

## Davis, Tracy C

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**From:** Sias, Alona  
**Sent:** Thursday, April 29, 2021 11:10 AM  
**To:** Arba, Ryan; Davis, Tracy C  
**Cc:** Wildfire Safety Division; Morgans, Lucy; Tomassian, Koko M.; Wu, Ming; Odunlami, Lola; Chaney, Jennifer  
**Subject:** RE: WMP - Data Request - Due April 30 2021 - HWT

Hi Ryan,

Thank you for reaching out. Please see responses to your questions below. Let us know if you have further questions or if it would be helpful to have a brief call to discuss.

1. HWT developed the emergency response protocol in 2020 prior to HWT's first facility, the Suncrest Facility, becoming operational on February 29, 2020. HWT is focused on continuous improvement of its wildfire strategy and thus annually reviews relevant procedures, including emergency response protocol, as part of a refresh of its failure mode and effects analysis (FMEA) to reflect operational learnings from the field, learnings and best practices from other entities, and innovation in wildfire-related mitigation measures. HWT reviewed the emergency response protocol in 2020 and determined that there were no new scenarios that were identified that dictated a change in plans. HWT followed the emergency response protocol during the Valley Fire that occurred within ~4 miles of HWT's Suncrest Facility in September of 2020 and determined that the emergency response protocol was adequate and did not require any changes. HWT has not had any on-site ignitions or PSPS events to date that would trigger deployment of the emergency response protocol. While the protocol has not changed, the procedure used has been updated with *de minimus* changes to add clarity and specificity.
2. In view of HWT's current limited footprint with one operational transmission facility (a single substation), HWT has a small staff overseeing HWT operations, including dedicated on-site staff performing asset inspection, maintenance work, and emergency response when needed. Additionally, HWT has remote system operators that remotely control the asset 24/7 from a North American Electric Reliability Corporation (NERC)-certified control center. Given HWT's current limited scope of operations in CA, spends associated with the emergency response protocol are not tracked separately and are covered under initiative 7.3.4.2. "Detailed inspections of transmission electric lines and equipment" in Table 12 of HWT's quarterly data report submitted along with HWT's 2021 WMP update, with 2020 spend of ~\$80 K.

Finally, HWT has engaged a private fire brigade trained on electrical fires to be on-call for fire suppression service in case of an on-site ignition. This arrangement ensures that HWT has dedicated access to qualified fire suppression services that enable timely response in the field to avoid uncontrollable propagation of wildfire. The annual spend on this initiative is ~\$70 K and is reported under initiative 7.3.6.6. "Stationed and on-call ignition prevention and suppression resources and services" in Table 12 of HWT's quarterly data report submitted along with HWT's 2021 WMP update.

Thanks,  
Alona

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**From:** Arba, Ryan <Ryan.Arba@cpuc.ca.gov>  
**Sent:** Tuesday, April 27, 2021 4:30 PM  
**To:** Davis, Tracy C <TracyC.Davis@nexteraenergy.com>; Sias, Alona <Alona.Sias@nexteraenergy.com>  
**Cc:** Wildfire Safety Division <wildfiresafetydivision@cpuc.ca.gov>; Morgans, Lucy <Lucy.Morgans@cpuc.ca.gov>; Tomassian, Koko M. <koko.tomassian@cpuc.ca.gov>; Wu, Ming <Ming.Wu@cpuc.ca.gov>; Odunlami, Lola <Lola.Odunlami@cpuc.ca.gov>; Arba, Ryan <Ryan.Arba@cpuc.ca.gov>  
**Subject:** WMP - Data Request - Due April 30 2021 - HWT

Caution - External Email (ryan.arba@cpuc.ca.gov)

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Good afternoon,

Respond to the following data request by Friday April 30, 2021, at 5 p.m. Submit your response to the Wildfire Safety Division inbox at [wildfiresafetydivision@cpuc.ca.gov](mailto:wildfiresafetydivision@cpuc.ca.gov) with a copy to [ryan.arba@cpuc.ca.gov](mailto:ryan.arba@cpuc.ca.gov), [lucy.morgans@cpuc.ca.gov](mailto:lucy.morgans@cpuc.ca.gov), and [koko.tomassian@cpuc.ca.gov](mailto:koko.tomassian@cpuc.ca.gov).

In section 5.3.10 of its 2020 WMP, HWT introduced its emergency response protocol that included a 3 year/10 year plan and an intentionally empty Table 29.

1. In its 2021 WMP Update, HWT stated that there has been no updates to the emergency response protocol. HWT shall explain the emergency response protocol review process – specifically, HWT shall detail the factors that were considered before the conclusion of no updates are needed for the 2021 emergency response protocol.
2. In its 2020 WMP Update, HWT intentionally left Table 29 blank due to the timing of the WMP filing, stating that the 230 kV Suncrest facility was not operational yet. Since then, the Suncrest facility has been operating for close to a year and the WSD requests that HWT provides the following spends associated with the emergency response protocol: Adequate and trained workforce for service restoration (9.1), Preparedness and planning for service restoration (9.5), and Cooperation with suppression agencies (10.3). If HWT is unable to provide the requested spends, the utility shall provide a thorough explanation of the limitations.

Regards, Ryan

Ryan Arba  
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 Wildfire Safety Division  
 CA Public Utilities Commission  
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Note: The Wildfire Safety Division will be transitioning into The Office of Energy Infrastructure Safety under the California Natural Resources Agency as of July 1, 2021 and our contact information will change. More information will be shared shortly. Please reach out if you have any questions.