



October 1, 2024

To: South California Edison
Gary Chen
Director, Safety & Infrastructure Policy
2244 Walnut Grove Avenue
Rosemead, CA 91770

SUBJECT: Office of Energy Infrastructure Safety’s Audit Report of Southern California Edison’s 2022 Vegetation Management Work

Pursuant to the requirements of California Public Utilities Code section 8386.3(c)(5)(A), the Office of Energy Infrastructure Safety (Energy Safety) completed its final report on Southern California Edison’s (SCE) 2022 Substantial Vegetation Management (SVM) audit. Energy Safety finds that SCE substantially complied with the substantial portion of the vegetation management requirements in its 2022 Wildfire Plan Update.

The attached report follows Energy Safety’s publication of its SVM audit on July 31, 2024, and SCE’s subsequent response on August 21, 2024. Pursuant to statutory requirements, a copy of the report is issued to SCE, published on Energy Safety’s 2022 SVM Docket¹ and provided to the California Public Utilities Commission.

Sincerely,

A handwritten signature in blue ink that reads "Sheryl Bilbrey".

Sheryl Bilbrey
Program Manager | Environmental Science Division
Office of Energy Infrastructure Safety

Cc:

Karen McLaughlin, Energy Safety
Julie Rueckheim, Energy Safety
Forest Kaser, CPUC

¹ All documents related to SCE’s 2022 SVM audit are available on Energy Safety’s e-filing under the “[2022-SVM](#)” docket and available here: (<https://efiling.energysafety.ca.gov/Lists/DocketLog.aspx?docketnumber=2022-SVM>) [accessed July 22, 2024]



State of California – A Natural Resources Agency

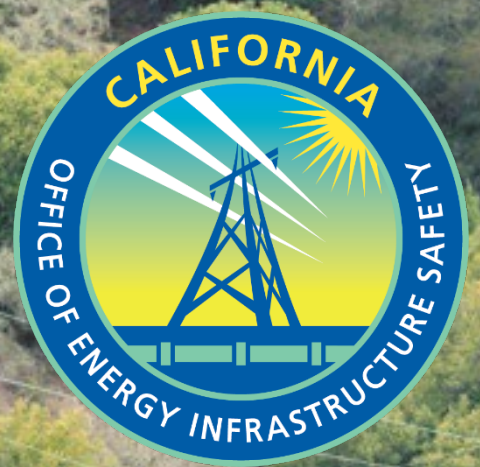
Gavin Newsom, Governor

OFFICE OF ENERGY INFRASTRUCTURE SAFETY
715 P Street, 20th Floor | Sacramento, CA 95814
916.902.6000 | www.energysafety.ca.gov

Caroline Thomas Jacobs, Director

Leslie Palmer, CPUC
Johnny Parker, SCE
Elizabeth Leano, SCE
Cynthia Childs, SCE

Attachment: SCE 2022 SVM Audit Report



OFFICE OF ENERGY INFRASTRUCTURE SAFETY
**2022 SUBSTANTIAL VEGETATION
MANAGEMENT AUDIT REPORT**
SOUTHERN CALIFORNIA EDISON

October 2024

TABLE OF CONTENTS

1. Introduction.....	1
2. 2022 SVM Audit Findings.....	2
3. Substantial Vegetation Management Compliance Analysis.....	4
3.1 Initiative Level Assessment.....	5
3.1.1 Initiative 7.3.5.5 Fuel Management (including all wood management) and Reduction of “slash” from Vegetation Management Activities.....	5
3.1.2 Initiative 7.3.5.14: Recruiting and Training of Vegetation Management Personnel	7
3.2 Programmatic Assessment.....	8
4. Conclusion.....	9

1. Introduction

Pursuant to Public Utilities Code section 8386.3(c)(5), the Office of Energy Infrastructure Safety (Energy Safety) must audit the vegetation management work performed by, or on behalf of, an electrical corporation. The Audit shall specify any failure of the electrical corporation to fully comply with the vegetation management requirements in its Wildfire Mitigation Plan (WMP).¹ Energy Safety then provides the Audit to the electrical corporation and grants it a reasonable time to correct and eliminate any deficiency specified in the Audit.² Following receipt and review of the electrical corporation's Corrective Action Plan (CAP), Energy Safety issues an Audit Report to the electrical corporation identifying whether the electrical corporation substantially complied with the substantial portion of the vegetation management requirements in the applicable year.³

Energy Safety published the 2022 SCE Substantial Vegetation Management (SVM) Audit on July 31, 2024. The Audit concluded that SCE did not perform all of the work specified in two out of the 21 vegetation management initiatives in its 2022 WMP Update as shown in section 2, Table 1, reproduced from the Audit. In response to the Audit, SCE submitted its CAP on August 20, 2024. Energy Safety reviewed SCE's CAP as part of the analysis presented in Section 3 of this document and determined that SCE substantially complied with the substantial portion of the vegetation management requirement in its 2022 WMP Update.

¹ Pub. Util. Code, § 8386.3(c)(5)(A).

² SCE 2022 Substantial Vegetation Management Audit.
(<https://efiling.energysafety.ca.gov/Search.aspx?docket=2022SVM>, accessed August 8, 2024).

³ 2023 Compliance Guidelines, Section 6.1 (September 2023). p. 15.
(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55586&shareable=true>, accessed August 21, 2024).

2. 2022 SVM Audit Findings

The 2022 SVM Audit found that SCE performed all required work in 19 of the 21 initiatives and was deficient in two. Table 1 below is reproduced from Energy Safety's 2022 SCE SVM Audit.

2022 WMP Update Initiative Number	2022 Vegetation Management Initiative	Audit Finding
7.3.5.1	Additional Efforts to Manage Community and Environmental Impacts	Performed Required Work
7.3.5.2	Detailed Inspections and Management Practices or Vegetation Clearances around Distribution Electrical Lines and Equipment	Performed Required Work
7.3.5.3	Detailed Inspections and Management Practices for Vegetation Clearances Around Transmission Electrical Lines and Equipment	Performed Required Work Refer to 7.3.5.2
7.3.5.4	Emergency Response Vegetation Management due to Red Flag Warning or Other Urgent Weather Conditions	Performed Required Work
7.3.5.5	Fuel Management (including all wood management) and Reduction of "slash" from Vegetation Management Activities	Did Not Perform All Required Work
7.3.5.6	Improvement of Inspections	Performed Required Work
7.3.5.7	Remote Sensing Inspections of Vegetation Around Distribution Electric Lines and Equipment	Performed Required Work
7.3.5.8	Remote Sensing Inspections of Vegetation Around Transmission Electric Lines and Equipment	Performed Required Work
7.3.5.9	Other Discretionary Inspections of Vegetation Around Distribution Electric Lines and Equipment, Beyond Inspections Mandated by Rules and Regulations	Performed Required Work

7.3.5.10	Other Discretionary Inspections of Vegetation Around Transmission Electric Lines and Equipment, Beyond Inspections Mandated by Rules and Regulations	Performed Required Work Refer to 7.3.5.9
7.3.5.11	Patrol Inspections of Vegetation Around Distribution Electric Lines and Equipment	Performed Required Work
7.3.5.12	Patrol Inspections of Vegetation Around Transmission Electric Lines and Equipment	Performed Required Work Refer to 7.3.5.11
7.3.5.13	Quality Assurance / Quality Control of Vegetation Management	Performed Required Work
7.3.5.14	Recruiting and Training of Vegetation Management Personnel	Did Not Perform All Required Work
7.3.5.15	Identification and Remediation of “At-Risk Species”	Performed Required Work
7.3.5.16	Removal and Remediation of Trees with Strike Potential to Electric Lines and Equipment	Performed Required Work
7.3.5.17	Substation Inspection	Performed Required Work
7.3.5.18	Substation Vegetation Management	Performed Required Work
7.3.5.19	Vegetation Management System	Performed Required Work
7.3.5.20	Vegetation Management to Achieve Clearances Around Electric Lines and Equipment	Performed Required Work
7.3.5.21	Vegetation Management Activities Post-Fire	Performed Required Work

3. Substantial Vegetation Management Compliance Analysis

Energy Safety is required to assess whether the electrical corporation substantially complied with the substantial portion of the vegetation management requirements in the applicable year.⁴ The determination of substantial compliance is based on an analysis of both the electrical corporation's compliance with each vegetation management program initiative as well as the program overall. The initiative level analysis includes:

- 1) **Achievement of Objective-** Determination of whether the electrical corporation's deficiencies, after considering its planned corrective actions, have not detracted from the electrical corporation's ability to achieve the objectives of its vegetation management programs; and
- 2) **Good Faith Effort-** Determination of whether the electrical corporation's effort to fulfill the vegetation management requirement constituted a good faith effort to comply with the vegetation management requirements in the approved WMP.

The final analysis includes a synthesis of initiative level analysis and a programmatic assessment of whether the electrical corporation completed the large majority of the vegetation management requirements in its approved WMP.

Energy Safety's Audit document, dated July 31, 2024, concluded that SCE did not provide documentation to support that all work was performed for two of the 21 vegetation management initiatives in its 2022 WMP Update (Initiatives 7.3.5.5 Fuel Management and 7.3.5.14 Recruiting and Training of Vegetation Management Personnel). Section 3.1 is the initiative level assessment which includes: 1) a summary of the 2022 SVM audit finding, 2) the CAP submitted by SCE specific to the audit findings, and 3) Energy Safety's initiative level analysis and determination of compliance with the substantial vegetation management portions of the 2022 WMP Update. Section 3.2 is Energy Safety's programmatic assessment of SCE's completion of the large majority of the vegetation management requirements.

⁴ Pub. Util. Code, § 8386.3(c)(5)(C).

3.1 Initiative Level Assessment

3.1.1. Initiative 7.3.5.5 Fuel Management (including all wood management) and Reduction of “slash” from Vegetation Management Activities

2022 SVM Audit Finding

Energy Safety’s 2022 SVM Audit concluded that SCE did not complete pole brushing on (1) all non-exempt PRC 4292 poles in State Responsibility Areas (SRAs); (2) all poles in AOC within HFRA; and (3) 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. SCE supplied an Excel file indicating that some poles within one or more of these three categories had a status of “not worked” in 2022.

SCE’s CAP Response

In its CAP, SCE stated that it was interpreting inspection of “all poles” in its approved 2022 WMP Update to mean inspecting and clearing poles dependent on access and authority and that they would not inspect and clear poles if factors such as environmental or customer access constraints and/or resource availability were present.

The CAP also referenced the August 8, 2024 meeting with Energy Safety during which SCE explained the WMP Update statement as it relates to SCE’s formal WMP target for pole brushing (VM-2). SCE stated during the meeting that the inventory of the distribution poles target was based on the formal VM-2 in which “SCE will access, inspect, and clear (dependent on access and authority) approximately 78,700 distribution poles (separate from and in addition to the 55,100 PRC 4292 poles.)”⁵

⁵ [SCE’s 2022 WMP Update](#), p. 407

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=52051&shareable=true>, accessed February 18, 2022).

Determination of Substantial Compliance with the Vegetation Management Initiative from the 2022 WMP Update

Criteria 1: Achievement of Objective

Based on the additional information provided in the CAP, SCE clarified that it would not inspect and clear poles if factors such as environmental or customer access constraints and/or resource availability were present. Energy Safety agrees that SCE did meet the pole-brushing inventory by inspecting and clearing poles in HFRA that met or exceeded SCE's targets for which SCE had access and authority based on the language of the 2022 WMP Update.⁶

Criteria 2: Good Faith Effort

SCE exceeded its pole clearing (VM-2) target by clearing 64,022 poles subject to PRC 4292. They also completed work on an additional 105,377 poles that were separate from and in addition to the PRC 4292 poles that were not constrained by environmental or customer access issues. Thus, SCE made a good faith effort to comply with the vegetation management requirements in its approved 2022 WMP Update related to Initiative 7.3.5.5.

Initiative Level Determination

Energy Safety agrees that SCE exceeded its VM-2 pole brushing target and provided a sufficient clarification between the use of the term "all poles" and the poles that were "not worked" on due to environmental, resource availability, and access or authority constraints. For these reasons, Energy Safety has determined that SCE addressed the SVM Audit finding for Initiative 7.3.5.5 Fuel Management (including all wood management) and Reduction of "slash" from Vegetation Management Activities. However, as its program matures, Energy Safety expects that SCE will work to clear constraints in a timely fashion to complete pole brushing activities and minimize wildfire ignition risk in the future. Energy Safety also requests timely notice of constraints preventing pole clearing target progress during a compliance year.

⁶ Response to DR-226, question 46; attachment "Crowe-SCE-2022 SVM 01 Q.046 Answer.pdf."

3.1.2. Initiative 7.3.5.14: Recruiting and Training of Vegetation Management Personnel

2022 SVM Audit Finding

Energy Safety's 2022 SVM Audit included the finding that SCE was unable to: 1) provide documentation showing that SCE hosted a mentorship program to train noncertified ISA Arborists (Specialists [SPs]) and 2) provide ISA Arborist credentials of pre-inspectors or supervisors who performed and/or advised pre-inspections activities in 2022. The audit also included the finding that SCE did not provide documentation explaining how SCE maintained staffing levels of 90 to 100 ISA-certified arborists and provide corresponding documentation.

SCE's CAP Response

In its CAP, SCE explained that it "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 Senior Specialists (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."⁷

SCE provided documentation of its vendors' ISA certified Arborists, including individual ISA certifications and the total number of staffing levels in 2022.⁸ The documentation shows that SCE employed an average of 110 arborists in 2022.

Energy Safety's Analysis of Substantial Vegetation Management Compliance with the 2022 WMP Update

Criteria 1: Achievement of Objective

While not able to provide documentation of a formal mentoring program, SCE did explain that mentoring happened in the field with hands-on experience and learning. This field mentoring meets the objective of the program for Initiative 7.3.5.14 Recruiting and Training of Vegetation Management Personnel. For the ISA Certifications, SCE's corrective action response provided supporting documentation substantiating SCE's pre-inspection personnel's credentials, and the 2022 staffing level target of 90 to 100 ISA-Certified arborists in SCE's 2022 WMP Update.

⁷ SCE 2022 SVM Audit Corrective Action Plan (August 21, 2024). p. 5.

⁸ SCE 2022 SVM Audit Corrective Action Plan (August 21, 2024). p. 5; attachment "2022 ISA Certified Arborists_Redacted.pdf."

Criteria 2: Good Faith Effort

SCE's informal mentorship process and training sessions as well as the additional documentation showing that they maintained the appropriate staffing levels for ISA certified arborists demonstrates that SCE made a good faith effort to comply with the vegetation management requirements and objectives for this initiative.

Initiative Level Determination

Energy Safety determined that SCE met the program objectives for this initiative. As SCE's training and certification program matures, Energy Safety requests that it improve its record-keeping such that future training records will be available for Energy Safety's review in future years. Energy Safety has determined that SCE complied with Initiative 7.3.5.14: Recruiting and Training of Vegetation Management Personnel.

3.2 Programmatic Assessment

Energy Safety's Audit document, dated July 31, 2024, found that SCE completed 19 of the 21 initiatives in its 2022 WMP Update. The Audit found that not all work was completed for two initiatives; however, Energy Safety determined that SCE's CAP response, dated August 21, 2024, provided sufficient clarification and additional documentation to support the determination that SCE complied with these initiatives, as discussed above. As a result, Energy Safety finds that SCE performed the large majority of the work described in its 2022 WMP Update.

4. Conclusion

Based on the analysis discussed in Section 3, Energy Safety concludes that SCE substantially complied with the substantial portion of the vegetation management requirements in its 2022 WMP Update.

DATA DRIVEN FORWARD-THINKING INNOVATIVE SAFETY FOCUSED



OFFICE OF ENERGY INFRASTRUCTURE SAFETY
A California Natural Resources Agency
www.energysafety.ca.gov

715 P Street, 20th Floor
Sacramento, CA 95814
916.902.6000

