



March 27, 2026

To: Southern California Edison
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Vice President, Wildfire & Business Resiliency
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SUBJECT: Southern California Edison’s (SCE’s) 2024 Vegetation Management Audit (VMA) Report

Pursuant to the requirements of California Public Utilities Code section 8386.3(b)(5)(C), the Office of Energy Infrastructure Safety (Energy Safety) has completed its audit of SCE’s 2024 Vegetation Management activities included in the 2023-2025 Wildfire Mitigation Plan (WMP).

As described in the attached audit report, Energy Safety concluded that SCE has successfully achieved the objectives of 12 initiatives within its vegetation management program and has an outstanding deficiency in one initiative in performance year 2024. While Energy Safety has identified a deficiency in one area within SCE’s vegetation management program, SCE has acknowledged this shortfall and has initiated corrective actions to address it in future years.

Pursuant to statutory requirements, a copy of this report is issued to SCE, published on Energy Safety’s 2024 VM Audits Docket, and provided to the California Public Utilities Commission (CPUC).

Sincerely,

A handwritten signature in cursive script that reads "Sheryl Bilbrey".

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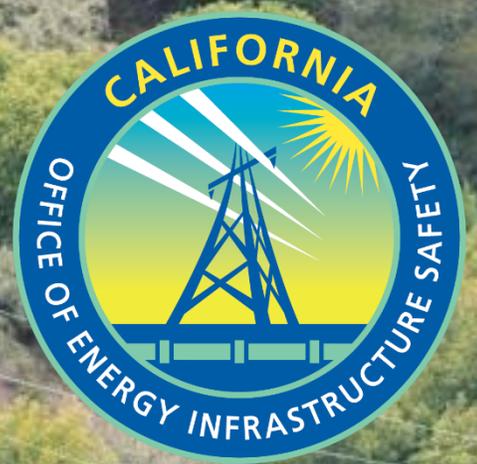
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Attachment: SCE 2024 VMA Report



OFFICE OF ENERGY INFRASTRUCTURE SAFETY
2024 VEGETATION MANAGEMENT
AUDIT REPORT
SOUTHERN CALIFORNIA EDISON

March 27, 2026

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EXECUTIVE SUMMARY

Pursuant to Public Utilities Code section 8386.3(b)(5)(A), the Office of Energy Infrastructure Safety (Energy Safety) may audit the vegetation management work performed by, or on behalf of, the electrical corporation following the end of the performance period.

The Southern California Edison Company (SCE) 2023-2025 WMP had 13 vegetation management initiatives in six programmatic areas. Energy Safety provided its Vegetation Management Audit (VMA) of SCE's work related to its vegetation management commitments in its Wildfire Mitigation Plan (WMP) on October 24, 2025 (included in Appendix 1).¹

The VMA identified that SCE did not provide sufficient documentation that all work was complete for five of the 13 vegetation management initiatives. SCE provided its Corrective Action Plan (CAP) on October 30, 2025 (included in Appendix 2).² The CAP included additional data, clarifications, and corrective actions to address the deficient vegetation management initiatives.

As discussed in this VMA Report, SCE has provided sufficient documentation to demonstrate that all work identified in 12 vegetation management initiatives from its 2023-2025 WMP was implemented successfully in 2024 or that SCE has provided a CAP that addresses deficiencies for those 12 initiatives. SCE has an outstanding deficiency in one of the 13 VM initiatives: 8.2.6 Open Work Orders. SCE has acknowledged this deficiency and has planned for or initiated implementation of corrective actions so that it may be addressed.

¹ Energy Safety's 2024 WMP VM Audit of SCE (October 24, 2025). Appendix 1

² Southern California Edison Company 2024 WMP VM Audit Corrective Action Plan (October 24, 2025). Appendix 2

1. INTRODUCTION

Pursuant to Public Utilities Code section 8386.3(b)(5)(A), the Office of Energy Infrastructure Safety (Energy Safety) may audit the vegetation management work performed by, or on behalf of, the electrical corporation following the end of the performance period. The VMA includes three phases:

1. **The initial audit.** The VMA identifies deficiencies in the electrical corporation's implementation of the vegetation management commitments in its WMP.³ Energy Safety provided the 2024 VMA to SCE on September 30, 2025,⁴ via electronic mail. The VMA is included in Appendix 1.
2. **The CAP.** Energy Safety then provides the electrical corporation time to respond to and develop corrective actions for any deficiency specified in the VMA and provide this response in its CAP. The electrical corporation may provide supplemental data, additional supporting documentation, clarifying statements, and corrective actions for consideration by Energy Safety for use in its final determination of the electrical corporation's performance relative to its WMP vegetation management commitments. SCE provided its CAP to Energy Safety on October 24, 2025.⁵ SCE's CAP is included in Appendix 2.
3. **The audit report.** Energy Safety then reviews the CAP and issues a VMA Report to the electrical corporation identifying any outstanding deficiency in the electrical corporation's implementation of its vegetation management commitments in the WMP. The VMA Report is publicly available on Energy Safety's E-Filing System on the 2024 VM Audits Docket. The VMA and CAP (items 1 and 2 above) are included as appendices within the VMA Report. This VMA Report concludes the VMA process for the 2024 performance year.

This document concludes the final phase of the VMA process for the 2024 performance year.

The VMA Report is organized as follows:

- Section 2 includes a summary of the deficiencies identified during the VMA, SCE's CAP, and Energy Safety's determination of outstanding deficiencies in SCE's implementation of or planned corrective actions for the 2024 WMP vegetation

³ Pub. Util. Code, § 8386.3(b)(5)(A).

⁴ Energy Safety's 2024 Vegetation Management Audit of Southern California Edison Company. (September 30, 2025). Appendix 1.

⁵ [SCE's 2024 WMP VM Audit Corrective Action Plan](#) (October 24, 2025).

management commitments.

- Section 3 includes a discussion of SCE’s vegetation management program maturity and programmatic performance relative to the achievement of the objectives of WMP in 2024.
- Section 4 is Energy Safety’s conclusion regarding SCE’s completion of all work associated with its WMP commitments and program performance for 2024.

2. SCE’S 2024 VMA FINDINGS

SCE’s 2023-2025 WMP identifies the objectives, preventative strategies, and programs that SCE has implemented to minimize the risk that its infrastructure will cause catastrophic wildfire. Energy Safety analyzed each of the thirteen vegetation management initiatives listed in Section 8.2 (Vegetation Management and Inspections) of SCE’s 2023-2025 WMP⁶ as part of the initial VMA. Each initiative includes one or more commitments. These commitments include both quantitative targets (e.g., completion of a specified number of inspections) and narrative, but verifiable, statements (e.g., implementation of personnel training programs). Energy Safety identified the WMP quantitative commitments and narrative statements within each initiative and determined whether SCE had completed all work associated with each commitment in performance year 2024. Energy Safety’s determination of whether all work was complete was based on data and documentation submitted by SCE.

Energy Safety determined that an initiative was “complete” if SCE provided sufficient data or supporting information demonstrating completion of all commitments (targets and/or statements) within that initiative. If any commitment was incomplete or insufficiently documented, Energy Safety determined that the initiative was “deficient.”

Energy Safety’s VMA found that SCE provided data and documentation to support completion of work for eight of the 13 initiatives and did not provide information and documentation to support completion of work for five initiatives. Of the five deficient initiatives identified in the VMA, SCE’s CAP either provided additional documentation to demonstrate that it completed the work or had begun to implement corrective actions to address four of the five initiatives. As a result, Energy Safety concluded that SCE successfully achieved the objectives of 12 of the 13 vegetation management initiatives in its 2023-2025 WMP for performance year 2024. Energy Safety found that SCE has outstanding deficiencies in one vegetation management initiative in its 2023-2025 WMP. This deficiency is summarized in Table 1.

⁶ Southern California Edison Company, [2023-2025 Base Wildfire Mitigation Plan](http://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56770&shareable=true), Published June 4, 2024, pp. 434
URL: (<http://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56770&shareable=true>).

Table 1. Summary of SCE's outstanding deficiencies in performance year 2024.

Vegetation Management Initiative	Description of Deficiency
8.2.6 Open Work Orders	SCE did not meet its commitment to complete all P1 and P2 work orders within targeted, risk-based time frames. SCE also did not demonstrate that it monitored P2 work orders to ensure that they did not become a P1 condition.

2.1 WMP VM commitment assessment approach

The purpose of the VMA is to determine whether SCE performed all work related to commitments made in its WMP and identify any deficiencies in SCE's vegetation management programs that have the potential to increase ignition risk.

The VMA includes the following steps:

1. **Completion of Work-** Determination of whether the electrical corporation submitted sufficient documentation to demonstrate that it performed all work for each of the vegetation management commitments described in the WMP.

If the electrical corporation provided sufficient documentation demonstrating that all work was completed for all commitments within an initiative, Energy Safety concluded that the initiative is complete, and the analysis ended here. If the electrical corporation did not provide sufficient documentation to conclude that all work was complete, then Energy Safety continued the analysis to include one or more of the following:

2. **Assessment of Constraints-** Energy Safety will review the documentation provided regarding constraints to determine acceptability and commitment to resolving constraints in a timely way.
3. **Corrective Actions-** Energy Safety reviewed the corrective actions proposed by the electrical corporation to determine if the proposed corrections will prevent future deficiencies and ensure that all commitments related to the initiative will be completed in future performance years.

4. **Achievement of Objective-** Determination of whether the electrical corporation's incomplete work has detracted from its ability to achieve the objective of the initiative after considering constraints and planned corrective actions.

2.2 Analysis of work commitments associated with 2024 VM Initiatives

SCE's 2024 VMA identified five initiatives for which SCE initially did not provide sufficient documentation to support that all work was completed. SCE provided additional documentation and corrective actions in its CAP response to support a finding that it either completed or achieved the objective of four of the five deficient initiatives that Energy Safety identified in the VMA.

A summary of Energy Safety's VMA and VMA Report initiative findings are presented in Table 2. A finding of "Complete" for the VMA Report indicates that SCE provided additional documentation in its CAP to support that all work was completed. A finding of "Achieved Objective" indicates that, while Energy Safety identified some deficiencies, the majority of the work was completed and the CAP provided corrective actions that will address any remaining deficiencies. Energy Safety's analysis which resulted in these conclusions is described for each initiative below.

Table 2. Summary of Energy Safety’s findings regarding completion of SCE VM Initiatives in its 2023-2025 WMP for performance year 2024. Deficient initiatives are bold.

Vegetation Management Initiative	Initial Audit Finding	Final Audit Finding
8.2.2. Vegetation Management Inspections	Complete	Complete
8.2.3.1 Pole Clearing	Complete	Complete
8.2.3.2 Wood and Slash Management	Deficient	Achieved Objective
8.2.3.3 Clearance	Deficient	Achieved Objective
8.2.3.4 Fall-In Mitigation	Deficient	Achieved Objective
8.2.3.5 Substation Defensible Space	Complete	Complete
8.2.3.6 High-Risk Species	Complete	Complete
8.2.3.7 Fire Resilient Right-of-Ways	Complete	Complete
8.2.3.8 Emergency Response of Vegetation Management	Complete	Complete
8.2.4 Vegetation Management Enterprise System	Complete	Complete
8.2.5. Quality Assurance and Quality Control	Deficient	Complete
8.2.6 Open Work Orders	Deficient	Deficient
8.2.7 Workforce Planning	Complete	Complete

VMA Finding 1— 8.2.3.2 Wood and Slash Management

The purpose of this initiative is to take actions “to manage all downed wood and ‘slash’ generated from vegetation management activities.”⁷

Summary of Initiative Work Commitments and 2024 Audit Findings

SCE did not provide sufficient documentation to support that all work commitments pertaining to Initiative 8.2.3.2 Wood and Slash Management were completed in 2024.

In its 2023-2305 WMP, SCE committed to “remove all wood and material resulting from mitigation for Routine Line Clearing, Structure Brushing, HTMP, and the Dead and Dying Tree Program typically within 100 feet of a dirt or paved road, subject to site conditions.”⁸

While SCE provided excerpts from its contractors’ statement of work (SOW) requiring removal of wood and slash following vegetation management activities, SCE did not provide documentation demonstrating that it verified the wood and slash was removed from work sites.⁹ Failure to remove wood and slash debris following tree trimming and removal activities would contribute to unnecessary risk on the system. Without documentation demonstrating that wood and slash resulting from mitigation work for Routine Line Clearing, Structure Brushing, HTMP Program, and the Dead and Dying Tree Program was removed from the site except when constrained beyond SCE’s control, SCE cannot verify that the work was completed.

SCE explained that the post-work verification conducted by internal senior specialists (SSPs) includes inspection for debris removal and site cleanup as a part of their oversight and review and QC inspectors assess debris removal as part of the structure brushing QC procedure.¹⁰ However, while this demonstrates an intent to verify that the work was completed, SCE did not submit any documentation supporting that these reviews were completed, nor the outcomes of the oversight inspections.

⁷ [Technical Guidelines](#) (December 6, 2022), p. A-24

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true>).

⁸ Southern California Edison Company, [2023-2025 Base Wildfire Mitigation Plan](#), Published June 4, 2024, p.411 URL: (<http://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56770&shareable=true>).

⁹ Energy Safety’s 2024 Vegetation Management Audit of Southern California Edison Company. (September 30, 2025). Appendix 1. pp. A-22-A-24.

¹⁰ Data Request OEIS-E-SVM_2025-SCE-001, Question 14; attachment: “OEIS-E-SVM_2025-SCE-001 Q.14 Answer.pdf.”

SCE also stated that they do not consider vegetation debris cleanup as a formal target for the 2023-2025 WMP and thus did not make it mandatory to track all mitigation records of debris removal, which it considers to be too burdensome because SCE would have to reach out to each contractor that may not have retained or records of the removal work done in the field.¹¹ However, without this documentation, SCE could not verify that its contractors adhered to protocols and the debris removal was completed.

SCE's CAP Response

In its CAP, SCE stated that its QC reviews did not identify any widespread pattern of debris being left inappropriately on site.¹²

SCE's CAP also included a corrective action to address the record keeping deficiency. SCE stated that an Arbora software solution, implemented in late 2024, included a mandatory field in the work management system (WMS) to document wood and slash management.¹³ As a result of this corrective action, SCE expects to have complete records of wood and slash management going forward. SCE independently evaluated the effectiveness of the Arbora solution in 2025 revealing that, "approximately 97% of the records had the debris removal field documented by field crews."¹⁴ Regarding the 3% of instances where the debris management field was left blank, SCE affirmed that it implemented another Arbora software in 2025 to address the issue. Following this corrective action, SCE states that "debris management field was populated for 99.8% of records."

Analysis of Vegetation Management Performance with the 2023-2025 WMP

The improper management of wood and slash debris could create an unnecessary increase of ground fuels which could exacerbate wildfire spread. Therefore, it is critical for SCE to keep accurate records of all wood and slash management work. Because SCE did not demonstrate that it recorded whether its contractors removed wood and slash from work sites, Energy Safety initially found Initiative 8.2.3.2 Wood and Slash Management deficient.

¹¹ Data Request OEIS-E-SVM_2025-SCE-001, Question 14; attachment: "OEIS-E-SVM_2025-SCE-001 Q.14 Answer.pdf," p. 4.

¹² Southern California Edison Company 2024 WMP VM Audit Corrective Action Plan (October 24, 2025). Appendix 2

¹³ Southern California Edison Company 2024 WMP VM Audit Corrective Action Plan (October 24, 2025). Appendix 2

¹⁴ Southern California Edison Company 2024 WMP VM Audit Corrective Action Plan (October 24, 2025). Appendix 2

In the VMA, Energy Safety requested that SCE submit documentation demonstrating that wood and slash resulting from mitigation work for Routine Line Clearing, Structure Brushing, HTMP Program, and the Dead and Dying Tree Program was removed from work sites except when beyond SCE's control, and if constraints prevented removal, SCE should provide detail describing the circumstances. In its CAP, SCE stated that its QC procedures require its inspectors to look for debris removal; however, SCE did not provide documentation demonstrating that this work was completed.

While SCE did not demonstrate that wood and slash was removed from worksites in 2024, SCE stated that it has taken multiple steps to improve recordkeeping and verify contractor adherence to protocols. SCE has implemented improvements to the Arbora software in late 2024 and 2025 in response to deficiencies identified in the SCE 2023 Substantial Vegetation Audit Report.¹⁵ The Arbora solution will include mandatory tracking of wood and slash and SCE's early testing has indicated that it now successfully documents >99% of wood and slash removal. The development and implementation of corrective actions to document wood and slash removal demonstrate that SCE has successfully addressed this deficiency.

Initiative Level Determination

The objective of this initiative is "to manage all downed wood and 'slash' generated from vegetation management activities."¹⁶ While SCE did not demonstrate that all work on Wood and Slash Management was completed in performance year 2024, SCE addressed deficiencies identified in the 2023 SVM and 2024 VMA by implementing corrective actions that ensure that wood and slash management is appropriately documented in future years. These actions are sufficient to achieve the objective of the initiative and address the deficiency identified in the 2024 VMA. Therefore, Energy Safety has determined that there are no outstanding deficiencies in Initiative 8.2.3.2 Wood and Slash Management.

VMA Finding 2 - 8.2.3.3 Clearance

The purpose of this initiative was to take actions "after inspection to ensure that vegetation does not encroach upon electrical equipment and facilities, such as tree trimming."¹⁷

Summary of Initiative Work Commitments and 2024 Audit Findings

SCE did not provide sufficient documentation that it completed all work associated with Initiative 8.2.3.3 Clearance.

¹⁵ SCE 2023 Substantial Vegetation Management Audit (June 13, 2025) pp.5-8
(<https://efiling.energysafety.ca.gov/Search.aspx?docket=2023-SVM>)

¹⁶ Office of Energy Infrastructure Safety, [2023-2025 Base Wildfire Mitigation Plan Technical Guidelines](#), Published December 6, 2022, p. A-24, URL:
(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true>).

¹⁷ [Energy Safety's 2023-2025 Wildfire Mitigation Plan Technical Guidelines](#) (December 6, 2022), p. A-24
(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true>).

SCE did not provide sufficient documentation to demonstrate that each tree inspected in Distribution Vegetation Management Plan (VM-7) and Transmission Vegetation Management Plan (VM-8) received the prescribed mitigation.¹⁸ Energy Safety found that of the 128,014 inspections where a mitigation was prescribed, SCE completed those mitigations for 118,576 trees (93%), failing to complete mitigations on the remaining 9,438 trees (7%) in High Fire Risk Areas (HFRA). SCE did not provide sufficient documentation to demonstrate that mitigations assigned during supplemental patrols conducted in HFRA were completed.¹⁹ Because SCE failed to provide documentation for 7% of the prescribed mitigation work from routine inspections, and for all its supplemental patrols, Energy Safety concluded that SCE did not maintain minimum clearances for distribution and transmission lines.²⁰

SCE also committed to performing “expanded line clearances to mitigate the risk of vegetation contact with energized conductors [...] At a minimum, SCE’s Routine Line Clearing work within HFRA maintains at least the required four feet clearance for Distribution lines and the required 10 feet clearance for Transmission lines for a full annual inspection cycle.” SCE did not provide sufficient documentation to demonstrate that it prescribed and performed expanded clearances as described in the 2023-2025 WMP. SCE provided documentation demonstrating that it conducted 135,187 total inspections of its electrical system in 2024, 134,839 of which were on its Distribution or Transmission system.²¹ Of the total number of cleared trees at the time of inspection, 4,487 (3%) trees had a post clearance status other than “complete.” SCE stated that the work on these trees was likely complete and that the error in recorded status was due to “incorrect end-user selection of post mitigation clearance drop-down menus” while operating its work management system (Survey 123). While these entries might be in error, SCE did not provide documentation verifying that these trees complied with clearance requirements.

There was also a discrepancy between the total number of trees mitigated for clearance work in the VM-7 and VM-8 programs (136,752, described in the previous section)²² and the total number in the documentation supplied in response to its clearance program (135,082, sum of all trims and removals to achieve clearances).²³ SCE did not provide explanation for why the two files reported different numbers of mitigations for clearance.

¹⁸ Energy Safety’s 2024 Vegetation Management Audit of Southern California Edison Company. (September 30, 2025). Appendix 1. pp. A-25-A-27.

¹⁹ Data Request OEIS-E-SVM_2025-SCE-001, Question 3; attachment: “03_OEIS-E-SVM_2025-SCE-001_Q.03-2024 Supplemental Patrols & Mitigation.xlsx.”

²⁰ Energy Safety’s 2024 Vegetation Management Audit of Southern California Edison Company. (September 30, 2025). Appendix 1. pp. A-25-A-27.

²¹ Data Request OEIS-E-SVM_2025-SCE-001, Question 15-16; attachment: “OEIS-E-SVM_2025-SCE-001_Q.15-16_RLC Clearance.xlsx.”

²² Data Request OEIS-E-SVM_2025-SCE-001, Question 1; attachment: “OEIS-E-SVM_2025-SCE-001_Q.01-02-19-21_2024 VM-7 & VM-8 Inspect & Mitigate.xlsx.”

²³ Data Request OEIS-E-SVM_2025-SCE-001, Question 15-16; attachment: “OEIS-E-SVM_2025-SCE-001_Q.15-16_RLC Clearance.xlsx.”

SCE's CAP Response

In its CAP, SCE provided an update on its clearance work in 2024. SCE calculated that 98% of the Routine Line Clearance prescriptions were completed by October 2025.^{24,25} Of the incomplete 9,438 inspection records identified by Energy Safety in 2024 VMA:

- 18 (<1%) records were duplicates
- 6,929 (73%) were completed as of 10/08/2025
- 1,210 (13%) were still constrained (e.g., environmental, access issues)
- 999 (11%) required no work (work was deemed no longer needed, e.g., tree trimmers identified clearance as being in compliance, mitigation completed by customer)
- 282 (3%) were either assigned to contractors or pending assignment after being released from constraints.

SCE also stated that 54 supplemental patrols conducted in 2024 resulted in 73 prescriptions. Of these 73 prescriptions, 72 were mitigated in 2024, while 1 prescription remains constrained.²⁶

Additionally, SCE prescribed expanded line clearances for 134,839 trees. Energy Safety identified 4,550 of these trees as incomplete or with unknown status for 2024. SCE stated that this discrepancy was due to internal record keeping errors that allowed dropdown selection errors during data collection. Following SCE's investigation of the 4,550 records, it verified that 3,403 out of the 4,550 records had a 2024 inspection clearance (prior to subsequent mitigation) at or greater than required clearance distance (RCD) and therefore would have also met the RCD at the time of earlier inspection. In these cases, SCE attributed the unknown status to drop-down selection errors.²⁷

Regarding the remaining 1,147 records, SCE could not verify the clearances met compliance standards at the time of the initial inspection date. However, SCE reviewed inspection results for those sites when they were next inspected 6 to 12 months later and found the following:

- 715 had clearance distances that were sufficient to meet compliance standards (clearance met or exceeded RCD) and therefore must have also exceeded those distances during the previous inspection

²⁴ Southern California Edison Company 2024 WMP VM Audit Corrective Action Plan (October 24, 2025). Appendix 2

²⁵ In its CAP, SCE also stated that "there is no GO95, other regulatory, or programmatic requirement to remediate work within the same calendar year that work is prescribed [...] The VM-7 and VM-8 targets are not centered on timing of remediations, which is captured by work order prioritization and is the subject of a separate Energy Safety finding addressed below." VM-7 does not prescribe remediation timelines, but VM 8.2.3.3 does require electrical corporations to describe initiatives "after inspection to ensure that vegetation does not encroach upon electrical equipment and facilities, such as tree trimming." The data submitted did not support a finding of initiatives that "ensure" no encroachment because the data showed vegetation encroached upon electrical equipment and facilities.

²⁶ Southern California Edison Company 2024 WMP VM Audit Corrective Action Plan (October 24, 2025). Appendix 2

²⁷ Southern California Edison Company 2024 WMP VM Audit Corrective Action Plan (October 24, 2025). Appendix 2

- 118 trees had been removed
- 138 trees were less than RCD, but SCE stated that it is “reasonable to assume [these trees] had simply grown since the last inspection.”²⁸
- 176 trees had not yet received a next inspection at the time SCE analyzed the data and so previous condition was unknown.

Therefore, SCE stated that because the majority of the unaccounted trees (833 of 1,147) still met or exceeded the RCD 6 to 12 months later, those trees must have exceeded the RCD at the time of the inspection in which the status was incomplete or unknown.²⁹ Thus, SCE argued that it maintained clearances of RCD or greater for 99% of trees inspected (134,006 out of 134,839 trees inspected), but did not demonstrate that it met the minimum clearances for 314 trees (<1%, the 138 trees that were less than the RCD at the next inspection 6 to 12 months later and the 176 that have not been reinspected).

SCE stated that it began implementing the corrective actions described in the 2023 SVM Audit Report, in which SCE committed to update its Arbora work management system to prevent drop-down selection errors. More specifically, in 2025, crews can no longer select ‘Non Compliance’ in the “post clearance field, and instead, crew can only select the following from the drop-down menu: RCD, CCD, TCD, GRCD, or >GRCD.”³⁰

Additionally, SCE described the QA/QC methods used to ensure work was completed. First, Post Work Verification (PWV) conducted by SCE’s Senior Specialists (ISA Arborists) ensure work was compliant and that noncompliant work was assigned to contractors for rework. Second, SCE stated that it performed Quality Control inspections in 100% of the highest risk areas of its service territory, with lower rates of QC sampling inspections in lower risk areas. If appropriate clearances are not achieved, it would be annotated by QC. SCE stated that between the PWV and QC reviews, there was no indication that the trees were left in a noncompliant condition.

Analysis of Vegetation Management Performance with the 2023-2025 WMP

Maintaining clearances around electrical lines reduces risk of ignition due to vegetation contact with electrical lines, therefore electrical corporations must mitigate all clearance work prescribed during inspections to minimize wildfire risk. During the VMA, SCE did not provide sufficient documentation to support completion of all clearance work prescribed during its Routine Line Clearing and Supplemental Patrols, nor all commitments associated with its Expanded Clearances program. Accordingly, Energy Safety initially found Initiative

²⁸ Southern California Edison Company 2024 WMP VM Audit Corrective Action Plan (October 24, 2025). Appendix 2

²⁹ Southern California Edison Company 2024 WMP VM Audit Corrective Action Plan (October 24, 2025). Appendix 2

³⁰ Southern California Edison Company 2023 SVM Audit (June 13, 2025). p.10

https://efiling.energysafety.ca.gov/EFiling/GetFile.aspx?filePath=D%3a%5cFileThat%5cFileServer%5cPublic%5cPublicDocuments%5c2023-SVM%2fTN16034_20250613T132652_SCE_2023_Substantial_Vegetation_Management_Audit_Report.pdf

8.2.3.3. Clearance to be deficient.

In its CAP, SCE described an internal review of its records regarding clearance work in 2024 and summarized results demonstrating that it either completed all clearance work prescribed associated with its Routine Line Clearing and Supplemental Patrol Programs, or that the work was either pending, no longer needed, or otherwise constrained and SCE was working towards a resolution of the constraints. However, SCE did not provide the data files which support these statements.

SCE also described its review of its expanded clearance records and provided summarized results which SCE stated demonstrated that it completed the majority of its expanded clearance work; however, it could not verify that a subset of trees (314 out of 4,550) received clearance greater than the RCD because it was not recorded properly during the initial inspection and was either non-compliant during the subsequent inspection or had not been revisited.³¹ SCE did not provide the data files which support these statements.

In its CAP, SCE provided additional information to support that it completed 98% of routine line clearance work and 99% of expanded clearance work. The information was summarized from SCE's data and was consistent with the level of completion stated by SCE; however, SCE did not provide the supporting documentation to verify the summarized results. In addition, SCE acknowledged record keeping deficiencies which led to uncertainty in the compliance status of trees following initial inspection and acknowledged the shortfalls in clearance work identified by Energy Safety during the VMA. As a corrective action, in 2025 SCE initiated a process to reduce dropdown selection errors moving forward by implementing software solutions in Arbora to prevent recurrence.³² The Arbora enhancement would prevent users from leaving fields blank and would prevent users from inputting incorrect mitigations into the Post Clearance field.

Initiative Level Determination

The purpose of this initiative was to take actions after inspection to ensure that vegetation identified for follow up mitigation during the inspections does not encroach upon electrical equipment and facilities.³³ In the VMA, Energy Safety found that SCE did not provide documentation supporting completion of clearance work on a small percentage of trees associated with its routine clearance (7% of work) and expanded clearance programs (3% of work). SCE's CAP indicated that it conducted a review of its work records to determine if the clearance work was completed despite the recordkeeping insufficiencies which led to this finding. SCE's analysis showed that the majority of these work records were completed because the trees complied with the minimum clearance distances at the next inspection six

³¹ Southern California Edison Company 2024 WMP VM Audit Corrective Action Plan (October 24, 2025). Appendix 2

³² Southern California Edison Company 2024 WMP VM Audit Corrective Action Plan (October 24, 2025). Appendix 2

³³ [Energy Safety's 2023-2025 Wildfire Mitigation Plan Technical Guidelines](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true) (December 6, 2022), p. A-24 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true).

to twelve months later. According to SCE, only a small percentage of trees associated with SCE's routine clearance (3% of work), supplemental patrols (1%), and expanded clearance programs (<1% of work) remain pending.

SCE acknowledged that the data sent to Energy Safety during the VMA had errors resulting from a defect in its vegetation management software. The defect allowed users to input incorrect data or leave data fields blank, and SCE was unable to track the compliance status of a subset of trees following inspection. Following a similar finding in its 2023 vegetation management audit, SCE implemented a software solution to improve data collection and provide accurate data in 2025. Because SCE provided a reasonable response that it completed the majority of its clearance work and has implemented appropriate corrective actions to ensure that clearance work is logged and tracked in future compliance years, Energy Safety finds that SCE achieved the objective of Initiative 8.2.3.3 Clearance and does not have any outstanding deficiencies.

VMA Finding 3- 8.2.3.4 Fall-In Mitigation

The purpose of this initiative was to take actions “to identify and remove or otherwise remediate trees that pose a high risk of failure or fracture that could potentially strike electrical equipment.”³⁴

Summary of Initiative Work Commitments and 2024 Audit Findings

SCE did not provide sufficient documentation that it completed all work associated with Initiative 8.2.3.4 Fall-In Mitigation.

In its 2023-2025 WMP, SCE committed to perform inspections using a risk-based approach and based on the results of the inspections, generate prescriptions and perform the required remediations.³⁵ Therefore, Energy Safety assessed completion of the Fall-in Mitigation initiative based on whether each tree that was inspected in the Hazard Tree Management Program (HTMP) and Dead and Dying Tree Removal Program received the prescribed mitigation.

³⁴ [Energy Safety's 2023-2025 Wildfire Mitigation Plan Technical Guidelines](https://efiling.energy.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true) (December 6, 2022), p. A-24 (https://efiling.energy.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true).

³⁵ Southern California Edison Company, [2023-2025 Base Wildfire Mitigation Plan](http://efiling.energy.ca.gov/eFiling/Getfile.aspx?fileid=56770&shareable=true), Published June 4, 2024, p. 394-395 URL: (http://efiling.energy.ca.gov/eFiling/Getfile.aspx?fileid=56770&shareable=true).

SCE provided documentation of its HTMP risk assessments and associated mitigation work conducted in 2024 for its HTMP program³⁶ and Dead and Dying Tree Removal Program.³⁷ Energy Safety found that of the 1,114 HTMP inspections where mitigation was prescribed, SCE completed those mitigations for 1,044 trees (94%), failing to complete mitigations on the remaining 70 trees (6%) in High Fire Risk Areas (HFRA). For its Dead and Dying Tree Removal Program, SCE completed removals for 1,489 trees (77%) and the remaining 448 trees (23%) had no completion date. Thus, in performance year 2024, SCE did not complete all prescribed mitigations.

SCE's CAP Response

SCE reviewed the 70 trees (6%) in HFRA identified by Energy Safety to have pending mitigations. Of these trees, SCE determined:

- 67 were originally subject to constraints (e.g., environmental, access, or customer constrained). However, as of September 2025:
 - 12 were resolved and mitigated
 - 19 were resolved and pending mitigation
 - 36 remain constrained and are pending environmental approval
- 2 prescriptions were cancelled (work was deemed no longer needed, e.g., tree trimmers identified clearance as in compliance or mitigation was completed by customer)
- 1 prescription was mitigated in 2025.³⁸

SCE stated that its Dead and Dying Tree Removal Program (VM-4) target for 2024 was to “Inspect 485 grids and prescribe mitigation for dead and dying trees with strike potential within those grids.” According to SCE, it inspected 581 grids.³⁹

SCE reviewed the 448 trees pending removal under the Dead and Dying Tree Removal Program and determined that:

³⁶ Data Request OEIS-E-SVM_2025-SCE-001, Question 7, attachment: “07_OEIS-E-SVM_2025-SCE-001 Q. 07 Answer.pdf and 07_OEIS-E-SVM_2025-SCE-001_Q.07-08_2024 HTMP_VM-1 Work.xlsx.”

³⁷ Data Request OEIS-E-SVM_2025-SCE-001, Question 10, attachment: 10_OEIS-E-SVM_2025-SCE-001_Q.10-11_2024 D&D_VM-4 Mitigation.xlsx.”

³⁸ Southern California Edison Company 2024 WMP VM Audit Corrective Action Plan (October 24, 2025). Appendix 2

³⁹ SCE stated that there is no regulatory or programmatic requirement to complete prescribed dead and dying trees within the calendar year that work was prescribed and cited SCE’s internal threat management document UVM-08 for guidance for mitigation timelines, and constraints that may extend or delay completion. VM 8.2.3.4 does not prescribe remediation timelines, but it does require electrical corporations to describe “actions taken to identify and remove or otherwise remediate trees that pose a high risk of failure or fracture that could potentially strike equipment.” The data submitted did not support a finding of initiatives that such trees were removed or remediated because the removals and remediations were not complete.

- 394 were originally subject to constraints (e.g., environmental, customer constrained). However, as of September 2025:
 - 110 were resolved and mitigated
 - 8 were resolved and pending mitigation
 - 276 remain constrained and are pending environmental approval
- 53 prescriptions were cancelled (e.g., work was deemed no longer needed)
- 1 prescription was mitigated in 2025.

Analysis of Vegetation Management Performance with the 2023-2025 WMP

Timely mitigation of trees that pose a high risk of falling into or striking infrastructure will reduce the risk of wildfire ignition. During the initial VMA, SCE did not provide sufficient documentation to support completion of all work associated with its commitments associated with its HTMP and Dead and Dying Tree Removal programs. Accordingly, Energy Safety initially found Initiative 8.2.3.4. Fall-in Mitigation to be deficient.

Leaving hazard trees unmitigated in high-wildfire risk areas could present a risk to electrical lines and equipment which may result in catastrophic wildfire. Therefore, for assessment of performance in this initiative, SCE must demonstrate that it is managing its prescribed work and making progress on removing hazard trees as they are identified. To this end, SCE described an internal review of its records regarding fall-in mitigation work in 2024 and summarized results demonstrating that it either completed all clearance work as prescribed in its HTMP and Dead and Dying Tree Programs, that the work was no longer needed, or that work was otherwise constrained and SCE was working towards a resolution of the constraints. This update on tree status demonstrates that SCE is tracking progress on prescribed mitigations associated with its HTMP and Dead and Dying Tree Programs has made progress in completing this work since the VMA.

Initiative Level Determination

The purpose of this initiative was to identify and remove or otherwise remediate trees that pose a high risk of failure or fracture that could potentially strike electrical equipment. SCE provided documentation to demonstrate that it either completed all work associated with its Hazard Tree Management Program (HTMP) (VM-1) and Dead and Dying Tree Removal Program (VM-4) or that the work was constrained and SCE was working to resolve those constraints. Therefore, SCE achieved the objective of Initiative 8.2.3.4 Fall-In Mitigation for performance year 2024 and does not have any outstanding deficiencies.

VMA Finding 4- 8.2.5 Quality Assurance and Quality Control

The purpose of this initiative is the “[e]stablishment and function of audit process to manage and confirm work completed by employees or contractors, including packaging QA/QC information for input to decision-making and related integrated workforce management processes.”⁴⁰

Summary of Initiative Work Commitments and 2024 Audit Finding

SCE did not provide sufficient documentation to demonstrate that it met its goals for sample size and pass rates associated with its Distribution Vegetation Management Plan (DVMP), Transmission Vegetation Management Plan (TVMP) and Hazard Tree Program (HTP) associated with Initiative 8.2.5 Quality Assurance and Quality Control.

QC Inspection Sampling Sizes and Pass Rates for DVMP. SCE’s WMP included a risk informed QC sampling program for DVMP, which prioritized QA inspections in the highest risk areas as determined by its Tree Risk Index (TRI).⁴¹ In the highest risk areas (TRI A), SCE committed to conduct QA/QC inspections on 4,718 circuit miles. For all other risk categories (TRI-B, TRI-C, and TRI-D), SCE committed to using judgmental sampling to achieve a Confidence Levels (CL) and Confidence Intervals (CI) (CL/CI) of 99/3%.⁴² SCE provided several documents describing the work completed in its DVMP program and the work completed was not consistent between documents. The documentation does show that SCE exceeded its sampling goals for TRI-A risk category QA/QC sampling (completing 5,381 circuit miles of QA/QC inspections) but missed its goal for sampling for TRI risk categories B, C, and D.⁴³

QC Inspection Sampling Sizes and Pass Rates for TVMP and Non-TRI Distribution Circuits. SCE’s WMP stated that SCE would use judgmental sampling to achieve a CL/CI of 99/5% for Transmission circuit miles associated with its TVMP.⁴⁴ SCE provided documentation

⁴⁰ [Technical Guidelines](#) (December 6, 2022), p. A-25 URL: (<http://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true>).

⁴¹ Southern California Edison Company, [2023-2025 Base Wildfire Mitigation Plan](#), Published June 4, 2024, pp. 429-432 URL: (<http://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56770&shareable=true>). URL: (<http://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55866&shareable=true>). This table was modified for Energy Safety’s data request to include statements and targets relevant to 2024.

⁴² Southern California Edison Company, [2023-2025 Base Wildfire Mitigation Plan](#), Published June 4, 2024, pp. 429 URL: (<http://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56770&shareable=true>). (<http://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55866&shareable=true>). This table was modified for Energy Safety’s data request to include statements and targets relevant to 2024.

⁴³ Energy Safety’s 2024 Vegetation Management Audit of Southern California Edison Company. (September 30, 2025). Appendix 1. pp. A-41-A-45.

⁴⁴ Southern California Edison Company, [2023-2025 Base Wildfire Mitigation Plan](#), Published June 4, 2024, pp. 429 URL: (<http://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56770&shareable=true>).

demonstrating that it completed QC inspections along 824 transmission circuit miles.⁴⁵ However, SCE did not describe how it calculated how many transmission line miles should receive QC inspections to achieve a CL/CI of 99/5%. Therefore, SCE did not provide sufficient documentation to demonstrate that it met its CL/CI goal for its transmission lines.

Remediation of HTP. SCE's WMP stated that 100% of its Hazard Tree and Dead and Dying Tree programs receive QA/QC to verify remediation was performed. Additionally, for SCE's Hazard Tree program, independent QC tree assessments are performed to provide assurance that the assessments performed by the Hazard Tree assessments are accurate.⁴⁶ SCE provided documentation to support that it conducted 1,561 QC inspections on trees that received mitigations in either the HTMP or Dead and Dying Tree Removal Program. Based on this documentation, SCE achieved a 98% pass rate for mitigations on its HTMP and Dead and Dying Tree Programs in performance year 2024, compared to the committed 100% pass rate.⁴⁷

SCE's CAP Response

QC Inspection Sampling Sizes and Pass Rates for DVMP

SCE confirmed that the CL/CI of 99/3% applies to distribution circuit miles in TRI-B, TRI-C, and TRI-D. SCE stated that:

“Although the sampling rate for risk tranches B, C, and D may not have been achieved (1,059 actual miles inspected versus 1,402 planned), SCE exceeded its overall TRI QC inspection sampling by 256 miles and performed 629 more miles in the highest risk tranche (TRIA). In other words, SCE exceeded its QC target for the highest risk tranche (TRIA) and on an overall basis across the four TRI risk categories. This was better than achieving fewer miles in TRI rank “A” (higher risk) and more miles in TRI ranks “B, C, D” (lower risk). In addition, by achieving more overall miles and more miles in TRI A [5,381 miles], SCE believes it has met the intent of the QA/QC statement in the WMP and performed adequate QC sampling for the DVMP.”⁴⁸

⁴⁵ Energy Safety's 2024 Vegetation Management Audit of Southern California Edison Company. (September 30, 2025). Appendix 1. pp. A-41-A-45.

⁴⁶ Southern California Edison Company, [2023-2025 Base Wildfire Mitigation Plan](http://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56770&shareable=true), Published June 4, 2024, pp. 429 URL: (<http://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56770&shareable=true>).

⁴⁷ Data Request OEIS-E-SVM_2025-SCE-001, Question 26; attachment: “26_OEIS-E-SVM_2025-SCE-001 Q. 26 Answer.pdf,” p. 2.

⁴⁸ Southern California Edison Company 2024 WMP VM Audit Corrective Action Plan (October 24, 2025). Appendix 2

When asked to explain why 5,381 miles received QC sampling when only 4,718 circuit miles were required to achieve a CL/CI of 100%, SCE explained that when it performs QC inspections, “it is not practical to separate HFRA/SRA miles from non-HFRA miles and therefore, QC performs inspections of all the miles in the applicable grids to minimize errors.”⁴⁹ Therefore, SCE explained that the additional 663 distribution circuit miles completed in TRI A were in non-HFRA areas.⁵⁰

QC Inspection Sampling Sizes and Pass Rates for TVMP and Non-TRI Distribution Circuits

SCE clarified that TRI ranking does not apply for transmission circuit miles. Additionally, SCE stated that transmission and distribution non-TRI circuits (also referred to as “all-other distribution lines”) have a CL/CI goal of 99/5%. SCE stated that for its 13K total miles of Transmission lines, sampling at 99/5% CL/CI required 634 miles to be inspected. SCE completed QC of 824 miles for Transmission, exceeding the requirement by 190 miles. SCE stated this CL/CI is not in its WMP, but it is mentioned in its VM procedure document UVM-07. SCE stated that its non-TRI Distribution total miles are approximately 32K, and sampling at 99/5% CL/CI requires 652 miles to be inspected. In 2024, SCE completed QC of 1,252 non-TRI miles for Distribution, exceeding its QA/QC sampling requirement.

Remediation of HTP

SCE reviewed the 1,561 QC records to determine which trees did not meet the target pass rate and determined 22 trees were not fully remediated and six work sites had insufficient site cleanup.⁵¹ Additionally, SCE stated that its QC auditor was sent back to the locations and verified all mitigations (except two) had been completed. SCE states that the two remaining sites were completed and verified after a third QA/QC visit.

SCE provided documentation demonstrating that the 22 trees that failed the initial QC inspection were mitigated in late 2024 or early 2025. Therefore, SCE stated that 100% QC of HTP remediations were performed and verified for performance year 2024.⁵²

Analysis of Vegetation Management Performance with the 2023-2025 WMP

Meeting QA/QC sample size and pass rate goals provides assurance that vegetation management activities were implemented as intended and that work practices were effectively mitigating ignition risk across SCE’s system. Because SCE did not demonstrate that it achieved all the sample size and pass rate goals included in its 2023–2025 WMP in the VMA, SCE did not complete all work associated with its WMP commitments for its DVMP, TVMP and

⁴⁹ SCE Data Request Set ES-SCE 2024 VMA-QA/QC-001 (March 13, 2029). pp. 1-2

⁵⁰ SCE Data Request Set ES-SCE 2024 VMA-QA/QC-001 (March 13, 2029). pp. 1-2

⁵¹ Southern California Edison Company 2024 WMP VM Audit Corrective Action Plan (October 24, 2025). Appendix 2

⁵² Southern California Edison Company 2024 WMP VM Audit Corrective Action Plan (October 24, 2025). Appendix 2

HTP programs. Accordingly, Energy Safety initially found Initiative 8.2.5 Quality Assurance and Quality Control to be deficient.

SCE established QA/QC sampling goals for its service territory based on ignition risk, with higher risk areas receiving more QA/QC inspections compared to lower risk areas. In its CAP and follow up communications with SCE, it confirmed that it completed QA/QC inspections along a total of 5,381 distribution circuit miles in TRI-A, although only 4,718 miles were specified to achieve a CL/CI of 100%.⁵³ SCE clarified that the additional 663 over the target of 4,718 were in non-HFRA and were inspected during QC inspections of a grid which included both HFRA and non-HFRA. SCE also confirmed that 1,059 distribution circuit miles in TRI Risk Categories B-D had been inspected, which is less than the required 1,402 miles specified in the WMP.⁵⁴ The reduction in sampling reduces the confidence in QA/QC sampling for these risk categories from a CL/CI of 99/3% to 99/3.5%. However, because SCE simultaneously increased the inspections conducted on distribution circuits TRI Risk Category A by 663 circuit miles while reducing sampling in TRI Risk Categories B, C, and D, the total mileage exceeds the requirement for all TRI risk areas with minimal impact on statistical confidence. Therefore, SCE met the objective of its QA/QC sampling associated with its DVMP.

In its CAP, SCE also provided additional documentation and clarifications which demonstrate that it completed all work associated with QA/QC sampling for its TVMP, non-TRI distribution circuits, and HTP and Energy Safety found no outstanding deficiencies in these programs.

Initiative Level Determination

The purpose of this initiative is to implement an audit process to manage and confirm work completed by employees or contractors.⁵⁵ SCE provided sufficient documentation and clarifications to demonstrate that it met statistically significant sample sizes to confirm that all work associated with its DVMP, TCMP, non-TRI distribution circuits and HTP met QA/QC requirements. Therefore, Initiative 8.2.5 Quality Assurance and Quality Control is complete and has no outstanding deficiencies.

VMA Finding 5- 8.2.6 Open Work Orders

The purpose of this initiative is to take actions “to manage the electrical corporation’s open work orders resulting from inspections that prescribe vegetation management activities.”⁵⁶

⁵³ Southern California Edison Company 2024 WMP VM Audit Corrective Action Plan (October 24, 2025). Appendix 2

⁵⁴ Southern California Edison Company 2024 WMP VM Audit Corrective Action Plan (October 24, 2025). Appendix 2

⁵⁵ [Technical Guidelines](#) (December 6, 2022), p. A-25 URL:

(<http://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true>).

⁵⁶ [Technical Guidelines](#) (December 6, 2022), p. A-25 URL:

(<http://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true>).

Summary of Initiative Work Commitments and Activities

SCE did not provide sufficient documentation to demonstrate that all work associated with Initiative 8.2.6 Open Work Orders was complete because it failed to prioritize work orders and complete mitigations within risk-based timeframes and did not monitor overdue work orders as described in its WMP.⁵⁷

Work Orders Completed Outside Risk Based Timeframes. In its WMP, SCE stated that it “prioritizes and endeavors to complete work orders within certain timeframes based on the risk posed by observed conditions.”⁵⁸ SCE categorized vegetation work orders as Priority 1 (P1, 24-72 hour target time frame), where vegetation is in contact, at risk of imminent contact, or expected to imminently fail and strike infrastructure, or Priority 2 (P2, 30-90 hour target time frame), where vegetation is currently stable but could either plausibly fail and contact infrastructure, or has a clearance distance that triggers mitigation work.⁵⁹

SCE’s WMP provided specific timeframes in which it committed to complete vegetation mitigation work based on its prioritization of the risk.⁶⁰ SCE did not provide documentation that it did not meet the timeframe commitments for all P1 and P2 trees.⁶¹

- Priority 1:
 - P1s where there is vegetation contact or evidence of contact, 24-hour mitigation. SCE identified 3,215 P1 trees with evidence of contact, of which it remediated 2,694 P1s (83%) within 24 hours and 521 (17%) P1 trees between 2 and 340 days following their identification date.
 - P1s in HFRA where vegetation is within 18 inches of energized equipment, 72-hour mitigation. SCE identified 2,452 P1 trees within 18 inches of equipment, of which it remediated 2,236 (91%) within 72 hours and 216 (9%) outside the 72-hour time frame.
- Priority 2:
 - P2s where vegetation is closer than the RCD (four feet) but beyond 18 inches, 30-day mitigation: SCE identified 13,960 P2 trees, of which it remediated 5,042 (36%) within 30 days and 8,918 (64%) outside this timeframe.

⁵⁷ Energy Safety’s 2024 Vegetation Management Audit of Southern California Edison Company. (September 30, 2025). Appendix 1. pp. A-49-A-54

⁵⁸ Southern California Edison Company, [2023-2025 Base Wildfire Mitigation Plan](http://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56770&shareable=true), Published June 4, 2024, p.432 URL: (<http://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56770&shareable=true>).

⁵⁹ Southern California Edison Company, [2023-2025 Base Wildfire Mitigation Plan](http://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56770&shareable=true), Published June 4, 2024, p. 433 URL: (<http://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56770&shareable=true>).

⁶⁰ Southern California Edison Company, [2023-2025 Base Wildfire Mitigation Plan](http://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56770&shareable=true), Published June 4, 2024, pp. 432-435 URL: (<http://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56770&shareable=true>).

⁶¹ Energy Safety’s 2024 Vegetation Management Audit of Southern California Edison Company. (September 30, 2025). Appendix 1. pp. A-49-A-53

- All other P2s related to Routine Line Clearing, 90-day mitigation. SCE identified 134,381 P2 trees, of which it remediated 98,941 (74%) within 90 days and 35,440 (26%) outside the 90-day timeframe.
- P2s related to HTMP and the Dead and Dying Tree Removal Program, 180-day timeframe. SCE stated that the remediation timeline is contingent on there being no constraints related to environmental hold, customer refusals, and weather impacts.⁶² SCE provided documentation that 2,070 HTMP and Dead and Dying Tree Removal Program trees were overdue past 180 days due to constraints. While SCE was able to attribute most of the overdue work orders to constraints, nearly 300 of the hazard trees were overdue for over 2 years.

In addition to these overdue work orders, the documentation also indicated that SCE and its contractors had record keeping deficiencies which suggest that SCE is not properly or promptly tracking inspections.

Failure to Monitor Overdue Work Orders. SCE stated in its WMP, “To mitigate the risk of an overdue vegetation work order becoming a fire risk, SCE monitors overdue work orders related to Routine Line Clearing that involve vegetation breaching the required compliance distance from SCE’s lines by revisiting them every 30 days to help ensure they do not become imminent threats.”⁶³ SCE provided documentation demonstrating that it created notifications for overdue work orders and that it required its contractors to reinspect sites with overdue work orders; however, it did not supply documentation to support that re-inspections happened within the target 30-day period.⁶⁴

SCE’s CAP Response

Work Orders Completed Outside Risk Based Timeframes. Regarding SCE’s failure to complete work within risk-based timeframes SCE stated:

“that GO95 does not specify remediation timelines for vegetation conditions. The P2 mitigation timelines for Line Clearing and HTP set forth in SCE’s UVM documentation are internal recommendations that may be subject to constraints. SCE also explained that for P1 and P1-72 conditions, many of the findings were likely due to “late work point closure in the WMS” and not delayed mitigations in the field. SCE’s 2023 CAP response also discussed the penalty language in the TVMP/DVMP Line Clearing contractor Statements of Work (SOWs) and the annual training that emphasized the commencement of penalties if there was no improvement in work order closures.”

⁶² OEIS-E-SVM_2025-SCE-001, Question 34, attachment: “OEIS-E-SVM_2025-SCE-001 Q.34 Answer.pdf,” p. 2.

⁶³ Southern California Edison Company, [2023-2025 Base Wildfire Mitigation Plan](https://www.sce.com/2023-2025-Base-Wildfire-Mitigation-Plan), Published June 4, 2024, pp. 434 URL: (<http://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56770&shareable=true>).

⁶⁴ Energy Safety’s 2024 Vegetation Management Audit of Southern California Edison Company. (September 30, 2025). Appendix 1. pp. A-53-A-54

Priority 1 Timelines:

SCE implemented corrective actions associated with a similar finding in its 2023 vegetation management audit, which made changes to its contractor scope of work to include potential penalties for late work and had since emphasized these changes during contractor training in 2024 and 2025.⁶⁵

To determine if these changes have had the desired impact on completion of priority 1 work orders SCE's VM regulatory and compliance team did a series of analyses P1 24-hour and P1 72-hour mitigations to determine if contractors were improving in their work completion timeframes. The first investigation was of all P1 work completed between April and May 2025. This investigation found that out of the total 726 P1 24-hour conditions, 725 (99.9%) were closed within 24 hours, and 1 (0.1%) was closed 7 days late. The file also showed 420 P1 72-hour conditions, of which 229 (54.5%) were closed within 72 hours, and 191 (45.4%) were closed late. From this investigation, SCE concluded that,

“Although significant improvement (99.86% conformance) was found for closure of P1-24 hour conditions [during this time period relative to the 2024 VMA], improvement was still needed for P1 72-hour conditions. As a result, VM Compliance issued internal corrective action VM-CA-58 on July 18, 2025, to analyze the results and potential penalties for each of SCE's tree trimming contractors.”⁶⁶

Following this investigation, SCE held individual meetings with all tree trimming contractors in July and August 2025 to discuss proposed penalties that would commence if further improvement in timely completion of work was not realized, in order to emphasize the importance of closing work points on a timely basis.

SCE stated that,

“Following the July and August meetings with contractors, SCE performed another analysis on October 2, 2025, which reviewed data for P1 24-hour and P1 72-hour conditions between September 1 and September 30, 2025. This showed significant improvement. Out of the total 712 P1 24-hour conditions, 708 (99.44%) were closed per expectations. Out of the total 167 P1 72-hour conditions, 159 (95.2%) were closed per expectations. Further, no records showed negative closure times (i.e., no work completion/closure dates occurred prior to the reported inspection date).”

SCE stated that it,

“plans to perform another analysis for work point closures in October or November 2025, and the internal corrective action will remain open to document the results of the

⁶⁵ Southern California Edison Company 2024 WMP VM Audit Corrective Action Plan (October 24, 2025). Appendix 2

⁶⁶ Southern California Edison Company 2024 WMP VM Audit Corrective Action Plan (October 24, 2025). Appendix 2

analysis.” Results will be shared with all contractors during individual meetings in November or December 2025. Going forward, SCE is optimistic that there will be continued improvement and limited late work point closures for P1 24-hour and P1 72-hour conditions.”

Priority 2 Timelines:

In its CAP, SCE stated that for P2s where vegetation is closer than the RCD but beyond 18 inches, it sends weekly P1/P2 backlog and aging reports to all VM schedulers and VM Managers to provide visibility and focus.⁶⁷ According to SCE, the report contains the number and trend of P2 noncompliant (<RCD) conditions throughout the SCE service territory. SCE stated that these weekly reports track “the number of days in constraint status and classified each work point by the number of days between creation and completion (e.g., < 5 days, 5-14 days, 15-30 days, > 30 days).”⁶⁸ According to SCE, these reports help staff identify work that is nearing the end of its timeframe, identify delays, and resolve constraints. SCE stated that “the reports are sent to contractors, and the contractors are expected to provide updates regarding when re-visits were performed to provide assurance the unmitigated work does not become a P1.”⁶⁹

P2s related to Routine Line Clearing (90 days) and HTMP/D&DT (180 days):

SCE stated that for P2s related to its Routine Line Clearing, HTMP, and Dead and Dying Tree Programs, “the remediation timeframes for these P2s are internal recommendations and may be subject to constraints, as it notes in UVM-08.”⁷⁰ SCE states that its guidance is more conservative than GO 95 Rule 18A which, according to SCE, allows for correction times to be extended under reasonable circumstances such as third party refusal, customer issues, lack of access, the need to obtain proper permits, and system emergencies (GO 95 Rule 18A(2)(b).

SCE states that it has implemented strategies to address remediations that may be delayed,

“For example, SCE performs re-visits to provide assurance a P2 does not become a P1. For routine line clearing, SCE attempts to revisit the work point every 30 days). For HTP delayed mitigations, trees in TRI risk category A are re-inspected annually to determine if tree health is declining which may warrant being classified as a P1 with mitigation subsequently occurring. SCE re-inspects trees in lower risk areas on a 3-year cadence. Revisiting locations is procedurally documented in UVM-10, Managing UVM Work and

⁶⁷ Southern California Edison Company 2024 WMP VM Audit Corrective Action Plan (October 24, 2025). Appendix 2

⁶⁸ Southern California Edison Company 2024 WMP VM Audit Corrective Action Plan (October 24, 2025). Appendix 2

⁶⁹ Southern California Edison Company 2024 WMP VM Audit Corrective Action Plan (October 24, 2025). Appendix 2

⁷⁰ Southern California Edison Company 2024 WMP VM Audit Corrective Action Plan (October 24, 2025). Appendix 2

Events.”⁷¹

SCE also stated that,

*“it maintains agreements with various environmental departments and agencies regarding the timely approval of work. SCE emphasizes that these external timelines often exceed SCE’s internal scheduling expectations and are outside of SCE’s direct control. While SCE applies project management best practices to coordinate with each agency, the unique review and approval processes of individual agencies can result in extended permitting timelines. In some instances, SCE states that these permits may take a considerable length of time before they are issued, impacting SCE’s ability to conduct the vegetation management activities.”*⁷²

Failure to Monitor Overdue Work Orders. Regarding its monitoring of overdue work orders, SCE stated that “it maintains a SharePoint site containing individual folders where each tree trimming contractor is expected to upload a weekly updated Excel spreadsheet indicating the status of their most recent re-inspections for the P2 work orders that have not yet been completed.”⁷³ SCE intends for these Excel spreadsheets to document the contractors’ re-inspection visits.

SCE stated that it is evaluating opportunities to improve its vegetation management documentation process for revisits.

“SCE’s long-term solution is to implement a formal work management feature within Arbora to manage work on constraints. Until that is implemented SCE is utilizing an Excel spreadsheet. SCE has observed instances of inconsistent contractor compliance where inspection follow-ups were either delayed or not properly documented. To resolve this, SCE plans to introduce a centralized “Contractor Inspection Follow-Up Tracker” that will serve as the single source of truth for all scheduler evaluations and trimmer inspection updates. The new tracker will log the most recent date a scheduler conducted a follow-up with a tree trimming contractor. If the follow-up resulted in a revisit, the tracker would include a link to the uploaded Excel document detailing the tree trimmer’s re-inspection dates. If no actions were required (e.g., the P2 condition has not yet developed into a P1 condition), the tracker will record the date the scheduler confirmed with the contractor no follow-up was necessary. SCE aims for this approach to ensure transparency and accountability, better aligning with the standards outlined in UVM

⁷¹ Southern California Edison Company 2024 WMP VM Audit Corrective Action Plan (October 24, 2025). Appendix 2

⁷² Southern California Edison Company 2024 WMP VM Audit Corrective Action Plan (October 24, 2025). Appendix 2

⁷³ Southern California Edison Company 2024 WMP VM Audit Corrective Action Plan (October 24, 2025). Appendix 2

*documents.*⁷⁴

Analysis of Vegetation Management Performance with the 2023-2025 WMP

The objective of Initiative 8.2.6 Open Work Orders is to manage open vegetation-management work orders identified through inspection activities. Because SCE did not provide documentation to support that it completed all of its work orders within the risk-based timeframes described in its WMP and did not monitor overdue work orders, Energy Safety initially found Initiative 8.2.6 Open Work Orders deficient in the VMA.

SCE acknowledged its limitations in collecting and providing accurate information regarding on-time completion of prescribed vegetation management work and SCE ultimately demonstrated that it fell short of its target timeframes for both P1 and P2 work orders for performance year 2024. In response to similar findings in the 2023 Vegetation Management Audit, SCE began implementing corrective actions in which it modified its contractor scope of work and contractor training to emphasize the need to complete work within risk-based time frame and described how SCE would issue penalties for late work.⁷⁵ SCE provided documentation demonstrating that this new approach is improving completion times for P1 trees but not for P2 trees, which had high levels of overdue work orders in 2024.

SCE also stated that GO 95 Rule 18 allows for P2 correction times to be extended under reasonable circumstances.⁷⁶ SCE also explained how it implemented practices to ensure a P2 tree does not become a P1 tree once overdue, a description of collaborations it has initiated to resolve constraints imposed by delays in agency authorization and permits, as well as short-term and long-term corrective actions to improve its tracking practices for overdue work in the future. These corrective actions demonstrate that SCE is improving its practices to ensure work orders are completed within target timeframes to reduce risk of wildfire ignition and will monitor work orders that are incomplete or overdue to minimize risk to its infrastructure from failing vegetation.

While these corrective actions may help SCE remediate trees within the target time frame in future performance years, in performance year 2024:

- P1 24-hr target: 556 trees were mitigated outside 24 hours
- P1-72-hr target: 218 P1 trees were mitigated outside the 72-hour time frame
- P2-30-day target: 8,934 trees were not mitigated within 30 days
- P2-90-day target: 5,440 trees were not mitigated within 90 days

⁷⁴ Southern California Edison Company 2024 WMP VM Audit Corrective Action Plan (October 24, 2025). Appendix 2

⁷⁵ Southern California Edison Company 2024 WMP VM Audit Corrective Action Plan (October 24, 2025). Appendix 2

⁷⁶ Southern California Edison Company 2024 WMP VM Audit Corrective Action Plan (October 24, 2025). Appendix 2

Although SCE's planned corrective actions demonstrate that it is working to mature its program, SCE left multiple trees, some of which were high risk (P1), without timely remediation. Further, SCE has not demonstrated that its corrective measures are effective for timely mitigation of P2 conditions. Leaving hazard trees unmitigated could pose a risk to electrical lines and equipment which could result in catastrophic wildfire.

Initiative Level Determination

In SCE's 2023-2025 WMP, it committed prioritizing and completing work orders within risk-based timeframes based observed conditions.⁷⁷ SCE did not demonstrate that P1 and P2 open work orders were appropriately managed within target risk-based timeframes in performance year 2024. While SCE provided corrective actions to ensure timely completion and monitoring of its open work orders in future performance years, it did not demonstrate that open work orders were appropriately managed and completed within risk-based timeframes in performance year 2024. This was particularly true of P2 work orders, which had the highest levels of overdue work and did not exhibit the same trends in timely mitigation as P1 trees as a result of the corrective actions. Therefore, Initiative 8.2.6 Open Work Orders has outstanding deficiencies.

3. SCE'S 2024 VM PROGRAMMATIC PERFORMANCE ASSESSMENT

3.1 Performance Assessment of SCE's VM Program

The programmatic assessment is an evaluation of SCE's VM program maturity. Energy Safety considers SCE's year-over-year progress in achieving VM objectives, and whether it has implemented the corrective actions as described in CAP responses from previous performance periods. Energy Safety also evaluates the totality of the vegetation management work and initiative level analysis conclusions to determine whether SCE has completed sufficient work in all initiatives within its vegetation management program to meet the stated objectives of the WMP and minimize the risk of catastrophic wildfire posed by electrical lines and equipment.

⁷⁷ Southern California Edison Company, [2023-2025 Base Wildfire Mitigation Plan](http://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56770&shareable=true), Published June 4, 2024, p.432
URL: (<http://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56770&shareable=true>).

3.2 2024 VM Programmatic Level Performance Analysis

Energy Safety's VMA, dated September 30, 2025, found that SCE completed all work in eight of the 13 initiatives in its 2023-2025 WMP and was deficient in five. SCE's CAP, dated October 24, 2025, sufficiently addressed four of the five deficient initiatives by supplying additional information which demonstrated that SCE performed the work or sufficient corrective actions to demonstrate that it achieved the objective of the initiative. SCE has also begun to implement the corrective actions committed to in previous audit cycles to improve procedures and recordkeeping practices, which demonstrated its commitment to mature its VM programs. However, while Energy Safety has noted improvements to SCE's vegetation management programs, it did not provide sufficient documentation demonstrating it performed all work or did not provide sufficient corrective actions to address deficiencies in one initiative: 8.2.6 Open Work Orders.

SCE's Initiative 8.2.6. Open Work Orders was also identified as a performance issue in previous vegetation management audits and as a result, SCE has begun to take actions to improve performance in this area. SCE's 2023 Substantial Vegetation Management Audit Report⁷⁸ and the 2024 VMA⁷⁹ found that SCE had data discrepancies in their record keeping of completed P1 and P2 work orders. In both cases, SCE attributed the inaccuracies to contractor data entry errors.^{80, 81} In response to the 2023 SVM Audit Report, SCE had planned and begun to implement corrective actions including training its contractors and instituting penalties for late work in 2024 and 2025. Following this implementation SCE conducted several internal reviews of the program, which indicated that contractors completed nearly all of P1 work on time and but did not achieve the same level of success with its P2 work orders. These analyses indicated that, while SCE's 2024 completion of P2 work orders has outstanding deficiencies, particularly regarding resolving constraints, SCE has made corrections which have improved performance in reducing wildfire risk in future performance years.

⁷⁸ SCE 2023 Substantial Vegetation Management Audit Report (June 13, 2025) pp.5-8 (<https://efiling.energysafety.ca.gov/Search.aspx?docket=2023-SVM>)

⁷⁹ SCE 2024 Vegetation Management Audit Report (June 13, 2025) pp A-49-A-53.

⁸⁰ SCE's 2023 WMP VM Audit Corrective Action Plan (March 19, 2025).

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58114&shareable=true>)

⁸¹ Southern California Edison Company 2024 WMP VM Audit Corrective Action Plan (October 24, 2025). Appendix 2

In addition to corrective actions taken in response to deficiencies identified in the 2024 VMA, SCE has also demonstrated programmatic maturity in two other initiatives through implementation of corrective actions from previous audit cycles which had positive impacts on performance. First, Energy Safety's 2023 Substantial Vegetation Management Audit Report⁸² and the 2024 VMA⁸³ found that SCE did not provide documentation demonstrating that wood and slash resulting from mitigation work for Routine Line Clearing, Structure Brushing, HTMP Program, and the Dead and Dying Tree Program was removed from the site. In its 2024 CAP response,⁸⁴ SCE stated that it has taken multiple steps to improve recordkeeping and verify contractor adherence to protocols in future performance years, including improvements to the Arbora software which will now include mandatory tracking of wood and slash. SCE's early testing of this software solution has indicated that now successfully tracks >99% of wood and slash removal. The development and implementation of corrective actions to track wood and slash removal demonstrate that SCE has begun to take steps to address this deficiency and Energy Safety will evaluate the implementation of the new tracking feature in future performance years. In addition, in response to its 2023 SVM Audit, SCE committed to including a formal qualitative WMP target for debris management in its upcoming 2026-2028 WMP.⁸⁵

Second, both the 2023 SVM Audit Report and 2024 VMA initially found that SCE had not completed all work associated with Initiative 8.2.3.3 Clearance. In both performance years SCE reasonably argued that it performed the majority of the work and achieved the objective of the initiative. The errors in reporting which led to the initial findings were attributed to recordkeeping issues which allowed SCE's contractors to make inaccurate selections in field drop-down menus. SCE has committed to implementing software improvements to its Arbora system in its SCE's 2023 CAP response⁸⁶ and 2024 VM CAP response⁸⁷ to eliminate these errors in future performance years.

⁸² SCE 2023 Substantial Vegetation Management Audit Report (June 13, 2025) pp.5-8
(<https://efiling.energysafety.ca.gov/Search.aspx?docket=2023-SVM>)

⁸³ SCE 2024 Substantial Vegetation Management Audit Report (DATE) pp.5-8
(<https://efiling.energysafety.ca.gov/Search.aspx?docket=2023-SVM>)

⁸⁴ Southern California Edison Company 2024 WMP VM Audit Corrective Action Plan (October 24, 2025). Appendix 2

⁸⁵ SCE 2026-2028 Wildfire Mitigation Plan R3 (January 22, 2026) p.333
(https://efiling.energysafety.ca.gov/EFiling/GetFile.aspx?filePath=D%3a%5cFileThat%5cFileServer%5cPublic%5cPublicDocuments%5c2026-2028-Base-WMPs%2fTN17437_20260122T151940_SCE_20262028_Base_WMP_R3.pdf)

⁸⁶ SCE's 2023 WMP VM Audit Corrective Action Plan (March 19, 2025).
(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58114&shareable=true>)

⁸⁷ Southern California Edison Company 2024 WMP VM Audit Corrective Action Plan (October 24, 2025). Appendix 2

Overall, SCE demonstrated continued improvements in its vegetation management programs and has completed the majority of the vegetation management work in its WMP in performance year 2024. Energy Safety has identified deficiencies in one area within SCE's vegetation management 2024 program; however, SCE acknowledges the program shortfall and has initiated implementation of corrective actions to address these deficiencies in future performance years. In addition, SCE has continued to demonstrate year-over-year improvements to its vegetation management management programs. Energy Safety will continue to monitor progress on programmatic performance in SCE's 2025 audit cycle.

CONCLUSION

Based upon the analysis discussed in Sections 2 and 3, Energy Safety concludes that SCE has made year-over-year improvements in its vegetation management programs and has successfully achieved the objectives of 12 initiatives within its 2024 vegetation management program. Energy Safety has identified an outstanding deficiency in one initiative within SCE's vegetation management program: 8.2.6 Open Work Orders. SCE has acknowledged this deficiency and has initiated implementation of corrective actions to address this deficiency.

DATA DRIVEN
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INNOVATIVE
SAFETY FOCUSED





APPENDIX 1. Southern California Edison's 2024 Vegetation Management Audit



APPENDIX DESCRIPTION

Pursuant to Public Utilities Code section 8386.3(b)(5)(A), Energy Safety may annually audit the vegetation management work performed by, or on behalf of, an electrical corporation. The Vegetation Management Audit (VMA) identifies deficiencies in the electrical corporation's implementation of the vegetation management commitments in its WMP.⁸⁸

For each of the 13 initiatives in Section 8.2 (Vegetation Management and Inspections) of SCE's 2023-2025 Wildfire Mitigation Plan (WMP), Energy Safety identified the quantitative targets and commitments as well as verifiable, narrative statements relevant to each initiative and compared that to the work performed by SCE in 2024.

This appendix reproduces the initial audit sent to SCE on September 30, 2025 which describes Energy Safety's analysis and determination of whether SCE completed all work for each VM initiative in performance year 2024.

Energy Safety's analysis included a summary of the information provided by SCE to substantiate completion of each target or statement, Energy Safety's analysis of that information, and a conclusion regarding completion. Based on the determination of completeness for all targets and statements, Energy Safety provides a finding for each initiative. Energy Safety gave a finding of "Complete" if SCE provided sufficient documentation or supporting information demonstrating completion of all targets and/or statements within that initiative. If any target or statement was incomplete or insufficiently documented, Energy Safety determined that the initiative was "deficient."

For any commitment or statement for which the SCE was not able to provide supporting documentation or information to support completion, SCE was asked to address those deficiencies as a part of a corrective action plan (CAP). SCE's CAP is included in Appendix 2.

⁸⁸ Pub. Util. Code, § 8386.3(b)(5)(A).

Southern California Edison Company's
2024 WMP Vegetation Management Audit

Audit Date: August 28, 2025

Revision Date: September 30, 2025

Response Due: October 16, 2025

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

From: Sheryl Bilbrey
Sheryl.Bilbrey@energysafety.ca.gov

CC: Karen McLaughlin, Energy Safety
Chelsea Contreras-Valencia, Energy Safety
Forest Kaser, CPUC
Leslie Palmer, CPUC
Johnny Parker, SCE
Elizabeth Leano, SCE
Cynthia Childs, SCE

Subject: Office of Energy Infrastructure Safety's Audit of Southern California Edison Company's 2024 WMP Vegetation Management Commitments

Pursuant to Public Utilities Code section 8386.3(5)(A), the Office of Energy Infrastructure Safety (Energy Safety) has completed an audit of the WMP vegetation management initiative commitments in Southern California Edison (SCE) Company's 2023-2025 Wildfire Mitigation Plan (WMP) for the 2024 performance year.

The audit findings provided in this document are based on Energy Safety's analysis of all relevant data provided to Energy Safety by SCE to substantiate completion of all vegetation management work commitments in qualitative statements and quantitative targets in its

WMP during performance year 2024. Instances where the data provided by SCE did not substantiate completion of the work associated with the WMP vegetation management initiative commitments are documented as deficiencies in this audit.

Upon receipt of this audit document, SCE must provide additional data or clarifications to Energy Safety as part of a Corrective Action Plan (CAP), described below. Energy Safety is available to meet with SCE to discuss the audit findings and provide any clarification necessary for SCE to prepare the CAP.

Energy Safety will consider all supplemental information and data included in the CAP as part of our analysis of SCE's performance relative to the 2024 WMP vegetation management initiative commitments. Upon completion of Energy Safety's analysis of the CAP, Energy Safety will publish an Audit Report identifying any outstanding deficiencies in SCE's implementation or planned corrective actions relative to its vegetation management commitments in the SCE 2023-2025 WMP.⁸⁹

⁸⁹ Southern California Edison Company, [2023-2025 Base Wildfire Mitigation Plan](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56770&shareable=true), Published June 4, 2024, URL:(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56770&shareable=true>).

SCE Corrective Action Plan

The CAP is an opportunity for SCE to provide supplemental data, additional supporting documentation and/or clarifying statements for consideration by Energy Safety's as part of our analysis of SCE's implementation or planned corrective actions relative to its vegetation management commitments in the 2023-2025 WMP. To support Energy Safety's performance assessment, the SCE CAP may include any of the following:

- Supplemental data and/or supporting documentation substantiating completion of all work on the vegetation management commitment identified as deficient in this audit during the 2024 performance year;
- Detailed documentation of constraint(s) that prevented completion of the work commitment and the actions SCE has taken to resolve those constraints; and/or
- Description of corrective actions SCE has implemented or plans to implement to address outstanding deficiencies identified in past or current vegetation management audits.

SCE must email a copy of its response report to Energy Safety within **30 days** of receipt of this document unless otherwise stated. The list of recipients should include:

- Karen McLaughlin, karen.mclaughlin@energysafety.ca.gov
- Chelsea Contreras-Valencia, Chelsea.Contreras-Valencia@energysafety.ca.gov
- Environmental Science Division, environmentalscience@energysafety.ca.gov

Audit Process Overview

Energy Safety analyzed each of the thirteen vegetation management initiatives listed in SCE's 2023-2025 WMP⁹⁰ as part of this initial audit report. The WMP identifies the electrical corporation's objectives, preventative strategies, and programs that it has implemented to minimize the risk that its infrastructure will cause catastrophic wildfire. The vegetation management section of the WMP includes 13 initiatives, each of which includes one or more specific work commitments. These commitments include both quantitative targets (e.g., completion of a specified number of inspections) and narrative, but verifiable, statements (e.g., implementation of personnel training programs). Energy Safety identified the WMP quantitative commitments and narrative statements relevant to each initiative and compared that to the work performed by SCE in performance year 2024. Determination of whether all work was complete for each commitment was based on data and documentation submitted by SCE.

For each initiative in Section 8.2 (Vegetation Management and Inspections) of SCE's 2023-2025 WMP, quantitative targets and commitments as well as verifiable, narrative statements were assessed for completion. SCE provided data and documentation to support completion of work for eight of the 13 initiatives and did not provide information and documentation to support completion of work for five initiatives. A summary of Energy Safety's findings regarding the VM initiatives is presented in Table 1. A summary of all work commitments for each initiative and Energy Safety's determination on completeness is presented in Table 2.

For each WMP commitment, a summary of the supporting information provided by SCE, Energy Safety's analysis of that information, and a conclusion regarding completion are documented. Energy Safety then provides a finding for each initiative. A finding of "complete" was given only if SCE provided sufficient data or supporting information demonstrating completion of all commitments (targets and/or statements) within that initiative. If any commitment was incomplete or insufficiently documented, the overall finding for the initiative was "deficient."

⁹⁰ Southern California Edison Company, [2023-2025 Base Wildfire Mitigation Plan](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56770&shareable=true), Published June 4, 2024, URL:(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56770&shareable=true>).

Table 1. Summary of Energy Safety's findings regarding completion of SCE's VM Initiatives in its 2023-2025 WMP for performance year 2024. Deficient initiatives are bold.

Programmatic Area	Vegetation Management Initiative	Audit Finding
8.2.2. Vegetation Management Inspections	8.2.2 Vegetation Management Inspections	Complete
8.2.3. Vegetation and Fuels Management	8.2.3.1 Pole Clearing	Complete
8.2.3. Vegetation and Fuels Management	8.2.3.2 Wood and Slash Management	Deficient
8.2.3. Vegetation and Fuels Management	8.2.3.3 Clearance	Deficient
8.2.3 Vegetation and Fuels Management	8.2.3.4 Fall-In Mitigation	Deficient
8.2.3. Vegetation and Fuels Management	8.2.3.5 Substation Defensible Space	Complete
8.2.3 Vegetation and Fuels Management	8.2.3.6 High-Risk Species	Complete
8.2.3 Vegetation and Fuels Management	8.2.3.1 Pole Clearing	Complete
8.2.3 Vegetation and Fuels Management	8.2.3.2 Wood and Slash Management	Complete
8.2.4 Vegetation Management Enterprise System	8.2.3.3 Clearance	Complete
8.2.5 Quality Assurance and Quality Control	8.2.5. Quality Assurance and Quality Control	Deficient
8.2.6 Open Work Orders	8.2.6 Open Work Orders	Deficient
8.2.7 Workforce Planning	8.2.7 Workforce Planning	Complete

Table 2. Summary of Energy Safety's findings regarding completion of SCE's WMP commitments in performance year 2024. Incomplete commitments are bold.

WMP Commitment	2024 Target	2024 Actual	Audit Finding
8.2.2.1 Routine Line Clearing: Detailed Inspections – Distribution (VM-7)	770 grids	778 grids; 660,668 inspections	Completed all work
8.2.2.1 Routine Line Clearing: Detailed Inspections- Transmission (VM-8)	416 circuits	430 circuits; 26,830 inspections	Completed all work
Transmission Vegetation Management Plan (UVM-02) and Distribution Vegetation Management Plan (UVM-03)	Annual Inspections	687,505 Total Inspections	Completed all work
8.2.2.1 Routine Line Clearing - Supplemental Patrol Inspections	Conduct supplemental patrols as needed	54 patrols	Completed all work
8.2.2.2. Hazard Tree Management Program (HTMP) Inspections (VM-1)	408 grids/ circuits	437 grids	Completed all work
HTMP Prescriptions	Prescribe Mitigations	145,956 tree mitigations prescribed	Completed all work

Dead & Dying Tree Removal Inspections (VM-4)	485 grids/ circuits	581 grids	Completed all work
HFRA Patrols	Identify dead, dying, or diseased trees	3,853 dead and dying trees identified	Completed all work
LiDAR Inspections- Distribution (VM-9)	1,020 HFRA circuit miles	1,131 HFRA circuit miles	Completed all work
LiDAR Inspections- Transmission (VM-10)	1,500 HFRA circuit miles	3,181 HFRA circuit miles	Completed all work
Structure Brushing (VM-2)	63,700 structures	82,137 structures	Completed all work
Manage downed wood and slash	Manage all wood and slash associated with mitigation activities	Did not achieve	Did not complete all work
Clearance as prescribed (VM7 & VM8)	Mitigate trees identified in detailed inspections	118,576 (93%) trees mitigated	Did not complete all work
8.2.3.3.1 Expanded Clearances	100% trees meet or exceed RCD	97% trees met or exceeded RCD	Did not complete all work
Expanded Clearances for Generation Legacy Facilities (VM-3)	50 sites	70 sites	Completed all work

8.2.3.4.1 Hazard Tree Management Program (HTMP) (VM-1)	Complete prescribed work	Completed 1,044 out of 1,114 mitigations (94% complete)	Did not complete all work
8.2.3.4.2 Dead and Dying Tree Removal Program (VM-4)	Complete prescribed work	Completed 1,489 out of 1,937 mitigations (77% complete)	Did not complete all work
8.2.3.5.1 Substation Inspection and Management	Inspect substations; mitigate as needed	114 mitigations at 166 substations	Completed all work
Target high risk species (VM-1, VM-7, and VM-8)	Track and monitor high risk species in VM-1, VM-7 and VM-8	Achieved	Completed all work
Pilot projects in support of active management of ROW	Complete and track success of pilot projects	Achieved	Completed all work
Incremental inspections and mitigations (MV-7 and VM-8)	Inspect and mitigate in areas of concern (AOCs)	17,138 mitigations in AOCs	Completed all work
8.2.3.8.1 Emergency Response Vegetation Management Post-Fire	Mitigate vegetation hazards post-fire	5,608 mitigations	Completed all work

Vegetation Management Work Management Tool (Arbora) (VM-6)	Monitor stabilization of Arbora and develop plan and begin execution of plan to enable additional VM maintenance programs	Achieved	Completed all work
QC inspection sampling sizes and pass rates for DVMP	4,718 TRI category A circuit miles; 1,402 TRI categories B-D circuit miles; RCD/CCD Pass Rates 100%/95%	5,381 TRI category A circuit miles; 1,059 TRI categories B-D circuit miles; RCD/CCD Pass Rates 100%/97%	Did not complete all work
QC inspection sampling sizes and pass rates for TVMP	Inspect to achieved 99/5%; RCD/CCD Pass Rates 100%/95%	Insufficient information on sample size; RCD/CCD Pass Rates 100%/98%	Did not complete all work
Remediation of HTP	100% remediation	98% remediation	Did not complete all work
PRC 4292 Structures	Inspect structures using CL/CI of 99/2%	Achieved	Completed all work
Prioritize work orders and mitigate according to risk	Priority 1 trees (24 - 72 hours); Priority 2 trees (30 - 180 days)	Did not achieve	Did not complete all work
Monitor overdue work orders	Weekly	Did not achieve	Did not complete all work

Staff qualifications	Certifications & experience	Achieved	Completed all work
Training	Training for inspectors and project staff	Achieved	Completed all work

*Table 2 was updated to include all commitments analyzed in the initial 2024 SCE VM Audit.

Analysis of Initiative Completion

8.2.2 Vegetation Management Inspections

The purpose of this initiative is to describe the “[i]nspections of vegetation around and adjacent to electrical facilities and equipment that may be hazardous by growing, blowing, or falling into electrical facilities or equipment.”⁹¹ Inspection activities along Distribution and Transmission lines included Routine Line Clearing, Hazard Tree Management Program, Dead and Dying Tree Removal Program, and LiDAR inspections, which are analyzed in the sub-sections below.

8.2.2.1 Routine Line Clearing

Quantitative Target or Commitment, Supporting Information, and Analysis

SCE included the following targets for detailed inspections along distribution and transmission lines in its 2023-2025 WMP.⁹² For ease of comparison, the WMP target and work completed are summarized below:

Initiative Activity	SCE’s 2024 Target	Actual Completed in 2024
Detailed Inspections (HFRA) - Distribution	770 grids	778 grids
Detailed Inspections (HFRA) - Transmission	416 circuits	430 circuits

Supporting Information and Analysis:

Distribution Detailed Inspections: SCE provided an Excel file with metadata listing the distribution grids where routine line clearing was inspected in 2024. The file included the grid ID, inspection date, and HFTD categorization.⁹³ According to this file, SCE inspected 778 grids in 2024 along distribution lines in the High Fire Threat District (HFTD), thus exceeding its VM-7 target of inspecting 770 grids. This file is consistent with SCE’s Q4 QDR data submission which

⁹¹ [Energy Safety 2023-2025 Wildfire Mitigation Plan Technical Guidelines \(Dec. 2022\) \(hereafter Technical Guidelines\)](#), Published December 6, 2022, p. A-24, URL:

(<http://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true>).

⁹² Southern California Edison Company, [2023-2025 Base Wildfire Mitigation Plan](#), Published June 4, 2024, p. 380, URL:(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56770&shareable=true>).

⁹³ Data Request OEIS-E-SVM_2025-SCE-001, Question 5; attachment: “05_OEIS-E-SVM_2025-SCE-001_Q.05_VM-7_VM-8 Inspect.xlsx” and “05_OEIS-E-SVM_2025-SCE-001 Q. 05 Answer.pdf.”

stated that SCE inspected 778 grids to inform trimming prescriptions in the January to December calendar year.⁹⁴

Transmission Detailed Inspections: SCE provided an Excel file and metadata listing the transmission circuits where routine line clearing was inspected in 2024. The file included the circuit ID, circuit name, inspection date and HFTD categorization.⁹⁵ According to this information, SCE inspected 430 circuits from December 2023 through December 2024 to inform work prescriptions in 2024, 419 of which occurred in 2024, along transmission lines in the HFTD, exceeding its VM-8 target of inspecting 416 circuits. This file is consistent with SCE's Q4 QDR data submission which stated that SCE inspected 430 grids to inform trimming prescriptions in the January to December calendar year.⁹⁶

Conclusion: SCE provided information consistent with the completion of work identified in this target.

Narrative Statements, Supporting Information, and Analysis

Statement 1

Statement: "SCE performs annual inspections and trimming for clearance around conductors in accordance with applicable regulations and internal processes such as GO 95, PRC 4293 and SCE's Transmission Vegetation Management Plan (UVM-02) and Distribution Vegetation Management Plan (UVM-03)."⁹⁷

Supporting Information and Analysis: SCE provided an Excel file and metadata listing the vegetation management inspections and mitigations for clearance conducted in the HFRA in 2024 as a part of its Routine Line Clearing programs under VM-7 and VM-8.⁹⁸ The inspections tab of this file included the tree ID, inspection date, whether the inspection was on the distribution or transmission system, latitude, longitude, the mitigation type prescribed (no work required, trim, or removal), and the fire risk zone. SCE noted that it does not distinguish between SRA/LRA/FRA in its fire risk designation for this program. The number of inspections of its distribution and transmission systems and the number of each work prescription type

⁹⁴ Docket # 2024- QDR. File: [SCE 2024 Q4 QDR Tables 1-15 R1](#). Table 1. (July 16, 2025) URL: (<http://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58928&shareable=true>).

⁹⁵ Data Request OEIS-E-SVM_2025-SCE-001, Question 5; attachment: "05_OEIS-E-SVM_2025-SCE-001_Q.05_VM-7_VM-8 Inspect.xlsx" and "05_OEIS-E-SVM_2025-SCE-001 Q. 05 Answer.pdf."

⁹⁶ Docket # 2024- QDR. File: [SCE 2024 Q4 QDR Tables 1-15 R1](#). Table 1. (July 16, 2025) URL: (<http://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58928&shareable=true>).

⁹⁷ Southern California Edison Company, [2023-2025 Base Wildfire Mitigation Plan](#), Published June 4, 2024, p. 380 (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56770&shareable=true>).

⁹⁸ Data Request OEIS-E-SVM_2025-SCE-001, Question 1; attachment: "OEIS-E-SVM_2025-SCE-001_Q.01-02-19-21_2024 VM-7 & VM-8 Inspect & Mitigate.xlsx."

resulting from inspections at each of these points are summarized in the table below.⁹⁹

Work Prescription Following Inspection	# Inspections Distribution Locations	# Inspections Transmission Locations	# Inspections Not Applicable to Distribution or Transmission	Total
No Work Required	499,710	21,903	7	521,620
Trim	155,700	3,495	0	159,195
Removal	5,258	1,432	0	6,690
Total Inspections	660,668	26,830	7	687,505

Of the total inspections, 76% required no work, 23% were prescribed a trim, and 1% were prescribed removal. The majority of the inspections were along SCE’s distribution system (96% of inspection points) and 4% were along its transmission system. The completion of mitigation work associated with these inspections is discussed in Section 8.2.3.3. Clearance.

Conclusion: SCE provided information consistent with the completion of work identified in this statement.

Statement 2

Statement: “SCE also conducts supplemental patrols to help ensure that vegetation encroachments do not occur during peak fire season and high wind conditions. The risks are higher in certain locations, such as canyons, which experience higher winds. SCE also uses the TRI model to optimize and help reduce the need for supplemental patrols, which incorporates a number of risk factors into the POI value. SCE analyzes all methods of alternative patrols, selecting the most appropriate patrol based on the location-specific need for inspection.”¹⁰⁰

Supporting Information and Analysis: SCE provided an Excel file and metadata listing all supplemental patrols conducted in HFRA and the resulting mitigation work completed in 2024.¹⁰¹ The Excel file included two worksheets, one documenting the supplemental inspections and the second documenting the supplemental mitigations which resulted from those inspections. The inspections worksheet included the record ID, work status, location information, dates of inspection, inspection type, and work order number. Based on this file,

⁹⁹ While Energy Safety finds that SCE provided documentation that it conducted inspections and trimming in furtherance of these requirements, this audit makes no findings as to full compliance with the laws and regulations cited.

¹⁰⁰ Southern California Edison Company, [2023-2025 Base Wildfire Mitigation Plan](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56770&shareable=true), Published June 4, 2024, pp. 390-391 URL: (<http://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56770&shareable=true>) .

¹⁰¹ Data Request OEIS-E-SVM_2025-SCE-001, Question 3; attachment: “03_OEIS-E-SVM_2025-SCE-001_Q.03-2024 Supplemental Patrols & Mitigation.xlsx.”

SCE completed 54 supplemental patrol inspections. Mitigations associated with supplemental patrols will be assessed in section 8.2.2.3 Clearance below.

SCE stated supplemental patrols “are conducted in areas where topography or vegetation conditions are known to pose a threat to SCE’s facilities during extreme weather events, such as peak fire season and periods of high wind conditions.”¹⁰² The mitigations worksheet indicates that work associated with supplemental patrols was conducted in areas of either elevated or extreme fire risk, as a part of its Operation Santa Ana, Area of Concern, or Canyon Patrol programs.¹⁰³ Furthermore, the file indicated that the work was done from May through December, within the timeframe SCE considered fire season. Thus, SCE demonstrated that it conducted supplemental patrols and that the majority of these occurred during peak fire season and in high-risk areas; therefore, SCE performed work consistent with the statement.

Conclusion: SCE provided information consistent with the completion of work identified in this statement.

8.2.2.2 Hazard Tree Management Program

Quantitative Target or Commitment, Supporting Information, and Analysis

SCE included the following targets in its 2023-2025 WMP.¹⁰⁴ For ease of comparison, the WMP target and work completed are summarized below:

Initiative Activity	SCE’s 2024 Target	Actual Completed in 2024
Hazard Tree Management Program (HTMP)	408 grids/circuits	437 grids/circuits

Supporting Information and Analysis: SCE provided an Excel file listing inspections conducted as part of SCE’s Hazard Tree Management Program (HTMP) in 2024. The file included the inspection date, grid ID and HFTD class.¹⁰⁵ According to the information in this Excel file, SCE inspected 437 distribution grids between November 2023 and December 2024 as part of the HTMP, 410 of these grids in 2024. SCE indicated that inspections were only performed on

¹⁰² Data Request OEIS-E-SVM_2025-SCE-001, Question 3; attachment: “03_OEIS-E-SVM_2025-SCE-001 Q. 03 Answer.pdf.”

¹⁰³ Data Request OEIS-E-SVM_2025-SCE-001, Question 3; attachment: “03_OEIS-E-SVM_2025-SCE-001_Q.03-2024 Supplemental Patrols & Mitigation.xlsx.”

¹⁰⁴ Southern California Edison Company, [2023-2025 Base Wildfire Mitigation Plan](#), Published June 4, 2024, p. 379 URL: (<http://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56770&shareable=true>).

¹⁰⁵ Data Request OEIS-E-SVM_2025-SCE-001, Question 6, attachment: “06_OEIS-E-SVM_2025-SCE-001_Q.06_VM-1 Inspect.xlsx.”

Distribution grids.¹⁰⁶ SCE did not provide an explanation as to why no Transmission circuits were assessed in this program. However, the WMP does not specify how many of each type of asset should be inspected, only that the inspection scope and frequency were driven by the Tree Risk Calculator (TRC) model that was developed under standards set forth by the ISA Tree Risk Assessment Qualification (TRAQ).¹⁰⁷ This file is consistent with SCE's Q4 QDR data submission which stated that SCE inspected 437 grids/circuits to prescribe mitigation for hazardous trees with strike potential within those grids in SCE's HFRA.¹⁰⁸ Therefore, SCE completed work consistent with its VM-1 target of 408 grids/circuits within the HTMP.

Conclusion: SCE provided information consistent with the completion of work identified for this target associated with VM-1.

Narrative Statements, Supporting Information & Analysis, and Conclusion

Statement 3

Statement: "HTMP inspectors use the Tree Risk Calculator (TRC) to document tree defects and likelihood of failure and target impact. The certified arborist assigns a risk score based on six criteria: (1) Voltage Impact; (2) Fire Impact; (3) Likelihood of Impact; (4) Tree Lean; (5) Tree Height Factor; and (6) Site Condition Attributes. [...] Depending on the inspector's assessment results, a tree is classified into one of two categories: (1) a subject tree which does not need mitigation but is added to SCE's tree inventory for continued monitoring or (2) a hazard tree needing mitigation (trim) or removal. [...] Based on the results of the inspection, SCE generates prescriptions and performs the required remediations."¹⁰⁹

Supporting Information and Analysis: SCE provided an Excel file and metadata of the HTMP risk assessments and associated mitigation work conducted in 2024.¹¹⁰ The Excel file included the risk assessment date, prescribed mitigation (prune, removal, or no work required), fire risk designation, risk score, tree species, and conditions identified. According to this file, SCE conducted 145,956 total risk assessment inspections in performance year 2024, the prescribed work for each inspection, and percentage of each mitigation type, are summarized in the table below:

¹⁰⁶ Data Request OEIS-E-SVM_2025-SCE-001, Question 6, attachment: "06_OEIS-E-SVM_2025-SCE-001_Q.06 Answer.pdf."

¹⁰⁷ Southern California Edison Company, [2023-2025 Base Wildfire Mitigation Plan](#), Published June 4, 2024, pp. 394-395 URL: (<http://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56770&shareable=true>).

¹⁰⁸ Docket # 2024- QDR. File: [SCE 2024 Q4 QDR Tables 1-15 R1](#). Table 1. (July 16, 2025) URL: (<http://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58928&shareable=true>).

¹⁰⁹ [SCE's 2023-2025 WMP](#) (Rev. #1.1, Jun. 4, 2024), p. 394 URL: (<http://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56770&shareable=true>).

¹¹⁰ Data Request OEIS-E-SVM_2025-SCE-001, Question 7, attachment: "07_OEIS-E-SVM_2025-SCE-001 Q. 07 Answer.pdf and 07_OEIS-E-SVM_2025-SCE-001_Q.07-08_2024 HTMP_VM-1 Work.xlsx."

Mitigation Prescribed	Number of Trees
Prune	168 (0.1%)
Removal	1,117 (0.8%)
No work required	144,671 (99.1%)
Total	145,956

This file demonstrates that tree crews assessed tree conditions using the schema described and rated the trees according to risk. Completion of mitigation work associated with these inspections will be assessed in Section 8.2.3.4. Fall-in Mitigation.

Conclusion: SCE provided information consistent with the completion of work identified in this statement.

8.2.2.3 Dead and Dying Tree Removal Program

Quantitative Target or Commitment, Supporting Information, and Analysis

SCE included the following targets in its 2023-2025 WMP.¹¹¹ For ease of comparison, the WMP target and work completed are summarized below:

Initiative Activity	SCE's 2024 Target	Actual Completed in 2024
Dead and Dying Tree Removal Program Inspections	485 grids/circuits	581 grids/circuits

Supporting Information and Analysis: SCE provided an Excel file listing the grids and circuits inspected as part of SCE's Dead and Dying Tree Removal Program in 2024. The file included the inspection date, grid ID, and HFTD tier.¹¹² According to the information in this Excel file, SCE inspected 581 distribution grids between November 2023 and December 2024 as part of the Dead and Dying Tree Removal Program, 545 of these grids in 2024. SCE indicated that inspections were only performed on distribution grids.¹¹³ SCE did not provide an explanation as to why no transmission circuits were assessed in this program. However, the WMP does not

¹¹¹ Southern California Edison Company, [2023-2025 Base Wildfire Mitigation Plan](#), Published June 4, 2024, p. 379-380 URL: (<http://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56770&shareable=true>).

¹¹² Data Request OEIS-E-SVM_2025-SCE-001, Question 9, attachment: "09_OEIS-E-SVM_2025-SCE-001_Q.09_2024 D&D_VM-4 Inspect.xlsx."

¹¹³ Data Request OEIS-E-SVM_2025-SCE-001, Question 6, attachment: "06_OEIS-E-SVM_2025-SCE-001_Q.09 Answer.pdf."

specify how many of each type of asset should be inspected, only that the inspections for the Dead and Dying Tree Removal program will be scheduled based on the consolidated inspection strategy.¹¹⁴ This file is consistent with SCE's Q4 QDR data submission which stated that SCE inspected 581 grids/circuits to prescribe mitigation for dead and dying trees with strike potential within those grids/circuits.¹¹⁵ Therefore, SCE completed work consistent with its VM-4 target of 485 grids/circuits associated with the HTMP.

Conclusion: SCE provided information consistent with the completion of work identified for this target associated with VM-4.

Narrative Statements, Supporting Information & Analysis, and Conclusion

Statement 4

Statement: "SCE conducts patrols in HFRA to identify and remove dead, dying, or diseased trees affected by drought conditions and/or insect infestation. All trees that are identified within strike distance of SCE overhead facilities that are dead or expected to die within one year are prescribed for removal."¹¹⁶

Supporting Information and Analysis: SCE provided an Excel file listing all dead and dying trees identified during its Dead and Dying Tree Removal Program inspection program in 2024. The file included the tracking ID, tree's coordinates, patrol date, work type (removal), work/mitigation completion date, and HFTD designation.¹¹⁷ Based on this Excel file, SCE identified 3,853 dead and dying trees with patrol dates from November 2023 to December 2024, of which 3,794 were in 2024. SCE stated that its patrol inspections performed in November and December of 2023 are included in SCE's 2024 VM-4 inspection schedule.¹¹⁸ Under Initiative 8.2.2, Energy Safety assessed the completion of dead and dying trees patrol inspections and prescriptions for removal. The completion of the removals will be assessed under Initiative 8.2.3.4 Fall-In Mitigation.

Conclusion: SCE provided information consistent with the completion of work identified in this statement.

¹¹⁴ Southern California Edison Company, [2023-2025 Base Wildfire Mitigation Plan](#), Published June 4, 2024, pp. 397-398 URL: (<http://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56770&shareable=true>).

¹¹⁵ Docket # 2024- QDR. File: [SCE 2024 Q4 QDR Tables 1-15 R1](#). Table 1. (July 16, 2025) URL: (<http://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58928&shareable=true>).

¹¹⁶ Southern California Edison Company, [2023-2025 Base Wildfire Mitigation Plan](#), Published June 4, 2024, p. 419 URL: (<http://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56770&shareable=true>).

¹¹⁷ Data Request OEIS-E-SVM_2025-SCE-001, Question 10, attachment: 10_OEIS-E-SVM_2025-SCE-001_Q.10-11_2024 D&D_VM-4 Mitigation.xlsx."

¹¹⁸ Data Request OEIS-E-SVM_2025-SCE-001, Question 10, attachment: 10_OEIS-E-SVM_2025-SCE-001 Q. 10 Answer.pdf" p. 2, footnote 1.

8.2.2.4 Remote Sensing Inspections: LiDAR

Quantitative Target or Commitment, Supporting Information, and Analysis

SCE included the following targets in its 2023-2025 WMP.¹¹⁹ For ease of comparison, the WMP target and work completed are summarized below:

Initiative Activity	SCE's 2024 Target	Actual Completed in 2024
LiDAR Distribution Vegetation Inspections	1,020 HFRA circuit miles	1,131 HFRA circuit miles
LiDAR Transmission Vegetation Inspections	1,500 HFRA circuit miles	3,181 HFRA circuit miles

Supporting Information and Analysis: SCE provided an Excel file of its LiDAR Inspections for performance year 2024. The file included two worksheets, one for its distribution system and one for its transmission system which included columns for circuit ID and name, the completion date, circuit miles inspected, and HFTD risk zone. This file indicated that SCE conducted LiDAR inspections along approximately 1,131 Distribution and 3,181 Transmission circuit miles, on 43 Distribution and 229 Transmission circuits.¹²⁰ This file is consistent with SCE's Q4 QDR data submission which stated that SCE conducted LiDAR inspections along 1,130.4 distribution circuit miles and 3,180.92 transmission circuit miles in HFRA.¹²¹ Thus, SCE exceeded both of its LiDAR vegetation inspection targets related to the number of HFRA circuit miles along distribution (VM-9) and transmission (VM-10) lines.

Conclusion: SCE provided information consistent with the completion of work identified in these targets associated with VM-9 and VM-10.

Finding – 8.2.2 Vegetation Management Inspections

SCE provided information consistent with the completion of work identified in 8.2.2.1 Routine Line Clearing, 8.2.2.2. Hazard Tree Mitigation Program, 8.2.2.3. Dead and Dying Tree Removal Program, and 8.2.2.4. LiDAR Inspections. Therefore, Energy Safety concluded that initiative 8.2.2 Vegetation Management Inspections is complete.

¹¹⁹ Southern California Edison Company, [2023-2025 Base Wildfire Mitigation Plan](#), Published June 4, 2024, pp. 380-381 URL: (<http://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56770&shareable=true>).

¹²⁰ Data Request OEIS-E-SVM_2025-SCE-001, Question 12; attachment: "OEIS-E-SVM_2025-SCE-001_Q.012-2024 LiDAR VM-9 and VM-10.xlsx."

¹²¹ Docket # 2024- QDR. File: [SCE 2024 Q4 QDR Tables 1-15 R1](#). Table 1. (July 16, 2025) URL: (<http://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58928&shareable=true>).

8.2.3.1 Vegetation and Fuels Management – Pole Clearing

The purpose of this initiative is to describe the “[p]lan and execution of vegetation removal around poles per Public Resources Code section 4292 and outside the requirements of Public Resources Code section 4292 (e.g., pole clearing performed outside of the State Responsibility Area).”¹²²

Quantitative Target or Commitment, Supporting Information, and Analysis

SCE included the following target in its 2023-2025 WMP.¹²³ For ease of comparison, the WMP target and work completed are summarized below:

Initiative Activity	SCE’s 2024 Target	Actual Completed in 2024
Structure Brushing (PRC 4292 exempt structures only)	63,700 structures	82,137 structures

Supporting Information and Analysis: SCE provided an Excel file listing all structures inspected in HFTD in 2024. The file included the structure ID, location information (latitude and longitude, inspection date, clearing date, status, HFTD tier, and whether it was in SRA.¹²⁴ According to this file, SCE inspected 116,388 structures. Results of these inspections and the percentage of the total number of inspections are summarized in the table below:

¹²² [Technical Guidelines](#) (December 6, 2022), p. A-24 URL:

(<http://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true>).

¹²³ Southern California Edison Company, [2023-2025 Base Wildfire Mitigation Plan](#), Published June 4, 2024, p.379 URL: (<http://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56770&shareable=true>) This table was modified for Energy Safety’s data request to include statements and targets relevant to 2024.

¹²⁴ Data Request OEIS-E-SVM_2025-SCE-001, Question 13; attachment: “13_OEIS-E-SVM_2025-SCE-001_Q.13-2024 Structure Brushing_VM-2.xlsx.”

Inspection Result	Number of Structures
Structure brushing complete	82,137 (70%)
Partial clearance	1,677 (1%)
No access	20,140 (17%)
No clearance required	11,284 (10%)
No structure found	1,147 (1%)
No longer in scope	3 (<1%)
Total	116,388

According to this file, SCE cleared 82,137 of the structures it inspected in 2024, thus exceeding its Structure Brushing (VM-2) target. This file is consistent with SCE’s Q4 QDR data submission which stated that SCE inspected 116,388 structures.¹²⁵ The QDR did not provide a number for the number of structures that were cleared. SCE did not provide any additional information on how it planned to resolve access issues or why some structures only received partial clearance.

Conclusion: SCE provided information consistent with the completion of work identified for this target associated with VM-2.

Finding – 8.2.3.1 Pole Clearing

SCE provided information consistent with the completion of work identified in 8.2.3.1.1. Structure Brushing. Therefore, Energy Safety concludes initiative 8.2.3.1 Pole Clearing is complete.

8.2.3.2 Vegetation and Fuels Management – Wood and Slash Management

The purpose of this initiative is to take actions “to manage all downed wood and ‘slash’ generated from vegetation management activities.”¹²⁶

¹²⁵ Docket # 2024- QDR. File: [SCE 2024 Q4 QDR Tables 1-15 R1](http://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58928&shareable=true). Table 1. (July 16, 2025) URL: (<http://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58928&shareable=true>).

¹²⁶ [Technical Guidelines](http://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true) (December 6, 2022), p. A-24 (<http://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true>).

Narrative Statements, Supporting Information, and Analysis

Statement 5

Statement: “SCE’s contract crews strive to remove all wood and material resulting from mitigation for Routine Line Clearing, Structure Brushing, HTMP, and the Dead and Dying Tree Program typically within 100 feet of a dirt or paved road, subject to site conditions. On private property, crews will typically strive to remove all wood, providing that crews are able to maneuver and operate their equipment close enough to the area (e.g., skid steers).”¹²⁷

Supporting Information and Analysis: SCE stated that its contractors were responsible for performing and managing removal of wood and slash as a part of their vegetation management work.¹²⁸ In response to DR OEIS-E-SVM-2025-SCE-001, SCE emphasized that that its “contract crews strive” to remove wood and sash, but are not required to do so.¹²⁹

Specifically, SCE stated:

SCE’s contractors are responsible for performing and managing removal of wood and slash material as part of their vegetation management (VM) mitigation work. However, as emphasized in SCE’s WMP statement, not all material is removed from every location, as the expectation is that crews strive (i.e., use best efforts) but are not required to do so 100% of the time, as there may be site conditions or circumstances where removal is not safe, practicable, or desired (for example, customers may specifically request that material be left as habitat, mulch, or chopped into firewood). Because tree trimming and removal work inherently produces cuttings and woody material, SCE considers debris management as part of completing vegetation management work.

SCE provided the following documentation to demonstrate that it required contractors to remove wood and slash associated with its vegetation management programs:¹³⁰

Routine Line Clearing Program – SCE provided an excerpt from its contractors’ statement of work (SOW) regarding wood and slash management. The excerpt states “Contractor is responsible for immediate cleanup and disposal of all debris generated from line clearing or

¹²⁷ Southern California Edison Company, [2023-2025 Base Wildfire Mitigation Plan](https://www.sce.com/2023-2025-Base-Wildfire-Mitigation-Plan), Published June 4, 2024, p.411 URL: (<http://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56770&shareable=true>).

¹²⁸ Data Request OEIS-E-SVM_2025-SCE-001, Question 14; attachment: “OEIS-E-SVM_2025-SCE-001 Q.14 Answer.pdf.”

¹²⁹ Data Request OEIS-E-SVM_2025-SCE-001, Question 14; attachment: “OEIS-E-SVM_2025-SCE-001 Q.14 Answer.pdf.”

¹³⁰ Data Request OEIS-E-SVM_2025-SCE-001, Question 14; attachment: “OEIS-E-SVM_2025-SCE-001 Q.14 Answer.pdf.”

other Edison support or vegetation management activity. Contractor shall leave the property in the same condition as it was when they entered the property.”¹³¹

Structure Brushing Program – SCE included an excerpt from its SOW, which states that after clearance work the contractor must complete “[s]cattering/broadcasting of cleared brush outside of clearance area, where allowed. Excessive brush that would require stacking and/or present a hazard must be hauled away to dump on the same day.”¹³²

HTMP and Dead and Dying Tree Removal Program– SCE provided an excerpt from its SOW that stated “Contractor is responsible for immediate cleanup and disposal of all debris generated from vegetation management activity. Contractor shall leave the property in the same condition as it was when they entered the property.”¹³³

SCE also provided a screenshot of language included in all vegetation management SOWs that stated that contractors must comply with applicable laws and standards.¹³⁴ While this documentation supports that SCE directs its contractors to complete wood and slash management in accordance with the contract provisions, SCE could not provide Energy Safety with specific documentation of when and where wood and slash management was completed in the field. SCE stated that while its work management system (WMS) includes fields for contractors to input wood and slash removal information, SCE does not require contractors to complete these fields.¹³⁵ Therefore, SCE cannot provide Energy Safety with documentation verifying that the work was completed in all or most instances, nor can it confirm that, if the work was not completed, that there was a valid constraint preventing completion. It is incumbent upon SCE to enforce their contract provisions and provide Energy Safety with field records demonstrating the completion of all wildfire mitigation work that SCE has committed to perform.

SCE stated that it performs post-work verification by internal senior specialists (SSPs) who are ISA Certified Arborists.¹³⁶ SSPs are required to look for debris removal and site cleanup as a part of their oversight and review. SCE also stated that, specifically for structure brushing,

¹³¹ Data Request OEIS-E-SVM_2025-SCE-001, Question 14; attachment: “OEIS-E-SVM_2025-SCE-001 Q.14 Answer.pdf.”

¹³² Data Request OEIS-E-SVM_2025-SCE-001, Question 14; attachment: “OEIS-E-SVM_2025-SCE-001 Q.14 Answer.pdf.”

¹³³ Data Request OEIS-E-SVM_2025-SCE-001, Question 14; attachment: “OEIS-E-SVM_2025-SCE-001 Q.14 Answer.pdf.”

¹³⁴ Data Request OEIS-E-SVM_2025-SCE-001, Question 14; attachment: “OEIS-E-SVM_2025-SCE-001 Q.14 Answer.pdf.”

¹³⁵ Data Request OEIS-E-SVM_2025-SCE-001, Question 14; attachment: “OEIS-E-SVM_2025-SCE-001 Q.14 Answer.pdf.”

¹³⁶ Data Request OEIS-E-SVM_2025-SCE-001, Question 14; attachment: “OEIS-E-SVM_2025-SCE-001 Q.14 Answer.pdf.”

its QC inspectors assess debris removal as part of the QC procedure.¹³⁷ However, while this demonstrates an intent to verify that the work was completed, SCE did not submit any documentation supporting that these reviews were completed, nor the outcomes of the oversight inspections.

For Energy Safety to determine debris clearing was completed, SCE must submit documentation demonstrating that wood and slash resulting from mitigation work for Routine Line Clearing, Structure Brushing, HTMP Program, and the Dead and Dying Tree Program was removed from the site except when beyond SCE's control, and if constraints prevented removal, SCE should provide detail describing the circumstances. SCE stated in their response that they do not consider vegetation debris cleanup as a formal target for the 2023-2025 WMP and thus does not make it mandatory to track all mitigation records of debris removal, which it considers to be too burdensome because SCE would have to reach out to each contractor that may not have retained or records of the removal work done in the field.¹³⁸ However, without this documentation, Energy Safety could not conclude that the debris removal was completed. Moreover, the documentation SCE submitted indicated that SCE does not field verify whether wood and slash removal was completed by its contractors, as its contractors are required to do through their contracts.

Conclusion: SCE did not provide information consistent with the completion of all work identified in this statement.

Finding – 8.2.3.2 Wood and Slash Management

SCE did not provide information consistent with the completion of work identified in this initiative. Therefore, Energy Safety concludes that initiative 8.2.3.2 Wood and Slash Management is deficient.

In its CAP response SCE must provide records of wood and slash removal for work associated with its vegetation management programs and whenever work was not completed, SCE must submit documentation describing the constraints which prevented this work and identify the actions it plans to implement to ensure the work is completed in future performance years.

¹³⁷ Data Request OEIS-E-SVM_2025-SCE-001, Question 14; attachment: "OEIS-E-SVM_2025-SCE-001 Q.14 Answer.pdf."

¹³⁸ Data Request OEIS-E-SVM_2025-SCE-001, Question 14; attachment: "OEIS-E-SVM_2025-SCE-001 Q.14 Answer.pdf," p. 4.

8.2.3.3 Vegetation and Fuels Management –Clearance

The purpose of this initiative is to take actions “after inspection to ensure that vegetation does not encroach upon electrical equipment and facilities, such as tree trimming.”¹³⁹

8.2.3.3.1. Expanded Clearing

Quantitative Target or Commitment, Supporting Information, and Analysis

SCE did not have a target for Clearance in its 2023-2025 WMP. However, for expanded clearing, SCE’s WMP states that it “seeks to achieve expanded clearances where feasible in HFRA as part of its Routine Line Clearing activities (Distribution Vegetation Management Plan [VM-7] and Transmission Vegetation Management Plan [VM-8]).”¹⁴⁰ Therefore, Energy Safety assessed completion of this initiative based on whether each tree that was inspected in each of these programs received the prescribed mitigation. Energy Safety limited this analysis to inspections performed in Q1, Q2, and Q3, because inspections conducted in Q4 of 2024 could be completed in Q1 of 2025 and still meet the 90-day P2 timeframe specified in Section 8.2.6 Open Work Orders. The table below summarizes the total number of mitigation activities prescribed during inspections between January and September, the number of mitigation activities that were completed and the percent completion for each mitigation type, and the number of inspections that did not receive the prescribed mitigation and the percentage of incomplete mitigations for each mitigation type.

Activity/Line Type	Total Inspections with Prescriptions	Inspection with a Mitigation	Inspections without a Mitigation
Trims	122,591	114,630 (94%)	7,961 (6%)
Removals	5,423	3,946 (73%)	1,477 (27%)
All work on Distribution	123,278	114,875 (93%)	8,403 (7%)
All work on Transmission	4,736	3,701 (78%)	1,035 (22%)
Total	128,014	118,576 (93%)	9,438 (7%)

¹³⁹ [Technical Guidelines](#) (December 6, 2022), p. A-24 URL: (<http://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true>).

¹⁴⁰ Southern California Edison Company, [2023-2025 Base Wildfire Mitigation Plan](#), Published June 4, 2024, p. 412 URL: (<http://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56770&shareable=true>).

Supporting Information and Analysis: SCE provided an Excel file and metadata listing all the vegetation management inspections and mitigations for clearance conducted in the HFRA in 2024 as a part of its Routine Line Clearing programs under VM-7 and VM-8.¹⁴¹ The inspections worksheet of this file included the tree ID, inspection date, whether the inspection was on the distribution or transmission system, latitude, longitude, the mitigation type prescribed (no work required, trim, or removal), and the fire risk zone. The mitigation worksheet included the completion date, tree ID, mitigation type, line type, fire risk, latitude, longitude, tree species, and growth rate. The file indicated that 165,885 total mitigations were completed in 2024.

To assess whether inspections received prescribed mitigations, Energy Safety determined whether each unique tree ID between January and September 2024 in the inspection worksheet had a corresponding mitigation completion date in the mitigation worksheet. Energy Safety found that of the 128,014 inspections where a mitigation was prescribed, SCE completed those mitigations for 118,576 trees (93%), failing to complete mitigations on the remaining 9,438 trees (7%) in High Fire Risk Areas (HFRA). Energy Safety also determined that the completion rate for trims (94%) was slightly higher than the completion rate for removals (73%) and that there was a higher completion rate for work prescribed on its distribution system (93%) compared to its transmission system (78%). Thus, in performance year 2024, SCE did not complete all prescribed mitigations in HFRA.

SCE also provided an Excel file and metadata listing all supplemental patrols conducted in HFRA and the resulting mitigation work completed in 2024.¹⁴² The Excel file included two worksheets, one documenting the supplemental inspections and the second documenting the supplemental mitigations which resulted from those inspections. The inspections worksheet included the record ID, work status, location information, dates of inspection, inspection type, and work order number. The mitigations worksheet included the record ID, status, latitude and longitude, inspection type, work order, fire risk, clearances achieved, and the work completed. Based on this file, SCE completed 54 supplemental patrol inspections and 99 mitigation activities. However, the inspections file did not identify where work was prescribed and the record IDs for the inspections and mitigations worksheets did not match; therefore, Energy Safety could not verify that inspections resulted in mitigation work. However, the mitigations worksheet indicated expanded clearances were achieved for trees associated with supplemental patrols in HFRA during high fire threat season. These number of trees with the respective clearances are summarized below:

¹⁴¹ Data Request OEIS-E-SVM_2025-SCE-001, Question 1; attachment: "OEIS-E-SVM_2025-SCE-001_Q.01-02-19-21_2024 VM-7 & VM-8 Inspect & Mitigate.xlsx."

¹⁴² Data Request OEIS-E-SVM_2025-SCE-001, Question 3; attachment: "03_OEIS-E-SVM_2025-SCE-001_Q.03-2024 Supplemental Patrols & Mitigation.xlsx."

Clearance Distance	Number of Trees
12 ft or more	28
9ft - 12 ft	6
6 ft - 9 ft	2
4 ft - 6 ft	9
less than 4 ft	54

Because all of the prescribed work for clearances was not completed, Energy Safety found that SCE did not complete all work associated with this initiative.

Conclusion: SCE did not provide information consistent with the completion of all clearance work associated with VM-7 and VM-8 and its supplementary patrol inspections.

Narrative Statements, Supporting Information, and Analysis

Statement 6

Statement: “SCE performs expanded line clearances to mitigate the risk of vegetation contact with energized conductors. [...] “At a minimum, SCE’s Routine Line Clearing work within HFRA maintains at least the required four feet clearance for Distribution lines and the required 10 feet clearance for Transmission lines for a full annual inspection cycle. Where GRCD has been achieved historically, SCE strives to maintain the expanded clearance thereafter.”¹⁴³

Supporting Information and Analysis: SCE provided an Excel file documenting the clearance work along distribution and transmission lines within the HFRA in 2024, which included the inspection date, clearance completion date, fire risk rating, and clearance designation (Grid Resiliency Clearance Distance [GRCD], Trigger Clearance Distance [TRC], Compliance Clearance Distance [CCD], Regulation Clearance Distance [RCD], or Non-Compliant).¹⁴⁴ Based on this file, SCE conducted 135,187 total inspections of its electrical system in 2024, 134,839 of which were on its Distribution or Transmission system. These activities and the clearances achieved are summarized in the table below based on the type of work used to achieve the clearances and by line type:

¹⁴³ Southern California Edison Company, [2023-2025 Base Wildfire Mitigation Plan](http://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56770&shareable=true), Published June 4, 2024, p. 412-413 URL: (<http://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56770&shareable=true>).

¹⁴⁴ Data Request OEIS-E-SVM_2025-SCE-001, Question 15-16; attachment: “OEIS-E-SVM_2025-SCE-001_Q.15-16_RLC Clearance.xlsx.”

Activity/ Line Type	Total Inspections	GRCD+	TCD+CCD+RCD	Not Specified
Trims on Distribution Lines	125,124	94,452 (75%)	27068 (22%)	3,604 (3%)
Removals on Distribution Lines	4,978	4,146 (83%)	54 (1%)	778 (16%)
No Work Required on Distribution Lines	104	27 (26%)	7 (7%)	70 (67%)
<i>Total Distribution Clearance Activity</i>	<i>130,206</i>	<i>9,8598 (76%)</i>	<i>27122 (21%)</i>	<i>4,382 (3%)</i>
Trims on Transmission lines	2,878	2,364 (82%)	433 (15%)	81 (3%)
Removals on Transmission Lines	1,754	1702 (97%)	28 (2%)	24 (1%)
No Work Required on Transmission Lines	1	0 (0%)	1 (100%)	0 (0%)
<i>Total Transmission Clearance Activity</i>	<i>4,633</i>	<i>4066 (88%)</i>	<i>461 (10%)</i>	<i>105 (2%)</i>
<i>Total Clearance Activity</i>	<i>134,839</i>	<i>102,664 (76%)</i>	<i>27,583 (21%)</i>	<i>4,487 (3%)</i>

Of the 134,839 clearance inspections on transmission and distribution lines, 102,664 (76%) had GRCD or greater clearance distances, indicating that SCE met its commitment to implement GRCD into its Clearance program. This percentage of GRCD is greater than SCE's historical success rate stated in its WMP (67%).¹⁴⁵ The majority of trees inspected, 130,247 (97%), met or exceeded the minimum required clearance distance (RCD).

Of the total inspections, 1,071 (3%) prescribed trees were either non-compliant or "P1-24" or had a blank entry for compliance status post clearance (listed as "not specified" in the table above. SCE stated that blank, P1-24, or non-compliance entries for the post clearance status are due to "incorrect end-user selection of post mitigation clearance drop-down menus" while operating its work management system (Survey 123).¹⁴⁶ While these entries might be in error, SCE could not provide documentation verifying that these trees were in compliance with clearance requirements. Because the statement committed to maintaining the minimum required clearance (RCD) for all trees in HFRA, Energy Safety concluded that not all work was completed in 2024.

¹⁴⁵ Southern California Edison Company, [2023-2025 Base Wildfire Mitigation Plan](http://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56770&shareable=true), Published June 4, 2024, p.416 URL: (http://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56770&shareable=true).

¹⁴⁶ Data Request OEIS-E-SVM_2025-SCE-001, Question 15-16; attachment: "OEIS-E-SVM_2025-SCE-001 Q.15-16 Answer.pdf."

There also appears to be a discrepancy between the total number of trees mitigated for clearance work in the VM-7 and VM-8 programs (136,752, described in the previous section)¹⁴⁷ and the total number in the documentation supplied in response to its clearance program (135,082, sum of all trims and removals to achieve clearances).¹⁴⁸ SCE did not provide explanation for why the two files report different numbers of mitigations for clearance.

Conclusion: SCE did not provide information consistent with the completion of work identified in this statement.

8.2.3.3.2 Expanded Clearances for Legacy Facilities

Quantitative Target or Commitment, Supporting Information & Analysis, and Conclusion

SCE provided the following target in its 2023-2025 WMP.¹⁴⁹ For ease of comparison, the WMP target and work completed are summarized below:

Initiative Activity	SCE's 2024 Target	Actual Completed in 2024
Expanded Clearances for Generation Legacy Facilities	50 sites	70 sites

Supporting Information and Analysis: SCE provided screenshot images and records from ArcGIS, the system that maintains records of treated sites, demonstrating that 70 sites received work for expanded clearances for legacy facilities in 2024. The screen shots included the work order number, the completion date, location, HFTD class, facility name and type, and notes on the work completed.¹⁵⁰ According to the screen shots, SCE treated 70 Legacy Facilities in 2024, all of which were rated with a High Fire Threat District (HFTD) tier risk score. This file is consistent with SCE's Q4 QDR data submission which stated that SCE performed vegetation treatment and maintenance at 70 sites.¹⁵¹

¹⁴⁷ Data Request OEIS-E-SVM_2025-SCE-001, Question 1; attachment: "OEIS-E-SVM_2025-SCE-001_Q.01-02-19-21_2024 VM-7 & VM-8 Inspect & Mitigate.xlsx."

¹⁴⁸ Data Request OEIS-E-SVM_2025-SCE-001, Question 15-16; attachment: "OEIS-E-SVM_2025-SCE-001_Q.15-16_RLC Clearance.xlsx."

¹⁴⁹ Southern California Edison Company, [2023-2025 Base Wildfire Mitigation Plan](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56770&shareable=true), Published June 4, 2024, p.378 (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56770&shareable=true>). This table was modified for Energy Safety's data request to include statements and targets relevant to 2024.

¹⁵⁰ Data Request OEIS-E-SVM_2025-SCE-001, Question 17; attachment: "OEIS-E-SVM_2025-SCE-001 Q. 17 Answer.pdf."

¹⁵¹ Docket # 2024- QDR. File: [SCE 2024 Q4 QDR Tables 1-15 R1](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58928&shareable=true). Table 1. (July 16, 2025). URL: ([http://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58928&shareable=true](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58928&shareable=true)).

Conclusion: SCE provided information consistent with the completion of work identified for this target.

Finding – 8.2.3.3 Clearance

SCE did not provide information consistent with the completion of work identified 8.2.3.3.1. Expanded Clearing. Therefore, Energy Safety concludes that initiative 8.2.3.3 Clearance is deficient.

In its CAP response SCE must provide additional information on why clearances were not achieved for all mitigation work assigned during its routine line clearing inspections work, correct any errors in the files associated with expanded clearances to demonstrate that all trees achieved the minimum required clearance distance, and provide clarification on why there is a discrepancy between mitigation work from its VM-7 and VM-8 programs and its clearance programs. SCE must also provide corrective actions to ensure clearance work will be completed in the future.

8.2.3.4 Vegetation and Fuels Management – Fall-In Mitigation

The purpose of this initiative is to take actions “to identify and remove or otherwise remediate trees that pose a high risk of failure or fracture that could potentially strike electrical equipment.”¹⁵²

Quantitative Target or Commitment, Supporting Information, and Analysis

SCE did not have a target for Fall-in Mitigation in its 2023-2025 WMP. However, WMP Section 8.2.3.4.1 Hazard Tree Management Program describes the VM-1 program,¹⁵³ which is introduced in Section 8.2.2.2 HTMP Inspections and WMP Section 8.2.3.4.2 Dead and Dying Tree Removal Program describes the VM-4 program,¹⁵⁴ which is introduced in Section 8.2.2.3 Dead and Dying Tree Removal Program Inspections. SCE’s WMP states that it “performs inspections using a risk-based approach encompassed in the TRI model. [...] Based on the results of the inspection, SCE generates prescriptions and performs the required

¹⁵² [Technical Guidelines](#) (December 6, 2022), p. A-24 URL: (<http://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true>).

¹⁵³ Southern California Edison Company, [2023-2025 Base Wildfire Mitigation Plan](#), Published June 4, 2024, p. 418 URL: (<http://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56770&shareable=true>).

¹⁵⁴ Southern California Edison Company, [2023-2025 Base Wildfire Mitigation Plan](#), Published June 4, 2024, p. 418 URL: (<http://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56770&shareable=true>).

remediations.”¹⁵⁵ Therefore, Energy Safety assessed completion of the Fall-in Mitigation initiative based on whether each tree that was inspected in the HTMP and Dead and Dying Tree Removal Program received the prescribed mitigation. As with Clearances, Energy Safety included all work orders with a completion date in this analysis but excluded work orders that would have been associated with inspections performed within 180 days of December 31, 2024, which is the mitigation timeframe for P2 trees associated with HTMP and Dead and Dying Tree Removal specified in Section 8.2.6 Open Work Orders, because those work orders had not exceeded the timeframe commitment between the inspection (where work was prescribed) and the completion of that work. The table below summarizes the total number of mitigation activities prescribed during inspections between January and June, the number of mitigation activities that were completed, and the number of inspections that did not receive the prescribed mitigation under these two programs, and the percentage of complete and incomplete mitigations of each type.

Work Type Prescribed	# Trees Prescribed Work	# Trees with Completed Mitigation	# Trees with Incomplete Mitigation
Hazard Tree Mitigation Program (HTMP)			
Prune	144	140 (97%)	4 (3%)
Removal	970	904 (93%)	66 (7%)
Total HTMP Mitigations	1,114	1,044 (94%)	70 (6%)
Dead and Dying Tree Removal Program			
Removal	1,937	1,489 (77%)	448 (23%)

Supporting Information and Analysis: SCE provided an Excel file and metadata of the HTMP risk assessments and associated mitigation work conducted in 2024 for its HTMP program¹⁵⁶ and Dead and Dying Tree Removal Program.¹⁵⁷ The files included tracking IDs, coordinates, inspection date, work type, completion date, and HFTD designation.¹⁵⁸ As noted in section 8.2.2, SCE’s HTMP inspections identified 1,285 hazard trees which required mitigation, and identified 3,853 dead and dying trees in performance year 2024.

¹⁵⁵ Southern California Edison Company, [2023-2025 Base Wildfire Mitigation Plan](#), Published June 4, 2024, p. 394-395 URL: (<http://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56770&shareable=true>).

¹⁵⁶ Data Request OEIS-E-SVM_2025-SCE-001, Question 7, attachment: “07_OEIS-E-SVM_2025-SCE-001 Q. 07 Answer.pdf and 07_OEIS-E-SVM_2025-SCE-001_Q.07-08_2024 HTMP_VM-1 Work.xlsx.”

¹⁵⁷ Data Request OEIS-E-SVM_2025-SCE-001, Question 10, attachment: 10_OEIS-E-SVM_2025-SCE-001_Q.10-11_2024 D&D_VM-4 Mitigation.xlsx.”

¹⁵⁸ Data Request OEIS-E-SVM_2025-SCE-001, Question 10, attachment: 10_OEIS-E-SVM_2025-SCE-001_Q.10-11_2024 D&D_VM-4 Mitigation.xlsx.”

To assess completion, Energy Safety determined if each tree in the HTMP and Dead and Dying Tree Removal Program had a completion date assigned. SCE stated that blank completion dates were due to constraints (i.e. “access constraints, environmental constraints, or resource constraints”) or “mitigations that are still pending assignment and still within SCE’s internal remediation timeline for this program.”¹⁵⁹ To account for those mitigations which may be pending assignment, entries were excluded from the analysis if they had no completion date but were within 180 days of December 31, 2024 (the completion timeframe for hazard trees associated with these two programs). Energy Safety found that of the 1,114 HTMP inspections where mitigation was prescribed, SCE completed those mitigations for 1,044 trees (94%), failing to complete mitigations on the remaining 70 trees (6%) in High Fire Risk Areas (HFRA). Energy Safety also determined that the completion rate for trimming/pruning (97%) was slightly higher than the completion rate for removals (93%). For its dead and dying tree removals program, SCE completed removals for 1,489 trees (77%) and the remaining trees had no completion date. Thus, in performance year 2024, SCE did not complete all prescribed mitigations in HFRA.

Conclusion: SCE did not complete all fall in mitigation work associated with this target.

Finding – 8.2.3.4 Fall-In Mitigation

SCE did not provide information consistent with the completion of fall-in mitigation work associated with its HTMP or Dead and Dying Tree Removal Program. Therefore, Energy Safety concludes that initiative 8.2.3.4 Fall-In Mitigation is deficient.

In its CAP response SCE must provide documentation to support that the work was completed, or documentation demonstrating why the work was constrained and when the work was expected to be completed. SCE must also provide corrective actions to ensure fall-in mitigation work will be completed in the future.

8.2.3.5 Vegetation and Fuels Management –Substation Defensible Space

The purpose of this initiative is to take actions “to reduce ignition probability and wildfire consequence due to contact with substation equipment.”¹⁶⁰

¹⁵⁹ Data Request OEIS-E-SVM_2025-SCE-001, Question 10, attachment: 10_OEIS-E-SVM_2025-SCE-001 Q. 10 Answer.pdf” p. 2.

¹⁶⁰ [Technical Guidelines](http://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true) (December 6, 2022), p. A-25 URL: (http://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true).

Narrative Statements, Supporting Information, and Analysis

Statement 7

Statement: “SCE inspects vegetation around its substations for potential risks from encroachment or blow-in or fall-in hazards and manages vegetation around its substations by performing pruning, removal, and weed abatement. The primary risk to be mitigated is vegetation contact with energized conductors and equipment, as well as preventing fire damage to substations.”¹⁶¹

Supporting Information and Analysis: SCE provided an Excel file, which included two worksheets, the first listing all the inspections it conducted around its substations which included the inspection dates, substation ID, name, and type, HFRA categorization, number of inspections per substation, work order records, and prescribed work identified in 2024, and the second the vegetation mitigations that were prescribed during those inspection, which included the record ID, location, substation name, inspection date, work status, inspection date, work prescribed, completion data, and a description of the work completed.¹⁶² According to this file, SCE completed 1,248 total inspections on all 166 substations. As a result of these substation inspections, SCE identified 114 mitigations needed and documented the completion of all prescribed work in 2024, such as crown reductions, pruning, and tree removals.

Conclusion: SCE provided information consistent with the completion of work identified in this statement.

Finding – 8.2.3.5 Substation Defensible Space

SCE provided information consistent with the completion of work identified in this initiative. Therefore, Energy Safety concludes that initiative 8.2.3.5 Substation Defensible Space is complete.

¹⁶¹ Southern California Edison Company, [2023-2025 Base Wildfire Mitigation Plan](#), Published June 4, 2024, p. 421 URL: (<http://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56770&shareable=true>).

¹⁶² Data Request OEIS-E-SVM_2025-SCE-001, Question 18; attachment: “OEIS-E-SVM_2025-SCE-001_Q.18_VM Sub Inspect 2024.xlsx.”

8.2.3.6 Vegetation and Fuels Management – High-Risk Species

The purpose of this initiative is to take actions “to reduce the ignition probability and wildfire consequence attributable to high-risk species of vegetation.”¹⁶³

Narrative Statements, Supporting Information, and Analysis

Statement 8

Statement: “SCE targets high-risk (which SCE refers to as “at-risk”) species through its HTMP (VM-1) initiative and/or Routine Line Clearing (VM-7 and VM-8) activities.”¹⁶⁴

Supporting Information and Analysis: To support this statement, SCE referred to the Excel files which documented the inspections and mitigations completed for HTMP and Routine Line Clearing. As described in previous sections, the Excel file for VM-7 and VM-8 contains all instances where SCE removed vegetation when prescribed during detailed inspections of distribution and transmission lines. This file contained both the species name and growth rate of that species (fast, medium, or slow), in addition to the work completion date, tree ID, location, and fire risk tier.¹⁶⁵ According to this file, SCE trimmed or removed 55,048 fast-growing species identified in 2024, including but not limited to, Eucalyptus, Athel, Ash, Bamboo, and Palm varieties. The Excel file for VM-1 also contained species information, as well as a comprehensive risk score based on tree conditions observed in the field.¹⁶⁶ These files demonstrate that SCE considered growth rates and other risk factors in its work prioritization process, which is consistent with the commitment in this statement.

Conclusion: SCE provided information consistent with the completion of work identified in this statement.

Finding – 8.2.3.6 High-Risk Species

SCE provided information consistent with the completion of work identified in this initiative. Therefore, Energy Safety concludes initiative 8.2.3.6 High-Risk Species is complete.

¹⁶³ [Technical Guidelines](#) (December 6, 2022), p. A-25 URL:

(<http://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true>).

¹⁶⁴ Southern California Edison Company, [2023-2025 Base Wildfire Mitigation Plan](#), Published June 4, 2024, p. 421 URL: (<http://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56770&shareable=true>).

¹⁶⁵ Data Request OEIS-E-SVM_2025-SCE-001, Question 19; attachment: “OEIS-E-SVM_2025-SCE-001 Q. 19 Answer.pdf” and “OEIS-E-SVM_2025-SCE-001_Q.01-02-19-21_2024 VM-7 & VM-8 Inspect & Mitigate.xlsx.”

¹⁶⁶ Data Request OEIS-E-SVM_2025-SCE-001, Question 7, attachment: “07_OEIS-E-SVM_2025-SCE-001 Q. 07 Answer.pdf and 07_OEIS-E-SVM_2025-SCE-001_Q.07-08_2024 HTMP_VM-1 Work.xlsx.”

8.2.3.7 Vegetation and Fuels Management – Fire Resilient Right-of-Ways

The purpose of this initiative is to take actions “to promote vegetation communications that are sustainable, fire-resilient, and compatible with the use of the land as an electrical corporation right-of-way.”¹⁶⁷

Narrative Statements, Supporting Information, and Analysis

Statement 9

Statement: “SCE’s Fuel Management Program demonstrates SCE’s commitment to wildfire safety through active management of Rights-of-Way (ROW) and reduction of hazardous fuel loading on the landscape that is not captured by routine VM operations... SCE currently manages several pilot programs, that if successful and subject to an assessment of constraints and feasibility, may be incorporated into this initiative in future years. Several of these pilot programs have been implemented in conjunction with environmentally approved Integrated Vegetation Management (IVM) practices.”¹⁶⁸

Supporting Information and Analysis: In its WMP, SCE listed several pilot programs it planned to initiate to enhance its Fuel Management Program: the herbicide program (and related ROW Low Growth Program), hydroseeding, goat grazing, and tree growth regulators,¹⁶⁹ SCE documented progress on the following pilot programs:

¹⁶⁷ [Technical Guidelines](#) (December 6, 2022), p. A-25 URL:

(<http://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true>).

¹⁶⁸ Southern California Edison Company, [2023-2025 Base Wildfire Mitigation Plan](#), Published June 4, 2024, . 423 URL: (<http://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56770&shareable=true>).

¹⁶⁹ Southern California Edison Company, [2023-2025 Base Wildfire Mitigation Plan](#), Published June 4, 2024, p. 423 URL: (<http://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56770&shareable=true>).

Herbicide/ROW Low Growth Program: In its data request response, SCE explained the Herbicide program was the same as the ROW Low Growth Program. SCE provided an Excel file that documented all instances in 2024 where SCE employed pre-emergent herbicide treatment.¹⁷⁰ The Excel file included the site name, method of application, APN, parcel size, treatment date, and county. Based on this file, SCE applied pre-emergent herbicides on 394 parcels across approximately 1,225 acres. Additionally, SCE stated that this process is still under evaluation and that based on the current results, it has observed approximately 25% of previously treated vegetation had resprouted the following year.¹⁷¹

Hydroseeding: SCE stated that in 2023 it had “determined the use of hydroseeding was not a feasible vegetation management program and was not a sustainable treatment method based on certain weather and climate characteristics in SCE’s service area.”¹⁷² As such, SCE discontinued this pilot and did not conduct hydroseeding activity in 2024.

Goat Grazing: SCE stated that it utilized goat grazing on 32 acres within the Shaver Lake area of its service territory. SCE provided a screenshot of the invoice for this work, which showed that the animals were allowed to graze from June to September 2024.¹⁷³

Tree Growth Regulators (TGR): In its data request response from the 2023 SVM Audit (ES310-SCE—2023-SVM-01, Question 01), SCE had stated that it piloted the TGR program in the City of Visalia on 410 TGR treated trees out of a total of 650 trees in the control group. The goal was to reduce growth and the need for trims from October 2021 through January 2024. However, SCE determined the TGR material did not achieve the desired results to reduce growth, and the pilot program was discontinued in March of 2024.¹⁷⁴

Conclusion: SCE provided information consistent with the completion of work identified in this statement.

Finding – 8.2.3.7 Fire Resilient Right-of-Ways

SCE provided information consistent with the completion of work identified in this initiative. Therefore, Energy Safety concludes that initiative 8.2.3.7 Fire Resilient Right-of-Ways is complete.

¹⁷⁰ Data Request OEIS-E-SVM_2025-Liberty-001, Question 20; attachment: “OEIS-E-SVM_2025-SCE-001_Q.20_Herbicide 2024.xlsx” p. 2.

¹⁷¹ Data Request OEIS-E-SVM_2025-Liberty-001, Question 20; attachment: “OEIS-E-SVM_2025-SCE-001 Q. 20 Answer.pdf,” p. 3

¹⁷² Data Request OEIS-E-SVM_2025-Liberty-001, Question 20; attachment: “OEIS-E-SVM_2025-SCE-001 Q. 20 Answer.pdf,” p. 2

¹⁷³ Data Request 266, Question 22; attachment: “ES266-SCE-2023-SVM-01_Q.22 Answer.pdf.”

¹⁷⁴ Data Request OEIS-E-SVM_2025-Liberty-001, Question 20; attachment: “OEIS-E-SVM_2025-SCE-001 Q. 20 Answer.pdf,” p. 3

8.2.3.8 Vegetation and Fuels Management –Emergency Response of Vegetation Management

The purpose of this initiative is the “planning and execution of vegetation activities in response to emergency situations including weather conditions that indicate an elevated fire threat and post-wildfire service restoration.”¹⁷⁵

Narrative Statements, Supporting Information, and Analysis

Statement 10

Statement: “As part of mitigating increased wildfire risk, SCE performs incremental vegetation inspections and remediations in certain locations within its HFRA during the fire season based on weather conditions and other factors.”¹⁷⁶

Supporting Information and Analysis: In its WMP, SCE noted that it conducts its Emergency Response Vegetation Management activities within its inspection and line clearing programs (relating to VM-7 and VM-8).¹⁷⁷ SCE provided an Excel file listing all the Routine Line Clearing inspections conducted in 2024 along Distribution (VM-7) and Transmission (VM-8) lines within the HFRA and in designated Areas of Concern (AOC) during fire season.⁷² According to this file, SCE inspected a total of 687,505 sites comprising of 660,668 distribution sites (VM-7) and 26,830 transmission sites (VM-8), which included 83,285 inspections in AOCs (38,505 in the summer, and 44,780 in the Fall) in 2024. Further, the file shows that many trees received multiple inspections throughout the year, supporting SCE’s commitment to perform incremental inspections. SCE conducted 130,206 mitigations along its distribution lines and 4,633 along its transmission lines, which included 17,138 mitigations in AOCs (10,271 in the summer and 6,867 in the Fall).¹⁷⁸ Completion of mitigation work on inspections is discussed in Section 8.2.3.3 Clearance above. While the Excel file documents that the prescribed work in AOCs was conducted during the fire season, SCE noted that “vegetation management inspections do not document weather conditions at the time of inspection or remediation,” but that it does monitor red-flag warnings and will pause non-urgent work as needed.¹⁷⁹

¹⁷⁵ [Technical Guidelines](#) (December 6, 2022), p. A-25 URL:

(<http://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true>).

¹⁷⁶ Southern California Edison Company, [2023-2025 Base Wildfire Mitigation Plan](#), Published June 4, 2024, p.424 URL: (<http://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56770&shareable=true>).

¹⁷⁷ Southern California Edison Company, [2023-2025 Base Wildfire Mitigation Plan](#), Published June 4, 2024, p.424 URL: (<http://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56770&shareable=true>).

¹⁷⁸ Data Request OEIS-E-SVM_2025-Liberty-001, Question 01 ; attachment: “OEIS-E-SVM_2025-SCE-001_Q.01-02-19-21_2024 VM-7 & VM-8 Inspect & Mitigate.xlsx.”

¹⁷⁹ Data Request OEIS-E-SVM_2025-Liberty-001, Question 21; attachment: “OEIS-E-SVM_2025-SCE-001 Q. 21 Answer.pdf,” p. 2.

Conclusion: SCE provided information consistent with the completion of work identified in this statement.

8.2.3.8.1 Emergency Response Vegetation Management Post-Fire

Narrative Statements, Supporting Information, and Analysis

Statement 11

Statement: “SCE performs post-fire Vegetation Management activities as a response to fires that occur unexpectedly and not as a planned fire mitigation initiative with forecasted scope. SCE conducts post-fire remediation efforts to remove trees that have become hazards due to fire damage and address resulting debris. Trees can become hazards as a result of recent fire damage and be at risk of falling into SCE facilities and infrastructure.”¹⁸⁰

Supporting Information and Analysis: SCE provided an Excel file exported from SCE’s internal work management system which documents SCE’s post fire work determinations for 2024, which includes the record ID, location (latitude and longitude, the event/fire name, the date of the event, the date work was completed, the work that was completed (directional prune, side prune, removal, crown reduction, or no work required), and the status of completion.¹⁸¹ Post-fire activities and their relative percentages are summarized in the table below:

Activity	# Trees	Percentage of Total
No Work Required	53	1%
Crown Reduction	506	9%
Directional Prune	83	1%
Side Prune	285	5%
Removal	4,734	84%
Total Post Fire Mitigations	5,608	99%
Total Post Fire Activities	5,661	100%

The file shows that SCE conducted post-fire vegetation management for eight events in 2024, and recorded 5,661 post-fire determinations, of which 5,608 required some form of mitigation. Of the post-fire mitigations, removal was the most common activity (84%). This file supports that SCE performed post-fire vegetation management and removed trees that have become hazards due to fire damage.

¹⁸⁰ Southern California Edison Company, [2023-2025 Base Wildfire Mitigation Plan](https://www.sce.com/2023-2025-Base-Wildfire-Mitigation-Plan), Published June 4, 2024, p. 426 URL: (<http://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56770&shareable=true>).

¹⁸¹ Data Request OEIS-E-SVM_2025-SCE-001, Question 22, attachment: “OEIS-E-SVM_2025-SCE-001_Q.22_VM_Post-Fire_2024.xlsx.”

Conclusion: SCE provided information consistent with the completion of work identified in this statement.

Finding – 8.2.3.8 Emergency Response of Vegetation Management

SCE provided information consistent with the completion of work identified in this initiative. Therefore, Energy Safety concludes initiative 8.2.3.8 Emergency Response of Vegetation Management is complete.

8.2.4 Vegetation Management Enterprise System

The purpose of this initiative is the “[o]peration of and support for centralized vegetation management and inspection enterprise system(s) updated based upon inspection results and activities such as hardening, maintenance, and remedial work.”¹⁸²

Narrative Statements, Supporting Information, and Analysis

Statement 12

Statement: “Monitor stabilization of Arbora and develop plan and begin execution of plan to enable additional VM maintenance programs.”¹⁸³

Supporting Information and Analysis: In its WMP, SCE committed to a multi-year transition from its legacy work management system to a more comprehensive work management system that integrates across its asset and vegetation management workstreams. SCE provided seven screenshot images from its vegetation management work management tool, Arbora, demonstrating that SCE continued to incorporate new capabilities into its enterprise management system in 2024.^{184,185}

The screenshots include the following:

¹⁸² [Technical Guidelines](#) (December 6, 2022), p. A-25 URL:

(<http://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true>).

¹⁸³ Southern California Edison Company, [2023-2025 Base Wildfire Mitigation Plan](#), Published June 4, 2024, p.378 URL: (<http://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56770&shareable=true>).

¹⁸⁴ Data Request OEIS-E-SVM_2025-SCE-001, Question 24-25, attachment: “OEIS-E-SVM_2025-SCE-001 Q. 24-25 Answer.pdf,” pp. 2 and 3

¹⁸⁵ Data Request OEIS-E-SVM_2025-SCE-001, Question 23, attachment: “OEIS-E-SVM_2025-SCE-001 Q. 23 Answer.pdf,” pp. 2-5

- 1) A screenshot of “The Arbora Journey” which summarizes how VM programs are being integrated into Arbora and the expected timeframes for integration for each component. The summary shows the following timeframes for integration:
 - a. HTP/Dead & Dying Tree Removal (includes inspections, mitigations, and QC) – April 2022
 - b. Routine Line Clearing (includes inspections, mitigations, and QC) – June 2024
 - c. Emergent Work SAP Integration – November 2023
 - d. Expansion of Emergent Work Capabilities – March 2025
 - e. Supplemental Patrols – anticipated Q4 2025
 - f. Structure Brushing – anticipated 2027
- 2) An image of the Emergent Work queue from the Arbora work management system in 2024.
- 3) An image demonstrating the details of an individual Emergent Work request in Arbora, showing comprehensive location information, and work order information and status.
- 4) An image showing the development tasks for how SCE deployed essential enhancements to Arbora to enable SAP (Systems, Applications & Products) integration in 2024, showing the name of each phase, the sprint, prioritization of the tasks and type of activity.
- 5) A process map for the Emergent Work program integration between Arbora (Salesforce) and SCE’s Enterprise SAP system.
- 6) An example of an Arbora performance report for Emergent Work demonstrating how the program is being tracked and monitored.
- 7) A screenshot of a Power BI dashboard generated from Snowflake data showing a performance summary of trims and inspections which included a progress report on the work completed versus remaining, performance relative to the goal timeframes, performance on inspections per month compared to inspections planned and how many inspections remain for each inspection program.

SCE stated that its transition to Arbora has enabled improved visibility of work across multiple VM programs (e.g., RLC, HTP, Emergent work) and that it plans to continue to expand capabilities to include additional VM Maintenance programs (e.g., Trouble Orders, Supplemental Patrols) in 2025.¹⁸⁶ Thus, SCE provided sufficient documentation to demonstrate that it has continued the process of integrating its distinct work management systems, which will ultimately result in increased capability in managing both its vegetation management and asset management workstreams. As the program matures, Energy Safety will continue to evaluate the completion of this integration in future audit years.

¹⁸⁶ Data Request OEIS-E-SVM_2025-SCE-001, Question 24-25, attachment: “OEIS-E-SVM_2025-SCE-001 Q. 24-25 Answer.pdf,” pp. 2 and 3

Conclusion: SCE provided information consistent with the completion of work identified in VM-6 target.

Finding – 8.2.4 Vegetation Management Enterprise System

SCE provided documentation consistent with the completion of work identified in this initiative. Therefore, Energy Safety concludes initiative 8.2.4 Vegetation Management Enterprise System is complete.

8.2.5 Quality Assurance and Quality Control

The purpose of this initiative is the “[e]stablishment and function of audit process to manage and confirm work completed by employees or contractors, including packaging QA/QC information for input to decision-making and related integrated workforce management processes.”

Quantitative Target or Commitment, Supporting Information, and Analysis

Distribution and Transmission Vegetation Management Plan

SCE provided the following goals for its QA/QC program in its 2023-2025 WMP.¹⁸⁷ For ease of comparison, the WMP goals for sample size and pass rates compared to the work completed are summarized below:

¹⁸⁷ Southern California Edison Company, [2023-2025 Base Wildfire Mitigation Plan](http://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56770&shareable=true), Published June 4, 2024, pp. 429-432 URL: (<http://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56770&shareable=true>). URL: (<http://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55866&shareable=true>). This table was modified for Energy Safety’s data request to include statements and targets relevant to 2024.

Activity Being Audited	2024 Goal	Actual 2024
Distribution Circuits in TRI Risk Category A	QA Inspections on 4,718 circuit miles	5,381 circuit miles
Distribution Circuits in TRI Risk Category B-D	QA Inspections on 1,402 circuit miles	1,059 circuit miles
All other Distribution Circuits inspected	QA Inspections to achieve CL/CI of 99/3%	1,025 circuit miles
Distribution Vegetation Management Plan	RCD ¹⁸⁸ Target Pass Rate is 100% CCD ¹⁸⁹ Target Pass Rate is 95%	RCD Pass Rate = 100% CCD Pass Rate = 97%
Transmission circuits inspected	QA Inspections to achieve CL/CI of 99/5%	824 circuit miles
Transmission Vegetation Management Plan	RCD Target Pass Rate is 100% CCD Target Pass Rate is 95%	RCD Pass Rate = 100% CCD Pass Rate = 98%
HTP QC Remediation (Dead & Dying Tree Removal and HTPM)	100% remediation	98% remediated

Supporting Information and Analysis: SCE's WMP described its QA sampling program and pass rates, which are also described in detail in procedure UVM-07 ("Post Work Verification and UVM Program").

QC Sampling Success: SCE's WMP included a risk informed QC sampling program for its distribution system, which prioritized QA inspections in the highest risk areas. In the highest risk areas (based on its TRI risk model- TRI A), SCE committed to performing QA inspections on 100% of its distribution circuit miles (4,718) and using judgmental sampling to achieve a CL/CI of 99/3% for distribution circuit miles all other high risk areas (TRI-B, TRI-C, TRI-D). SCE provided two Excel files documenting the circuit miles which received QA inspections in 2024. The files included the Grid-ID, TRI Ranking, whether the inspection was on distribution or transmission lines, The total circuit miles, total miles in HFRA, the date the QC inspection was assigned, and the date the inspection was complete. The files were not consistent. One file, which was pre-sorted showing only distribution line miles with a TRI rank of A, B, C, or D showed SCE conducted 5,381 circuit miles of along TRI Level A lines and 1,025 circuit miles along TRI Levels B,C, and D lines for a combined total of 6,406 line miles. The second file included total line miles on distribution and transmission lines and those with a TRI rank and those without. According to this file, SCE conducted a total of 5,347 circuit miles of TRI Level A along distribution lines, and 1,029 circuit miles of TRI Levels B, C, and D for a combined total of 6,376 TRI ranked miles. The total line miles file also indicated that SCE completed QC

¹⁸⁸ Definition: Regulation Clearance Distance (RCD).

¹⁸⁹ Definition: Compliance Clearance Distance (CCD).

inspections on 1,292 distribution circuit miles with no TRI rank. Both files demonstrate that SCE exceeded its TRI A sampling goal, and its combined total for all TRI risk categories, but missed its goal for QC inspections of TRI B, C, and D.

SCE did not provide documentation to demonstrate how it calculated how many line miles should receive QC inspections to achieve a CL/CI of 99/3% for all other line miles in its distribution system. Because the detailed inspection data for its distribution system was provided as number of grids and the mitigation work completed was on a per tree unit basis (VM-7), Energy Safety could not calculate the number of non-TRI circuit miles required to meet the CL/CI goal. Therefore, SCE did not achieve its QA/QC sampling goal for its highest risk areas in performance year 2024 and did not provide sufficient documentation to support that it met its CL/CI goal for all other distribution lines.

SCE's WMP stated that SCE would use judgmental sampling to achieve a CL/CI of 99/5% for circuit miles along its Transmission system. SCE provided two Excel files documenting the circuit miles which received QA inspections in 2024. The files included the Grid-ID, Circuit Name, TRI Ranking, whether the inspection was on distribution or transmission lines, The total circuit miles, total miles in HFRA, the date the QC inspection was assigned, and the date the inspection was complete. Both files demonstrate that SCE completed QC inspections along 824 transmission circuit miles. However, SCE did not provide documentation to demonstrate how it calculated how many transmission line miles should receive QC inspections to achieve a CL/CI of 99/5%. Because the detailed inspection data for its transmission system was provided as number of circuits and the mitigation work completed was on a per tree unit basis (VM-8), Energy Safety could not calculate the number of transmission circuit miles required to meet the CL/CI goal. Therefore, SCE did not provide sufficient documentation to support that it met its CL/CI goal for its transmission lines.

QC Pass Rates: SCE provided screenshot images of its QC Performance Dashboard which tabulated monthly distribution clearance pass rates for its Distribution Vegetation Management Program (DVMP) and Transmission Vegetation Management Program (TVMP) systems in 2024. SCE stated that the QC of routine line clearing work for DVMP and TVMP was transitioned from Survey 123 to Arbora Work Management Systems in 2024. Therefore, SCE provided screen shot images from both dashboards which covered separate segments of the calendar year. The cumulative totals from both dashboards are summarized in the table below:

System	Total trees inspected	RCD non-compliant trees	RCD pass rate	CCD non-compliant trees	CCD Pass rate
Distribution	408,666	1,675	99.6%	11,531	97.2%
Transmission	16,994	138	99.2%	676	96.0%

This documentation demonstrates that SCE exceeded its cumulative RCD and CCD pass rates

for both its distribution and transmission systems in performance year 2024.

Conclusion: SCE did not provide information consistent with the completion of work identified for its QA/QC goals for its distribution and transmission system.

Hazard Tree Assessment Program

SCE provided the following goals for its QA/QC program in its 2023-2025 WMP.¹⁹⁰ For ease of comparison, the WMP goals for sample size and pass rates compared to the work completed are summarized below:

Activity Being Audited	2024 Goal	Actual 2024
HTP QC Remediation (Dead & Dying Tree Removal and HTMP)	100% remediation	98% remediated

Supporting Information and Analysis: SCE provided an Excel file listing all the QC verification of remediation performed in 2024 as part of its Hazard Tree and Dead and Dying Tree programs.¹⁹¹ The file included Grid ID, and location information, the original inspection date, the tree ID and species, the original work prescribed, the work that was completed, the mitigation date, the QC date, the QC status and results, and a description of the discrepancy identified by the QC inspector. The mitigation dates range from October 2023 through December 2024 and all QC inspection dates range were in performance year 2024. The file indicated that SCE conducted 1,561 QC inspections on trees that received mitigations in either the HTMP or Dead and Dying Tree Removal Program. Results of the QC inspections are summarized in the table below:

QC Result	# Trees	Percent of total QC inspections
Tree Failed QC for Incomplete Work	24	2%
Tree Failed QC for Mitigation Not Achieved	3	0%
Tree Failed QC for Mitigation work was not performed	19	1%
Tree Failed QC for Clean-up/Property Damage Only	70	4%
Trees passed (compliance pass rate)	1,559	97%
Tree and site passed (overall pass rate)	1,445	93%

¹⁹⁰ Southern California Edison Company, [2023-2025 Base Wildfire Mitigation Plan](http://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56770&shareable=true), Published June 4, 2024, pp. 429-432 URL: (<http://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56770&shareable=true>).

¹⁹¹ Data Request OEIS-E-SVM_2025-SCE-001, Question 26; attachment: "26_Q26 HTP QC Inspection on Mitigation WOLIs-2024.xlsx."

Based on this file, SCE’s initial success rate for mitigations was 97% (work was complete and the mitigation achieved) and had an initial success rate of 93% when failures to leave the site in the same condition as when the crews arrived were also taken into account. SCE stated that site cleanup was not included in the pass rate calculation because it’s not considered a compliance failure conducted.

SCE stated that trees that failed the QC inspection were re-inspected after corrections had been made. The file indicated that an additional 18 trees passed QC when the trees were reinspected, leaving 28 trees, 2% of the total trees inspected for QC. Results are summarized below:

Remediation Required	# Trees requiring remediation after QC	# Successful QC remediations	# Trees still requiring remediation	Percent of Total Trees Inspected
Incomplete Work	24	7	17	1%
Mitigation Not Achieved	3	1	2	0%
Mitigation work was not performed	19	10	9	1%

With these remediations, SCE achieved a 98% pass rate for mitigations on its HTMP and Dead and Dying Tree Programs in performance year 2024.¹⁹²

Conclusion: SCE did not provide information consistent with the completion of work identified in this QA/QC goal.

Narrative Statements, Supporting Information, and Analysis

Statement 13

Statement: For VM’s Hazard Tree and Dead and Dying Tree programs, 100% QC is performed to verify the remediation was performed. Additionally, for SCE’s Hazard Tree program, independent QC tree assessments are performed to provide assurance the assessments performed by the Hazard Tree assessments are accurate.”¹⁹³

Supporting Information and Analysis: As described above, SCE provided an Excel file listing all the QC verification of remediation performed in 2024 as part of its Hazard Tree and Dead and

¹⁹² Data Request OEIS-E-SVM_2025-SCE-001, Question 26; attachment: “26_OEIS-E-SVM_2025-SCE-001 Q. 26 Answer.pdf,” p. 2.

¹⁹³ Southern California Edison Company, [2023-2025 Base Wildfire Mitigation Plan](#), Published June 4, 2024, p.429 URL: (<http://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56770&shareable=true>).

Dying Tree programs.¹⁹⁴ However, not all of the tree IDs in the QC verifications match tree IDs in the HTMP and Dead and Dying Tree Mitigations work files as described in section 8.2.3.4 Fall-In Mitigation. Only 608 tree records from both the HTMP¹⁹⁵ and Dead and Dying Tree Removal¹⁹⁶ mitigation files had a corresponding QC inspection record in the “QC Inspection on Mitigation WOLIs” file.¹⁹⁷ This discrepancy could be due to the fact that 316 of the QC inspection records were on mitigation work completed in 2023, which were not recorded in the HTMP and Dead and Dying mitigation work files for 2024 and that not every mitigation from 2024 may have received a QC inspection before the end of the calendar year. However, the files provided do not provide sufficient documentation to demonstrate that SCE performed QC inspections on 100% of its HTMP and Dead and Dying Tree Removal program mitigation work.

SCE also provided an Excel file listing the independent QC inspections performed in 2024 which included the grid and tree ID, QC completion date, QC risk scores, species identified, QC risk assessment date, prescribed work assessment, grid/circuit ID, and location coordinates.¹⁹⁸ Based on this file, SCE’s QC inspectors performed 5,763 independent Hazard Tree Assessments in 2024. Of the 5,763 assessments, QC inspectors identified 294 trees (5%) where the original assessment did not prescribe mitigation, but the QC inspector would have recommended a prescription be made. SCE stated that “in those instances, the work point is sent back to the assigned contractor to perform a third independent assessment. This helps ensure no trees requiring mitigation are missed.”¹⁹⁹ This documentation demonstrated that SCE performed the independent QC tree assessments consistent with the work commitment in this statement.

Therefore, SCE did not provide sufficient information to support that 100% of its HTP mitigations received QC inspections, but did provide information consistent with the completion of independent QC assessments.

Conclusion: SCE did not provide information consistent with the completion of work identified in this statement.

¹⁹⁴ Data Request OEIS-E-SVM_2025-SCE-001, Question 26; attachment: “26_Q26 HTP QC Inspection on Mitigation WOLIs-2024.xlsx.”

¹⁹⁵ Data Request OEIS-E-SVM_2025-SCE-001, Question 7, attachment: “07_OEIS-E-SVM_2025-SCE-001 Q. 07 Answer.pdf and 07_OEIS-E-SVM_2025-SCE-001_Q.07-08_2024 HTMP_VM-1 Work.xlsx.”

¹⁹⁶ Data Request OEIS-E-SVM_2025-SCE-001, Question 10, attachment: 10_OEIS-E-SVM_2025-SCE-001_Q.10-11_2024 D&D_VM-4 Mitigation.xlsx.”

¹⁹⁷ Data Request OEIS-E-SVM_2025-SCE-001, Question 26; attachment: “26_Q26 HTP QC Inspection on Mitigation WOLIs-2024.xlsx.”

¹⁹⁸ Data Request OEIS-E-SVM_2025-SCE-001, Question 26; attachment: “26_Q26 HTP QC Independent Inspections Completed in 2024.xlsx.”

¹⁹⁹ Data Request OEIS-E-SVM_2025-SCE-001, Question 26; attachment: “26_OEIS-E-SVM_2025-SCE-001 Q. 26 Answer.pdf,” p. 3.

Statement 14

Statement: “QC will target to inspect PRC 4292 Distribution Structures using a CL/CI of 99/2%, approximately 330 structures monthly.”²⁰⁰

Supporting Information and Analysis: SCE stated that, in 2024, it assumed a distribution pole population of approximately 110,00 poles to calculate a sample population of 4,009 QC inspections (~334 per month) to achieve the QC target CI/CL of 99/2%.²⁰¹ SCE provided an Excel file containing results from its structure brushing QC inspections PRC 4292 structures in 2024. The file included structure location (latitude and longitude), Structure ID, QC inspection date, and results of the QC inspection. The file showed that SCE completed 4,575 QC inspections on structures in 2024 and the QC pass/failure rates are summarized in the table below:

QC Result	PRC 4292 Structures	Rate
QC Pass	3,040	66%
QC Fail	1,535	34%

The number of structures inspected for QC exceeded the CI/CL target and the average monthly inspections (381) exceeded the 330 monthly goal anticipated in the WMP. Though it does not impact completion of work in the statement above WMP because SCE did not have a target QC pass rate for structure brushing in its WMP, it is still worth noting that the file showed that only roughly 66% of structures passed the QC inspections in 2024,²⁰² much lower than the pass rate for tree mitigation work.

Conclusion: SCE provided information consistent with the completion of work identified in this statement.

Statement 15

Statement: “QC findings are tabulated using a dashboard system that identifies conformance rate and specific locations where work is performed and by the specific contractor. Monthly reports are generated documenting the results of the QC inspections in addition to monthly performance review meetings where performance in general is discussed.”²⁰³

²⁰⁰ Southern California Edison Company, [2023-2025 Base Wildfire Mitigation Plan](http://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56770&shareable=true), Published June 4, 2024, p. 430 URL: (http://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56770&shareable=true).

²⁰¹ Data Request OEIS-E-SVM_2025-SCE-001, Question 27; attachment: ‘OEIS-E-SVM_2025-SCE-001 Q.27 – Answer.pdf.’

²⁰² Data Request OEIS-E-SVM_2025-SCE-001, Question 27; attachment: ‘OEIS-E-SVM_2025-SCE-001 Q.27 – Answer.pdf’ and “Q27_2024 Structure Brushing PRC 4292.xlsx.”

²⁰³ Southern California Edison Company, [2023-2025 Base Wildfire Mitigation Plan](http://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56770&shareable=true), Published June 4, 2024, p. 430 URL: (http://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56770&shareable=true).

Supporting Information and Analysis: SCE provided four screenshot images of its QC Performance Dashboard depicting its 2024 QC findings by contractor,²⁰⁴ two examples of monthly reports generated for its contractors in 2024,²⁰⁵ and a screenshot image showing a recurring monthly meeting with its contractor to discuss performance.²⁰⁶

The images SCE provided demonstrate that SCE can view QC results for its system as a whole, as well as view results by contractor and district. The first two images of SCE's QC performance dashboard of QC findings showed overall year to date and monthly QC conformance rates (RCD and CCD) for all vegetation management inspection contractors and for all tree pruning contractors. The second two images of the QC dashboard showed the overall year to date and monthly QC conformance rates (RCD and CCD) for one inspection contractor and one tree pruning contractor.

SCE also provided two examples of its monthly reports generated in 2024, one for a pre-inspection contractor and another for a tree trimmer contractor.²⁰⁷ The reports summarized the contractors' individual safety, quality, and compliance scores and trends in performance over the performance year.

The documentation provided demonstrates that SCE tracked the performance of its contractors and provided performance feedback to those contractors throughout performance year 2024.

Conclusion: SCE provided information consistent with the completion of work identified in this statement.

Finding – 8.2.5 Quality Assurance and Quality Control

SCE did not provide information consistent with the completion of work identified in this initiative. Therefore, Energy Safety concludes initiative 8.2.5 Quality Assurance and Quality Control is deficient.

²⁰⁴ Data Request Data Request OEIS-E-SVM_2025-SCE-001, Question 28; attachment: "OEIS-E-SVM_2025-SCE-001 Q.28 – Answer.pdf."

²⁰⁵ Data Request OEIS-E-SVM_2025-SCE-001, Question 28, attachments: Q28_Sample Pre-Inspection Monthly Scorecard July - Redacted.pdf and Q28_Sample Tree Trimmer Monthly Scorecard July - Redacted.pdf.

²⁰⁶ Data Request OEIS-E-SVM_2025-SCE-001, Question 28, attachment: OEIS-E-SVM_2025-SCE-001 Q.28 – Answer.pdf," p. 2.

²⁰⁷ Data Request OEIS-E-SVM_2025-SCE-001, Question 28, attachments: Q28_Sample Pre-Inspection Monthly Scorecard July - Redacted.pdf and Q28_Sample Tree Trimmer Monthly Scorecard July - Redacted.pdf.

In its CAP response, SCE must provide documentation describing how it calculated the number of line miles for its DVMP and TVMP programs, how it plans to complete the QC remediations for its Hazard Tree Program, and explain how it tracks 100% QC work on mitigations associated with its HTMP and Dead and Dying Tree Program to ensure completion. If SCE cannot meet its WMP commitments, it must submit documentation describing the constraints which prevented completion and identify the actions it plans to implement to ensure the work is completed in future performance years.

8.2.6 Open Work Orders

The purpose of this initiative is to take actions “to manage the electrical corporation’s open work orders resulting from inspections that prescribe vegetation management activities.”²⁰⁸

Quantitative Target or Commitment, Supporting Information, and Analysis

In its WMP, SCE states that it “prioritizes and endeavors to complete work orders within certain timeframes based on the risk posed by observed conditions.”²⁰⁹ SCE categorizes vegetation work orders between Priority 1 (P1), where vegetation is in contact, at risk of imminent contact, or expected to imminently fail and strike infrastructure, and Priority 2 (P2), where vegetation is currently stable but could plausibly fail and strike or contact infrastructure or has a clearance distance that triggers mitigation work.²¹⁰

SCE’s WMP provided specific timeframes in which it committed to complete vegetation mitigation work based on its prioritization of the risk.²¹¹ These mitigation timeframes, the number of trees identified for each risk category, the number of mitigations that met the target and the relative percentage of completed mitigations in each category are summarized in the table below:

²⁰⁸ [Technical Guidelines](http://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true) (December 6, 2022), p. A-25 URL: (http://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true).

²⁰⁹ Southern California Edison Company, [2023-2025 Base Wildfire Mitigation Plan](http://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56770&shareable=true), Published June 4, 2024, p.432 URL: (http://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56770&shareable=true).

²¹⁰ Southern California Edison Company, [2023-2025 Base Wildfire Mitigation Plan](http://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56770&shareable=true), Published June 4, 2024, p. 433 URL: (http://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56770&shareable=true).

²¹¹ Southern California Edison Company, [2023-2025 Base Wildfire Mitigation Plan](http://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56770&shareable=true), Published June 4, 2024, pp. 432-435 URL: (http://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56770&shareable=true).

Prioritization	Target Timeframe	# Trees Identified	# Tree Mitigations Meeting Target
P1- Vegetation contact	24 hours	3,251	2,695 (83%)
P1- Vegetation within 18 inches	72 hours	2,452	2,236 (91%)
P2- Between 18 inches and 4 feet (RCD)	30 days	13,961	5,051 (36%)
P2- Routine Line Clearance	90 days	134,381	98,941 (74%)
P2- HTMP	180 days	1,408	878 (62%)
P2- Dead & Dying Tree Removal	180 days	2,933	1,394 (48%)

Supporting Information and Analysis: SCE provided Excel files of its P1 and P2 trees and associated mitigations.²¹² These files indicated that SCE did not meet the timeframe commitments for all P1 and P2 trees; although P1 trees had a higher success rate compared to P2 trees.

The files also included multiple instances where work completion dates pre-dated the inspection dates (2,661 occurrences). Of these occurrences, 338 (12%) had work dates that pre-dated the inspection date by over a week (the longest pre-date was 71 days). Further, the pre-date errors were far more common for P1 trees (1,876 or 70% of all pre-dates) than for P2 trees. SCE stated that pre-date entry occurs when the tree trimmer completed the work in the field before the notification was entered into SCE's administrative system. Energy Safety counted such instances with those trees that were completed on time; however, the prevalence of such instances indicates that SCE and its contractors are not properly or promptly tracking inspections and as a result cannot be fully confident that work is being completed or documented correctly.

Detailed analysis for each priority category is included below:

P1s where there is vegetation contact or evidence of contact- SCE provided an Excel file listing all the P1 trees identified in HFRA areas in 2024 with a 24-hour mitigation timeframe. The file included the inspection date, work completion date, work prescribed, mitigation type, fire risk, and location information.²¹³ According to this file, SCE identified 3,251 P1 trees,

²¹² Data Request OEIS-E-SVM_2025-SCE-001, Question 30-33 and Question 34, attachments: OEIS-E-SVM_2025-SCE-001_Q30-33.xlsx" and "OEIS-E-SVM_2025-SCE-001_Q34_HTMP_DD P2s_fnl.xlsx."

²¹³ Data Request OEIS-E-SVM_2025-SCE-001, Question 30, attachments: OEIS-E-SVM_2025-SCE-001_Q30-33.xlsx" and "OEIS-E-SVM_2025-SCE-001 Q.30 Answer.pdf."

of which 2,695 P1s (83%) were remediated within 24 hours, but 1,027 P1s had a reported work completion date that occurred before the inspection date.²¹⁴ Because 556 (17%) P1 trees were mitigated outside 24 hours (between 2 and 340 days following their identification date), SCE did not complete the work commitments for this priority category.

P1s in HFRA where vegetation is within 18 inches of energized equipment- SCE provided an Excel file listing all the P1 trees identified in HFRA areas in 2024 with a 72-hour mitigation timeframe, which included the inspection date, work completion date, work prescribed, mitigation type, fire risk, and location information.²¹⁵ According to this file, SCE identified 2,452 P1 trees within 18 inches of equipment which required mitigation. Of these, 2,236 (91%) were remediated within 72 hours, but 777 P1 trees had a work completion date before the reported inspection date.²¹⁶ Because 218 (9%) P1 trees were mitigated outside the 72-hour time frame, SCE did not complete the work commitments for this priority category.

P2s where vegetation is closer than the RCD (four feet) but beyond 18 inches- SCE provided an Excel file listing all the P2 trees identified in HFRA areas in 2024 with a 30-day mitigation timeframe, which included the inspection date, work completion date, work prescribed, mitigation type, fire risk, and location information.²¹⁷ The file indicated that SCE identified 13,961 P2 trees which required mitigation. SCE remediated 5,051 (36%) of these P2 trees within 30 days, but 317 had a reported work completion date that occurred before the inspection date.²¹⁸ Because 8,934 (64%) P2 trees closer than the regulatory distance were not mitigated within 30 days, SCE did not complete the work commitments for this priority category.

All other P2s related to Routine Line Clearing- SCE provided an Excel file listing all the P2 trees identified in HFRA areas in 2024 with a 90-day mitigation timeframe, which included the inspection date, work completion date, work prescribed, mitigation type, fire risk, and location information.²¹⁹ SCE identified 134,381 P2 trees, of which 98,941 (74%) were remediated within 90 days, but 468 had a reported work completion date that occurred

²¹⁴ Data Request OEIS-E-SVM_2025-SCE-001, Question 30, attachments: OEIS-E-SVM_2025-SCE-001_Q30-33.xlsx” and “OEIS-E-SVM_2025-SCE-001 Q.30 Answer.pdf.”

²¹⁵ Data Request OEIS-E-SVM_2025-SCE-001, Question 30, attachments: OEIS-E-SVM_2025-SCE-001_Q30-33.xlsx” and “OEIS-E-SVM_2025-SCE-001 Q.30 Answer.pdf.”

²¹⁶ OEIS-E-SVM_2025-SCE-001, Question 31, attachments: Question 30, attachments: OEIS-E-SVM_2025-SCE-001_Q30-33.xlsx” and “OEIS-E-SVM_2025-SCE-001 Q.31 Answer.pdf”

²¹⁷ Data Request OEIS-E-SVM_2025-SCE-001, Question 30, attachments: OEIS-E-SVM_2025-SCE-001_Q30-33.xlsx” and “OEIS-E-SVM_2025-SCE-001 Q.30 Answer.pdf.”

²¹⁸ OEIS-E-SVM_2025-SCE-001, Question 32, attachments: Question 30, attachments: “OEIS-E-SVM_2025-SCE-001_Q30-33.xlsx” and “OEIS-E-SVM_2025-SCE-001 Q.32 Answer.pdf.”

²¹⁹ Data Request OEIS-E-SVM_2025-SCE-001, Question 30, attachments: OEIS-E-SVM_2025-SCE-001_Q30-33.xlsx” and “OEIS-E-SVM_2025-SCE-001 Q.30 Answer.pdf.”

before the inspection date.²²⁰ Because 35,440 (26%) trees were not mitigated within 90 days, SCE did not complete the work commitments in this statement.

P2s related to HTMP and the Dead and Dying Tree Removal Program- SCE provided an image of its HTMP remediation timeline table from UVM-08 (Managing Vegetation threats) and an Excel document showing P2 HTMP and Dead and Dying Tree Removal (DRI) tree record data entries.²²¹ In total for HTMP, there were 1,408 trees identified as P2 and out of those entries, 878 (62%) trees were remediated within 180 days. Of the HTMP trees that were mitigated after 180 days, 174 of these were over one year past due and 79 trees were over two years past due. The Dead and Dying Tree Removal data contained a total of 2,933 trees identified as P2 and out of those entries 1,394 (48%) trees were remediated within 180 days. Of the Dead and Dying Tree Program trees that were mitigated after 180 days, 643 of these were over one year past due and 215 trees were over two years past due.

SCE explained the remediation timeline is contingent on there being no constraints related to environmental hold, customer refusals, and weather impacts.²²² The Excel file included a column which described constraints for work orders. The constraints given for work orders that exceeded the 180-day time frame are summarized below:

Constraint Listed	Dead and Dying Work Orders Over 180 days	HTMP Work Orders Over 180 days	Total (HTMP + D&D Tree Removal)
Weather	142	46	188
Environmental Constraint- ESA and	44	0	44
Customer Approval	25	20	45
Agency Authorization Required	289	94	383
Biological/Archeological Environmental Hold	1,030	292	1,322
Outage Required	2	0	2
Permit	2	9	11
None Given	5	7	12

Constraints were given for 461 HTMP and 1,534 Dead and Dying Tree Program overdue work orders. No constraints were given for five HTMP and seven D&DT overdue work orders. SCE stated that blanks in the constraints field may be “attributed, but not limited to, desktop users bypassing the field or system limitations” and that “[o]btaining additional information

²²⁰ OEIS-E-SVM_2025-SCE-001, Question 33, attachments: “OEIS-E-SVM_2025-SCE-001_Q30-33.xlsx” and “OEIS-E-SVM_2025-SCE-001 Q.33 Answer.pdf.”

²²¹ OEIS-E-SVM_2025-SCE-001, Question 34, attachments: “OEIS-E-SVM_2025-SCE-001_Q34_HTMP_DD P2s_fnl.xlsx.”

²²² OEIS-E-SVM_2025-SCE-001, Question 34, attachment: “OEIS-E-SVM_2025-SCE-001 Q.34 Answer.pdf,” p. 2.

would be burdensome as SCE would have to reach out to individual contractors who may or may not have retained information documenting the constraint.”²²³ Regardless, while SCE was able to attribute most of its overdue work orders to some form of constraint, it did not provide documentation explaining how it was seeking to resolve the constraints quickly so that hazardous vegetation does threaten its system. Because nearly 300 hazard trees were overdue for over 2 years, constraints were clearly not resolved rapidly. As such, Energy Safety concluded that SCE did not remediate P2 hazard trees within 180 days and did not demonstrate that it resolved constraints in a timely manner, and therefore did not complete all work commitments in this statement.

Conclusion: SCE did not provide information consistent with completion of work identified in its work order goals.

Narrative Statements, Supporting Information, and Analysis

Statement 16

Statement: “To mitigate the risk of an overdue vegetation work order becoming a fire risk, SCE monitors overdue work orders related to Routine Line Clearing that involve vegetation breaching the required compliance distance from SCE’s lines by revisiting them every 30 days to help ensure they do not become imminent threats.”²²⁴

Supporting Information and Analysis: SCE provided screenshot images from its dashboard reporting system which showed the monthly breakdown of overdue work orders with P2 notifications that were created and completed in 2024.²²⁵ The dashboard reported 24,732 completed notifications. SCE was unable to provide individual dates of the 30-day field visits due to record system limitations, but stated that “vegetation management contractors were required to revisit the work locations weekly for work orders which were already assigned to them,” and that “work orders unassigned to tree crews (such as work on environmental hold or subject to other constraints), SCE internal Senior Specialists (ISA-Certified Arborists) were required to revisit the locations.”²²⁶ SCE provided a screen shot of its Timeline of Services section of its contractor SOW which required contractors to reinspect sites.

The documentation SCE provided supports that it created notifications for overdue work orders and that it required its contractors to reinspect sites with overdue work orders; however, it did not supply documentation to support that the reinspections actually

²²³ OEIS-E-SVM_2025-SCE-001, Question 34, attachment: “OEIS-E-SVM_2025-SCE-001 Q.34 Answer.pdf,” p. 2.

²²⁴ Southern California Edison Company, [2023-2025 Base Wildfire Mitigation Plan](#), Published June 4, 2024, pp. 434 URL: (<http://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56770&shareable=true>).

²²⁵ OEIS-E-SVM_2025-SCE-001, Question 35, attachment: “OEIS-E-SVM_2025-SCE-001 Q.35 Answers.pdf.”

²²⁶ OEIS-E-SVM_2025-SCE-001, Question 35, attachment: “OEIS-E-SVM_2025-SCE-001 Q.35 Answers.pdf.”

happened. Therefore, SCE did not provide sufficient documentation to support that the work in this statement was completed.

Conclusion: SCE did not provide information consistent with the completion of work identified in this statement.

Finding – 8.2.6 Open Work Orders

SCE did not provide information consistent with the completion of work identified in this initiative. Therefore, Energy Safety concludes that the initiative 8.2.6 Open Work Orders is deficient.

In its CAP response SCE must submit documentation describing the constraints which prevented the timely completion of its work orders and describe the corrective actions it plans to implement to avoid overdue work orders in future performance years. SCE must also provide protocols it plans to implement to track reinspection of sites which have been prioritized for work but for which constraints have delayed the work, to ensure that they do not become an imminent risk of ignition.

8.2.7 Workforce Planning

The purpose of this initiative is that “[p]rograms...ensure that the electrical corporation has qualified vegetation management personnel and to ensure that both employees and contractors tasked with vegetation management responsibilities are adequately trained to perform relevant work.”²²⁷

Narrative Statements, Supporting Information, and Analysis

Statement 17

Statement: In its WMP SCE, provided information regarding Vegetation Management Qualifications and Training describing the minimum qualifications and special certifications for Inspections personnel in Table 8-20 of its WMP.²²⁸ List of Worker Titles and Qualifications from this table are summarized below:

1. Specialist
 - Special Certification Requirements: none required

²²⁷ [Technical Guidelines](#) (December 6, 2022), p. A-26 URL:

(<http://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true>).

²²⁸ Southern California Edison Company, [2023-2025 Base Wildfire Mitigation Plan](#), Published June 4, 2024, pp. 438, 439, and 442 URL: (<http://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56770&shareable=true>).

- Three or more years of experience in Utility Vegetation Management
- 2. Senior Specialist²²⁹
 - Special Certification Requirements: ISA Arborist
 - Electrical Corporation % Special Certifications: 100%
 - Contractor % Special Certifications: 47%
- 3. Inspector²³⁰
 - Special Certification Requirements: ISA Arborist
 - Contractor % Special Certifications: 100%
- 4. Lead Inspector²³¹
 - Special Certification Requirements: ISA Arborist
 - Recommended Certification: Tree Risk Assessment Qualification
 - Contractor % Special Certifications: 62%
- 5. Customer Coordinator
 - Special Certification Requirements: ISA Arborist
 - Contractor % Special Certifications: 9%
- 6. General Foreman
 - Special Certification Requirements: ISA Arborist
 - Contractor % Special Certifications: 12%
- 7. Quality Control Inspector
 - Special Certification Requirements: ISA Arborist
 - Contractor % Special Certifications: 67%

Supporting Information and Analysis: SCE provided an explanation of the requirements and qualifications for Utility Specialists,²³² Tree Risk Assessor Qualifications (TRAQ),²³³ and the Board Certified Master Arborist (BCMA) credential.²³⁴ Also, SCE provided an Excel file documenting required and not required staff certifications for its HTMP QC Inspectors, HTMP QC Lead Inspectors or Supervisors, and their respective ISA certification numbers and

²²⁹ ISA Certified Arborist is required for SCE-employed Senior Specialists. For contractor Senior Specialists who may perform some work duties on a temporary basis, ISA certification is encouraged, but not required.

²³⁰ ISA Certified Arborist is not a requirement for Inspectors and Customer Coordinators, but they are encouraged to obtain certification when eligible.

²³¹ ISA Certified Arborist is a requirement for SCE-employed Lead Inspectors.

²³² **“Utility Specialist** – An ISA Certified Arborist Utility Specialist has a minimum of 2000 hours experience over two years in electric utility vegetation management or has served as a consultant to a utility, with a minimum of 4,000 hours over a maximum 10-year period.” (“OEIS-E-SVM_2025-SCE-001 Q. 36 Answr.pdf”).

²³³ **“TRAQ** – The ISA Tree Risk Assessment Qualification (ISA TRAQ) is a voluntary qualification program designed to train and assess candidates in a specialized field of arboriculture. When a professional earns the ISA TRAQ credential, they should be recognized by their peers and the public as a tree care professional who has specialized knowledge in tree risk assessment.” (“OEIS-E-SVM_2025-SCE-001 Q. 36 Answr.pdf”).

²³⁴ **“BCMA** – The ISA Board Certified Master Arborist credential is the highest level of certification offered by ISA. This credential recognizes ISA Certified Arborists® who have reached the pinnacle of their profession.” (“OEIS-E-SVM_2025-SCE-001 Q. 36 Answr.pdf”).

performed inspections (i.e., High Threat Assessment, DVMP, TVMP, and High Threat Mitigation). According to the Excel file, SCE staffed a total of 45 QC Inspectors and Supervisors, of which five QC Inspectors hold two or more years of qualifying experience, 38 served as HTMP QC Inspectors with ISA Certifications, and seven Supervisors hold ISA certifications in 2024.²³⁵ Thus, SCE's HTMP and QC Inspectors maintained the required vegetation management qualifications in 2024.

Conclusion: SCE provided information consistent with the completion of work identified in this statement.

Statement 18

Statement: SCE committed to implementation of training programs for both its inspections and projects staff stating: "SCE provides onboard and annual training– Utility Vegetation Management Core Plans Training – to all vegetation management employees and vegetation contractor lead personnel. This training provides detailed reviews of program requirements, practices, and procedures, and any updates or enhancements pertaining to SCE's vegetation management program."²³⁶ And "Training for HTMP, the Dead and Dying Tree Removal Program, and Structure Brushing includes: Training of specific work processes; refusal management; vegetation threat management; QC requirements; Tree Risk Calculator training for those involved in HTMP; and environmental-specific training."²³⁷

Supporting Information and Analysis: SCE provided a copy of the Utility Vegetation Management- Core Plans Training document,²³⁸ which included the slide decks used for the training conducted January 4 – 5, 2024 and the "refresher" (make-up) session on April 15, 2024.²³⁹ SCE also provided the two-day mandatory UVM Core Plans Training Roster with redacted names of the attendees, which noted 115 people attended the session.²⁴⁰ Thus, SCE provided information consistent with the implementation of training programs for its SVM personnel, consistent with the work commitment in this statement.

Conclusion: SCE provided information consistent with the completion of work identified in

²³⁵ Data Request OEIS-E-SVM_2025-SCE-001, Question 36; attachments: "OEIS-E-SVM_2025-SCE-001_Q36_QC Inspector Certifications" and "OEIS-E-SVM_2025-SCE-001 Q. 36 Answer.pdf."

²³⁶ Southern California Edison Company, [2023-2025 Base Wildfire Mitigation Plan](http://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56770&shareable=true), Published June 4, 2024, p. 441 URL: (<http://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56770&shareable=true>).

²³⁷ Southern California Edison Company, [2023-2025 Base Wildfire Mitigation Plan](http://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56770&shareable=true), Published June 4, 2024, p. 441 URL: (<http://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56770&shareable=true>).

²³⁸ Data Request OEIS-E-SVM_2025-SCE-001, Question 37, attachment: "OEIS-E-SVM_2025-SCE-001_Q37_2024 UVM Core Plans_FINAL 010424_Redacted.pdf." and "Day 2_SCE 2024 UVM Core Plans Training - Attendance report 1-05-24_Redacted.pdf."

²⁴⁰ Data Request OEIS-E-SVM_2025-SCE-001, Question 37, attachment: "Attendance UVM Core Plans - REFRESHER_Redacted_041524.pdf."

this statement.

Finding – 8.2.7 Workforce Planning

SCE provided information consistent with the completion of work identified in this initiative. Therefore, Energy Safety concludes that initiative 8.2.7 Workforce Planning is complete.



APPENDIX 2. Southern California Edison 2024 Corrective Action Plan



APPENDIX DESCRIPTION

SCE submitted its corrective action plan (CAP) to Energy Safety on October 24, 2025.

This appendix reproduces that CAP response in its entirety.

Docket #: 2024 SVM

October 24, 2025

Sheryl Billbrey
Program Manager, Environmental Science Division
Office of Energy Infrastructure Safety
715 P Street, 20th Floor
Sacramento, CA 95814

SUBJECT: The Southern California Edison Company's 2024 WMP Vegetation Management Audit Corrective Action Plan (CAP)

Southern California Edison Company (SCE) appreciates the opportunity to provide a response to the Office of Energy Infrastructure Safety (Energy Safety's) Audit of SCE's 2024 WMP Vegetation Management Commitments. SCE recognizes the effort required of Energy Safety to conduct this audit and the level of collaboration with SCE achieved to complete it.

INTRODUCTION

The previous version of California Public Utilities Code (PUC) Section 8386.3(c)(5)(A) required Energy Safety to audit, on an annual basis, the vegetation management work performed by SCE as described in its Wildfire Management Plan (WMP). Under the revised version of PUC Section 8386.6(b)(5)(A), effective September 19, 2025, Energy Safety may conduct audits of the vegetation management work performed by, or on behalf of, an electrical corporation. The office must provide an initial audit report, and the electrical corporation then has a reasonable time to respond to and develop corrective actions for any deficiency specified in the initial audit report.

Energy Safety's initial 2024 Audit findings were provided to SCE on August 28, 2025. These were later revised on September 30, 2025. In performing the 2024 WMP Vegetation Management Audit, Energy Safety found that SCE did not provide information consistent with the completion of all work commitments for five of its 13 vegetation management initiatives. These findings were related to (1) Wood and Slash Management (8.2.3.2); (2) Clearance (8.2.3.3); (3) Fall-In Mitigation (8.2.3.4); (4) Quality Assurance and Control (8.2.5); and (5) Open Work Orders (8.2.6). As requested by Energy Safety, SCE provides additional data, documentation, and clarifications in response to each of the stated findings, as part of SCE's Corrective Action Plan (CAP), described below.

Several of Energy Safety's 2024 findings were similar to findings from the 2023 Substantial Vegetation Management (SVM) audit, conducted earlier this year. SCE believes many of the actions it took to resolve the 2023 findings were initiated prior to the issuance of the draft 2024 report. Where applicable, SCE respectfully asks Energy Safety to reconsider the issued findings and in lieu of the findings, document in the report the corrective actions SCE implemented to correct the deficiency moving forward.

Finding #1 Wood & Slash (includes only 1 category):

8.2.3. Vegetation and Fuels Management - 8.2.3.2 Wood and Slash Management
(Statement 5, Initial Audit Report, p. 20-23)

Energy Safety’s initial findings:

Programmatic Area	Vegetation Management Initiative	Audit Finding
8.2.3. Vegetation and Fuels Management	8.2.3.2 Wood and Slash Management	Deficient

WMP Commitment	2024 Target	2024 Actual	Audit Finding
Manage downed wood and slash	Manage all wood and slash associated with mitigation activities	Did not achieve	Did not complete all work

Statement 5: “SCE’s contract crews strive to remove all wood and material resulting from mitigation for Routine Line Clearing, Structure Brushing, HTMP, and the Dead and Dying Tree Program typically within 100 feet of a dirt or paved road, subject to site conditions. On private property, crews will typically strive to remove all wood, providing that crews are able to maneuver and operate their equipment close enough to the area (e.g., skid steers).” (Initial Audit Report, p. 20)

Energy Safety Finding:

SCE did not provide information consistent with the completion of work identified in this initiative. Therefore, Energy Safety concludes that initiative 8.2.3.2 Wood and Slash Management is deficient.

In its CAP response SCE must provide records of wood and slash removal for work associated with its vegetation management programs and whenever work was not completed, SCE must submit documentation describing the constraints which prevented this work and identify the actions it plans to implement to ensure the work is completed in future performance years. (Initial Audit Report, p. 23)

SCE’s Response:

SCE appreciates Energy Safety’s recognition of the documentation provided by SCE in support of this initiative. As described in SCE’s data request responses, and as acknowledged in Energy Safety’s Initial Audit Report, SCE (1) provided excerpts from its contractors’ statement of work (SOW) demonstrating that it requires contractors to remove wood and slash; (2) described the post-work verification and QC inspections that provide oversight to ensure debris removal and

site cleanup is performed; and (3) explained that field records were incomplete because the existing data fields were not mandatory in 2024.¹

Although SCE did not consider vegetation debris cleanup as a separate, formal target for the 2023-2025 WMP and thus did not previously make it mandatory to track all mitigation records of debris removal, SCE has since taken multiple steps to improve recordkeeping and verify contractor adherence after being made aware of this finding.

First, Energy Safety identified a similar finding for the 2023 calendar year in its 2023 Substantial Vegetation Management (SVM) Audit issued on February 18, 2025. In SCE's 2023 CAP response, submitted on March 19, 2025, SCE explained that an Arbora software solution was implemented in late 2024 to document contractor actions regarding wood and slash management. These fields have now been made mandatory in the work management system (WMS), and as a result SCE expects to have more complete records of wood and slash management going forward.

Second, SCE's QC function for structure brushing reviews wood and slash management at worksites. In 2024, SCE did not identify any widespread pattern of debris being left inappropriately on site.

Third, on July 11, 2025, in response to the 2023 SVM audit finding and to evaluate the effectiveness of the Arbora solution that was implemented in late 2024, SCE's VM regulatory and compliance team requested a report of all completed routine line clearing mitigations performed between January 1, 2025 and June 30, 2025 to confirm evidence of completed debris removal based on the Arbora system enhancements. The information was received on July 15, 2025. The file contained approximately 354K mitigations (both trimming and removals) performed between January 1 and June 30, 2025, and revealed approximately 97% of the records had the debris removal field documented by field crews, which provides evidence that the mandatory fields are working. However, the data also revealed that approximately 10,685 trees (3%) showed the debris management field was left blank. After identifying this issue, SCE's VM regulatory and compliance team issued internal corrective action VM-CA-57 on July 18, 2025, to address the 3% blanks and discussed the issue with SCE's VM technology team to understand why a small percentage of records were still blank despite the data field being mandatory. The probable cause was identified and another Arbora software solution was implemented on September 4, 2025, to address the issue.

Fourth, to verify the effectiveness of the September 4, 2025, Arbora solution, records were requested for all trims and removals performed between September 5 and October 13, 2025. Approximately 32K trims and/or removals were performed, and the debris management field was populated for 99.83% of records.

¹ If helpful for Energy Safety, SCE could provide examples of selected field records from 2024 that demonstrate wood and slash management. However, not all records from 2024 contain this information because those data fields were not previously mandatory.

In summary, since the deficiency is identical to the 2023 SVM finding and is related to “lack of documentation of debris removal” and not actual debris being left on site, SCE believes the actions it took in 2024 prior to the issuance of the 2023 SVM report in February 2025, and as a result of the technology solutions and data analysis implemented through internal corrective action VM-CA-57, provide reasonable assurance that SCE is addressing the concerns to prevent recurrence. Given the above, SCE respectfully requests Energy Safety to reconsider this finding and find that SCE has implemented appropriate corrective actions to address this issue.

Finding #2 Clearance (includes 2 sub-categories):

8.2.3. Vegetation and Fuels Management - 8.2.3.3 Clearance
(Initial Audit Report, p. 23-28)

Energy Safety’s initial findings:

Programmatic Area	Vegetation Management Initiative	Audit Finding
8.2.3. Vegetation and Fuels Management	8.2.3.3 Clearance	Deficient

Energy Safety Finding:

SCE did not provide information consistent with the completion of work identified 8.2.3.3.1. Expanded Clearing. Therefore, Energy Safety concludes that initiative 8.2.3.3 Clearance is deficient.

In its CAP response SCE must provide additional information on why clearances were not achieved for all mitigation work assigned during its routine line clearing inspections work, correct any errors in the files associated with expanded clearances to demonstrate that all trees achieved the minimum required clearance distance, and provide clarification on why there is a discrepancy between mitigation work from its VM-7 and VM-8 programs and its clearance programs. SCE must also provide corrective actions to ensure clearance work will be completed in the future. (Initial Audit Report, p. 29)

1st Sub-Category: Complete all prescribed mitigations in 2024

Mitigation for prescription from inspections in 2024 were not all completed in 2024 for VM-7, VM-8, and supplemental patrols.
(Initial Audit Report, p. 23-26)

WMP Commitment	2024 Target	2024 Actual	Audit Finding
Clearance as prescribed (VM7 & VM8)	Mitigate trees identified in detailed inspections	118,576 (93%) trees mitigated	Did not complete all work

Energy Safety Analysis (Initial Audit Report, p. 23-26)

Routine Line Clearing (VM-7 & VM-8)

SCE’s WMP states that it “seeks to achieve expanded clearances where feasible in HFRA as part of its Routine Line Clearing activities (Distribution Vegetation Management Plan [VM-7] and Transmission Vegetation Management Plan [VM-8]).” Therefore, Energy Safety assessed completion of this initiative based on whether each tree that was inspected in each of these programs received the prescribed mitigation. Energy Safety limited this analysis to inspections performed in Q1, Q2, and Q3, because inspections conducted in Q4 of 2024 could be completed in Q1 of 2025 and still meet the 90-day P2 timeframe specified in Section 8.2.6 Open Work Orders. (Initial Audit Report, p. 23-24)

To assess whether inspections received prescribed mitigations, Energy Safety determined whether each unique tree ID between January and September 2024 in the inspection worksheet had a corresponding mitigation completion date in the mitigation worksheet. Energy Safety found that of the 128,014 inspections where a mitigation was prescribed, SCE completed those mitigations for 118,576 trees (93%), failing to complete mitigations on the remaining 9,438 trees (7%) in High Fire Risk Areas (HFRA). Thus, in performance year 2024, SCE did not complete all prescribed mitigations in HFRA. (Initial Audit Report, p. 25-27)

Table reproduced from Initial Audit Report, p. 24

Activity/Line Type	-Total Inspections with Prescriptions	Inspection with a Mitigation	Inspections without a Mitigation
Trims	122,591	114,630 (94%)	7,961 (6%)
Removals	5,423	3,946 (73%)	1,477 (27%)
All work on Distribution	123,278	114,875 (93%)	8,403 (7%)
All work on Transmission	4,736	3,701 (78%)	1,035 (22%)
Total	128,014	118,576 (93%)	9,438 (7%)

Supplemental Patrols

SCE also provided an Excel file and metadata listing all supplemental patrols conducted in HFRA and the resulting mitigation work completed in 2024. The Excel file included two worksheets, one documenting the supplemental inspections and the second documenting the supplemental mitigations which resulted from those inspections [. . .] However, the inspections file did not identify where work was prescribed and the record IDs for the inspections and mitigations worksheets did not match; therefore, Energy Safety could not verify that inspections resulted in mitigation work. (Initial Audit Report, p. 25)

Energy Safety Conclusion:

Because all of the prescribed work for clearances was not completed, Energy Safety found that SCE did not complete all work associated with this initiative.

SCE did not provide information consistent with the completion of all clearance work associated with VM-7 and VM-8 and its supplementary patrol inspections. (Initial Audit Report, p.26)

SCE Response:

Routine Line Clearing (VM-7 & VM-8)

SCE clarifies there is no GO95, other regulatory, or programmatic requirement to remediate work within the same calendar year that work is prescribed. SCE’s VM-7 and VM-8 vegetation management activities are focused on performing inspections and prescribing appropriate mitigations in order to achieve the necessary clearance to mitigate the risk of vegetation contact with energized conductors. The VM-7 and VM-8 targets are not centered on timing of remediations, which is captured by work order prioritization and is the subject of a separate Energy Safety finding addressed below.

As such, Energy Safety’s conclusion that “because all of the prescribed work for clearances was not completed [in 2024], Energy Safety found that SCE did not complete all work associated with this initiative” (p.27), imposes a heightened standard that is not intended to be part of these WMP targets. When a mitigation is prescribed, the timeline for completion is dependent on the risk identified and may be subject to constraints. For example, SCE’s internal threat management document UVM-08 provides guidance for mitigation timelines and identifies multiple constraints that may reasonably extend or delay completion. Additionally, and as stated in SCE’s 2023 SVM audit response, SCE’s guidelines documented in UVM-08 are significantly more prescriptive than what is specified under CPUC GO 95, Rule 18A. Nevertheless, in response to this initial audit finding, SCE reviewed and investigated the 9,438 inspection records related to Routine Line Clearing that Energy Safety identified in the table above. Of the 9,438 records that Energy Safety found had not been completed in 2024, 18 records were found to be duplicates for a total of 9,420 records.

Of the 9,420 records:

- 6,929 (73%) were completed as of 10/08/2025.
- 1,210 (13%) are still constrained (e.g., environmental, access issues)
- 999 (11%) required no work (work was deemed no longer needed, e.g., tree trimmers identified clearance as being in compliance, mitigation completed by customer)
- 282 (3%) are either assigned to contractors or pending assignment after being released from constraints

Therefore, the records demonstrate that at least 93% of the prescriptions were completed within the same calendar year, and in total 98% were completed by October 2025.

Supplemental Patrols

For supplemental patrols conducted in HFRA, SCE tracks patrols and corresponding mitigations as distinct activities within its work management system. Following a detailed review, SCE identified that 54 supplemental patrols conducted in 2024 resulted in 73 prescriptions. Of these 73 prescriptions, 72 were mitigated in 2024, while 1 prescription remains constrained. SCE further clarifies that the original supplemental mitigation data provided to Energy Safety consisted of all mitigations completed in 2024 from supplemental patrols (a total of 99 mitigations), which included 27 mitigations completed from prescriptions created in 2023².

Given the above, SCE respectfully requests Energy Safety to reconsider this finding. SCE believes the additional information presented demonstrates that SCE has completed the vast majority of mitigations that were prescribed from the Routine Line Clearing and Supplemental Patrol inspections that were performed in 2024, and that most delays were due to documented constraints such as environmental holds.

2nd Sub-Category: Post Clearance Data (Statement 6, Initial Audit Report, p.26-28)

Some post clearance inspection data included blanks, noncompliance, or P1s under VM-7 and VM-8.

Energy Safety’s initial findings:

WMP Commitment	2024 Target	2024 Actual	Audit Finding
8.2.3.3.1 Expanded Clearances	100% trees meet or exceed RCD	97% trees met or exceeded RCD	Did not complete all work

Statement 6: “SCE performs expanded line clearances to mitigate the risk of vegetation contact with energized conductors. [...] “At a minimum, SCE’s Routine Line Clearing work within HFRA maintains at least the required four feet clearance for Distribution lines and the required 10 feet clearance for Transmission lines for a full annual inspection cycle. Where GRCD has been achieved historically, SCE strives to maintain the expanded clearance thereafter.” (Initial Audit Report, p. 26)

Energy Safety Analysis:

SCE provided an Excel file documenting the clearance work along distribution and transmission lines within the HFRA in 2024, which included the inspection date, clearance completion date, fire risk rating, and clearance designation (Grid Resiliency Clearance Distance [GRCD], Trigger

² Data Request OEIS-E-SVM_2025-SCE-001, Question 3; attachment: “03_OEIS-E-SVM_2025-SCE-001_Q.03-2024 Supplemental Patrols & Mitigation.xlsx.”

Clearance Distance [TCD], Compliance Clearance Distance [CCD], Regulation Clearance Distance [RCD], or Non-Compliant [<RCD]). (Initial Audit Report, p. 26-28)

Table reproduced from Initial Audit Report, p. 27

Activity/ Line Type	Total Inspections	GRCD+	TCD+CCD+RCD	Not Specified
Trims on Distribution Lines	125,124	94,452 (75%)	27,068 (22%)	3,604 (3%)
Removals on Distribution Lines	4,978	4,146 (83%)	54 (1%)	778 (16%)
No Work Required on Distribution Lines	104	27 (26%)	7 (7%)	70 (67%)
<i>Total Distribution Clearance Activity</i>	<i>130,206</i>	<i>98,598 (76%)</i>	<i>27,122 (21%)</i>	<i>4,382 (3%)</i>
Trims on Transmission lines	2,878	2,364 (82%)	433 (15%)	81 (3%)
Removals on Transmission Lines	1,754	1702 (97%)	28 (2%)	24 (1%)
No Work Required on Transmission Lines	1	0 (0%)	1 (100%)	0 (0%)
<i>Total Transmission Clearance Activity</i>	<i>4,633</i>	<i>4066 (88%)</i>	<i>461 (10%)</i>	<i>105 (2%)</i>
<i>Total Clearance Activity</i>	<i>134,839</i>	<i>102,664 (76%)</i>	<i>27,583 (21%)</i>	<i>4,487 (3%)</i>

Of the total inspections, 1,071 (3%) prescribed trees were either non-compliant or “P1-24” or had a blank entry for compliance status post clearance (listed as “not specified” in the table above.³ SCE stated that blank, P1-24, or non-compliance entries for the post clearance status are due to “incorrect end-user selection of post mitigation clearance drop-down menus” while operating its work management system (Survey 123). While these entries might be in error, SCE could not provide documentation verifying that these trees were in compliance with clearance requirements. Because the statement committed to maintaining the minimum required clearance (RCD) for all trees in HFRA, Energy Safety concluded that not all work was completed in 2024. (Initial Audit Report, p 28)

There also appears to be a discrepancy between the total number of trees mitigated for clearance work in the VM-7 and VM-8 programs (136,752, described in the previous section) and the total number in the documentation supplied in response to its clearance program (135,082, sum of all trims and removals to achieve clearances). SCE did not provide explanation

³ This statement is directly from Energy Safety’s Initial Audit Report. SCE believes the figure of 1,071 is a typographical error and should be 4,487.

for why the two files report different numbers of mitigations for clearance. (Initial Audit Report, p. 28)⁴

Energy Safety Conclusion:

SCE did not provide information consistent with the completion of work identified in this statement. (Initial Audit Report, p. 28)

SCE Response:

Following Energy Safety’s release of its draft 2024 SVM Audit report, SCE requested a list of the 4,487 records Energy Safety identified as “not specified” in order to investigate this finding. To aid in SCE’s investigation and CAP response, Energy Safety provided a file on September 23, 2025 that included a total of 4,550 records under the tab labeled “Post Clearance incomplete”. Energy Safety identified these 4,550 records as containing the following post-clearance statuses: blank, non-compliant (<RCD), P1-24, or P1-72. SCE then performed additional analysis to verify that these trees had been mitigated in compliance with clearance requirements.

First, SCE’s Post Work Verification (PWV) performed by SCE’s Senior Specialists (ISA Arborists) ensures work is left compliant. If trees are found nonconforming, they are required to be reworked by the contractor. In addition, SCE’s QC function performs 100% Quality Control inspections in the highest risk areas of SCE’s service territory, with lower rates of QC sampling inspections in lower risk areas. If appropriate clearances are not achieved, it would be annotated by QC. Between the PWV and QC reviews, there was no indication that the trees were left in a noncompliant condition.

Second, to provide reasonable assurance these post-clearance designations were drop-down selection errors and not trees left non-compliant, SCE performed a thorough analysis of the 4,550 instances where the post clearance data field showed blank, non-compliant, P1-24, or P1-72. Of the 4,550 records, 3,403 were identified to have a 2024 inspection clearance (prior to subsequent mitigation) of either RCD, CCD, TCD, GRCD, or >GRCD. In other words, the clearance distance found at time of inspection (pre-clearance) was already sufficient to meet compliance standards, so it was not likely that the clearance distance left after mitigation (post-clearance) would be insufficient. This suggests the data fields were simply drop-down selection errors.

In addition, of the remaining 1,147 records, the below tree clearances were identified at the next inspection:

⁴ SCE confirms there is no discrepancy; both files, when filtered for trim and removal, reflect a total of 135,082 records.

Quantity	Clearance at Next Inspection
68	RCD – Regulation Clearance Distance
55	CCD – Compliance Clearance Distance
29	TCD – Trigger Clearance Distance
556	GRCD – Grid Resiliency Clearance Distance
7	> GRCD – Greater than Grid Resiliency Clearance Distance
118	Trees Removed and no additional inspection
18	P1-24
41	P1-72
79	Noncompliant (less than RCD)
176	No next inspection data
1147	Total

In other words, when those trees were next inspected between 6 to 12 months later, the vast majority were found to have clearance distances that were sufficient to meet compliance standards (e.g., RCD, CCD, TCD, GRCD, >GRCD). 118 trees had already been removed, and 176 trees had not yet received their next inspection at the time SCE analyzed the data. Of the 138 trees found to be P1-24, P1-72, and noncompliant (<RCD), it is reasonable to assume they had simply grown since the last inspection. Therefore, it is highly unlikely that these trees were left noncompliant in 2024, since the subsequent inspection found most of them still had adequate clearance.

Third, SCE has taken steps to reduce these dropdown selection errors going forward. In response to a similar finding for 2023 identified in Energy Safety’s 2023 SVM Audit (issued on February 18, 2025), SCE described the actions it was implementing in its 2023 CAP response, submitted on March 19, 2025.⁵ On May 7, 2025, SCE issued an internal corrective action VM-CA-55 to address this issue. SCE implemented software solutions in 2025 to prevent recurrence.⁶

Given the above, SCE respectfully requests Energy Safety to reconsider this finding. SCE believes the additional information presented provides reasonable assurance to Energy Safety that the 4,550 records shown as blank, noncompliant (<RCD), P1-24, or P1-72 were most likely the result of user error (specifically, incorrect drop-down selection) and did not reflect insufficient clearance conditions in the field. SCE has also taken corrective actions to implement software solutions to prevent recurrence.

⁵ “Finally, as a result of the internal corrective action that was issued, SCE implemented a software solution in the new Arbora work management system. [...] Since tree trimmers should be mitigating any encroachments to achieve clearance distances of RCD or greater, now the crews can no longer accidentally select P1, P1 72-hours, or Non Compliance in the “post clearance” field” (SCE 2023 CAP Response, p. 7).

⁶ For 2024 data, SCE clarifies that the Arbora software update prevented users from entering Noncompliance or P1 in the Post Clearance field, but still allows the field to remain blank. All Noncompliance and P1 entries in that field originate from Survey123 (the prior WMS). As part of Corrective Action VM-CA-55, SCE is working on enhancing Arbora to prevent the blanks.

Finding #3 Fall-In Mitigation (includes 2 sub-categories):

No Statement provided (Initial Audit Report, p. 29-32)

Energy Safety’s initial findings:

Programmatic Area	Vegetation Management Initiative	Audit Finding
8.2.3 Vegetation and Fuels Management	8.2.3.4 Fall-In Mitigation	Deficient

Energy Safety Finding:

The purpose of this initiative is to take actions “to identify and remove or otherwise remediate trees that pose a high risk of failure or fracture that could potentially strike electrical equipment. (Initial Audit Report, p. 29)

SCE did not provide information consistent with the completion of fall-in mitigation work associated with its HTMP or Dead and Dying Tree Removal Program. Therefore, Energy Safety concludes that initiative 8.2.3.4 Fall-In Mitigation is deficient.

In its CAP response SCE must provide documentation to support that the work was completed, or documentation demonstrating why the work was constrained and when the work was expected to be completed. SCE must also provide corrective actions to ensure fall- in mitigation work will be completed in the future. (Initial Audit Report, p. 32)

Table reproduced from Initial Audit Report, p. 31

Work Type Prescribed	# Trees Prescribed Work	# Trees with Completed Mitigation	# Trees with Incomplete Mitigation
Hazard Tree Mitigation Program (HTMP)			
Prune	144	140 (97%)	4 (3%)
Removal	970	904 (93%)	66 (7%)

Total HTMP Mitigations	1,114	1,044 (94%)	70 (6%)
Dead and Dying Tree Removal Program			
Removal	1,937	1,489 (77%)	448 (23%)

1st Sub-Category: HTMP Prescribed Mitigation (Initial Audit report, p. 31-32)

Energy Safety’s initial findings:

WMP Commitment	2024 Target	2024 Actual	Audit Finding
8.2.3.4.1 Hazard Tree Management Program (HTMP) (VM-1)	Complete prescribed work ⁷	Completed 1,044 out of 1,044 mitigations (81% complete) ⁸	Did not complete all work

Energy Safety Analysis:

SCE provided an Excel file and metadata of the HTMP risk assessments and associated mitigation work conducted in 2024 for its HTMP program and Dead and Dying Tree Removal Program. (Initial Audit Report, p. 31)

To assess completion, Energy Safety determined if each tree in the HTMP and Dead and Dying Tree Removal Program had a completion date assigned. SCE stated that blank completion dates were due to constraints (i.e. “access constraints, environmental constraints, or resource constraints”) or “mitigations that are still pending assignment and still within SCE’s internal remediation timeline for this program.”

Energy Safety found that of the 1,114 HTMP inspections where mitigation was prescribed, SCE completed those mitigations for 1,044 trees (94%), failing to complete mitigations on the remaining 70 trees (6%) in High Fire Risk Areas (HFRA) [. . .] Thus, in performance year 2024, SCE did not complete all prescribed mitigations in HFRA. (Initial Audit Report, p. 31-32)

Energy Safety Conclusion:

⁷ SCE clarifies that the VM-1 target was “Inspect 408 grids/circuits and prescribe mitigation for hazardous trees with strike potential within those grids in SCE’s HFRA.”

⁸ This statement is directly from Energy Safety’s Initial Audit Report. SCE believes the percentage of 81% is a typographical error and should be 94% (1,044 out of 1,114).

SCE did not complete all fall in mitigation work associated with this target. (Initial Audit Report, p. 32)

SCE's Response:

SCE clarifies there is no regulatory or programmatic requirement to complete hazard tree mitigations within the same calendar year that work is prescribed.

SCE's VM-1 target for 2024 was to "Inspect 408 grids/circuits and prescribe mitigation for hazardous trees with strike potential within those grids in SCE's HFRA." SCE inspected 437 grids and therefore exceeded its VM-1 target for 2024. SCE's Hazard Tree Mitigation Program (HTMP) is designed to reduce wildfire risk, and mitigation activities are prioritized and scheduled based on the level of risk identified. As such, completion may occur outside the calendar year of prescription. For example, SCE's internal threat management document UVM-08 provides guidance for mitigation timelines, and identifies multiple constraints that may reasonably extend or delay completion. SCE's 180-day mitigation timeline for HTMP is subject to various constraints, and SCE prioritizes risk when prescribing and executing mitigation work. SCE clarifies that the VM-1 target focuses on HTMP inspections and prescriptions, and is not centered on timing of remediations, which is captured by work order prioritization and is the subject of a separate Energy Safety finding addressed below.

Nonetheless, following the release of Energy Safety's draft 2024 SVM Audit Report, SCE requested a list of the 70 HTMP records Energy Safety identified as "incomplete" in order to investigate the status of each mitigation. To aid in SCE's investigation and CAP response, Energy Safety provided a file on September 23, 2025.

Upon further review of these 70 records, SCE determined:

- (1) 67 were originally subject to constraints (e.g., environmental, access, or customer constrained).

However, as of September 2025:

- a. 12 were resolved and mitigated
 - b. 19 were resolved and pending mitigation
 - c. 36 remain constrained and are pending environmental approval
- (2) 2 prescriptions were cancelled (work was deemed as no longer needed, e.g., tree trimmers identified clearance as being in compliance, mitigation completed by customer)
 - (3) 1 prescription was mitigated in 2025.

Given the above, SCE respectfully requests Energy Safety to reconsider this finding. Of the 70 "incomplete" mitigations for VM-1, all were either mitigated, cancelled, or constrained as of September 2025. The additional information presented demonstrates that SCE completed the vast majority of HTMP mitigations that were prescribed in 2024, that most delays were due to documented constraints such as environmental holds, and that SCE continues to make progress resolving constraints and completing this work.

2nd Sub-Category: Dead and Dying Tree Removal Program

(Initial Audit Report, p. 31-32)

Energy Safety's initial findings:

WMP Commitment	2024 Target	2024 Actual	Audit Finding
8.2.3.4.2 Dead and Dying Tree Removal Program (VM-4)	Complete prescribed work ⁹	Completed 1,489 out of 1,937 mitigations (77% complete)	Did not complete all work

Energy Safety Analysis:

SCE provided an Excel file and metadata of the HTMP risk assessments and associated mitigation work conducted in 2024 for its HTMP program and Dead and Dying Tree Removal Program. (Initial Audit Report, p. 31)

To assess completion, Energy Safety determined if each tree in the HTMP and Dead and Dying Tree Removal Program had a completion date assigned. SCE stated that blank completion dates were due to constraints (i.e. "access constraints, environmental constraints, or resource constraints") or "mitigations that are still pending assignment and still within SCE's internal remediation timeline for this program." (Initial Audit Report, p. 31)

For its dead and dying tree removals program, SCE completed removals for 1,489 trees (77%) and the remaining trees had no completion date. Thus, in performance year 2024, SCE did not complete all prescribed mitigations in HFRA. (Initial Audit Report, p. 32)

Energy Safety Conclusion:

SCE did not complete all fall in mitigation work associated with this target. (Initial Audit Report, p. 32)

SCE's Response:

SCE clarifies there is no regulatory or programmatic requirement to complete Dead & Dying Tree Removals within the same calendar year that work is prescribed.

SCE's VM-4 target for 2024 was to "Inspect 485 grids and prescribe mitigation for dead and dying trees with strike potential within those grids." SCE inspected 581 grids and therefore exceeded its VM-4 target for 2024. Similar to HTMP, SCE's Dead and Dying Tree Removal Program is designed to reduce wildfire risk, and mitigation activities are prioritized and scheduled based on the level of risk identified. As such, completion may occur outside the calendar year of prescription. For example, SCE's internal threat management document UVM-08 provides guidance for mitigation timelines, and identifies multiple constraints that may reasonably extend or delay completion. SCE's 180-day mitigation timeline for Dead & Dying

⁹ SCE clarifies that the VM-4 target was "Inspect 485 grids and prescribe mitigation for dead and dying trees with strike potential within those grids."

Tree Removal is subject to various constraints, and SCE prioritizes risk when prescribing and executing mitigation work. SCE clarifies that the VM-4 target focuses on Dead & Dying inspections and prescriptions, and is not centered on timing of remediations, which is captured by work order prioritization and is the subject of a separate Energy Safety finding addressed below.

Nonetheless, following the release of Energy Safety’s draft 2024 SVM Audit Report, SCE requested a list of the 448 Dead & Dying Tree Removal records Energy Safety identified as “incomplete” in order to investigate the status of each mitigation. To aid in SCE’s investigation and CAP response, Energy Safety provided a file on September 23, 2025.

Upon further review of these 448 records, SCE determined:

- (1) 394 were originally subject to constraints (e.g., environmental, customer constrained). However, as of September 2025:
 - a. 110 were resolved and mitigated
 - b. 8 were resolved and pending mitigation
 - c. 276 remain constrained and are pending environmental approval
- (2) 53 prescriptions were cancelled (e.g., work was deemed as no longer needed, trees scheduled to be inspected are inspected and clearance is identified as in compliance, mitigation completed by customer)
- (3) 1 prescription was mitigated in 2025.

Given the above, SCE respectfully requests Energy Safety to reconsider this finding. Of the 448 “incomplete” mitigations for VM-4, all were either mitigated, cancelled, or constrained as of September 2025. The additional information presented demonstrates that SCE completed the vast majority of Dead & Dying Tree Removals that were prescribed in 2024, that most delays were due to documented constraints such as environmental holds, and that SCE continues to make progress resolving constraints and completing this work.

Finding #4 QA/QC (includes 4 Sub-Categories):

(Initial Audit Report, p. 42-51)

Energy Safety’s initial findings:

Programmatic Area	Vegetation Management Initiative	Audit Finding
8.2.5 Quality Assurance and Quality Control	8.2.5. Quality Assurance and Quality Control	Did not complete all work

Energy Safety Finding:

The purpose of this initiative is the “establishment and function of audit process to manage and confirm work completed by employees or contractors, including packaging QA/QC information for input to decision-making and related integrated workforce management processes.” (Initial Audit Report, p. 42)

SCE did not provide information consistent with the completion of work identified in this initiative. Therefore, Energy Safety concludes initiative 8.2.5 Quality Assurance and Quality Control is deficient. (Initial Audit Report, p. 51)

In its CAP response, SCE must provide documentation describing how it calculated the number of line miles for its DVMP and TVMP programs, how it plans to complete the QC remediations for its Hazard Tree Program and explain how it tracks 100% QC work on mitigations associated with its HTMP and Dead and Dying Tree Program to ensure completion. If SCE cannot meet its WMP commitments, it must submit documentation describing the constraints which prevented completion and identify the actions it plans to implement to ensure the work is completed in future performance years. (Initial Audit Report, p. 51)

Table reproduced from Initial Audit Report, p. 43

Activity Being Audited	2024 Goal	Actual 2024
Distribution Circuits in TRI Risk Category A	QA Inspections on 4,718 circuit miles	5,381 circuit miles
Distribution Circuits in TRI Risk Category B-D	QA Inspections on 1,402 circuit miles	1,059 circuit miles
All other Distribution Circuits inspected	QA Inspections to achieve CL/CI of 99/3%	1,025 circuit miles
Distribution Vegetation Management Plan	RCD Target Pass Rate is 100% CCD Target Pass Rate is 95%	RCD Pass Rate = 100% CCD Pass Rate = 97%
Transmission circuits inspected	QA Inspections to achieve CL/CI of 99/5%	824 circuit miles
Transmission Vegetation Management Plan	RCD Target Pass Rate is 100% CCD Target Pass Rate is 95%	RCD Pass Rate = 100% CCD Pass Rate = 98%
HTP QC Remediation (Dead & Dying Tree Removal and HTMP)	100% remediation	98% remediated

1st Sub-Category: Inadequate QC sampling for DVMP for risk categories B, C, D

Initial Audit Report p.43-44

Energy Safety’s initial findings:

WMP Commitment	2024 Target	2024 Actual	Audit Finding
<p>QC inspection sampling sizes and pass rates for DVMP</p>	<p>4,718 TRI category A circuit miles; 1,403 TRI categories B-D circuit miles; RCD/CCD Pass Rates 100%/95%</p>	<p>5,381 TRI category A circuit miles; 1,059 TRI categories B-D circuit miles; RCD/CCD Pass Rates 100%/97%</p>	<p>Did not complete all work</p>

Energy Safety Analysis:

SCE’s WMP described its QA sampling program and pass rates, which are also described in detail in procedure UVM-07 (“Post Work Verification and UVM Program”).

SCE’s WMP included a risk informed QC sampling program for its distribution system, which prioritized QA inspections in the highest risk areas. In the highest risk areas (based on its TRI risk model- TRI A), SCE committed to performing QA inspections on 100% of its distribution circuit miles (4,718) and using judgmental sampling to achieve a CL/CI of 99/3% for distribution circuit miles all other high-risk areas (TRI-B, TRI-C, TRI-D). SCE provided two Excel files documenting the circuit miles which received QA inspections in 2024. (Initial Audit Report, p. 43)

The files were not consistent¹⁰. One file, which was pre-sorted showing only distribution line miles with a TRI rank of A, B, C, or D showed SCE conducted 5,381 circuit miles of along TRI Level A lines and 1,025 circuit miles along TRI Levels B,C, and D lines for a combined total of 6,406 line miles. The second file included total line miles on distribution and transmission lines and those with a TRI rank and those without. According to this file, SCE conducted a total of 5,347 circuit miles of TRI Level A along distribution lines, and 1,029 circuit miles of TRI Levels B, C, and D for a combined total of 6,376 TRI ranked miles. (Initial Audit Report, p. 44)

Both files demonstrate that SCE exceeded its TRI A sampling goal, and its combined total for all TRI risk categories, but missed its goal for QC inspections of TRI B, C, and D. (Initial Audit Report, p. 44)

SCE’s Response:

Energy Safety states that “SCE did not achieve its QA/QC goal in the highest risk areas in compliance year 2024.” (Initial Audit Findings, p. 44). SCE respectfully requests Energy Safety to reconsider this finding. Although the sampling rate for risk tranches B, C, and D may not have been achieved (1,059 actual miles inspected versus 1,402 planned), SCE exceeded its overall TRI QC inspection sampling by 256 miles and performed 629 more miles in the highest risk tranche (TRI A). In other words, SCE exceeded its QC target for the highest risk tranche (TRI A) and on an overall basis across the four TRI risk categories. This was better than achieving fewer miles in TRI rank “A” (higher risk) and more miles in TRI ranks “B, C, D” (lower risk). In addition, by

¹⁰ OEIS followed up via email on 8/11/2025 and SCE explained how to filter the files.

achieving more overall miles and more miles in TRI A, SCE believes it has met the intent of the QA/QC statement in the WMP and performed adequate QC sampling for the DVMP.

2nd Sub-Category: QC sampling did not achieve CL/CI of 99/3% for all other D miles.
(Initial Audit Report, p. 44)

All other Distribution Circuits inspected	QA Inspections to achieve CL/CI of 99/3%	1,025 circuit miles
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Energy Safety Analysis:

SCE did not provide documentation to demonstrate how it calculated how many line miles should receive QC inspections to achieve a CL/CI of 99/3% for all other line miles in its distribution system. Because the detailed inspection data for its distribution system was provided as number of grids and the mitigation work completed was on a per tree unit basis (VM-7), Energy Safety could not calculate the number of non-TRI circuit miles required to meet the CL/CI goal. (Initial Audit Report, p. 44)

Therefore, SCE did not achieve its QA/QC sampling goal for its highest risk areas in performance year 2024 and did not provide sufficient documentation to support that it met its CL/CI goal for all other distribution lines. (Initial Audit Report, p. 44)

SCE’s Response:

Regarding Energy Safety’s comment that “SCE did not provide documentation to support that it met the CL/CI goal of 99/3% for all other distribution lines,” Energy Safety incorrectly assumed the CL/CI of 99/3% applied to non-TRI distribution miles. SCE clarifies that the CL/CI of 99/3% referred to distribution circuit miles in TRI-B, TRI-C, and TRI-D. (SCE’s 2023-2025 WMP, p. 429).

SCE did not state in the WMP the intended CL/CI for other non-TRI distribution miles. Below is Table 2 from SCE’s VM procedure document UVM-07, which provides the mileage basis for non-TRI miles and sets forth the overall sample size in order to achieve a 99/5% CL/CI. For Distribution, total miles are shown as approximately 32K, and sampling at 99/5% CL/CI requires 652 miles to be inspected. In 2024, SCE completed QC of 1,252 non-TRI miles for Distribution, exceeding the Table 2 requirements by 600 miles.

T / D	HFRA / Non-HFRA	Total Miles	CL/CI %	Miles Inspected
Transmission	Both	≈ 13000	99/5	634
Distribution	Both	≈ 31680		652
Total	N/A	≈ 44680	N/A	1286

Therefore, SCE respectfully requests Energy Safety to reconsider this finding. SCE conducted sufficient QC sampling on Distribution non-TRI miles to achieve CL/CI of 99/5%.

**3rd Sub-Category: QC sampling for TVMP
(Initial Audit Report, p. 43-44)**

Energy Safety’s initial findings:

WMP Commitment	2024 Target	2024 Actual	Audit Finding
QC inspection sampling sizes and pass rates for TVMP	Inspect to achieved 99/5%; RCD/CCD Pass Rates 100%/95%	Insufficient information on sample size; RCD/CCD Pass Rates 100%/98%	Did not complete all work

Energy Safety Analysis

Because the detailed inspection data for its transmission system was provided as number of circuits and the mitigation work completed was on a per tree unit basis (VM-8), Energy Safety could not calculate the number of transmission circuit miles required to meet the CL/CI goal. Therefore, SCE did not provide sufficient documentation to support that it met its CL/CI goal for its transmission lines. (Initial Audit Report, p. 43-44)

SCE’s Response:

Please see SCE’s response in the DVMP section above (2nd sub-category) for more details.

Below is Table 2 from VM’s procedure document UVM-07, which provides the mileage basis for non-TRI miles and sets forth the overall sample size in order to achieve a 99/5% CL/CI. TRI ranking does not apply for transmission circuit miles. For Transmission, total miles are shown as approximately 13K, and sampling at 99/5% CL/CI requires 634 miles to be inspected. SCE completed QC of 824 miles for Transmission, exceeding the Table 2 requirements by 190 miles.

T / D	HFRA / Non-HFRA	Total Miles	CL/CI %	Miles Inspected
Transmission	Both	≈ 13000	99/5	634
Distribution	Both	≈ 31680		652
Total	N/A	≈ 44680	N/A	1286

Therefore, SCE respectfully requests Energy Safety to reconsider this finding, as SCE conducted sufficient QC sampling on Transmission miles to achieve CL/CI of 99/5%.

**4th Sub-Category: Remediation of HTP
(Initial Audit Report, p. 46-47)**

Energy Safety’s initial findings:

WMP Commitment	2024 Target	2024 Actual	Audit Finding
Remediation of HTP	100% remediation	98% remediation	Did not complete all work

Energy Safety Analysis

SCE provided an Excel file listing all the QC verification of remediation performed in 2024 as part of its Hazard Tree and Dead and Dying Tree programs.

Based on this file, SCE’s initial success rate for mitigations was 97% (work was complete and the mitigation achieved) and had an initial success rate of 93% when failures to leave the site in the same condition as when the crews arrived were also taken into account. SCE stated that site cleanup was not included in the pass rate calculation because it’s not considered a compliance failure. (Initial Audit Report, p. 46)

SCE stated that trees that failed the QC inspection were re-inspected after corrections had been made. The file indicated that an additional 18 trees passed QC when the trees were reinspected, leaving 28 trees, 2% of the total trees inspected for QC. (Initial Audit Report, p. 47)

Table reproduced from Initial Audit Report, p. 47

Remediation Required	# Trees requiring remediation after QC	# Successful QC remediations	# Trees still requiring remediation	Percent of Total Trees Inspected
Incomplete Work	24	7	17	1%
Mitigation Not Achieved	3	1	2	0%
Mitigation work was not performed	19	10	9	1%

With these remediations, SCE achieved a 98% pass rate for mitigations on its HTMP and Dead and Dying Tree Programs in performance year 2024. (Initial Audit Report, p. 47)

Energy Safety Conclusion

SCE did not provide information consistent with the completion of work identified in this QA/QC goal. (Initial Audit Report, p. 47)

SCE’s Response:

As an initial clarification, Energy Safety’s Initial Audit Report stated: “Additionally, SCE claimed 100% QC verification of HTMP and Dead and Dying Tree mitigations, but only 608 tree records had corresponding QC inspection records, and many mitigations from 2024 lacked QC documentation.” (Initial Audit Report, p. 48) However, SCE provided Excel file ***Q26 HTP QC Inspection on Mitigation WOLIs-2024.xlsx***, which contained 1561 QC records (1559 for Hazard Tree and 2 for Dead and Dying Tree).¹¹ SCE is unsure of the reference to 608 tree records, as Energy Safety’s analysis and findings appear to include 1561 QC inspections.

Energy Safety stated 28 of 1561 (1.8%) trees did not receive full mitigation. After receiving Energy Safety’s finding and the 2024 Initial Audit Report, SCE reviewed the 1561 QC records and determined only 22 were found to not be fully remediated, as 6 of the QC findings were associated with insufficient site cleanup. Additionally, QC was sent back to the locations and verified all mitigations (except 2) had been completed. The 2 remaining were then completed several days after the most recent QC visits performed in September, and re-verified for a third time. The Table below identifies the following: (1) 1st QC date; (2) results of the first QC inspection; (3) Mitigation date after the first QC failure; (4) 2nd QC date; (5) results of the second QC inspection; (6) Mitigation date after the second QC failure; (7) final (3rd) QC inspection date, and (8) results. The results show that 100% remediation of QC findings have been performed.

WOLI ID	Tree ID	1st QC	Results	Mitigation	2nd QC	Results	Mitigation	3rd QC/SSP	Results
H00624099004	TREE-354112	4/26/2024	Fail	7/16/2024	9/9/2025	Pass			
H01328740016	TREE-395767	7/23/2024	Fail	11/22/2024	9/10/2025	Pass			
H02850710001	TREE-2757271	7/23/2024	Fail	11/22/2024	9/10/2025	Pass			
H02981858002	TREE-2730346	12/11/2024	Fail	4/22/2025	9/5/25	Pass			
H02455606005	TREE-2743656	10/22/2024	Fail	1/21/2025	9/10/2025	Pass			
H00842215019	TREE-386878	4/26/2024	Fail	8/2/2024	9/10/2025	Pass			
H01497332002	TREE-145527	7/13/2024	Fail	N/A	9/9/2025	Fail	9/15/2025	9/15/2025	Pass
H01049223002	TREE-101835	6/22/2024	Fail	3/13/2024	9/9/2025	Pass			
H01949577003	TREE-2700043	5/3/2024	Fail	5/14/2024	9/10/25	Pass			
H01949785001	TREE-2700044	5/3/2024	Fail	5/14/2024	9/11/25	Pass			
H01328740015	TREE-405030	6/22/2024	Fail	11/22/2024	9/9/2025	Pass			
H01351013006	TREE-387732	4/19/2024	Fail	7/15/2024	9/10/2025	Pass			
H00968581017	TREE-189177	7/11/2024	Fail	4/7/2025	9/10/2025	Pass			
H01210928004	TREE-446410	8/14/2024	Fail	1/19/2025	9/10/2025	Pass			
H00842215023	TREE-138972	4/26/2024	Fail	9/4/2024	9/10/2025	Pass			
H00842215024	TREE-119624	4/26/2024	Fail	9/4/2024	9/10/2025	Pass			
H01760039008	TREE-2579040	1/3/2024	Fail	7/8/2024	9/11/25	Pass			
H00749856001	TREE-445252	6/29/2024	Fail	7/2/2024	9/11/25	Pass			
H00770855002	TREE-167909	6/7/2024	Fail	12/11/2024	9/5/25	Fail	9/12/2025	9/12/2025	Pass
H01949710003	TREE-2700028	5/3/2024	Fail	5/14/2024	9/10/25	Pass			
H01949710004	TREE-2700029	5/3/2024	Fail	5/14/2024	9/10/25	Pass			
H01949699004	TREE-2700032	5/3/2024	Fail	5/3/2024	9/10/25	Pass			

SCE clarifies that in 2024, 100% QC of HTP remediations were performed. 22 trees (1.5%) which failed the initial QC inspection were mitigated in late 2024 or early 2025, although they were

¹¹ SCE Data Request OEIS-E-SVM 2025-SCE-001, Question 26 and 29.

not re-inspected by QC after the initial QC failure until 2025. With the exception of 2 trees, QC confirmed all of the trees were properly mitigated in late 2024 or early 2025, and the 2 remaining were also corrected following the second QC inspection. SCE’s QC program attempts to perform timely re-verification of prior QC failures, while balancing QC resource demands throughout the service territory.

Given the information above, SCE respectfully requests Energy Safety to reconsider this finding. The records show that SCE performed QC on 100% of HTP remediations in 2024 (i.e., SCE sent QC inspectors to validate all mitigation results). Where QC inspectors found concerns (22 trees, 1.5%), the vast majority (all but 2 trees, 0.1%) were mitigated in 2024 or early 2025. The final 2 trees were promptly remediated after being identified in the 2nd QC inspection. This demonstrates that SCE’s QC program is working effectively to identify issues and ensure mitigations are properly completed.

FINDING #5 – OPEN WORK ORDERS (INCLUDES 2 SUB-CATEGORIES)

(Initial Audit Report, p. 57)

Energy Safety’s initial findings:

Programmatic Area	Vegetation Management Initiative	Audit Finding
8.2.6 Open Work Orders	8.2.6 Open Work Orders	Did not complete all work

The purpose of this initiative is to take actions “to manage the electrical corporation’s open work orders resulting from inspections that prescribe vegetation management activities.” (Initial Audit Report, p. 51)

Energy Safety Findings

SCE did not provide information consistent with the completion of work identified in this initiative. Therefore, Energy Safety concludes that the initiative 8.2.6 Open Work Orders is deficient.

In its CAP response SCE must submit documentation describing the constraints which prevented the timely completion of its work orders and describe the corrective actions it plans to implement to avoid overdue work orders in future performance years. SCE must also provide protocols it plans to implement to track reinspection of sites which have been prioritized for work but for which constraints have delayed the work, to ensure that they do not become an imminent risk of ignition. (Initial Audit Report, p. 57).

Overall Open Work Order Findings - SCE’s Response

SCE received a similar finding in the 2023 SVM Audit, issued on February 18, 2025. In SCE’s CAP response to the 2023 finding, submitted on March 19, 2025, SCE explained that GO95 does not specify remediation timelines for vegetation conditions. The P2 mitigation timelines for Line

Clearing and HTP set forth in SCE’s UVM documentation are internal recommendations that may be subject to constraints. SCE also explained that for P1 and P1-72 conditions, many of the findings were likely due to “late work point closure in the WMS” and not delayed mitigations in the field. SCE’s 2023 CAP response also discussed the penalty language in the TVMP/DVMP Line Clearing contractor Statements of Work (SOWs) and the annual training that emphasized the commencement of penalties if there was no improvement in work order closures. These corrective action measures are described in additional detail below.

1st Sub-Category: Prioritize Work Orders (Initial Audit Report, p. 53-56)

Energy Safety’s initial findings:

WMP Commitment	2024 Target	2024 Actual	Audit Finding
Prioritize work orders and mitigate according to risk	Priority 1 trees (24 – 72 hours); Priority 2 trees (30 – 180 days)	Did not achieve	Did not complete all work

Energy Safety’s Analysis

In its WMP, SCE states that it “prioritizes and endeavors to complete work orders within certain timeframes based on the risk posed by observed conditions.” SCE’s WMP provided specific timeframes in which it committed to complete vegetation mitigation work based on its prioritization of the risk.

SCE provided Excel files of its P1 and P2 trees and associated mitigations. These files indicated that SCE did not meet the timeframe commitments for all P1 and P2 trees; although P1 trees had a higher success rate compared to P2 trees.

The files also included multiple instances where work completion dates pre-dated the inspection dates (2,661 occurrences). Of these occurrences, 338 (12%) had work dates that pre-dated the inspection date by over a week (the longest pre-date was 71 days). Further, the pre-date errors were far more common for P1 trees (1,876 or 70% of all pre-dates) than for P2 trees. SCE stated that pre-date entry occurs when the tree trimmer completed the work in the field before the notification was entered into SCE’s administrative system. Energy Safety counted such instances with those trees that were completed on time; however, the prevalence of such instances indicates that SCE and its contractors are not properly or promptly tracking inspections and as a result cannot be fully confident that work is being completed or documented correctly. (Initial Audit Report p. 53)

P1s where there is vegetation contact or evidence of contact: SCE provided an Excel file listing all the P1 trees identified in HFRA areas in 2024 with a 24-hour mitigation timeframe. According to this file, SCE identified 3,251 P1 trees, of which 2,695 P1s (83%) were remediated within 24 hours, but 1,027 P1s had a reported work completion date that occurred before the inspection date. Because 556 (17%) P1 trees were mitigated outside 24 hours (between 2 and 340 days following their identification date), SCE did not complete the work commitments for this priority category. (Initial Audit Report, p. 53)

P1s in HFRA where vegetation is within 18 inches of energized equipment: SCE provided an Excel file listing all the P1 trees identified in HFRA areas in 2024 with a 72-hour mitigation timeframe, which included the inspection date, work completion date, work prescribed, mitigation type, fire risk, and location information. Of these, 2,236 (91%) were remediated within 72 hours, but 777 P1 trees had a work completion date before the reported inspection date. Because 218 (9%) P1 trees were mitigated outside the 72-hour time frame, SCE did not complete the work commitments for this priority category. (Initial Audit Report, pp. 53-54)

P2s where vegetation is closer than the RCD (four feet) but beyond 18 inches: SCE provided an Excel file listing all the P2 trees identified in HFRA areas in 2024 with a 30-day mitigation timeframe [. . .] The file indicated that SCE identified 13,961 P2 trees which required mitigation. SCE remediated 5,051 (36%) of these P2 trees within 30 days, but 317 had a reported work completion date that occurred before the inspection date. Because 8,934 (64%) P2 trees closer than the regulatory distance were not mitigated within 30 days, SCE did not complete the work commitments for this priority category. (Initial Audit Report, p. 54)

P2s related to Routine Line Clearing: SCE provided an Excel file listing all the P2 trees identified in HFRA areas in 2024 with a 90-day mitigation timeframe. SCE identified 134,381 P2 trees, of which 98,941 (74%) were remediated within 90 days, but 468 had a reported work completion date that occurred before the inspection date. Because 35,440 (26%) trees were not mitigated within 90 days, SCE did not complete the work commitments in this statement. (Initial Audit Report, p. 54)

For P2s related to HTMP and the Dead and Dying Tree Removal Program: SCE provided an image of its HTMP remediation timeline table from UVM-08 (Managing Vegetation threats) and an Excel document showing P2 HTMP and Dead and Dying Tree Removal (DRI) tree record data entries. Of the HTMP trees that were mitigated after 180 days, 174 of these were over one year past due and 79 trees were over two years past due. Of the Dead and Dying Tree Program trees that were mitigated after 180 days, 643 of these were over one year past due, and 215 trees were over two years past due. (Initial Audit Report p. 55)

Constraints were given for 461 HTMP and 1,534 Dead and Dying Tree Program overdue work orders. No constraints were given for five HTMP and seven D&DT overdue work orders. SCE stated that blanks in the constraints field may be “attributed, but not limited to, desktop users bypassing the field or system limitations” and that “obtaining additional information would be burdensome as SCE would have to reach out to individual contractors who may or may not have retained information documenting the constraint.” Regardless, while SCE was able to attribute most of its overdue work orders to some form of constraint, it did not provide documentation explaining how it was seeking to resolve the constraints quickly so that hazardous vegetation does threaten its system. As such, Energy Safety concluded that SCE did not remediate P2 hazard trees within 180 days and did not demonstrate that it resolved constraints in a timely manner and therefore did not complete all work commitments in this statement. (Initial Audit Report, p. 55-56)

Energy Safety Conclusion

SCE did not provide information consistent with completion of work identified in its work order goals. (Initial Audit Report, p. 56).

SCE's Response

SCE provides a response for each of the P1 and P2 categories.

P1 24-hour and P1 72-hour timelines: SCE received a similar finding in the 2023 SVM Audit, issued on February 18, 2025. As stated in SCE's 2023 CAP response, submitted on March 19, 2025, SCE believes the P1 24-hour and P1 72-hour mitigations are being performed timely in the field, but contractors' back-office staff are not always entering and closing work points in the work management system on a timely basis. That said, to determine whether timely closure of work points was improving (following SOW changes and emphasis of potential penalties during training conducted in 2024 and February 2025), the VM regulatory and compliance team obtained data for all P1 24-hour and P1 72-hour mitigations that were completed in April and May 2025. Out of the total 726 P1 24-hour conditions, 725 (99.86%) were closed within 24 hours, and 1 (0.13%) was closed 7 days late. The file also showed 420 P1 72-hour conditions, of which 229 (54.5%) were closed within 72 hours, and 191 (45.4%) were closed late. Although significant improvement (99.86% conformance) was found for closure of P1-24 hour conditions, improvement was still needed for P1 72-hour conditions. As a result, VM Compliance issued internal corrective action VM-CA-58 on July 18, 2025, to analyze the results and potential penalties for each of SCE's tree trimming contractors.

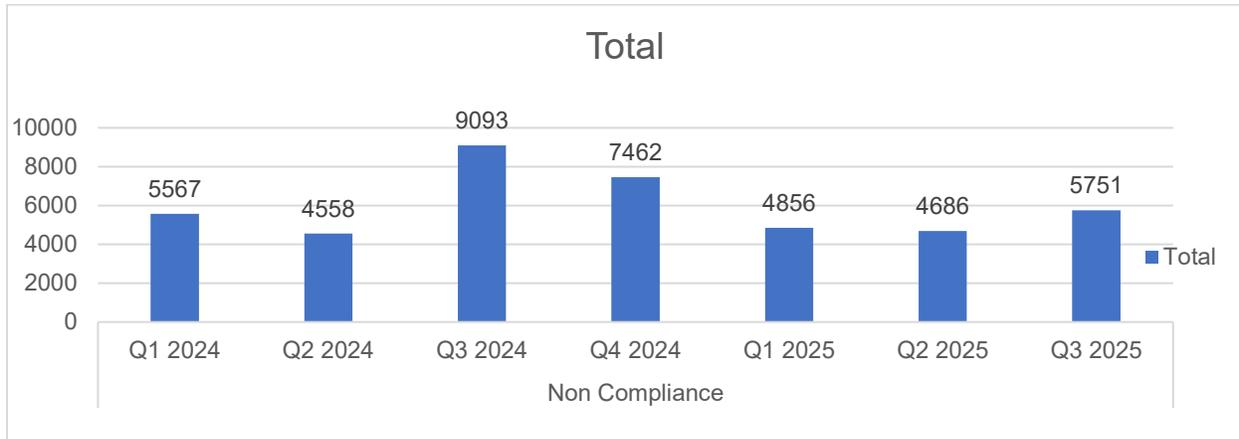
To emphasize the importance of closing work points on a timely basis, SCE held individual meetings with all tree trimming contractors in July and August 2025 to discuss proposed penalties that would commence in 4Q25 if further improvement was not realized¹².

Following the July and August meetings with contractors, SCE performed another analysis on October 2, 2025, which reviewed data for P1 24-hour and P1 72-hour conditions between September 1 and September 30, 2025. This showed significant improvement. Out of the total 712 P1 24-hour conditions, 708 (99.44%) were closed per expectations. Out of the total 167 P1 72-hour conditions, 159 (95.2%) were closed per expectations. Further, no records showed negative closure times (i.e., no work completion/closure dates occurred prior to the reported inspection date).

SCE plans to perform another analysis for work point closures in October or November 2025, and the internal corrective action will remain open to document the results of the analysis. Results will be shared with all contractors during individual meetings in November or December 2025. Going forward, SCE is optimistic that there will be continued improvement and limited late work point closures for P1 24-hour and P1 72-hour conditions.

¹² Meeting materials are available upon request.

P2s where vegetation is closer than the RCD (four feet) but beyond 18 inches (30 days): In addition to performing monitoring to provide reasonable assurance the P2s do not become P1s, SCE sends weekly P1/P2 backlog and aging reports in an Excel spreadsheet to all VM schedulers and VM Managers to provide visibility and focus. The report contains all P2 noncompliant (<RCD) conditions throughout the SCE service territory, not just in HFRA, and not just those that are older than 30 days. Although sent on a weekly basis, below is a trend report of P2 noncompliance (< RCD) conditions for each quarter from 1Q24 through 3Q25.



In addition to the above trends, the weekly Excel report tracks the number of days in constraint status and classifies each work point by the number of days between creation and completion (e.g., < 5 days, 5-14 days, 15-30 days, > 30 days). This helps SCE to zero in on those P2 conditions that are aging and work to identify delays and resolve constraints. The reports are sent to contractors, and the contractors are expected to provide updates regarding when re-visits were performed to provide assurance the unmitigated work does not become a P1.

P2s related to Routine Line Clearing (90 days) and HTMP/D&DT (180 days): SCE further clarifies the remediation timeframes for these P2s are internal recommendations and may be subject to constraints, as noted in UVM-08. SCE’s guidance is more conservative than GO95 Rule 18A, which also allows for correction times to be extended under reasonable circumstances such as third party refusal, customer issue, no access, permits required, and system emergencies (GO95 Rule 18A(2)(b)).

SCE has implemented several strategies to address remediations that may be delayed. For example, SCE performs re-visits to provide assurance a P2 does not become a P1. For routine line clearing, SCE attempts to revisit the work point every 30 days (see subcategory 2 below). For HTP delayed mitigations, trees in TRI risk category A are re-inspected annually to determine if tree health is declining which may warrant being classified as a P1 with mitigation subsequently occurring. Trees in lower risk areas are re-inspected on a 3-year cadence. Revisiting locations is procedurally documented in UVM-10, Managing UVM Work and Events.

SCE also maintains agreements with various environmental departments and agencies regarding the timely approval of work. These external timelines often exceed SCE’s internal scheduling expectations and are outside of SCE’s direct control. While SCE applies project management best practices to coordinate with each agency, the unique review and approval processes of individual agencies can result in extended permitting timelines. In some instances, these permits may take a considerable length of time before they are issued, impacting SCE's ability to conduct the vegetation management activities.

In addition, to improve the processing of environmental permits for vegetation management work activities, SCE continues to collaborate with agencies such as the California Department of Fish & Wildlife (CDFW) and other agencies to streamline approvals. SCE has made significant strides with the Bureau of Land Management (BLM) for a programmatic permit agreement, with approvals from the Bakersfield Field Office in place as of Q4 2024 and further approvals anticipated by 2026.

Given this information on the corrective actions SCE has taken to improve contractors’ timely closure of P1 conditions, and the additional measures SCE has introduced to track P2 conditions and manage external delays and constraints, SCE respectfully requests Energy Safety to reconsider this finding.

2nd Sub-Category: Monitor Overdue Work Orders (Initial Audit Report, p.56-57)

Statement 16: “To mitigate the risk of an overdue vegetation work order becoming a fire risk, SCE monitors overdue work orders related to Routine Line Clearing that involve vegetation breaching the required compliance distance from SCE’s lines by revisiting them every 30 days to help ensure they do not become imminent threats.” (Initial Audit Report, P. 56)

Energy Safety’s initial findings:

WMP Commitment	2024 Target	2024 Actual	Audit Finding
Monitor overdue work orders	Weekly	Did not achieve	Did not complete all work

Energy Safety’s Analysis

SCE provided screenshot images from its dashboard reporting system which showed the monthly breakdown of overdue work orders with P2 notifications that were created and completed in 2024. (Initial Audit Report, p. 56)

The documentation SCE provided supports that it created notifications for overdue work orders and that it required its contractors to reinspect sites with overdue work orders; however, it did not supply documentation to support that the re-inspections actually happened. Therefore, SCE did not provide sufficient documentation to support that the work in this statement was completed. (Initial Audit Report, p. 57)

Energy Safety Conclusion

SCE did not provide information consistent with the completion of work identified in this statement. (Initial Audit Report, p. 56- 57)

SCE's Response

SCE maintains a SharePoint site containing individual folders where each tree trimming contractor is expected to upload a weekly updated Excel spreadsheet indicating the status of their most recent re-inspections for the P2 work orders that have not yet been completed. These Excel spreadsheets are intended to document the contractors' re-inspection visits.

However, SCE is evaluating opportunities to improve its vegetation management documentation process for revisits. SCE's long-term solution is to implement a formal work management feature within Arbora to manage work on constraints. Until that is implemented SCE is utilizing an Excel spreadsheet. SCE has observed instances of inconsistent contractor compliance where inspection follow-ups were either delayed or not properly documented. To resolve this, SCE plans to introduce a centralized "Contractor Inspection Follow-Up Tracker" that will serve as the single source of truth for all scheduler evaluations and trimmer inspection updates. The new tracker will log the most recent date a scheduler conducted a follow-up with a tree trimming contractor. If the follow-up resulted in a revisit, the tracker would include a link to the uploaded Excel document detailing the tree trimmer's re-inspection dates. If no actions were required (e.g., the P2 condition has not yet developed into a P1 condition), the tracker will record the date the scheduler confirmed with the contractor no follow-up was necessary. This approach ensures transparency and accountability, better aligning with the standards outlined in UVM documents.

Given this information, SCE respectfully requests Energy Safety to reconsider this finding. SCE currently maintains self-reported Excel spreadsheets from each of the tree trimming vendors documenting their most recent re-inspection activity. In addition, to improve consistency, transparency, and accountability, SCE is working to develop a new centralized tracker as a corrective action in response to this Energy Safety finding.

CONCLUSION

SCE appreciated the opportunity to submit this 2024 WMP Vegetation Management Audit Corrective Action Plan (CAP) 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), and Cynthia Childs (Cynthia.Childs@sce.com).

Sincerely,

//s//

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