

Docket #: 2021 SVM

October 13, 2023

Suzie Rose
Program Manager, Compliance Assurance Division
Office of Energy Infrastructure Safety
715 P Street, 20th Floor
Sacramento, CA 95814

SUBJECT: SCE 2021 SVM Audit Corrective Action Plan

Dear Program Manager Rose:

Southern California Edison Company (SCE) provides its response and corrective action plan to the Office of Energy Infrastructure Safety's (Energy Safety) 2021 Substantial Vegetation Management (SVM) Audit.

INTRODUCTION

SCE appreciates the opportunity to provide a response to Energy Safety's 2021 SVM Audit. SCE recognizes the effort required of Energy Safety to conduct this audit and the level of collaboration with SCE achieved to complete it.

California Public Utilities Code (PUC) Section 8386.3(c)(5)(A) requires an electrical corporation to notify Energy Safety "within one month after it completes a substantial portion of the vegetation management requirements in its wildfire mitigation plan." Pursuant to this directive, throughout 2021 SCE tracked progress of the vegetation management initiatives in its WMP and notified Energy Safety of substantial completion.

Upon receiving notice from the electrical corporation, PUC Section 8386.3(c)(5)(A) requires Energy Safety to "promptly audit the work performed by, or on behalf of, the electrical corporation" and to "specify any failure of the electrical corporation to fully comply with the vegetation management requirements in the wildfire mitigation plan."

Concurrently, PUC Section 8386.3(c)(2)(B) requires each electrical corporation to engage an independent evaluator "to review and assess the electrical corporation's compliance with its plan." For 2021, SCE selected NV5 and Guidehouse as the qualified Independent Evaluator (IE). The IE Annual Report on Compliance was issued on July 15, 2022 and found that SCE was "substantially compliant" with its 2021 WMP.

Energy Safety's 2021 SVM Audit was provided to SCE on September 29, 2023. In performing the 2021 WVM Audit, Energy Safety identified both "quantitative commitments (e.g., miles of lines

to inspect)” and “verifiable statements (e.g., training of personnel)” in the vegetation management section of SCE’s 2021 WMP Update. Energy Safety stated that “SCE did not perform all the work specified in five out of the 20 vegetation management initiatives in its 2021 WMP Update” and that “SCE was unable to provide supporting documentation or information consistent with statements made in its 2021 WMP Update regarding its vegetation management initiatives.”

Below, SCE provides a response to each of the findings and corrective actions specified in Table 4 of the 2021 SVM Audit.

SCE RESPONSE TO ENERGY SAFETY FINDINGS

Energy Safety Finding 1: SCE failed to implement a fuel management standard based on the Electric Power Research Institute’s study as stated in the 2021 WMP Update “SCE plans will review and analyze the results of the study and implement more regionally appropriate fuel management standards.” (7.3.5.5)

Energy Safety Corrective Action: SCE shall detail the steps it is taking to ensure vegetation management operations are consistent with statements made in its WMP.

SCE Response:

SCE’s statement regarding the EPRI study was not a formal WMP target, and SCE did not intend to characterize this issue as something that would be fully settled within 2021. SCE intended to use the EPRI study to support and inform ongoing efforts to implement more regionally appropriate fuel management standards. SCE continues to explore other opportunities to incorporate recommendations from the EPRI study with respect to fuel management and other vegetation management activities.

Regarding the corrective action, SCE’s vegetation management strategy and operational teams develop and execute plans to meet the approved WMP targets and other requirements or direction provided by Energy Safety when the WMP is approved. As stated above, SCE did not envision the statement quoted in Energy Safety’s finding as a requirement. To support the application of the EPRI study recommendations, SCE can share how it plans to incorporate portions of this study into its regional practices.

Energy Safety Finding 2: SCE stated in its 2021 WMP Update that it would perform pole brushing on approximately 200,000 to 300,000 distribution poles in 2021, but it only performed pole brushing on 71%¹ of poles in 2021. (7.3.5.5)

Energy Safety Corrective Action: SCE shall detail the steps it is taking to ensure vegetation management operations are consistent with statements made in its WMP.

¹ SCE completed pole brushing on approximately 163,100 poles out of the 200,000 target in 2021, which is approximately 82%, and not the 71% stated in the SVM Audit.

SCE Response:

SCE cleared fewer poles than it had set in its target for pole brushing due to impactful factors such as contractor performance, loss of crews, access constraints, and delays in obtaining environmental permitting.² In 2022, to mitigate these and other program constraints and improve the productivity level of the pole brushing program, SCE hired additional contractors to better align resources and work volume and implemented improvements in contractor processes. These process improvements, such as reducing the required number of in-person access attempts and increasing internal coordination efforts to reduce the environmental hold periods, led to more streamlined execution of work and a higher level of productivity. Going forward, SCE plans to introduce contractor performance scorecards for this program.

SCE has improved its process for reporting and monitoring vegetation management program performance, including identifying challenges earlier in the year. On a monthly basis, SCE examines each vegetation management WMP initiative to evaluate its progress and identify constraints to meeting its annual targets. If the initiative is not on track to meet its target, SCE flags the challenges (e.g., safety, vendor availability, access issues, etc.) and evaluates and initiates potential solutions. For initiatives with previously identified challenges, SCE closely tracks the progress made and timeline for the initiative's recovery.

Energy Safety Finding 3: SCE stated in its 2021 WMP Update that it would inspect approximately 80 transmission circuits using LiDAR in 2021 but inspected 72 transmission circuits in 2021. (7.3.5.8)

Energy Safety Corrective Action: SCE shall a) provide a reason why it failed to perform LiDAR on the expected number of transmission circuits; and b) detail the steps it is taking to ensure vegetation management operations are consistent with statements made in its WMP.

SCE Response:

In SCE's 2021 WMP, page 266, SCE stated that, "SCE *expects approximately* 80 transmission circuits to be flown in 2021" (emphasis added). SCE set an approximate target as the LiDAR program was still maturing, and the numbers of circuits can change during the year due to combining or separating for operational reasons. SCE believes completing 72 circuits constitutes substantial compliance based on the intent and language of the goal.

For 2022 and 2023 targets, SCE modified the metrics to circuit miles instead of circuits, which better reflects the scope of work as count of circuits may change during the year.

SCE has improved its process for reporting and monitoring vegetation management program performance, including identifying challenges earlier in the year. On a monthly basis, SCE examines each vegetation management WMP initiative to evaluate its progress and identify

² In SCE's response to ES145-SCE-2021 IE ARC Follow-up, SCE noted it addressed the quantity of 200,000 to 300,000 distribution poles targeted for brushing under the 2021 WMP (expanded scope) by completing approximately 40,500 poles in 2022 that had not been completed in 2021.

constraints to meeting its annual targets. If the initiative is not on track to meet its target, SCE flags the challenges (e.g., safety, vendor availability, access issues, etc.) and evaluates and initiates potential solutions. For initiatives with previously identified challenges, SCE closely tracks the progress made and timeline for the initiative's recovery.

Energy Safety Finding 4: SCE stated in its 2021 WMP Update that it would assess 150,000 to 200,000 HTMP trees, but it only assessed 87% of this target. (7.3.5.14 Recruiting and Training of Vegetation Management Personnel)

Energy Safety Corrective Action: SCE shall detail steps it is taking to ensure accurate targets are stated in the WMP.

SCE Response: Section 7.3.5.14 relates to "Recruiting and Training of Vegetation Management Personnel." SCE's recruitment and training of vegetation management personnel was not a factor in the performance of HTMP tree assessments in 2021. Please refer to SCE's response to Energy Safety's fifth finding below for more details on SCE's HTMP assessments in 2021.

Energy Safety Finding 5: SCE stated in its 2021 WMP Update that it would assess 150,000 to 200,000 HTMP trees, but it only assessed 87% of this target. (7.3.5.16 Removal and Remediation of Trees with Strike Potential to Electric Lines and Equipment)

Energy Safety Corrective Action: SCE shall detail steps it is taking to ensure accurate targets are stated in the WMP.

SCE Response: 2019 was the first year that SCE introduced the HTMP program, and the 2021 WMP targets were developed in late 2020 without the benefit of a fully known and identified population of subject trees. When SCE's assessors/inspectors went out into the field in 2021, they found fewer trees than anticipated within the "utility strike zone." Therefore, the original target overestimated the available volume of subject trees (i.e., trees with strike potential) to be assessed. Once the lower volume of trees was observed, SCE notified Energy Safety in accordance with Energy Safety procedures via submission of a change order. SCE's execution of HTMP, including total assessments performed, was in line with SCE's wildfire risk mitigation strategy. SCE completed 87% of the original 150,000 tree target, and 109% of the revised target that SCE proposed in the change order (120,000 trees).

Given that the number of trees with strike potential is difficult to estimate, in 2022 SCE shifted its program targets to be based on circuits, not trees. For 2022, SCE's target was to inspect 330 circuits and assess any trees with strike potential along those circuits."³ In 2022, SCE performed inspections and assessments for HTMP along 467 circuits in HFRA.

SCE has improved its process for reporting and monitoring vegetation management program performance, including identifying challenges earlier in the year. On a monthly basis, SCE

³ See SCE's 2022 WMP Update dated February 18, 2022, at p. 426.

examines each vegetation management WMP initiative to evaluate its progress and identify constraints to meeting its annual targets. If the initiative is not on track to meet its target, SCE flags the challenges (e.g., safety, vendor availability, access issues, etc.) and evaluates and initiates potential solutions. For initiatives with previously identified challenges, SCE closely tracks the progress made and timeline for the initiative's recovery.

Energy Safety Finding 6: SCE stated in its 2021 WMP Update that it performs inspections at each substation multiple times per year, but it did not do so for 95% of its substations in 2021.

Energy Safety Corrective Action: SCE shall a) provide a reason why it failed to inspect each substation multiple times per year, and b) detail the steps it is taking to ensure vegetation management operations are consistent with statements made in the WMP.

SCE Response:

SCE believes Energy Safety is using the data provided for *7.3.5.18 Substation Vegetation Management* to assess completion of *7.3.5.17 Substation Inspections*.

In DR 165 Q7, Energy Safety referenced 7.3.5.17, but the language was regarding 7.3.5.18. When SCE sought clarification, Energy Safety instructed SCE to provide completed work information on 7.3.5.18. DR 165 Question 7b pertaining to 7.3.5.17 requested an "inspection report of a substation conducted in 2021 in accordance with GO 174", which SCE provided. Evidence of completed work for 7.3.5.17 was neither requested, nor provided. This seems to have led to the incorrect conclusion that 95% of the substations were not inspected multiple times in 2021. However, SCE did complete this initiative, and can provide the evidence upon request.

CONCLUSION

SCE appreciates the opportunity to submit this response to the Substantial Vegetation Management Audit prepared by Energy Safety and looks forward to continued collaboration and partnership in this space.

Please direct any questions or requests for additional information to Liz Leano (Elizabeth.Leano@sce.com), Johnny Parker (Johnny.Parker@sce.com), and Cynthia Childs (Cynthia.Childs@SCE.com).

Sincerely,

//s//

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