

August 20, 2024

Docket #: 2022 SVM

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Office of Energy Infrastructure Safety
715 P Street, 20th Floor
Sacramento, CA 95814

SUBJECT: SCE 2022 SVM Audit Corrective Action Plan

Southern California Edison Company (SCE) appreciates the opportunity to provide a response to the Office of Energy Infrastructure Safety (Energy Safety)'s 2022 Substantial Vegetation Management (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.

INTRODUCTION

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 2022 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, Energy Safety must "promptly audit the work performed by, or on behalf of, the electrical corporation" and "specify any failure of the electrical corporation to fully comply with the vegetation management requirements in the wildfire mitigation plan." The electrical corporation has a reasonable time to correct and eliminate any deficiency specified in the audit.

Energy Safety's 2022 SVM Audit findings were provided to SCE on July 31, 2024. In performing the 2022 WVM Audit, Energy Safety identified both "quantitative commitments (e.g., number of inspections completed) and verifiable statements (e.g., training of personnel)" in the vegetation management section of SCE's 2022 WMP Update. Energy Safety stated that "SCE could not provide documentation demonstrating completion of two of the 21 vegetation management initiatives in its 2022 WMP Update." These findings were related to (1) pole brushing and (2) the recruitment and training of vegetation management personnel.

Below, SCE provides a response to each of the stated findings and any corrective actions, as needed.

ENERGY SAFETY FINDING 1

“SCE did not provide information consistent with the completion of all work identified in Initiative 7.3.5.5: Fuel Management (Including all Wood Management) and Reduction of “Slash” from Vegetation Management Activities. SCE must provide a corrective action response to address the areas in which SCE did not provide supporting documentation or information consistent with the language used in statement 26 above.”

<p>Statement 26</p>	<p><u>SCE Statement:</u> “SCE has created separate pole brushing goals for 2022 that will be specific as to which poles are subject to PRC 4292, and which poles are not. SCE recalibrated its approach for 2022 to brush all non-exempt PRC 4292 poles in SRAs, all poles in AOC within HFRA, all poles within HFRA that have the same type of equipment as the non-exempt PRC 4292 poles and have a wildfire consequence of greater than 300 acres burned in eight hours.”</p> <p><u>Energy Safety Comments:</u> “SCE provided an Excel file listing the total distribution poles with non-exempt equipment in 2022. SCE listed work dates of SCE poles that fall into the criteria described in statement 26. The Excel file contains three different sets of information including (1) all of SCE’s distribution poles that are non-exempt PRC 4292 poles in SRAs, (2) all distribution poles in AOC within HFRA, and (3) all distribution poles within HFRA with non-exempt equipment and have a wildfire consequence of greater than 300 acres burned in eight hours. The Excel file indicates that some poles in these three sets of information were “not worked.” Because SCE stated that some poles in the file may fall into more than one category; for example, some poles are located in both HFRA and SRA areas, Energy Safety was unable to determine the precise number of poles that were “not worked” in each of the three categories. Additionally, SCE explained that the poles with a “not worked” status did not have a date and were not counted toward the WMP goal due to factors such as environmental or customer access constraints and resource availability. Because the Excel file indicates that SCE did not work all the poles meeting the criteria, Energy Safety finds that SCE did not provide documentation or information consistent with the completion of work identified in this statement.”</p> <p><u>SCE Response:</u> SCE met with Energy Safety on August 8, 2024, and explained the context for the quoted Statement 26. In the 2022 WMP Update, this statement was describing the inventory of distribution poles and the intention was to brush those poles for which SCE had access and authority. This is evident in the following Statement 27, setting forth SCE’s formal WMP target for pole brushing (VM-2): “SCE will access, inspect and clear (<i>dependent on access and authority</i>) approximately 78,700 distribution poles (separate from and in addition to the 55,100 PRC 4292</p>
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	<p>poles).” (emphasis added).</p> <p>SCE’s Pole Brushing program has two components: (1) the compliance scope subject to PRC 4292 and (2) the expanded scope separate from and in addition to those PRC 4292 poles. Only the expanded scope is included in SCE’s formal WMP target for pole brushing, VM-2. For SCE’s expanded scope under VM-2, Vegetation Management works with Wildfire Safety to identify certain higher risk poles that are not subject to PRC 4292 but that satisfy other criteria, such as “poles in AOC within HFRA” or “poles within HFRA that have the same type of equipment as the non-exempt PRC 4292 poles and have a wildfire consequence of greater than 300 acres burned in eight hours.” As part of SCE’s expanded pole brushing target (VM-2), poles are visited and inspected, but may not necessarily be cleared if there are access or authority constraints. In addition, the inventory of poles eligible to be brushed under the expanded scope is greater than the number of poles completed each year (this is how SCE occasionally is able to exceed its targets).</p> <p>Furthermore, in the data request for Crowe-SCE-2022_SVM_01, Question 42, Energy Safety requested “[a] list of the total number of poles that are non-exempt and the total number that were brushed that are non-exempt.” SCE clarifies that this list includes poles that were not part of SCE’s VM-2 target and were not worked due to factors such as environmental or customer access constraints and/or resource availability. The list of non-exempt poles does not indicate whether SCE met its VM-2 target in 2022.</p> <p>As Energy Safety noted in its Conclusion for SCE’s WMP Statement 27, SCE provided evidence demonstrating that it completed its VM-2 target in 2022. SCE’s Statement 26 was describing different categories within SCE’s pole brushing inventory with the intention of brushing the poles for which SCE had access and authority. Since SCE met its VM-2 target in 2022, SCE requests that Energy Safety reconsider this finding in their final compliance report.</p>
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ENERGY SAFETY FINDING 2

“SCE did not provide information consistent with the completion of all work identified in Initiative 7.3.5.14: Recruiting and Training of Vegetation Management Personnel. SCE must provide a corrective action response to address the areas in which SCE did not provide supporting documentation or information consistent with the language used in statements 41, 43, and 44 above.”

<p>Statement 41</p>	<p><u>SCE Statement:</u> “For line clearing work, SCE requires any person supervising or advising pre-inspection activities in the field to be ISA-certified. For workers performing pre-inspections without supervision responsibilities, SCE requires a two-year degree or four years’ worth of field experience in arboriculture or related field.”</p> <p><u>Energy Safety Comments:</u> “SCE stated that it did not maintain copies of contractors’ certifications or degrees in 2022 since vegetation management pre-inspection work is performed by contract personnel. Further, SCE stated that contractors were expected to provide documentation of certifications or degrees to SCE upon request. Energy Safety could not verify that pre inspectors and pre-inspection supervisors held the credentials listed by SCE in statement 41 above.”</p> <p><u>SCE Response:</u> SCE provides a copy of the pre-inspection Statement of Work (SOW) from 2022 showing the required qualifications under SCE’s vendor contracts. See “Excerpt of PI SOW_Qualifications.pdf”. In addition, upon further review, SCE was able to locate documentation identifying contractor employees’ ISA credentials in 2022. The pre-inspection vendors in 2022 were ACRT, CNUC, Davey, UPE, and UTS. SCE met with Energy Safety on August 8, 2024, and agreed to provide this documentation as part of the corrective action. Please see spreadsheet titled “CONFIDENTIAL_2022 ISA Certified Arborists,” tab “2022 ISA Certified List.”</p> <p>In the attachment, SCE verifies its pre-inspection advisors were ISA-Certified in 2022, consistent with Statement 41 in the WMP. As such, SCE requests Energy Safety to reconsider this finding in their final compliance report.</p>
<p>Statement 43</p>	<p><u>SCE Statement:</u> “To address future needs and potential industry-wide shortages of ISA-certified arborists, SCE created a pipeline for future grooming of ISA-certified arborists with sufficient skills, knowledge and experience needed to support all SCE vegetation management activities. SCE started hiring experienced, but non-certified personnel as Specialists (SPs), with the intent that SPs will be mentored by SSPs in arboriculture and SCE program standards. After acquiring sufficient experience, the SPs will be prepared to take the required examinations to become ISA-certified.”</p> <p><u>Energy Safety Comments:</u> “SCE stated that since it does not utilize a tracking program during the mentoring process, SCE was unable to provide specific documentation of mentorship of Senior Specialists (SSPs) to SPs. Without documentation of the mentorship process, Energy Safety was</p>

	<p>unable to verify that SCE had a program to mentor SPs in 2022.”</p> <p><u>SCE Response:</u> In Statement 43, SCE did not commit to a formal “mentorship program” but expressed its intention to foster informal mentorship between certified and non-certified personnel. Thus SCE did not utilize a formal tracking mechanism for the mentoring process in 2022 because most of the mentorship occurs in the field with “hands-on” interactions occurring when SPs shadow SSPs, who perform a wide variety of expected tasks. Additionally, SCE’s vegetation managers and SSPs provide vegetation training throughout the year to all of SCE’s vegetation employees, including SPs. Therefore, SCE believes this informal mentorship process is operating as intended and requests Energy Safety to reconsider this finding in their final compliance report.</p>
<p>Statement 44</p>	<p><u>SCE Statement:</u> “The goal for 2022 is to maintain the current staffing levels of certified arborists performing work within SCEs service territory (90-100 ISA certified arborists) across the various vegetation programs, unless work demands significantly change due to new regulatory requirements, or unforeseen labor constraints exist.”</p> <p><u>Energy Safety Comments:</u> “SCE stated that it “had approximately 40 ISA-certified arborists employed in the Vegetation Management organization in 2022. SCE also utilizes contract staff that are ISA certified; however, it does not maintain a count nor a list of their certifications.” Without contract staff credentials, Energy Safety could not verify that 90-100 ISA certified arborists were employed in SCE’s various vegetation programs in 2022. Additionally, SCE failed to explain how it intended to maintain staffing levels of 90 to 100 ISA-certified arborists without records of 2022 contract staff credentials.”</p> <p><u>SCE Response:</u> Upon further review, SCE was able to locate documentation that shows that in 2022, there was an average of 110 arborists employed by SCE’s vegetation vendors that were ISA-certified. This was in addition to the approximately 40 ISA-certified arborists employed by SCE. SCE met with Energy Safety on August 8, 2024, and agreed to provide this documentation as part of the corrective action. Please see spreadsheet titled “CONFIDENTIAL_2022 ISA Certified Arborists,” tab “2022 Summary.”</p> <p>In the attachment, SCE demonstrates that in 2022, it achieved its goal of maintaining staffing levels of 90 – 100 ISA-certified arborists across the Vegetation Management programs. As such, SCE requests Energy Safety to reconsider this finding in their final compliance report.</p>

CONCLUSION

SCE appreciates the opportunity to submit this response to the 2022 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,

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Gary Chen

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