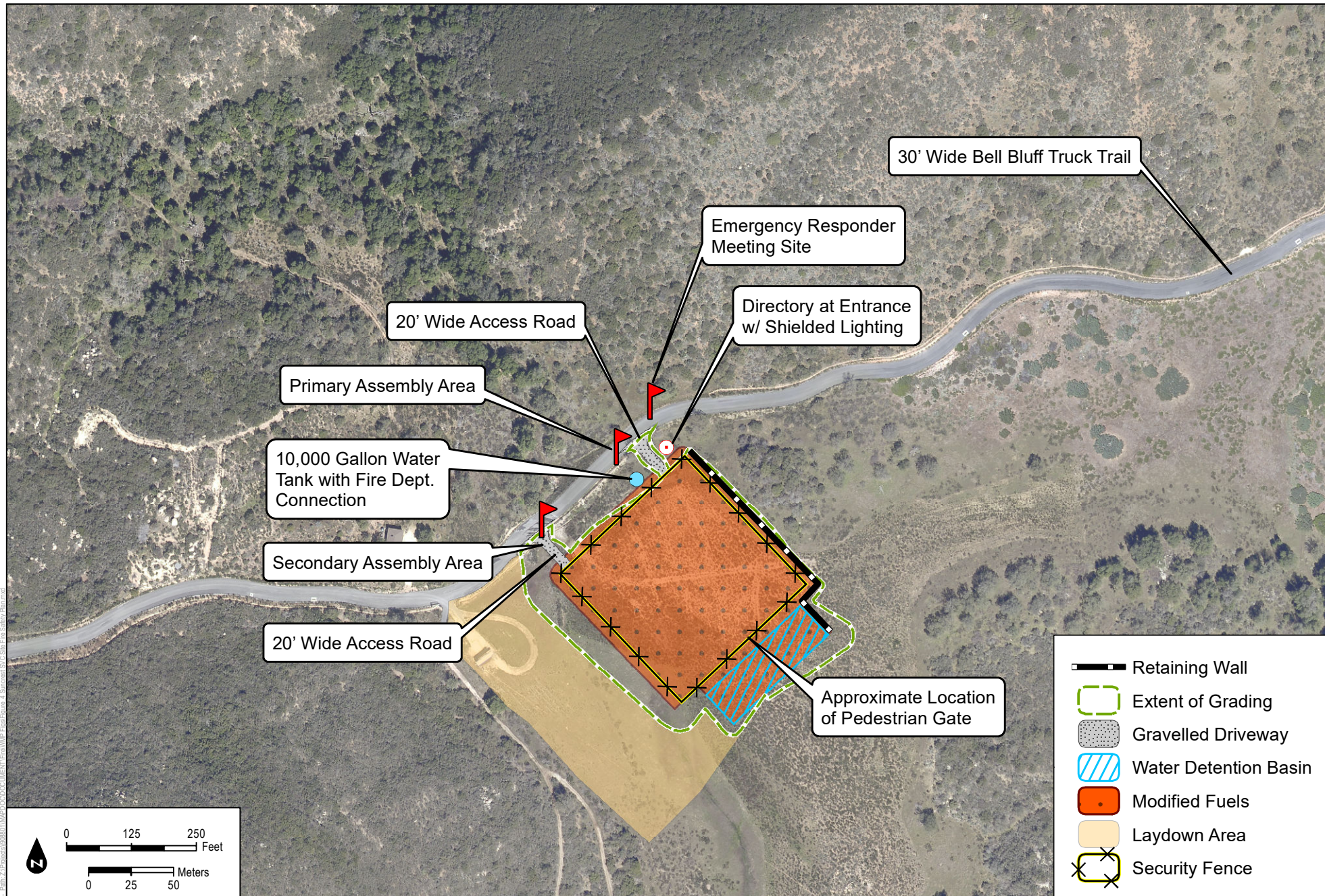
As with the WMP objectives, NEET West's fire prevention strategies and programs are all new (not already existing) and are focused on the timeframe "Before the next plan (WMP) filing", providing ongoing implementation with annual updates. The strategies, programs, and measures defined in this WMP will either be implemented before site grading begins (specifically for construction related strategies and programs) or before the Suncrest Project commences operation (for all other strategies and programs).

As described in Section 1.2 above, NEET West's WMP generally utilizes the "Before the next plan (WMP) filing timing" to reflect the nature of the currently existing NEET West Facility, which consists of the Suncrest Project that will be under construction in 2019. NEET West has also incorporated the "Within the next five years" timeframe into this WMP regarding specific programs that seek to periodically review facility fire safety and employee fire awareness and identify actions to be researched and where found to be feasible and cost-effective, to be implemented over a three to five year timeframe, or sooner if possible.

NEET West maintains a robust enterprise accounting tool that tracks costs for appropriate financial reporting, thus eliminating double tracking. Costs are only recognized, reported, and recovered via NEET West's recovery mechanism for operating costs, which is its FERC-approved Transmission Owner Tariff. The NEET West tariff ties back to a FERC Form 1, which is audited by a third party on an annual basis. Thus, NEET West ensures there is no double tracking of costs.

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SOURCE: Nextera, 2015; Aerial-SANGIS, 2017

Suncrest Dynamic Reactive Power Support WMP

FIGURE 4
Suncrest SVC Site Fire Safety Plan

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2.2 Potential Dynamic Climate Change Impacts on Fire Risk

California includes a variety of vegetation communities that will, at least during extreme weather events, readily ignite and spread wildfires. The Suncrest Project is located within a portion of San Diego County dominated by chaparral vegetation communities.

Fire corridors include the vegetation, terrain, and seasonal weather patterns that can result in high winds and low humidity. The current fire environment is anticipated to be capable of presenting significant wildfire behavior and fire environment changes related to climate change could impact future wildfire patterns. The Suncrest Project has been designed to withstand wildfires occurring within the fire environment in which it is located.

There are many factors and much that remains to be considered and researched in determining the effects of climate change on wildfires in California. However, current research (Keeley and Syphard 2016) indicates that the most notable vegetation changes caused by climate change are occurring within northern hemisphere montane forested areas. These higher elevation forests are experiencing extended droughts and warmer temperatures for longer durations. These changes, combined with tree overstocking that has occurred over the last century, have resulted in stressed forests and pest proliferation.

To date, chaparral areas have not realized significant climate changes beyond extended drought. The vegetation type is accustomed to drought conditions and higher temperatures. However, scientific research suggests that a longer term, drier, and hotter climate would result in a longer and delayed extreme fire weather occurrence, a shift in the peak Santa Ana wind period (Miller and Schlegel 2006), and likely a higher fire frequency. Over time, more frequent fires would result in lighter fuels and an upslope shift of vegetation types (Yuang Jin, et.al. 2015; Thorne, et al. 2016). This type conversion has been observed in chaparral communities subject to wildfires at above average frequencies (Safford and Van de Water 2014; Keeley and Brennan 2012; others) where it converts to a sparser, desert-like system and non-native grasses with lower intensity fires occurring more frequently, but having less potential impact on assets. The Suncrest Project is designed to withstand extreme wildfire conditions as well as minimize the likelihood of ignitions on site, as confirmed by SDCFA's extensive review and acceptance (December 2016) of the Suncrest Project's fire protection system. Due to these protections, the Suncrest Project is not likely to be affected by a wildfire under these potential future conditions. Although future conditions are expected to produce potentially more frequent fires, they would be lower intensity based on the vegetation type conversion and therefore, would have lower flame lengths, lower heat output, and produce fewer embers.

Conversely, the lighter fuels that may occur with climate change over time could result in an increased potential for ignitions from common ignition sources and result in more frequent but

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lower intensity wildfires. This potential is addressed through current protocols, including wide fuel modified areas that effectively separate Suncrest Project equipment from off-site fuels/vegetation.

Consistent with NEET West's WMP's adaptive management approach, NEET West will continue to evaluate climate change-related fire hazards and the preferred methods of mitigating potential facility impacts through prevention measures.

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3 RISK ANALYSIS AND RISK DRIVERS

3.1 Risk Analysis Methods

Fire risks are assessed based upon the potential frequency (*i.e.*, probability of an incident occurring) and consequence (*i.e.*, potential damage) should an event occur. NEET West conducts fire risk assessments of the NEET West Facilities utilizing the following approaches:

1. **Site Fire Environment Assessment** – Natural environments at NEET West Facilities are assessed by Subject Matter Experts (SME) to determine the presence of potential threats or conditions that could become a threat caused by NEET West Facilities, including wildfire.
2. **Facility Equipment Assessment** – NEET West’s SMEs conduct a formalized assessment of equipment using an FMEA (“Failure Modes and Effects Analysis”). This process considers the potential failures from each NEET West Facility component and assesses and prioritizes the potential risk, along with providing potential mitigations. The FMEA is described in more detail in Section 4.8.
3. **Fire Risk Assessment Workshops** – NEET West initiates facility-level risk analysis by convening pre-project focused workshops including NEET West planning, construction, operations and maintenance, and management personnel. These workshops also include third-party experts in various fields, depending on the NEET West Facility location and the risk profile.

3.1.1 Suncrest Project Risk Analysis

The Suncrest Project analysis detailed in the SDCFA-approved FPP indicates that fire risk is considered to be up to moderate during construction and low once the Suncrest Project is in operation. The moderate fire risk during construction is based on an analysis of the fire environment, including terrain, fuels, weather, and modeled fire behavior; and the activities occurring during construction, tempered with the planned fire risk reduction measures. This analysis was then compared with similar projects in southeast San Diego County that were evaluated in a similar method. The operations period was evaluated as low risk for fire ignition based on the same data evaluation and considering that the operations period includes a significantly lower presence of personnel, considered to be the primary potential ignition source. Further influencing the low risk during operations is the planned fire risk reduction measures that will be in place.

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The active construction phase results in higher potential for fires (up to a moderate risk). Hot Work, vegetation clearing, and other activities that may result in flame, heat, or spark sources can ignite vegetation, especially if non-native grasses have established and cured.

With respect to the CPUC's Risk Assessment Mitigation Phase (RAMP) and Safety Model and Assessment Proceedings (S-MAP), NEET West is a transmission-only electrical corporation and public utility whose rates and cost recovery are regulated exclusively by FERC. As such, NEET West does not have a RAMP or S-MAP.

The fire risk assessment for the Suncrest Project included all three NEET West risk assessment approaches, all of which are consistent with fire threat and equipment failure methods and are repeatable processes:

- 1. Site Fire Environment Risk Assessment** – A third-party fire protection consultant conducted this repeatable evaluation that included assessment of the Suncrest Project site and surrounding terrain, vegetative fuels, regional weather patterns, and regional fire history. Fire behavior modeling was conducted to determine (a) the anticipated risk to downwind assets from an ignition and (b) the potential extreme fire behavior and flame lengths so that electrical equipment and components could be appropriately setback and defended and to minimize the possibility that on-site fire could spread to off-site vegetation. The assessment included evaluation of the local fire response capabilities and resources, their response time, and availability of mutual aid. Among the factors evaluated were:
 - **Fire risks:** construction and operation;
 - **Site and facility ignition sources:** equipment, personnel, processes;
 - **Fire prevention strategies:** design, maintenance, inspections, monitoring;
 - **Mitigation measures:** reduced fire risk;
 - **Code compliance:** documented compliance with state, county, and other codes and guidelines;
 - **Fire agency coordination:** Firefighting and emergency response technical evaluation, training, and coordination; and
 - **Fire response resource needs:** agreement providing funding to SDCFA.
- 2. Electrical Equipment Risk Assessment** – NEET West conducted an in-depth evaluation of the Suncrest Project's electrical components to identify and prioritize risks and risk drivers, mitigate identified risk, and create a process for re-evaluating and reprioritizing these elements. This is a repeatable process that will be employed on at least an annual basis by NEET West. This FMEA

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process is described in detail below. Each component of a NEET West 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 actions.

NEET West utilizes an FMEA program for evaluating risk associated with the NEET West Facilities, as described above. The FMEA is a risk assessment method developed by NASA as part of its Space Program, to identify potential failure modes, and 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).

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 NEET West 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 SME brainstorm and capture all potential ways that 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 effective mitigation measures, and determine who should 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.

3. **Facility Risk Assessment Workshop** – NEET West conducted a risk assessment workshop that included SMEs from its in-house team as well as third-party consultants (Dudek and

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Accenture Consulting). The workshop focused on the Suncrest Project. The team identified and prioritized risk drivers, risks, and programs and strategies to address identified risks.

3.1.2 Risk vs. Hazard Discussion

While the Suncrest Project resides in a VHFHSZ and Tier 3 area, it is important to distinguish between hazard (which the hazard maps categorize) and risk (which the hazard maps do not quantify). Hazard is a property of the potential fire behavior for a given area (such as flame length, crown fire occurrence, and capacity to generate embers). Risk, however, is the potential for vegetation ignition and spread and threat to surrounding assets. Thus, even if there is potential high fire hazard in a given area (with expected high flame lengths, and aggressive wildfire), there may be a low risk of ignition if precautions have been provided (such as vegetation removal and setbacks along with perimeter fuel modification zones).

The risk assessment for the Suncrest Project concluded that the fire risk would be up to moderate during construction and decommissioning and low during operation, primarily due to the fire prevention measures that would be implemented during these respective phases.

3.2 Risk Drivers

The risk of wildfire being caused by any NEET West Facility is directly related to the type of vegetation (fuel bed) within its vicinity, the local/regional weather patterns, and the facility activities. Areas that include uninterrupted, natural vegetation present a risk of ignition from construction related activities or from ongoing operations activities or equipment failures. When the area also includes weather conditions that result in periodic high wind and low humidity, the wildfire risk is significantly enhanced. The following section discusses specific high priority risk drivers within each risk category.

3.2.1 Wildfire Risk and Risk Drivers

Wildfire risk and risk drivers have been prioritized within the five fire safety categories identified in the ALJ Ruling: (1) facility design and construction; (2) inspection and maintenance; (3) operation practices, (4) situational/condition awareness; and (5) response and recovery. Risk drivers and the NEET West programs and strategies that address each of them, by safety category, are presented in Table 2, followed by descriptions of the programs, strategies and specific fire prevention measures implemented at NEET West Facilities, focusing at this time on the Suncrest Project.

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**Table 2
Suncrest Project Risk, Risk Drivers and Mitigation Programs/Strategies**

Mitigation Programs/Strategies							
<i>Risk</i>	<i>Risk Drivers</i>	<i>Design & Construction</i>	<i>Inspection & Maintenance</i>	<i>Operational Practices</i>	<i>Situational/Conditional Awareness</i>	<i>Response & Recovery</i>	<i>Future Actions</i>
	Definition/Scope of Strategy Categories	Includes the strategies, processes, and programs NEET West will use to construct a fire-resistant facility and infrastructure	The procedures and processes NEET West will employ to help to ensure the continued safe and reliable operation of its facility	Practices and procedures that NEET West will utilize to minimize the risk of its operations igniting a wildfire	Includes the processes and systems NEET West will use to monitor fire conditions	The processes and practices NEET West will implement to prepare for, respond to, and recover from a wildfire incident	Processes, strategies, and technologies identified by NEET West as consideration for future implementation to reduce fire risk
Suncrest Project causes a wildfire	Hot Work during construction	>Hot Work procedure requires permits. The Site Safety Officer reviews and grants permits. >Work is performed with fire safe practices. A safe watch is used to monitor for ignitions after the work is completed.	Not applicable	>No unnecessary hot work is performed during red flag warning. >Monitor the job site after Hot Work job complete.	Monitor for red flag warning.	>Private fire brigade is used to suppress and control internal fires. >CAL FIRE and local first responders are notified. >Fire prevention and suppression equipment and tools are available on property and in the vicinity of project site.	To be determined
	Grubbing and grading during construction	Until the grubbing is complete, the private fire company is on site for fire suppression.	Not applicable	No unnecessary grubbing and grading during red flag warning.	Monitor for red flag warning.	>Private fire brigade is used to suppress and control internal fires. >CAL FIRE and local first responders can be notified. >Fire prevention and suppression equipment and tools are available on property and in the vicinity of project site.	To be determined
	Vehicle/machinery/tools (internal combustion engines) operations during construction	>Apply restrictions for locating vehicles. >Catalytic converters are required. >Vehicles have a minimum level of fire suppression tools.	Not applicable	No unnecessary use of tools or equipment during red flag warning.	Monitor for red flag warning.	>Private fire brigade is used to suppress and control internal fires. >CAL FIRE and local first responders can be notified.	To be determined
	Vegetation pile generate heat/provide fuel	>Fire suppression tools and fire brigade. >Remove vegetation piles within 48 hours. >Compost is set back from adjacent vegetation.	Not applicable	Not applicable	Not applicable	>Private fire brigade is used to suppress and control internal fires. >CAL FIRE and local first responders can be notified.	To be determined
	General equipment failure that creates an spark/arc	>Steel pole >Undergrounding majority of line >Stone surrounding equipment >Meets or exceeds San Diego	Create inspection and maintenance programs.	Not applicable	Not applicable	>Private fire brigade is used to suppress and control internal fires. >CAL FIRE and local first responders can be notified.	To be determined

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Table 2
Suncrest Project Risk, Risk Drivers and Mitigation Programs/Strategies

Mitigation Programs/Strategies							
<i>Risk</i>	<i>Risk Drivers</i>	<i>Design & Construction</i>	<i>Inspection & Maintenance</i>	<i>Operational Practices</i>	<i>Situational/Conditional Awareness</i>	<i>Response & Recovery</i>	<i>Future Actions</i>
		County fire code requirements and NFPA guidelines >Online diagnostic of equipment				>Fire prevention and suppression equipment and tools are available on property and in the vicinity of project site.	
	Extreme weather conditions (wind, drought, etc.)	>Steel pole >Perimeter fencing >Undergrounding of line >Perimeter zone outside of facility	Vegetation management program - inside perimeter fencing and outside perimeter.	>No unnecessary work during red flag warning >Coordination with control center	>Control center monitoring red flag warning. >External sources of information	Local fire and CAL FIRE staff up and position equipment strategically.	To be determined
	Wildlife interference	Perimeter fencing	Creation of inspection and maintenance programs	Not applicable	Not applicable	Not applicable	To be determined
	Vegetation interference (growing into facility)	Vegetation perimeter and setbacks	Vegetation management program - inside perimeter fencing and outside perimeter	Not applicable	Not applicable	Not applicable	To be determined
	Failure to follow maintenance procedures	Not applicable	Not applicable	>Training programs >Update and maintenance of processes and procedures	Not applicable	Not applicable	To be determined
	Failure to follow operations procedures	Not applicable	Not applicable	>Training programs >Update and maintenance of processes and procedures	Not applicable	Not applicable	To be determined
	Vegetation as a fuel source	Vegetation perimeter and setbacks	Vegetation management program - inside perimeter fencing and outside perimeter	Not applicable	Not applicable	Not applicable	To be determined
	Wire down	>Undergrounding line to minimize overhead wires >Goes directly into SDG&E substation >Paved road under portion of overhead line	24-hour monitoring of facility	Not applicable	Not applicable	Not applicable	To be determined
	Pole failure creating wire down	Steel pole	Creation of inspection and maintenance programs	Not applicable	Not applicable	Not applicable	To be determined
	Earthquake or other natural disasters	Not applicable	Creation of inspection and maintenance programs	Not applicable	Not applicable	Emergency response plan and strategy	To be determined
	Flame height reaching beyond facility	Outside fence perimeter	Not applicable	Not applicable	Not applicable	CAL Fire and local fire agencies	To be determined
	Inability to adequately respond to a fire on property	Some equipment has online diagnostic to monitor the health of the equipment.	Not applicable	Not applicable	>On-site cameras providing the ability to monitor conditions on the facility >Monitored real-time 24/7 from control room in TX. >Protocols to be developed with SDG&E. >Physical security monitored	Coordinated training with CAL FIRE and first responders on specific facility	To be determined

Table 2
Suncrest Project Risk, Risk Drivers and Mitigation Programs/Strategies

Mitigation Programs/Strategies							
Risk	Risk Drivers	Design & Construction	Inspection & Maintenance	Operational Practices	Situational/Conditional Awareness	Response & Recovery	Future Actions
	Climate change	To be determined	To be determined	To be determined	Monitor, evaluate, and adjust with annual wildfire mitigation plan	To be determined	To be determined
	Normal weather conditions (lightning)	Steel pole	Vegetation management program - inside perimeter fencing and outside perimeter	Not applicable	Monitor weather	Emergency response plan and strategy	To be determined
	Vandalism	>Perimeter fencing >Gated access >Steep terrain >Security cameras/monitoring	Creation of inspection and maintenance programs	Not applicable	Not applicable	Not applicable	To be determined

Note:
Suncrest Project Boundaries: Facility includes everything inside the access gate and perimeter fencing. It also includes the fuel modification zone immediately outside and surrounding the perimeter fencing.

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3.2.1.1 Facility Construction Risk Drivers

Fire risk is typically highest during construction (and decommissioning) when many activities are occurring simultaneously and include grading/grubbing, vehicle operation, larger numbers of humans on the site, Hot Work, and other potential spark, flame, or heat causing activities. The prioritized risk drivers during construction are:

1. **Hot Work During Construction** – Hot Work includes any process that can be (a) a source of ignition when flammable material is present or (b) a fire hazard regardless of the presence of flammable material in the workplace.
2. **Grubbing and Grading During Construction** – Grubbing vegetation from a project site and grading the site involves use of machinery within and adjacent to naturally vegetated areas, which represents a fire hazard due to heat and sparks that may result.
3. **Compost Pile(s) Combustion During Grubbing** – Piling vegetation too high and letting it dry out before it is processed or removed from the site may result in spontaneous combustion, which in turn can ignite nearby vegetation.
4. **Vehicle/Machinery/Tools (Internal Combustion Engines) Operation During Construction** – Use of gas-powered, internal combustion engines includes the potential for ignitions from heat, sparks, heated materials, or direct contact with vegetation.

3.2.1.2 Inspection and Maintenance Risk Drivers

1. **General Equipment Failure Creating Spark/Heat/Flame** – Transformers, capacitors, bushings, and other electrical facility components may fail without warning due to manufacturing defects, deferred maintenance, age, or other factors.
2. **Wildlife Interference** – Wild animals may create faults by degrading components or direct contact with electrical equipment, transmission line, etc. Wildlife may create nests, burrow, chew, or peck, creating conflicts and potentially, ignitions.
3. **Vegetation Interference** – Unmanaged vegetation can grow quickly to interfere with various facility and transmission line components, primarily through direct contact.
4. **Vegetation as a Fuel Source** – Vegetation adjacent to energy facilities presents a fuel source that can ignite from facility related failures or activities.

3.2.1.3 Operational Practices Risk Drivers

Fire risk during operation at the Suncrest Project is anticipated to be lower than during the construction phase. The Suncrest Project's human activity level drops significantly once

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construction is complete, vegetation management is in place, and Hot Work and other ignition sources are infrequent and not directly adjacent to unmaintained vegetation. The prioritized risk drivers during operations are:

1. **General Equipment Failure Creating Spark/Heat/Flame** – Transformers, capacitors, bushings, and other electrical facility components may fail without warning due to manufacturing defects, deferred maintenance, age, or other factors.
2. **Extreme Weather Conditions** – Wildfires may occur year-round in California, but conditions that result in high winds and low humidity have proven to result in aggressive wildfires that are not easily controlled. CAL FIRE estimates that 90% of the acreage burned occurs from the 10% of the fires that coincide with RFW conditions.
3. **Wildlife Interference** – Wild animals may create faults by degrading components or direct contact with electrical equipment, transmission lines, and other components. Wildlife may create nests, burrow, chew, or peck, creating conflicts and potentially, ignitions.
4. **Vegetation Interference** – Unmanaged vegetation can grow quickly to interfere with various facility and transmission line components, primarily through direct contact.
5. **Failure to Follow Maintenance Procedures** – Maintenance of electrical equipment is critical for its efficient and safe operation. Fire risk may increase over time without proper maintenance.
6. **Failure to Follow Operations Procedures** – Operations procedures are important as they define the parameters within which equipment safely operates. Operating outside of these parameters increases the risk of a malfunction or failure, and potential for fire.
7. **Vegetation as a Fuel Source** – Vegetation adjacent to energy facilities presents a fuel source that can ignite from facility related failures or activities.
8. **Wire Down** – Downed live wires have been the cause of numerous vegetation fires and avoiding this situation through pole strength and materials and vegetation management beneath transmission lines has been a focus of utilities for reducing fire risk.
9. **Pole Failure (Creating Wire Down)** – Pole failures are a leading cause for down live wires. Wood poles degrade over time and require replacement. Steel poles have been implemented on the Suncrest Project as a fire risk reducing measure.
10. **Earthquake or Other Natural Disasters** – Earthquakes, tornadoes, and similar natural disasters are unpredictable, but can cause ignitions through down wires and damaged facilities.
11. **Flame Reaching Beyond Facility** – Flames resulting from failed electrical equipment within a facility may become significant if they reach (such as when blown by wind) off-site vegetation, which may result in a wildfire.

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- 12. Inability to Adequately Respond to Fire on Facility** – Initial response to an ignition can have a significant impact on whether the ignition elevates beyond a small, isolated, and controllable event to a sizable fire that requires additional resources.
- 13. Climate Change** – Climate change may result in longer periods of hot and dry weather, resulting in drier vegetation and increased potential for ignition. Over time, under this scenario in southern California, a vegetation type conversion would be expected with a resulting higher fire frequency, but lower fire intensity.
- 14. Normal Weather Conditions (Lightning)** – Lightning represents a potential ignition source as well as a source for electrical equipment faults and failures.
- 15. Vandalism** – Vandalism remains a potential fire risk due to the ability of persons intending to harm a facility to damage components, cause failures, light fires, or otherwise cause vegetation ignitions from their actions.

3.2.1.4 Situational/Condition Awareness Risk Drivers

- 1. Inability to Adequately Respond to Fire on Facility** – Initial response to an ignition can have a significant impact on whether the ignition elevates beyond a small, isolated and controllable event to a sizable fire that requires additional resources.
- 2. Extreme Weather Conditions** – Wildfires may occur year-round in California, but conditions that result in high winds and low humidity have proven to result in aggressive wildfires that are not easily controlled. CAL FIRE estimates that 90% of the acreage burned occurs from the 10% of the fires that coincide with RFW conditions.
- 3. Climate Change** – Climate change may result in longer periods of hot and dry weather, resulting in drier vegetation and increased potential for ignition. Over time, under this scenario in southern California, a vegetation type conversion would be expected with a resulting higher fire frequency, but lower fire intensity.
- 4. Normal Weather Conditions (Lightning)** – Lightning represents a potential ignition source as well as a source for electrical equipment faults and failures.

3.2.1.5 Response and Recovery Risk Drivers

- 1. Hot Work During Construction** – Hot Work includes any process that can be (a) a source of ignition when flammable material is present, or (b) a fire hazard regardless of the presence of flammable material in the workplace.

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2. **Grubbing and Grading During Construction** – Grubbing vegetation from a project site and grading the site involves use of machinery within and adjacent to naturally vegetated areas, which represents a fire hazard due to heat and sparks that may result.
3. **Compost Pile(s) Combustion During Grubbing** – Piling vegetation too high and letting it dry out before it is processed or removed from the site may result in spontaneous combustion, which in turn can ignite nearby vegetation.
4. **Vehicle/Machinery/Tools (Internal Combustion Engines) Operation During Construction** – Use of gas-powered, internal combustion engines includes the potential for ignitions from heat, sparks, heated materials, or direct contact with vegetation.
5. **Wire Down** – Downed live wires have been the cause of numerous vegetation fires and avoiding this situation through pole strength and materials and vegetation management beneath transmission lines has been a focus of utilities for reducing fire risk.
6. **Earthquake or Other Natural Disasters** – Earthquakes, tornadoes, and similar natural disasters are unpredictable, but can cause ignitions through down wires and damaged facilities.
7. **Flame Reaching Beyond Facility** – Flames resulting from failed electrical equipment within a facility may become significant if they reach (such as when blown by wind) off-site vegetation, which may result in a wildfire.
8. **Inability to Adequately Respond to Fire on Facility** – Initial response to an ignition can have a significant impact on whether the ignition elevates beyond a small, isolated and controllable event to a sizable fire that requires additional resources.
9. **Extreme Weather Conditions** – Wildfires may occur year-round in California, but conditions that result in high winds and low humidity have proven to result in aggressive wildfires that are not easily controlled. CAL FIRE estimates that 90% of the acreage burned occurs from the 10% of the fires that coincide with RFW conditions.
10. **Normal Weather Conditions (Lightning)** – Lightning represents a potential ignition source as well as a source for electrical equipment faults and failures.

3.3 Wildfire Threat Area Evaluation

A component of the WMP Template is the evaluation of the area fire threat to determine whether it is accurately classified. Due to the Suncrest Project's limited size, minimal overhead transmission line, lack of trees within its influence area, and fire prevention mitigation measures, there is no justification for increasing the Tier fire threat level beyond its current Tier 3 (extreme) designation. NEET West intends to meet all applicable requirements for the Suncrest Project's Tier 3 Fire Threat location, per D.17-12-024.

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4 WILDFIRE PREVENTION STRATEGIES AND PROGRAMS

NEET West will implement new fire and wildfire prevention practices on NEET West Facilities located in fire threat areas that will address the identified risk drivers. Strategies and programs will either be implemented prior to site grading activities in the construction phase, or prior to the Suncrest Project commencing operation. As previously mentioned, the prevention strategies and programs are developed to address five primary fire safety categories (refer to Table 2):

1. Facility design and construction
2. Inspection and maintenance
3. Operational practices
4. Situational/condition awareness
5. Response and recovery

NEET West is currently in the process of creating new programs and strategies specifically customized for its Suncrest Project. These programs will be completed prior to the anticipated in-service date of approximately December 2019. In particular, NEET West is implementing inspection, operation, and maintenance programs customized to the Suncrest Project and the identified practices will be reviewed and approved by CAISO. Internal plans and strategies are developed and reviewed by the various NEET West specialty groups, including the Design, Construction, Operations, Maintenance, and Management Groups. The following subsections provide details regarding these programs, strategies and measures.

Pursuant to the ALJ Ruling,¹ NEET West is providing the following discussion describing how the implementation of the programs included in the Categories mitigate wildfire risks or drivers identified in the NEET West WMP.

Design and Construction

As presented in this WMP, much of 2019 will be spent constructing the Suncrest Project. The risk of wildfire ignitions during construction activities exists, and NEET West has developed mitigation efforts to reduce the likelihood of wildfires being caused by construction activities. Additionally, NEET West is using materials and design standards to reduce wildfire ignitions once the Suncrest Project is operational.

¹ ALJ Ruling at 7.

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Inspection and Maintenance

Wildfire ignitions can be created by poor equipment oversight, equipment failure, inadequate vegetation management and the ineffective audit of programs including failure to follow inspection, quality assurance and quality control procedures. In developing its WMP, NEET West has considered these causes of ignitions and has established or will establish inspection and maintenance procedures that address each of the modes for potential failure.

Operational Practices

NEET West has considered the risk of creating a wildfire during RFW days. NEET West's operating procedures specifically will address practices that can mitigate wildfire risks on RFW days. NEET West's staff and contractors will be trained to address practices on RFW days. Further, NEET West's procedures will, during RFW days, limit work and use of tools to necessary situations.

Situational Awareness

Providing real-time information regarding the status of NEET West Facilities and the surrounding area of operations will allow NEET West to monitor for potential or actual ignitions. NEET West will be utilizing real-time feedback from facility equipment continuous condition monitoring and camera systems, to ensure anomalies and any wildfire risks are immediately addressed.

Response and Recovery

In addition to real-time monitoring, NEET West will collaborate closely with first responders, through training and drills specific to NEET West Facilities, to strengthen on-going relationships with emergency agencies. These practices will help mitigate the risk that an ignition could spread. Accordingly, NEET West will establish working relationships and training with CAL FIRE, local first responders, and other emergency personnel as identified by appropriate authorities.

4.1 Facility Design and Construction

4.1.1 Fire Prevention Strategies and Programs

NEET West's new protocols for design and construction fire prevention include a robust program that has been reviewed and accepted by SDCFA. The prevention strategy during design focuses on hardening a site while construction focuses on providing the necessary training and resources so that all site workers are informed regarding fire safety requirements and best practices and training, inspections, and monitoring occur as required to meet overall fire prevention goals during construction. These strategies and programs will include:

- Emergency Notification Procedures

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- Evacuation Procedures
- Roles and Responsibility Assignments
- Red Flag Warning Protocols
- Hot Work Protocols
- Coordination with Local Fire Agency
- Fire Safety Briefings
- Fire Safety Inspections
- Fire Safety Training

4.1.2 Facility Design and Construction: Fire Risk Reduction Measures

NEET West has designed the Suncrest Project to include a high level of ignition resistance and hardening provisions. The Suncrest Project was designed to meet strict San Diego County requirements. The Suncrest Project includes the following fire prevention strategies for energized equipment:

- Undergrounding the one-mile transmission line – eliminates the potential for vegetation ignitions from the electrical transmission line
- Steel riser pole, intermediate pole, and short aboveground span (300 feet) into substation – poles will not be susceptible to wildfire due to short duration of combustion for nearest shrubs, and there are no trees present in this area. The wire spans less than 100 feet of vegetation and includes a paved road and the SDG&E Suncrest substation as the dominant ground cover.
- Setbacks from nearest vegetation and managed, inspected fuel modification zones
- The Suncrest Project site is a former laydown yard, with most shrub fuels previously removed, which results in reduced fuels in the primary activity area on day one of construction.
- Access roads meet San Diego County Fire code requirements – allows responding firefighters to access the Suncrest Project and includes staging areas and access around the Suncrest Project to manage fire and defend vegetation
- Security fencing and controlled access road – limit potential for vandalism
- Camera monitoring – fire detection, equipment monitoring, security and vandalism deterrence
- The use of mechanical connectors instead of weld joints for specific applications whenever possible (*e.g.*, SVC equipment installation) to reduce Hot Work and potential ignitions

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- Consider construction schedule flexibility to minimize overlap of higher risk activities (*e.g.*, grubbing, grading, commissioning) with the higher risk time of the year (RFW conditions)
- NEET West does not expect to deploy a weather station at the time of this WMP due to the limited duration of the Suncrest SVC construction

NEET West will employ the following new measures, as appropriate, during construction and decommissioning to reduce the risk of ignitions. These measures will be enforced through the Site Safety Officer (SSO) and ongoing worker safety training as well as by a compliance monitor required under the mitigation measures adopted in D.18-10-030.

- The private fire brigade will be on-site during all grubbing and grading activities and will be equipped with a Type VII or Type VI fire engine.
- During grubbing, vegetation piles shall not exceed 10 feet in height and shall retain at least 40% fuel moisture through spraying/wetting. Vegetation piles will be located at least 100 feet away from the nearest unmaintained vegetation and shall be removed from the site as soon as possible, and no longer than 48 hours after piling.
- Fire safety shall be a component of ongoing Suncrest Project maintenance. Employees and contractors working on the site during operations will be provided fire safety, prevention, and emergency protocols during their site induction training provided by the SSO.
- Fire rules shall be posted on the project's bulletin board at the contractor's field office and in areas visible to employees. This shall include all contractors and subcontractors if more than one.
- All internal combustion engines used at the Suncrest Project site shall be equipped with spark arrestors that are working as manufacturer intended, per routine inspection process by the SSO.
- Once initial two-track roads have been cut and initial fencing completed, light trucks and cars shall be used only on roads where the roadway is cleared of vegetation. Mufflers on all cars and light trucks shall be maintained so they function as intended, per routine inspection process by the SSO.
- The Suncrest Project will be equipped with at least one and up to two water trucks each with a 4,000 gallon capacity. Each truck will be equipped with 50 feet of 1¼ inch fast response hose with fog nozzles. Any hose size greater than 1½ inches shall use National Hose (NH) couplings.
- A cache of hose, pumps, fittings, shovels, Pulaski's, and other equipment will be available at staging sites. The amount of equipment will be determined by consultation between the

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SSO, SDCFA, and CAL FIRE. Additionally, on-site pickup trucks will be equipped with first-aid kits, fire extinguishers/backpack pumps and shovels. Contractor vehicles will be required to include the same basic equipment and will be audited by the SSO.

- Equipment parking areas and small stationary engine sites shall be cleared of all extraneous flammable materials.
- A fire watch (person responsible for monitoring for ignitions) will be provided during Hot Work and shall occur for up to one hour following completion of the Hot Work activities.
- Smoking will not be allowed on the Suncrest Project premises.
- Each construction site shall be equipped with fire extinguishers and firefighting equipment sufficient to extinguish small fires.
- The on-site contractor or NEET West personnel shall coordinate with the SDCFA and CAL FIRE to create a training component for emergency first responders to prepare for specialized emergency incidents that may occur at the Suncrest Project site.
- Contractors on-site will be directed to restrict use of chainsaws, chippers, vegetation masticators, grinders, drill rigs, tractors, torches, and explosives to outside of the official fire season (which may include any day with low humidity and high winds) to the greatest extent feasible. When the above tools are used, water trucks equipped with hoses, shovels, Pulaski's, and axes shall be easily accessible to personnel.
- All on-site personnel shall participate in fire prevention and response training exercises with the SDCFA and CAL FIRE.
- Ongoing Fire Patrols during declared fire weather, particularly, RFWs and warnings as defined by local and state agencies and the National Weather Service. The SSO will be assigned as "Fire Patrol" specifically to monitor work activities when an activity risk exists for fire compliance. The SSO will verify proper tools and equipment are on-site, assess any fire agency work restrictions, and may serve as a lookout for fire starts, including staying behind (*e.g.*, a fire watch) to make certain no residual fire exists. Fire watch may be performed by any site personnel. The SSO (or SSOs) will perform routine patrols of the site during the fire season equipped with a portable fire extinguisher and communications equipment. NEET West personnel shall notify the SDCFA and CAL FIRE of the name and contact information of the current SSO in the event of any change.
- All fires ignited on site shall be immediately reported to SDCFA and CAL FIRE.
- The engineering, procurement, and construction contracts for the Suncrest Project shall clearly state the fire safety requirements that are the responsibility of any person who enters the site.

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4.2 Inspection and Maintenance

4.2.1 Fire Prevention Strategies and Programs

NEET West will put in place new risk controls to address general equipment failures based on its maintenance philosophy, to provide real-time monitoring and periodic inspection. NEET West has designed its inspection and maintenance programs customized to the Suncrest Project, and these programs will be available prior to commencement of operation except for the construction related strategies and programs, which will be in place prior to site grading. Details provided herein may not be comprehensive and the final programs may vary in overall content.

In general, monthly inspections will be performed on the Suncrest Project to inspect each item of the equipment and check that no obvious abnormalities exist to the extent possible without taking the SVC out of service. Annually, it is anticipated that the Suncrest Project will be taken out of service to perform more invasive checks and maintenance on the SVC main components. Inspection and maintenance will be performed by local NEET West personnel and personnel provided by equipment vendors.

4.2.1.1 Maintenance Plan Philosophy

The NEET West maintenance philosophy is to continuously or periodically evaluate equipment condition, utilizing predictive maintenance technologies such as thermographic cameras, dissolved oil analysis, LiDAR and other specific online tests. The philosophy starts during the design and construction phase. NEET West has utilized design standards that require increased equipment tolerances. For example, modern manufacturing techniques allow for tighter subcomponent tolerances, but, in designing the Suncrest Project, NEET West attempted to ensure that equipment manufacturers will build in greater tolerance. This is designed to achieve greater equipment reliabilities and long lifetimes.

During the in-service phase, the philosophy utilizes various measurements on the actual equipment status in combination with measurement of performance, and environmental conditions measured by other devices, to trigger equipment maintenance.

The Suncrest Project's new maintenance plan will include a variety of tasks with the goal of predicting the future trend of equipment condition. Inspections performed while the equipment is in service and principles of statistical process control determine at what point maintenance activities will be appropriate. Inspection data collected by the predictive technologies are transferred to decision support tools to provide an asset health number, rank future maintenance work order execution, and determine next steps strategy. For example, data from on-line transformer dissolved gas analysis is weighted with data from visual inspection, infrared findings,

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ambient temperature, and transformers loading to risk rank the transformer in terms of current condition, loading and risk analysis. The results are fed into the Asset Management Program and can trigger the following: changes to scheduling; task frequency adjustment; or a new work order to address non-normal condition responses.

The maintenance strategy combines real-time monitoring with periodic inspections.

A maintenance plan will be created in accordance with the equipment vendors' directives, industry practice, NEET West's internal guidelines, and regulatory requirements. The plan will be in compliance with the CAISO Transmission Control Agreement and Maintenance Procedures and practices will be approved by the CAISO before the start of commercial operation.

The frequency of scheduled maintenance for any year, which is based on the manufacturer's recommendations and other sources of information, is broken down into bi-weekly, monthly, semi-annually (every six months), and annually.

Throughout the year, the scheduled maintenance will include certain routine maintenance and inspections that can be performed with the Suncrest Project in operation. This includes general checks and measurements, visual inspections, general housekeeping and vegetation control, line patrols, and maintenance and calibration of tools and equipment.

The scheduled maintenance will include a routine inspection performed by the field operations personnel. After energization of the Suncrest Project, this will consist of regular inspections, readings, checks and measurements, and will include power circuit breaker, transformer, auxiliary power system, switchyard, and housekeeping inspections. Any major deficiencies identified during the inspections shall be reported to the field operations lead who shall determine what appropriate actions are to be taken.

All maintenance activities will be managed to ensure all planned work tasks are executed to the maintenance plan schedule. The field operations lead shall ensure sufficient oversight of the maintenance program so variance or deviation from established plan or practice is managed and recorded. The field operations team shall immediately investigate the reason for the deferral, its impact on the system, and appropriate method of remediation.

NEET West's maintenance practices will be approved and annually audited by the CAISO in accordance with the CAISO Transmission Control Agreement.

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4.2.1.2 Trained Operations and Maintenance Personnel

NEET West's maintenance plan is being customized for the Suncrest Project. This plan's practices will be reviewed and approved by CAISO prior to commencing operations. This customized maintenance plan will be based on the following practices that are included in an existing enterprise level maintenance plan, but may be modified prior to implementation.

All NEET West maintenance will be carried out by NEET West operations personnel, affiliate personnel, or designated contractors that, through relevant training, experience, and instruction, are qualified to perform the task.

Operations personnel will maintain and operate the NEET West Facilities in accordance with good utility practice, sound engineering judgment, the guidelines as outlined in NERC applicable reliability standards, laws, and regulations. Operations personnel will take proper care to ensure the safety of personnel and the public in performing maintenance duties.

Further, NEET West will engage contractors or affiliate support where additional manpower is required, particularly where time is of the essence, such as during outages and in emergencies.

For inspections, maintenance, or repairs, and anywhere else where specialist skills are required, the operations team will either engage in a term contract with a preferred contractor, vendor, or in instances where the skills are readily available from a number of sources, seek suitable service providers as and when required.

The following programs are provided for inspection and maintenance of the NEET West Facilities. The programs/strategies discussed explain the additional detail regarding specific fire reduction measures in the following section.

4.2.1.3 NEET West Facility Inspections

NEET West Facility inspections will include monthly inspections by designated site personnel and as necessary, additional inspections during elevated site activity periods or extreme fire weather periods. Inspections will be conducted by experienced and trained individuals, who will document their findings and submit those findings to NEET West operations personnel and other appropriate personnel.

4.2.1.4 Electrical Infrastructure Inspections

NEET West Facilities are continuously monitored from a remote control center 24/7, and the health of major components is continuously analyzed alerting the operations team to any anomalies.

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Maintenance inspections, measurements, checks, tests, and analyses are intended to identify any problems that either may be averted completely or can be rectified before resulting in a more serious failure to equipment or to the operation of the NEET West Facilities.

All NEET West maintenance is carried out by the NEET West operations personnel that, by reason of training, experience, and instruction, are qualified to perform the task. Operations personnel will maintain and operate the facilities in accordance with good practice, sound engineering judgment, the guidelines as outlined in NERC applicable reliability standards, laws, and regulations. The NEET West operations personnel take proper care to ensure the safety of personnel and the public in performing maintenance duties.

Further, NEET West will engage contractors or affiliate support where additional manpower is required, particularly where time is of the essence, such as during outages and in emergencies.

For inspections, maintenance, or repairs, and anywhere else where specialist skills are required, the NEET West operations team either engage in a term contract with a preferred contractor, vendor, or in instances where the skills are readily available from a number of sources, seek suitable service providers as and when required.

4.2.2 Fuel Modification/Vegetation Management Inspections

4.2.2.1 *Inspection Process*

The NEET West vegetation management team will have a conservative program that embraces technology. Vegetation patrols will occur twice a year and will include aerial inspection and ground patrol. Patrol methods include high-resolution photography, LiDAR, and unmanned aircraft system/drones.

Site vegetation management will utilize visual inspections and observations from trained personnel to determine if further actions are necessary. On a monthly basis, personnel will conduct a visual inspection of the Suncrest Project, bareground perimeter, and parking areas. Field personnel will also note any vegetation on and around equipment. The visual inspections are intended to capture any issues in the early stages. NEET West may increase the frequency of inspection if it is warranted based on the findings.

4.2.2.2 *Vegetation Management Inspection QA/QC Process*

Quality Assurance and Quality Control (QAQC): A random, statistically representative sample of open, scheduled, and completed work will be selected and reviewed annually to assess performance and identify improvement opportunities.

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4.2.2.3 Annual Third-Party Fuel Modification Inspection

As a means of ensuring the fuel modification zone area is maintained, NEET West's field operations lead shall obtain an inspection and report from a SDCFA-authorized Wildland Fire Safety Inspector by June 1st of each year, certifying that vegetation management activities throughout the Suncrest Project site have been performed pursuant to this WMP. This effort further ensures vegetation maintenance and compliance with no impact on the local fire authority having jurisdiction (*i.e.*, SDCFA).

4.3 Operational Practices

4.3.1 Fire Prevention Strategies and Programs

NEET West is committed to providing the necessary strategies and programs to guide the fire prevention practices that will occur during operations.

Operational practices include all of the inspection and maintenance strategies and programs previously defined, along with operational practices of monitoring, fire weather practices, Hot Work protocols, and vegetation management.

4.3.1.1 Extreme Fire Weather Fire Prevention Strategies and Programs

NEET West understands that the wildfire risk is highest when high wind and low humidity weather conditions occur, which can happen any time of the year, but historically has occurred more frequently during the fall (October through December) and more recently, in the spring (May through June). Regardless of the timing of the RFW conditions, NEET West implements fire prevention strategies aimed at situation awareness, site work limitations, and monitoring during extreme fire weather periods. The Suncrest Project site's extreme fire weather fire prevention strategies are:

1. **Situational Awareness:** Monitoring of National Weather Service RFWs and coordinating with other agencies and third parties in the area to determine when restrictions should occur and when they should be lifted.
2. **Site Work Limitations:** During fire weather conditions warranting restrictions as indicated in #1 above, Suncrest Project site activities will be halted, unless it is determined that it is less safe to halt activities than to complete necessary actions. During the work stop period, NEET West's Senior Director of Operations will determine what, if any, site activities may be allowed based on the activity's potential to create spark, flame, heated materials, or other fire risks.

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3. **Monitoring:** Site activities and equipment operations are monitored as part of the NEET West normal operating procedures. During RFW weather conditions, monitoring will proceed, and may be enhanced beyond normal conditions, as warranted.

4.3.1.2 *Extreme Fire Weather Fire Prevention Protocol*

This WMP requires specific site activities to cease during declared RFW periods, unless it is determined to be more risky to halt work than to complete it. The National Weather Service may issue RFWs at any time when humidity and wind conditions meet pre-determined thresholds that would promote fire ignition and spread. Because the majority of acreage burned and assets threatened in California occurs during RFW weather conditions (Yufang Lin, et al. 2015), construction or operational activities will be limited to low fire hazard, non-Hot Work, unless within an ignition resistant structure until the RFW has been lifted.

The Suncrest Project is within an area of San Diego County that is actively monitored for fire weather conditions. The National Weather Service monitors humidity, wind, and temperatures and will declare RFWs and watches (<https://www.weather.gov/sgx/>), signaling that fire weather is anticipated. NEET West will monitor National Weather Service warnings and watches and will coordinate with other agencies and third parties in the area. NEET West also expects to coordinate with SDG&E to the extent possible regarding fire weather conditions. NEET West's field operations lead will actively monitor weather conditions and at all stages of facility construction, operation, maintenance, and decommissioning and will implement facility activity limitations during fire weather events.

Upon announcement of a RFW during active construction or maintenance, red flags will be prominently displayed at the Suncrest Project site entrance driveway gate and main office indicating to employees and contractors that restrictions are in place. Following construction, when the Suncrest Project is in-service, personnel would not be expected at the site daily, so red flags would not be displayed, unless maintenance was occurring that could not be delayed until after the RFW period.

4.3.2 *Fire Prevention Measures Applicable at All Times*

4.3.2.1 *Contractor Fire Safety Awareness Program*

Contractors will be provided fire safety training by the SSO, are expected to understand fire prevention and response, and are responsible for adhering to the Suncrest Project's policies regarding fire emergencies. These general fire prevention measures should help in the efforts to prevent a fire from occurring while on site.

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4.3.2.2 Hot Work Fire Safety Program

Hot Work is a primary source of ignition when conducted adjacent to flammable fuels. Accordingly, these prevention measures (land clearing, construction, operation, and decommissioning) apply at all times on the Suncrest Project. The following requirements are primarily from California Fire Code (CFC) Chapter 26, “Welding and other Hot Work,” and NFPA 51-B, “Fire Prevention During Welding, Cutting and other Hot Work”. Hot Work is defined in the CFC as operations involving cutting, welding, Thermit welding, brazing, soldering, grinding, thermal spraying, thawing pipe, or other similar operations. Hot Work areas are defined as the areas exposed to sparks, hot slag, radiant heat, or convective heat because of the Hot Work.

A Hot Work Permit shall be obtained from the on-site SSO, following guidelines from the fire agencies, for all Hot Work regardless of location. The SSO will require all Hot Work to be completed per requirements in NFPA 51-B and CFC Chapter 26. Hot Work permits are required because it is a safety measure that incorporates the SSO. Through this process, Hot Work on fire weather days can be avoided and on typical weather days, the SSO can review the work activity, its location, and make sure that it is appropriate and that there are no combustible materials or vegetation nearby.

Hot Work shall only be done in fire safe areas designated by the SSO and shall comply with the following:

- All personnel involved in Hot Work shall be trained in safe operation of the equipment by the SSO. This will include providing training at “tailgate safety meetings”. They shall also be made aware of the risks involved and emergency procedures, such as how to transmit an alarm and who is responsible to call 911.
- Signage required in areas where workers may enter indicating “Caution; Hot Work in progress; Stay Clear.”
- Hot Work shall not be done on any containers that contain or have contained flammable liquids, gases, or solids until containers have been thoroughly cleaned, purged, or inerted.
- A fire extinguisher with a minimum rating of 3-A-40 BC, a 5-gallon backpack pump fire extinguisher, and a 46-inch round point shovel, shall be readily accessible within 25 feet of Hot Work area.
- The SSO shall inspect the Hot Work area before issuing a permit and shall then make daily inspections.
- Welding and cutting shall comply with 2016 CFC Chapter 35 – Welding and Hot Work.

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- Electric arc Hot Work shall comply with 2016 CFC Chapter 35 – Welding and Hot Work.
- Piping manifolds and Hose Systems for Fuel Gases and Oxygen shall comply with CFC Section 3509.
- Cylinder use and storage shall comply with 2016 CFC Chapter 53, “Compressed Gases.”
- Personal Protective Clothing shall be selected to minimize the potential for ignition, burning, trapping hot sparks, and electric shock.
- As considered necessary by the SSO, post work fire monitoring may be required for up to one hour.
- Any ignitions will be immediately extinguished (as possible) by site personnel, and NEET West will notify the CPUC, SDCFA and CAL FIRE of the incident.

The SSO shall have the responsibility to assure safe Hot Work operations, and shall have the authority to modify Hot Work activities associated with construction and/or maintenance activities, and to exceed the requirements in NFPA 51-B and the 2016 CFC, to the degree necessary to prevent fire ignition. Workers must be trained on the Hot Work Information and Criteria in this WMP.

4.3.3 Vegetative Fuels and Vegetation Management

4.3.3.1 *Fire Prevention Strategies and Programs*

NEET West will incorporate a new vegetation management program at NEET West 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 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. Perimeter fuel modification areas will be treated by removal of the highest flammability plants and maintenance in a thinned, low fuel condition.

NEET West’s vegetation management team will perform annual ground inspections of any NEET West overhead lines and manage all activities in accordance with the principles under NERC FAC 003-4 requirements, which require a documented annual inspection and work management plan. In addition, NEET West’s vegetation management will be performed in compliance with applicable California requirements including CPUC General Order (GO) 95, Rule 35 and California Public

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Resources Code (PRC) §§ 4292 and 4293. The vegetation management team will conduct a visual inspection around the outside of the Suncrest Project at the same time as the line inspection.

In response to the the WMP Template adopted in the ALJ Ruling, certain vegetation-related subjects currently do not apply to the NEET West Facilities and therefore have not been included in NEET West's WMP at this time. In particular:

- Because NEET West is just beginning construction of its first project, and has designed its project to include appropriate fuel breaks, NEET West has not yet collaborated with local land managers regarding firebreak creation, and additional firebreaks may not be necessary at or near the Suncrest Project. To the extent that the NEET West Facilities offer land managers or fire professionals opportunities to enhance fuels management, NEET West will cooperate to the fullest extent allowable and where considered ecologically appropriate.
- There are no trees that would interfere with the Suncrest Project or its short-span overhead transmission line into the existing Suncrest substation. At-risk vegetation does not currently occur at the Suncrest Project site, but will be monitored during scheduled inspections and maintenance activities. Trees that could interfere with any future NEET West Facility will be managed as part of the overall vegetation management program, following all applicable laws and regulations, including for protected trees.
- Fuel modification occurring at the Suncrest Project site is limited to removal of all vegetation within the security fence and placement of rock, which will minimize erosion. The perimeter fuel modification areas include removal of highly flammable species, and use of a low-density mix of native plants. The potential for erosion is minimal given the small area included in the fuel modification areas and the presence of plants and lack of steep terrain. Erosion, flooding, and related secondary impact control measures would be implemented where necessary on all future NEET West Facilities to prevent secondary impacts from vegetation removal.

4.3.3.2 Additional Vegetation Management Requirements

1. Electrical Transmission Line Vegetation Management

In addition to the Suncrest Project site fuel modification requirements, the Suncrest Project interconnection transmission line requires standard vegetation clearance for the 300-foot-long overhead span and steel riser and intermediate poles. Overhead transmission line and transmission pole vegetation management is regulated by various codes and ordinances including the following regulations:

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California Public Utilities Commission

GO 95: Rules for Overhead Electric Line Construction

GO 95 is the standard governing the design, construction, operation, and maintenance of overhead electric lines in California. GO 95 includes safety standards for overhead electric lines, including minimum distances for conductor spacing, minimum conductor ground clearance, standards for calculating maximum sag, and vegetation clearance requirements.

The vegetation clearance requirements of GO 95 consist of Rule 35 (Tree Trimming Criteria), which defines minimum vegetation clearances around power lines.

Rule 35 guidelines require:

- 4 foot radial clearances are required for any conductor of a line operating at 2,400 volts or more, but less than 72,000 volts;
- 6 foot radial clearances are required for any conductor of a line operating at 72,000 volts or more, but less than 110,000 volts;
- 10 foot radial clearances are required for any conductor of a line operating at 110,000 volts or more, but less than 300,000 volts (this would apply to the Suncrest Project); and
- 15 foot radial clearances are required for any conductor of a line operating at 300,000 volts or more.

CCR, Title 14 Section 1254/1255. Minimum Clearance Provisions - PRC 4292

The firebreak clearances required by PRC § 4292 are applicable within an imaginary cylindrical space surrounding each pole or tower on which a switch, fuse, transformer or lightning arrester is attached and surrounding each dead-end or corner pole, unless such pole or tower is exempt from minimum clearance requirements by provisions of CCR, Title 14 Section 1255 or PRC § 4296. The radius of the cylindroids is 10 feet measured horizontally from the outer circumference of the specified pole or tower with height equal to the distance from the intersection of the imaginary vertical exterior surface of the cylindroid with the ground to an intersection with a horizontal plane passing through the highest point at which a conductor is attached to such pole or tower. Flammable vegetation and materials located wholly or partially within the firebreak space shall be treated as follows:

- At ground level – remove flammable materials, including but not limited to, ground litter, duff and dead or desiccated vegetation that will propagate fire;

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- From 0 to 8 feet above ground level – remove flammable trash, debris or other materials, grass, herbaceous and brush vegetation. All limbs and foliage of living trees shall be removed up to a height of 8 feet; and
- From 8 feet to horizontal plane of highest point of conductor attachment – remove dead, diseased or dying limbs and foliage from living sound trees and any dead, diseased or dying trees in their entirety.

North American Electric Reliability Corporation (NERC)

The purpose of the NERC FAC-003, *Standard Application Guide for Transmission Vegetation Management*, is to improve the reliability of the electric transmission systems by preventing outages from vegetation located on transmission rights-of-way (ROW) and minimizing outages from vegetation located adjacent to ROW, maintaining clearances between transmission lines and vegetation on and along transmission ROW, and reporting vegetation related outages of the transmission systems to the respective Regional Reliability Organizations (RRO) and NERC. This standard shall apply to all transmission lines operated at 200 kV and above and to any lower voltage lines designated by the RRO as critical to the reliability of the electric system in the region. The Suncrest Project meets these requirements per its fuel modification program defined in this WMP.

4.3.3.3 Facility Vegetation Maintenance

The vegetation management program will be managed by NEET West's vegetation management team and executed by several specialized vendors providing mowing, trimming, and herbicide services. This vegetation management program will include inspections and/or patrols.

In particular, on a semi-annual basis, weed control will be conducted throughout accessible areas of the substation while energized, as deemed necessary. On a yearly basis, herbicides control will be applied to substation HV areas, the parking area, and outlying perimeters as deemed necessary. Fuel modification maintenance work may be provided by herbicide, mowing, trimming, or other methods that result in the desired no fuel within the security fence and managed, reduced fuel conditions in the extended fuel modification zone detailed herein.

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4.4 Situational and Conditional Awareness

4.4.1 Fire Prevention Strategies and Programs

4.4.1.1 Real-Time Maintenance Monitoring

In addition to the Extreme Fire Weather monitoring described in Sections 4.3.1.1 and 4.3.1.2, the following equipment monitoring systems will be on-line prior to commencement of operations.

NEET West will remotely operate and monitor the NEET West Facilities from its affiliate Lone Star Transmission's 24/7 control center located in Austin, Texas. Such operation and monitoring will include the use of standard monitoring, control, protection equipment, use of circuit breakers, and other line relay protection equipment. Graphic displays and alarm processing will ensure NEET West transmission operations have real-time situational awareness. Support personnel will perform checks of the applications and hardware to ensure they are in proper working order, and will maintain equipment to ensure compliance with NERC Critical Infrastructure Protection Standard requirements. Any site anomalies will be communicated to local personnel, who will manage and undertake site corrective actions.

4.4.1.2 Monitoring Components:

NEET West will monitor the following components at the Suncrest Project:

- Transformer gas in oil signatures
- Transformer and SVC temperature monitoring to detect changes in heating characteristics
- SVC systems health: protection schemes, subcomponent controls and communication channels, subcomponent operation performance monitoring
- Central station close circuit cameras and physical security alarms of facilities

Periodic inspection of equipment condition to identify signs of trouble:

- Misalignment: partially closed, poor operation, over extended mechanisms
- Physical damage: poor operability, chipping, cracked
- Rusting: water staining, inadequate drainage, blocked drainage
- Water ingress: component discoloration, swollen gaskets, weathering, broken heaters, poor seals, water staining, musty smell.
- Vibration: unusually noisy operation, bearing squeal

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- Wear: uneven surfaces, uneven color
- Discoloration: uneven surface color
- Burning: indications of carbon
- Overheating: variations in surface and internal temperature
- Unusual noise: during specific operations and normal operating status
- Usual smell: burning, chemicals,
- Overgrowth of vegetation: compared to other areas
- Physical Security interference; poor broken gates, damage fencing
- Missing signage: incorrect labelling, fading lettering, weathering
- Animal ingress: bird streaks, signs of nesting, borrowing, chewing

Before placing the NEET West Facilities in service, NEET West will create a suite of facility operations practices. Maintenance practices will be 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 it results in a more serious failure to equipment or to the operation of the facility.

4.5 Response and Recovery

4.5.1 Fire Prevention Strategies and Programs

4.5.1.1 *Public Safety Power Shut-off Protocols*

As explained in Section 1, NEET West is a transmission-only utility and does not own, operate, or maintain electric distribution facilities. Accordingly, none of NEET West's Facilities include distribution reclosers.

As noted above, the NEET West Facilities will be monitored 24/7 by a remote system control operator. The system control operator is responsible for executing changes to the operational settings of the NEET West Facilities. During normal grid system operations, the CAISO is responsible for determining the operational settings for the NEET West Facilities. The CAISO will communicate changes to operational settings of the Suncrest Project with the system control operator who will then execute the setting changes at the Suncrest Project.

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The system control operator and field operations personnel are responsible for readiness at all times to assess potential and actual severe events and to coordinate restoration efforts. The actions taken in response to such events include the following principles:

- Monitor – monitor the event and its progression
- Protect – protect transmission and substation equipment from damage
- Safeguard – safeguard first responders
- Respond – assess impacts
- Restore – restore damaged equipment and place back in service

Prior to placing its facilities in service, NEET West will create procedures that encompass proactive and reactive responses to events that could affect its transmission and substation facilities. These procedures describe: the actions taken by first responders; contact lists that will be continually updated by NEET system control operator; and list of inventories of spare equipment, materials and supplies that will be continually updated by the field operations team.

The NEET West 24/7 system control operator will continually monitor weather and fire patterns that may result in events that could affect its facilities. When made aware that a severe event has been forecasted or is expected to occur, NEET West system operating personnel will:

- Track and/or assess the potential severe event (*e.g.*, location, path and intensity) and keep potentially impacted operating personnel and management informed of any development;
- Communicate with CAISO, interconnecting utilities and first responders so that they may begin preparations for any needed response and keep them posted on the potential event's progress;
- Take all actions necessary to protect the safety of its personnel, the general public, and facilities; and
- Communicate regarding changes in conditions with the CAISO.

Based on system conditions, NEET West operations personnel may execute a facility shut down process by opening the Suncrest Project's SVC 230 kV Circuit Breaker. If NEET West shuts down the Suncrest Project, NEET West will monitor the post shut-down situation and will execute the pre-agreed restoration procedure with the field operations team visual assessment of the facilities condition.

The field operations team members will conduct a visual assessment of the Suncrest Project to determine if it can be energized, and report back to the system control operator if damage prevents

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energization. Any damage must be reported to the system control operator; the first responder(s) will then receive a new assignment from the system control operator.

On-site emergencies requiring de-energizing of the Suncrest Project would be according to the following protocol. The Suncrest Project is connected to the electric grid by a radial line feed. Isolation of this line will electrically isolate the site. However, permission granting access to the site can only be from NEET West authorized personnel since charged capacitors still exist after site isolation. To support “project electrical shut-off,” NEET West will create and communicate an appropriate site access protocol, which will include typical routine site meetings with SDCFA and the private firefighting company during the operational phase. In addition, project contacts will be provided to the responding fire agencies so a person with project equipment knowledge can be contacted to assist responding firefighters.

In the event of an emergency or any system condition(s) that may require deenergization, or could potentially threaten the reliability of the NEET West Facilities or the CAISO grid, NEET West’s Operating Personnel shall notify CAISO, appropriate Transmission Operators (TOPs), and any other applicable entities. All communications with NEET West would be directed to NEET West’s President or the President’s delegate (see Table 4).

4.5.1.2 *System Interruption Protocol*

NEET West continuously monitors the NEET West Facilities for any situation or condition that could disrupt normal operations or create any interruption to the Bulk Electric System. The system control operator shall immediately notify CAISO and applicable TOP(s) of any situation or condition that could result in an emergency condition including, but not limited to:

- Loss of telecommunications;
- Unplanned change of equipment;
- Loss of voltage/reactive devices;
- Equipment reaching or exceeding facility rating;
- Enters an unknown operating state; and
- Failure of a protection system.

Prior to and during an emergency condition, CAISO will issue Dispatch Instructions to TOPs for the operation of the transmission grid. During a declared system emergency, CAISO can instruct TOPs to take specific operating actions that would otherwise be discretionary.

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The NEET West system control operator will notify NEET West staff and management about transmission events.

NEET West will respond to CAISO events as required and coordinate with CAISO and neighboring TOPs as necessary to ensure responses to emergencies are timely and organized. Coordination will include but not be limited to telephone communications via CAISO voice communication channels, conference calls, emails, and similar forms of communications.

A NEET West Operations Broadcast Message would be broadcast for any of the following conditions:

- Transmission line forced or planned outage
- Substation forced or planned outage
- Security event
- Primary equipment de-rating
- Protection system degradation
- Outage risk to equipment
- Environmental violation
- Fire at, or near, Suncrest Project equipment
- Vehicle accident
- Personnel injury
- Significant weather event

4.6 Post Incident Recovery, Restoration, and Remediation

NEET West will implement the safe, reliable, and efficient restoration of its facilities through use of field personnel and with experienced affiliate and contractor support, as required. NEET West's local field operators, in conjunction with its affiliate NextEra Energy Resources, LLC's high-voltage technicians located in Palm Springs, California, bring significant operations and maintenance capabilities.

To ensure the safe operation and adequate reliability of NEET West Facilities, including post-incident recovery, restoration, and remediation, NEET West will only utilize persons that are appropriately qualified, skilled, and experienced in their respective trades or occupations. NEET West also will require that all personnel undertake necessary training, including periodic specialized training depending on job role and responsibilities.

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NEET West will undertake post-incident recovery, restoration, and remediation consistent with the emergency response program described below in Section 5.2, below.

4.7 Alternative Technologies Strategies and Programs

NEET West continues to explore new technologies that will reduce the probability of an ignition event and/or reduce public exposure to a hazardous condition during periods of high fire risk by providing better situational awareness, faster isolation, or minimized energy transfer.

4.7.1 Potential Suncrest Facility Hardening/Technology/Training Measures

The Suncrest Project is considered to be significantly fire hardened and technologically advanced. As described in Section 1.2, above, NEET West has identified an objective over the next five years to identify and evaluate potential system hardening measures that could be implemented to further reduce or mitigate risk.

At the time of filing, NEET West has identified the following additional facility hardening measures for further evaluation:

- Drive level of awareness and fire risk behaviors to institutionalize fire risk culture
- Project 24/7 system operations to utilize real-time fire maps and monitor CAL FIRE Red Flag communications
- Rated masonry fire barrier walls and projectile shielding between the fire risk and designated equipment and /or structures
- Fixed foam deluge system, or portable foam system with local fire service advice
- Enhance vegetation setback around the substation and overhead-line, cover with crushed rock and vegetation growth suppression
- Evaluate the use of protective coating on transmission infrastructure
- Evaluate replacing transformer bushings with low explosion risk type bushings
- Evaluate the use of optical fire detectors (linear / electronic / pneumatic / heat actuated)
- Utilize real-time condition monitoring technology of transformer health vs. operating conditions
- Evaluate the purchase of additional land to increase setback perimeter around site

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5 EMERGENCY PREPAREDNESS AND RESPONSE

5.1 Emergency Preparedness

NEET West will develop an emergency response protocol that includes the following key components:

- Emergency classifications – defining emergency situations
- Emergency Response Training Program – protocols for responding to anticipated emergencies
- Advance Planning and Preparation – allocating resources and setting up response teams
- Emergency Anticipation – based on most common equipment failure types
- Service Restoration Procedures – primary and contingency approaches to service restore
- Personnel Responsibilities – assignment of roles and responsibilities
- Customer/Client Contacts – provide information regarding emergency and estimated schedule
- Communications – protocols for communicating status of emergency situations
- Outside Aid – pre-planned contractor assistance for specialized activities
- Support Services – actions and responsibilities for sustaining restoration process

5.2 Disaster and Emergency Response

This WMP's disaster and emergency preparedness plan is consistent with NEET West's system wide response approach. NEET West will customize its enterprise emergency management plan to provide a framework by which NEET West can respond effectively to wildfire threats and hazards. NEET West recognizes its essential role in both restoring normalcy after an incident and the importance of the utility sector to the daily lives of customers and stakeholders and the nation's economic well-being and security. The WMP reflects these considerations and is intended to be a framework for NEET West's engagement with external entities.

In the event of a disaster, NEET West expects to utilize experienced contractor and affiliate support to perform incident response and management. Roles and responsibilities are divided by functional areas and the emergency response is led by an area commander or an incident commander (IC), depending on incident scope or complexity. NEET West will use the ICS (ICS) as the foundation for its incident response organization. ICS is a standardized, on-scene, all-hazard incident management concept, which provides responders with an integrated organizational structure to match the complexities and demands of single or multiple incidents. Through the use of span of control management and a top-down organizational structure, ICS helps ensure full utilization of

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all incident resources, decreases confusion, and improves communication. As a system, ICS both provides an organizational structure for incident management, and guides the process for planning, building, and adapting that structure.

The standard ICS organization uses five functions as its foundation. All of the functional areas may or may not be used, based on a specific incident's needs. These functions include:

- Incident Command: Sets the incident objectives, strategies, and priorities and has overall responsibility for the incident or incident;
- Operations: Conducts tactical operations to carry out the plan; develops the tactical objectives and organization; and directs all tactical resources;
- Planning: Collects and evaluates information, maintains resource status, and maintains documentation for incident records;
- Logistics: Provides support, resources, and all other services needed to meet the operational objectives; and
- Finance/Administration: Monitors costs related to the incident and provides accounting, time recording, and cost analyses.

When an incident affects multiple entities and/or jurisdictions, a Unified Command structure may be established. The Unified Command organization consists of the ICs from the various jurisdictions or agencies, who form a single command structure and work together to make joint decisions. Institutions and responding agencies blend into an integrated, unified team. A unified approach results in:

- A shared understanding of priorities and restrictions;
- A single set of incident objectives;
- Collaborative strategies;
- Improved internal and external information flow;
- Less duplication of efforts; and
- Better resource utilization.

By utilizing this emergency response framework, NEET West will maintain a coordinated and standardized approach for activating and establishing the emergency response organization. The emergency response framework, along with all associated plans, serves to safeguard NEET West's ability to meet its essential missions and functions under wildfire threats and hazards, with or without warning, in preparation for or during any incident, regardless of its expected duration.

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5.2.1 Fire Agency Emergency Response

In addition to its internal emergency preparedness procedures, emergencies including active fire at the Suncrest Project site would be responded to by a robust regional fire-fighting system. Fire protection in the southeast San Diego County is shared by several agencies, with the SDCFA and CAL FIRE providing significant resources. The Suncrest Project is located within the SDCFA responsibility area. Emergency response for the Suncrest Project would be provided by the SDCFA Descanso Fire Station 45, which is staffed with CAL FIRE firefighter/paramedics via a Schedule A contract with San Diego County. The Descanso Fire Station is located at 9718 River Road, Descanso, California. The Descanso Station is approximately 6.5 miles to the most remote portion of the Suncrest Project, with a calculated travel time of approximately 11.7 minutes.² In addition, all of CAL FIRE's San Diego County Wildfire Response Resources are available and would be proportionally dispatched to wildfires in the Suncrest Project vicinity.

Due to the Suncrest Project's small size, NEET West does not anticipate establishing a separate Wildfire Infrastructure Protection team. However, NEET West will enter into a contract with a private firefighting contractor that includes qualifications and certifications consistent with fire agency requirements to conduct operations on electrical-related fires within the facility. The contract will be executed prior to the project beginning construction at the site. A suitable contract will be in place for the duration of the Suncrest Project's lifespan and will provide technical expertise for responding to fires in an energized facility.

5.2.1.1 Additional Emergency Preparedness Measures

Studies (Grant 2010 and others) evaluated what measures provide the best results for improving response capabilities and firefighter safety. Among the types of measures that provide the most benefit are firefighter training, proper labeling, firefighter familiarizing, and extreme caution during fire response. To that end, NEET West will implement the following measures:

- Conduct training sessions with local fire station personnel;
- Provide a technical report identifying project specific firefighting issues;

² Travel distances were derived from Google Earth road data and driving on the access roads to fire stations from the Suncrest Project site while travel times were calculated applying the nationally recognized Insurance Services Office (ISO) Public Protection Classification Program's Response Time Standard formula ($T=0.65 + 1.7 D$, where T = time and D = distance). The ISO response travel time formula discounts speed for intersections, vehicle deceleration and acceleration, and does not include turnout time.

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- Create a customized video training CD with SDCFA and CAL FIRE input that will be provided to local fire agencies for refresher training and training new firefighters who may rotate into potentially responding stations;
- Create consistent and clear labeling and placarding warnings on all electrical equipment; and
- Provide system technical contact information for reliably available key personnel who can assist responding firefighters with technical aspects of the Suncrest Project.

5.3 Suncrest Evacuation Procedures

During significant emergency situations at or near the Suncrest Project site, the SSO, in consultation with law enforcement or fire authorities, as possible, may issue an evacuation notice. When an evacuation has been declared, any on-site employees will gather at the designated assembly area, which would be the Suncrest Project's primary access driveway, but may be elsewhere, depending on the emergency and as designated by the SSO. The SSO will account for all personnel, as time allows. Once all employees are accounted for, or sooner if dictated by the emergency, the vehicles will safely convoy from the site to safe zones, which are generally areas off-site away from the threat including the greater San Diego urban areas. Should there still be persons within the site after the evacuation has been called, the SSO will send convened personnel off site to safe zones and the SSO and designated construction supervisors will perform a sweep of the facility if it is safe to do so, to locate persons and reconvene at the assembly area. Once all personnel are accounted for, they will exit the site. The Primary Designated Assembly Area is located at the main entrance and as illustrated on Figure 4, the Site Fire Safety Plan. Secondary assembly areas would be designated by the SSO and would be dependent on the nature of the emergency and its location.

Should a structure or wildland fire (or other emergency) occur that threatens the primary assembly area, other locations may be designated as secondary assembly areas by the SSO or supervisors, as dictated by the situation. The SSO and/or Site Supervisors should be prepared to be available to the IC throughout the incident to facilitate information exchange.

5.3.1 Evacuation Routes

Depending on the type and severity of the emergency, along with weather and/or localized site conditions, roadways designated on Figure 5 will be used for evacuating the area. The primary evacuation route is via Bell Bluff Truck Trail and Japatul Valley Road, which intersects with I-8. Secondary evacuation is provided south on Japatul Valley Road, west on Japatul Road, and north on Tavern Road, which connects with I-8. The secondary route, which travels south then west, would not be preferable in some emergencies due to its traveling through wildfire exposed

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landscapes. Use of this route is recommended to be limited to situations where it can be confirmed that evacuees would not be exposed to unsafe conditions or when fire and law enforcement direct evacuation along this route, if the primary evacuation route is determined to be unsafe for northerly evacuation. Both evacuation routes provide access to westbound or eastbound I-8.

The SSO is responsible for evacuations. They will employ situation awareness procedures to determine the emergency, talk with fire officials, as possible, and declare the emergency status. Foreman level supervisors shall assist the SSO in accounting for personnel. The SSO or his/her designee shall be assigned to meet and guide firefighting resources to the scene.

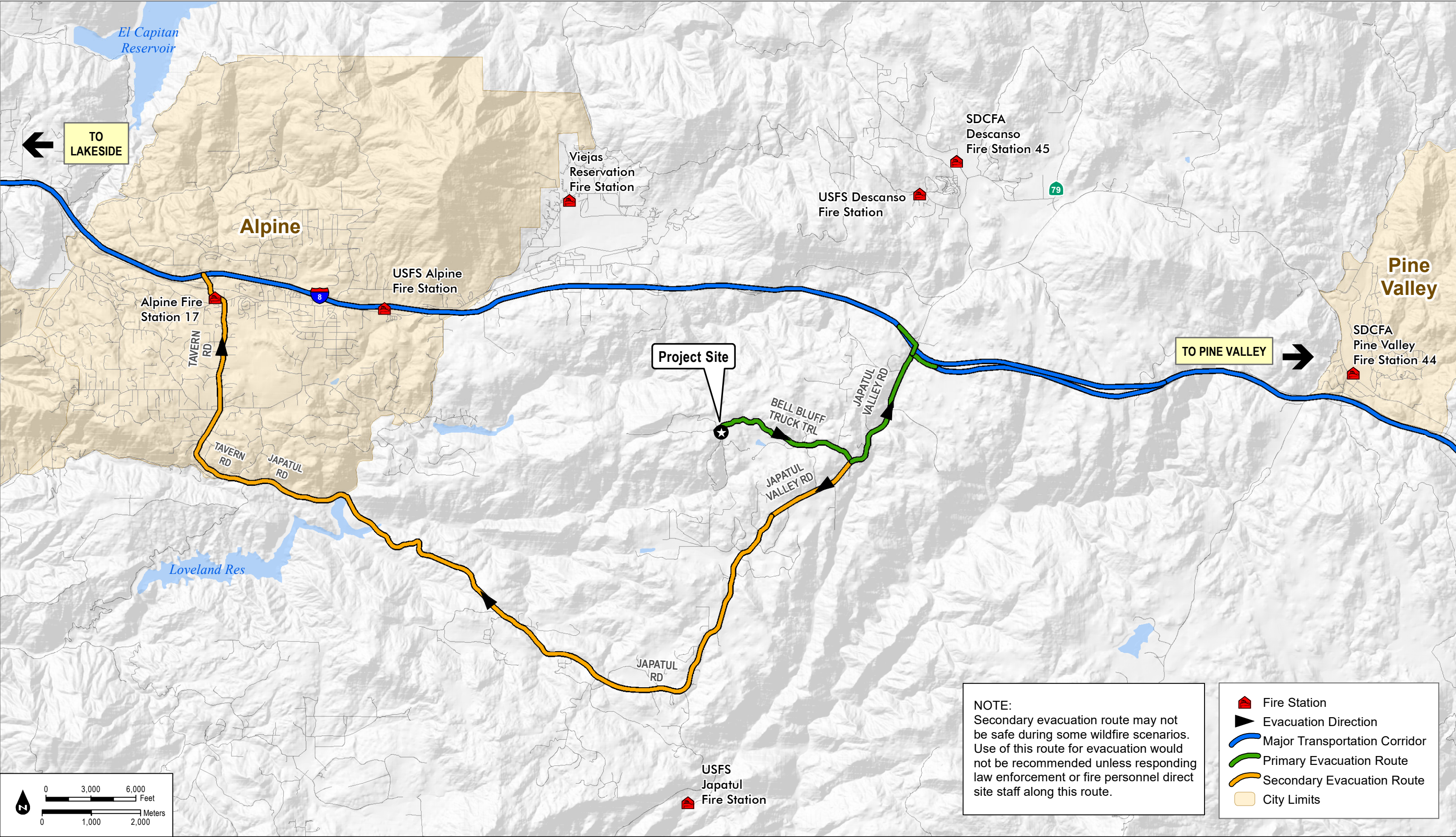
5.4 Customer Support during Emergencies

Private and public customer support is not applicable in emergency situation given the Suncrest Project's function and lack of a service area. However, NEET West includes a communications protocol for communication and coordination with its primary stakeholders, which include: CAISO, CPUC, SDG&E, and other utilities, elected officials, fire agencies and first responders, and NEET West's emergency response support team. NEET West's President or designee would be the point of contact for all communications and would initiate communication outreach with stakeholders.

Due to the Suncrest Project function and role in the overall system, designating priority essential services is not applicable.

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6 PERFORMANCE METRICS AND MONITORING

6.1 Historical Performance Metrics

As a newly certificated public utility in California that is beginning construction of its first project in the first quarter of 2019, NEET West does not have previously established metrics or prior plan performance. NEET West looks forward to working with the CPUC and interested stakeholders to determine the best practices that are consistent with the applicable provisions of SB 901 and other applicable CPUC safety requirements in implementing NEET West's WMP. As part of this initial WMP filing, NEET West has developed relevant safety metrics, which are discussed in the following sections. NEET West will update its future WMP filings to discuss how application of these metrics to plan performance informs any future updates to NEET West's WMP.

6.2 Establishing Performance Metrics

NEET West's fire prevention performance metrics are focused on reducing the potential for on-site ignitions that may spread to off-site vegetation. This process will include 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 performance metric tracking approach will utilize a format that offers the ability to track compliance trends over time, correct issues as they occur, and adapt metrics as conditions mandate.

These metrics will be measured by NEET West personnel at timeframes indicated, and as needed to ensure adequate tracking of goal achievement. As with this WMP overall, performance metrics will be managed according to an adaptive management approach which will facilitate changes in the measures and metric goals, as well as the measurement timeframes, if determined necessary. The stated goals in Table 3 provide the desired outcome for each metric. However, NEET West recognizes that there may be unforeseen circumstances that result in the inability to meet a metric goal for a given timeframe. This does not necessarily indicate a failure in the process that requires immediate action. The overall metric goal achievement trend will be the focus of this performance measurement process, with a primary focus on maintaining upward trending performance.

6.2.1 Suncrest Project Performance Metrics

Performance metrics are derived from and address program measures by fire safety category. Table 3 provides the performance metrics developed to directly address the identified primary wildfire risk drivers.

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Table 3
NEET West Wildfire Prevention Performance Metrics

Category	Metric	Responsible	Frequency
Design and Construction	<ul style="list-style-type: none">No reportable ignition incidents on RFW days	Engineering and Construction Project Manager	Monthly
Inspection and Maintenance	<ul style="list-style-type: none">100% of vegetation management inspections completed on timeNumber of urgent compliance issues remaining open after 24 hours	CAISO Director Infrastructure Contracts and Management; Senior Director NEET Operations	NEET West Ops: Quarterly CAISO: Annually
Operations	<ul style="list-style-type: none">100% of jobs performed safely during RFW days0% of projects with ignitions during post-project monitoring	Senior Director NEET Operations	Monthly
Situational Awareness	<ul style="list-style-type: none">100% of ignition potential incidents captured and addressed by remote monitoring	Senior Director NEET Operations	Monthly
Response and Recovery	<ul style="list-style-type: none">100% of CAL FIRE and local agencies trained regarding project	NEET West President	Quarterly

6.2.1.1 Design and Construction Metric

The NEET West metric of no reportable ignition incidents on RFW days is specific to its progress with the Suncrest Project. The project will be under construction for most of 2019 with a planned in service date of approximately December 2019. As discussed, risk assessments conducted in support of the Suncrest Project's design indicate that the construction period results in a higher fire risk (up to moderate), and the probability for a wildfire increases substantially during RFW periods. Therefore, the metric to avoid ignitions during these extreme fire weather periods targets the critical construction period and the periods during construction when the likelihood of ignition and spread is at its peak. This metric will be reviewed by the Operations Group (defined in Section 6.4) on a monthly basis, or more often if deemed necessary due to site conditions.

6.2.1.2 Inspection and Maintenance Metric

NEET West is in the process of customizing inspection and maintenance programs for its Suncrest Project, which will be in place prior to energization. NEET West recognizes the importance of having a proactive vegetation management program and strategy. As per the design of the Suncrest Project, vegetation will be kept to a minimum as well as a controlled perimeter around the SVC. NEET West will complete its required vegetation management inspections of its SVC facility, riser and intermediate poles and 300 feet of transmission line to minimize the impact of vegetation as a cause of

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equipment failure or fuel source for ignition. Additionally, NEET West understands the importance of addressing urgent compliance issues in a timely manner. NEET West will track and address all compliance issues, ensuring that the most urgent issues are addressed quickly and completely, and all compliance issues are addressed within requirements. These metrics will be tracked and reviewed on a monthly basis.

6.2.1.3 *Operations Metrics*

NEET West is in process of formalizing its Operations Plan for the Suncrest Project. The Operations Plan describes how the operational work tasks at the Suncrest Project will be completed and the workflow from input to end results, including the resources that will be used along the way. The Operations Plan is being developed and implemented to review, update, communicate, and approve changes to operating standards/procedures as may be necessary based on the results of facility inspections and monitoring.

NEET West has designed operating procedures to minimize the risk of its facilities and activities to be the source of a wildfire ignition. One practice that NEET West will employ to reduce the risk of becoming an ignition source during RFW days is to limit the work performed to only those activities for which the risk of proceeding is less than the risk of not performing the work. When these situations occur, NEET West will be measuring to confirm that all activities that are deemed necessary during RFW days are completed safely. NEET West will also minimize the potential of wildfire risk by monitoring job sites even after the work has been completed, to avoid creating a spark. These metrics will be monitored and reviewed monthly.

6.2.1.4 *Situational Awareness Metric*

NEET West has developed situational and conditional awareness programs that include 24/7 system monitoring, extreme fire weather monitoring, and live site monitoring. These programs provide information necessary to detect system anomalies that could indicate a fault or equipment malfunction and potential for ignitions. The programs enable live look-ins at the site to confirm whether a major issue has developed, which would then trigger an early emergency response.

As part of its situational awareness, NEET West will establish a metric that 100% of ignition potential incidents are captured and addressed by remote monitoring. The on-site monitoring technologies and off-site control room to guide local response efforts will be in place prior to commencement of operations. This metric will be measured and reviewed monthly.

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6.2.1.5 *Response and Recovery Metric*

Response and recovery during the construction phase of the Suncrest Project and before the filing of the next WMP will be focused on development of a formal training procedure to address both the implementation of an integrated cooperative training program and advanced notification process with CAL FIRE and SDCFA for high-risk issues before the commencement of operations. NEET West will establish a metric that 100% of CAL FIRE and SDCFA are trained regarding the Suncrest Project. These training programs/procedures focus on training for first responder agencies on the NEET West Facility. This metric will require scheduling and coordination with CAL FIRE and SDCFA, but the goal is to train their resources within the period covered by this WMP. This metric will involve a workplan and coordinated efforts. Measurement of this plan will be evaluated quarterly.

6.3 Previous Plan Metrics

As stated previously, there are no previous fire prevention plans to which performance metrics have been measured. Therefore, it is not possible at this time to compare how previous metric performance informed this WMP. However, future WMPs will include a discussion of metrics, their performance, and modifications deemed necessary.

6.4 Monitoring and Auditing the Plan

NEET West will monitor wildfire risk and audit the WMP every month. This review will occur during the monthly Operations Group's review meeting with the President of NEET West. The once monthly operations review meeting attendees are:

- NEET West President
- Senior Director NEET Operation (meeting chair and secretary) or their representative
- System control manager for NEET West
- Field operations lead for NEET West

Purpose of the NEET West monthly operations meeting is to review operational safety, environmental compliance, reliability performance and other governance and risk matters.

The Senior Director, NEET West Operations will be responsible for:

- Acting as the meeting Chair and secretary
- Monthly meeting administration, agenda and notes
- Tracking WMP performance metrics and their successful achievement or need for revised or additional metrics for the next WMP submittal

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- Annually reviewing and updating the WMP
- Ensuring sufficient resources are in place at all times to limit wildfire risk

President, NEET West is responsible for:

- WMP Execution
- Annually approving the WMP
- Ensuring sufficient budget is available annually to limit wild fire risk
- Filing WMP compliance reports with external agencies, as required

System Operations Manager is responsible for:

- Providing 24/7 situational awareness of fire risk
- Managing and coordinating daily fire risk matters with the NEET West field operations lead, President, and Director of Operations.
- Managing the coordination for NEET West of all fire risk matter with SDG&E, CAISO and Fire Agencies

Field Operations Lead, NEET West will be responsible for:

- Acting as the NEET West lead on fire risk monitoring and WMP working groups
- Documenting that preventative measures have been implemented and reporting back to the Senior Director Operation NEET West actions necessary to execute on any anomalies found
- Document any fire ignitions or other emergencies, and how the plan's protocols were executed to determine if changes are necessary
- Acting as the NEET West facility SSO and Incident Commander

6.4.1 Identifying and Correcting Deficiencies in the Plan

The NEET West field operations lead will be responsible for documenting plan performance and reporting to the WMP working group at the monthly NEET West Operations meeting. Deficiencies that are identified will be discussed by the working group and an appropriate adjustment made that will be effective immediately and then updated in the WMP for the next submittal.

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6.4.2 Monitoring and Auditing the Effectiveness of Equipment and Line Inspections

The field operations lead will be documenting scheduled and completed inspections of facilities and equipment along with line inspections. This WMP will include primarily construction related inspections with the potential for a short period of operations inspections the latter part of 2019.

Facility inspections will be limited to the Suncrest Project. Inspection reports would be submitted to NEET West's operations lead, who would submit to the lead monitor for inclusion in the overall facility documentation.

Line inspections will be limited to the short, 300-foot span from the riser and intermediate poles to the existing Suncrest Substation. There are no trees in the area that would present a potential hazard to the span. Vegetation at the poles would not impact the steel poles due to the short duration of shrub combustion.

6.5 Wildfire Mitigation Plan Execution

6.5.1 NEET West Roles and Responsibilities

Table 4 provides NEET West's Roles and Responsibilities for confirming that the fire prevention measures, inspections, monitoring, and QA/QC processes described in this WMP are successfully implemented at NEET West Facilities (currently the Suncrest Project).

**Table 4
NEET West Wildfire Mitigation Plan Roles and Responsibilities**

Role	NEET West or Designated Responsible Position
Emergency Contact	President, NEET West
Customer Outreach	President, NEET West
Communicate with California ISO	President, NEET West/Operations Group ³
WMP Execution	President, NEET West
Shut down customer/stakeholder contact	President, NEET West and Senior Director NEET West Operations
Facility Equipment Inspections	Senior Director NEET West Operations
WMP QA/QC	Senior Director NEET West Operations
WMP Metrics	Senior Director NEET West Operations

³ At minimum: system control and field representatives, an asset manager, and NEET West owner representative to have a formal monthly operation meeting/call to a set agenda, record meeting notes and include a review of the WMP metrics

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Table 4
NEET West Wildfire Mitigation Plan Roles and Responsibilities

Role	NEET West or Designated Responsible Position
Operations Plan	Senior Director NEET West Operations
Inspection Plan	Senior Director NEET West Operations
Maintenance Plan	Senior Director NEET West Operations
Incident Commander	Field Operations Lead
Site Safety Officer	Field Operations Lead
Document any ignitions and plan's performance	Field Operations Lead
Hot Work protocols	Field Operations Lead
WMP Updates – changes at facilities, new facilities, new regulations, climate change, etc.	Field Operations Lead
Fire Safety Training – Construction	Field Operations Lead/Private Fire Brigade/Consultant
Fuel Modification Zone Inspections/Maintenance	Field Operations Lead: Vegetation Management Team / Third Party consultant/ Vegetation management Contractor
RFW Weather Monitoring	System Control Operator/Systems Operations Manager
Emergency Response Plan	Emergency Response Organization/Area Commander/Incident Commander

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7 ADDITIONAL INFORMATION (CPUC DIRECTION)

Table 5 (NEET West Cost Table) provides the information requested in Attachment B to the ALJ Ruling (Cost Table Template). The NEET West Cost Table includes the “Categories” column added in the ALJ Ruling, and also includes the columns and headings in the Cost Table Template. NEET West divided the column labeled “Annual Cost (Capital v Expense)” into two columns labeled “Cost (One Time)” and “Cost (Annual)” to delineate one-time expenses from recurring annual expenses.

For each component of the NEET West WMP, the “Asset Addressed” is the Suncrest Project, because that is the only asset that NEET West is building or owns at this time. NEET West anticipates that its WMP will be updated and expanded over time to include additional projects as they are built.

NEET West does not have finalized cost data for the listed components in the column labeled “Program/Strategy (8386(C)(3)).” NEET West is starting construction of the Suncrest Project and the annual costs of operation are not yet finalized for rate recovery purposes. Those costs will be submitted to FERC for review and approval. To help assist the CPUC in evaluating potential costs associated with the WMPs, however, NEET West has provided current estimates of the costs associated with each listed component. These are shown as ranges in the columns labeled “Cost (One Time)” and “Cost (Annual).”

Regarding the column labeled “Costs Currently Reflected in Revenue Requirement?”, NEET West’s revenue requirement will be determined pursuant to the rate formula included in its FERC-jurisdictional CAISO Transmission Owner Tariff. NEET West has included Note 2 indicating that NEET West’s authorized revenue requirement is subject to FERC’s exclusive jurisdiction under Part II of the FPA.

Regarding the column labeled “Compliance Requirement?”, NEET West has addressed this topic in the WMP in Section 4. Note 3 references that discussion.

Regarding the column labeled “Identify any aspects of plan/strategy and associated funding that is or will be addressed in another case,” all aspects of NEET West’s cost recovery are subject to FERC’s exclusive jurisdiction under Part II of the Federal Power Act. NEET West has included Note 4 indicating that FERC regulates NEET West’s CAISO Transmission Owner Tariff and formula rate, through which NEET West develops the revenue requirement to be included in the CAISO transmission access charge. Note 4 references FERC Docket No. ER15-2239 where FERC accepted NEET West’s CAISO Transmission Owner Tariff.

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Regarding the column labeled “Identify any memorandum accounts where costs of program/strategy are being tracked and explain how double tracking is prevented,” NEET West tracks its costs consistent with FERC’s Uniform System of Accounts. NEET West has identified, to the extent known, the FERC Accounts where the relevant costs are or will be tracked. NEET West maintains a robust enterprise accounting tool that tracks costs for appropriate financial reporting, thus eliminating double tracking. Costs are only recognized, reported, and recovered via NEET West’s recovery mechanism for operating costs, which is its FERC-approved formula rate included in NEET West’s CAISO Transmission Owner Tariff. The NEET West tariff ties back to NEET West’s FERC Form 1, which is audited by a third party on an annual basis. Thus, NEET West ensures there is no double tracking of costs.

Regarding the column labeled “Previously included in RAMP?”, as stated above, FERC regulates NEET West’s rates. The RAMP requirements originated in individual utility general rate cases filed with the CPUC. NEET West does not file a general rate case with the CPUC and therefore does not have a RAMP. NEET West’s revenue requirement will be determined pursuant to its FERC-jurisdictional formula rate. This is stated in Note 6 in the NEET West Cost Table.

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Table 5
NEET West Cost Table

Categories	Programs/Strategy (8386 (C) (3))	Asset Addressed	Cost (One Time)	Cost (Annual)	Costs Currently Reflected in Revenue Requirement?	Compliance Requirement?	Identify Any Aspect of Plan/Strategy and Associated Funding that Is or Will Be Addressed in Another Case	Identify Any Memorandum Accounts Where Costs of Programs/Strategy Are Being Tracked and Explain How Double Tracking Is Prevented	Previously included in RAMP?	Evaluation Metrics	Assumptions underlying Metric(s)
			See Note 1	See Note 1	See Note 2	See Note 3	See Note 4	See Note 5	See Note 6		
(1) DESIGN AND CONSTRUCTION	Design Standards to Reduce Construction Ignitions							FERC Accounts 107 / 101 - Construction / Plant In-Service		No reportable ignition incidents on red flag warning days	Construction phase ignition risk is elevated, and extreme fire weather enhances the potential for accidental ignition. Metric measures ignitions during these critical timeframes
	Construction fire prevention program	Suncrest Project	\$150,000 - \$450,000	N/A				FERC Accounts 107 / 101 - Construction / Plant In-Service			
	Contracted fire brigade on-site during high ignition activities	Suncrest Project	\$40,000 - \$80,000	N/A				FERC Accounts 107 / 101 - Construction / Plant In-Service			
	Site Safety Officer throughout construction	Suncrest Project	\$160,000 - \$250,000	N/A				FERC Accounts 107 / 101 - Construction / Plant In-Service			
	Hot Work Procedures	Suncrest Project	TBD	TBD				FERC Accounts 107 / 101 - Construction / Plant In-Service			
	Fire Safety Training for all site personnel	Suncrest Project	\$10,000 to \$15,000	N/A				FERC Accounts 107 / 101 - Construction / Plant In-Service			
	Design Standards to Reduce Vegetation Ignitions							FERC Accounts 107 / 101 - Construction / Plant In-Service			
	Ignition resistant landscape (rock)	Suncrest Project	~ \$100/Cyard - \$180/Cyard (e.g., 2,100 Cyards = ~\$210,000 - \$380,000)	N/A				FERC Accounts 107 / 101 - Construction / Plant In-Service			
	Design and build with no wood poles	Suncrest Project	N/A	N/A				FERC Accounts 107 / 101 - Construction / Plant In-Service			
	Underground 1 mile line	Suncrest Project	\$5.1M - \$8.5M (including duct bank, splice vault, cable install)	N/A				FERC Accounts 107 / 101 - Construction / Plant In-Service			
	Steel riser and Intermediate Pole	Suncrest Project	\$150,000 - \$250,000	N/A				FERC Accounts 107 / 101 - Construction / Plant In-Service			
	Overhead span into substation (300 feet)	Suncrest Project	\$600,000 - \$1.5M	N/A				FERC Accounts 107 / 101 - Construction / Plant In-Service			
	Perimeter fencing	Suncrest Project	\$75/linear ft - \$250/linear ft	N/A				FERC Accounts 107 / 101 - Construction / Plant In-Service			
	Defensible space	Suncrest Project	\$1,800 per 100 sqft - \$2,500 per 100 sqft (e.g., 100ft-wide perimeter around a 6	N/A				FERC Accounts 107 / 101 - Construction / Plant In-Service			

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Table 5
NEET West Cost Table

Categories	Programs/Strategy (8386 (C) (3))	Asset Addressed	Cost (One Time)	Cost (Annual)	Costs Currently Reflected in Revenue Requirement?	Compliance Requirement?	Identify Any Aspect of Plan/Strategy and Associated Funding that Is or Will Be Addressed in Another Case	Identify Any Memorandum Accounts Where Costs of Programs/Strategy Are Being Tracked and Explain How Double Tracking Is Prevented	Previously included in RAMP?	Evaluation Metrics	Assumptions underlying Metric(s)
			See Note 1	See Note 1	See Note 2	See Note 3	See Note 4	See Note 5	See Note 6		
			acre parcel = ~\$1.8M - \$5.1M)								
(2) INSPECTION AND MAINTENANCE	Plans for Inspection (List all inspection plans separately)									1. 100% of Vegetation Management Inspections Completed On-Time 2. Number of Urgent Compliance Issues Remaining Open After 24 Hours	Inspection and maintenance programs drive facility and equipment conditions, and reduces fire risk when implemented by minimizing failures. Metric measures the successful achievement of these programs prior to operation.
	Inspector Training Program	Suncrest Project	TBD	TBD				FERC Accounts 560 - 574 - Transmission Operation and Maintenance Expense			
	Monthly component inspections	Suncrest Project	\$1,500 - \$5,000	\$15,000 - \$35,000				FERC Accounts 560 - 574 - Transmission Operation and Maintenance Expense			
	Monthly facility inspections	Suncrest Project						FERC Accounts 560 - 574 - Transmission Operation and Maintenance Expense			
	Routine facility inspections	Suncrest Project						FERC Accounts 560 - 574 - Transmission Operation and Maintenance Expense			
	Monthly vegetation inspections	Suncrest Project						FERC Accounts 560 - 574 - Transmission Operation and Maintenance Expense			
	Annual fuel modification zone inspections by 3rd party expert	Suncrest Project						FERC Accounts 560 - 574 - Transmission Operation and Maintenance Expense			
(3) OPERATIONAL PRACTICES	Blocking Reclosers	Suncrest Project	N/A	N/A				N/A		1) 100% of jobs performed safely during red flag warning days	Fire ignitions during operational phase are reduced from construction levels. Metric measures and tracks that operating procedures addressing the identified highest ignition risk activities are addressed
	Fast-Curve Settings	Suncrest Project	N/A	N/A				N/A			
	Sensitive Relay Settings	Suncrest Project	N/A	N/A				N/A			
	Red Flag Warning Period restrictions	Suncrest Project	\$5,000 - \$20,000	\$10,000 - \$30,000				FERC Accounts 560 - 574 - Transmission Operation and Maintenance Expense			
	Wildfire Infrastructure Protection Teams	Suncrest Project	TBD	TBD				FERC Accounts 560 - 574 - Transmission Operation and Maintenance Expense			
	Hot Work Procedures	Suncrest Project	\$4,000 - \$10,000	\$1,000 - \$2,000				FERC Accounts 560 - 574 - Transmission Operation and Maintenance Expense			
	Operations Contract Fire Brigade	Suncrest Project	20,000 - \$60,000	\$10,000 - \$50,000				FERC Accounts 560 - 574 - Transmission Operation and Maintenance Expense			
	Vegetation Management									2) 0 % of projects with ignitions during post-project monitoring	
	Pole clearance fuel modification at base	Suncrest Project	\$500 -\$2,000	\$1,000 - \$15,000				FERC Accounts 560 - 574 - Transmission Operation and Maintenance Expense			
	Facility wide vegetation removal	Suncrest Project						FERC Accounts 560 - 574 - Transmission Operation and Maintenance Expense			

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Table 5
NEET West Cost Table

Categories	Programs/Strategy (8386 (C) (3))	Asset Addressed	Cost (One Time)	Cost (Annual)	Costs Currently Reflected in Revenue Requirement?	Compliance Requirement?	Identify Any Aspect of Plan/Strategy and Associated Funding that Is or Will Be Addressed in Another Case	Identify Any Memorandum Accounts Where Costs of Programs/Strategy Are Being Tracked and Explain How Double Tracking Is Prevented	Previously included in RAMP?	Evaluation Metrics	Assumptions underlying Metric(s)
			See Note 1	See Note 1	See Note 2	See Note 3	See Note 4	See Note 5	See Note 6		
	Perimeter edge fuel modification zones	Suncrest Project						FERC Accounts 560 - 574 - Transmission Operation and Maintenance Expense			
(4) SITUATIONAL / CONDITIONAL AWARENESS	Weather Stations	N/A (See Note 7)	\$0	\$0				N/A		100% of ignition potential incidents captured and addressed by remote monitoring	Situational awareness detects issues early, enabling faster response and lower risk of ignitions. Metric measures successful achievement of these systems and programs prior to operation commencement
	Weather monitoring - NWS	Suncrest Project	\$10,000 - \$25,000	\$15,000 - \$40,000				FERC Accounts 560 - 574 - Transmission Operation and Maintenance Expense			
	Security cameras	Suncrest Project	\$80,000 - \$150,000					FERC Accounts 560 - 574 - Transmission Operation and Maintenance Expense			
	On-site personnel at specific periods	Suncrest Project	\$20,000 - \$50,000					FERC Accounts 560 - 574 - Transmission Operation and Maintenance Expense			
	SCADA system - facility component monitoring	Suncrest Project	\$50,000 - \$200,000					FERC Accounts 560 - 574 - Transmission Operation and Maintenance Expense			
(5) RESPONSE AND RECOVERY	Emergency Response Plan	Suncrest Project	\$20,000 - \$40,000	\$5,000 - \$15,000				FERC Accounts 560 - 574 - Transmission Operation and Maintenance Expense		100% of Local and CAL FIRE Agencies Trained Regarding Project	Fast response to Project by familiar and trained firefighters minimizes the potential for fire escape and wildfire. Metric measures successful achievement of cooperation and training prior to operation commencement
	Field Operations Recovery Procedures	Suncrest Project	\$10,000 - \$35,000					FERC Accounts 560 - 574 - Transmission Operation and Maintenance Expense			
	CAISO coordination	Suncrest Project	\$4,000 - \$15,000					FERC Accounts 560 - 574 - Transmission Operation and Maintenance Expense			
	Customer Outreach Plan (elected officials, CPUC, SDG&E, Fire Agencies, etc.)	Suncrest Project	\$10,000 - \$30,000					FERC Accounts 560 - 574 - Transmission Operation and Maintenance Expense			

Notes:
Note 1 These are current estimates only. Actual costs are subject to review by FERC, which regulates NEET West's rates and determines cost recovery.
Note 2 NEET West's authorized revenue requirement is subject to FERC's exclusive jurisdiction under Part II of the FPA.
Note 3 Refer to NEET West WMP Section 4 for compliance and risk reduction.
Note 4 FERC regulates NEET West's cost recovery and determines which costs are recoverable in transmission rates that are included in the TAC. See FERC Docket No. ER15-2239.
Note 5 NEET West tracks its costs in the FERC accounts listed in Column 8. NEET West tracks costs for appropriate financial reporting, which does not result in double tracking. Costs are only recognized, reported, and recovered via NEET West's FERC-approved tariff. The NEET West tariff ties back to a FERC Form 1, which is audited annually.
Note 6 NEET West's rates and cost recovery are regulated exclusively by FERC. NEET West does not have a RAMP or S-MAP.
Note 7 NEET West's facilities do not include weather stations.

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8 REFERENCES

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- NFPA 51b. National Fire Protection Association. Standard for Fire Prevention During Welding, Cutting, and Other Hot Work.
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- Thorne, J.H., R.M. Boynton, A.J. Holguin, J.A.E. Stewart, & J. Bjorkman. (2016) A climate change vulnerability assessment of California's terrestrial vegetation. California Department of Fish and Wildlife (CDFW), Sacramento, CA.
- Yufang Jin, Michael L Goulden, Nicolas Faivre, Sander Veraverbeke, Fengpeng Sun, Alex Hall, Michael S Hand, Simon Hook and James T Randerson. 2015. Identification of two distinct fire regimes in Southern California: implications for economic impact and future change. *Environmental Research Letters*, Volume 10, Number 9.

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