



February 2, 2024

To: Southern California Edison Company (SCE)
Shinjini Menon
Vice President Asset Management and Wildfire Safety
2244 Walnut Grove, Rosemead, CA 91770

SUBJECT: Office of Energy Infrastructure Safety's Report on SCE's 2021 Substantial Vegetation Management Audit

Pursuant to the requirements of California Public Utilities Code section 8386.3(c)(5)(C), the Office of Energy Infrastructure Safety (Energy Safety) completed its final report on SCE's 2021 Substantial Vegetation Management (SVM) audit. Energy Safety finds that SCE substantially complied with the substantial portion of the vegetation management requirements in its 2021 Wildfire Mitigation Plan Update.

The attached report follows Energy Safety's publication of its SVM audit on September 29, 2023, and SCE's subsequent response on October 13, 2023. Pursuant to statutory requirements, a copy of this report is issued to SCE, published on Energy Safety's 2021 SVM Docket¹ and provided to the California Public Utilities Commission.

Sincerely,

A handwritten signature in black ink, appearing to read "Shannon O'Rourke".

Shannon O'Rourke
Deputy Director | Electrical Infrastructure Directorate
Office of Energy Infrastructure Safety

Cc:
Forest Kaser, CPUC
Leslie Palmer, CPUC
Elizabeth Leano, SCE

¹ All documents related to SCE's 2021 SVM audit are available on Energy Safety's e-filing system under the "[2021-SVM](https://efiling.energysafety.ca.gov/EFiling/DocketInformation.aspx?docketnumber=2021-SVM)" docket and available here: (<https://efiling.energysafety.ca.gov/EFiling/DocketInformation.aspx?docketnumber=2021-SVM> [accessed February 2, 2024]).



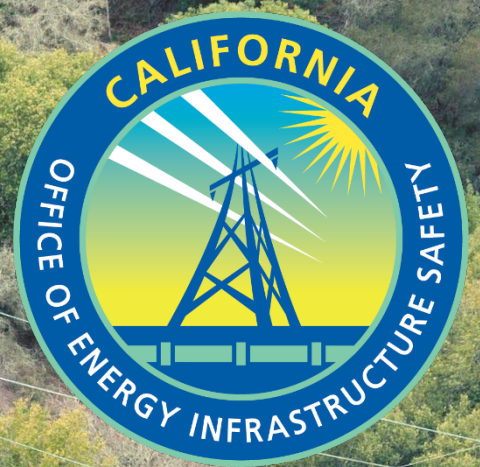
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OFFICE OF ENERGY INFRASTRUCTURE SAFETY
2021 SUBSTANTIAL VEGETATION
MANAGEMENT AUDIT REPORT
SOUTHERN CALIFORNIA EDISON COMPANY

February 2024

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1. Background

Pursuant to Public Utilities Code section 8386.3(c)(5), the Office of Energy Infrastructure Safety (Energy Safety) must audit the vegetation management work performed by, or on behalf of, the electrical corporation. The audit shall specify any failure of the electrical corporation to fully comply with the vegetation management requirements in the Wildfire Mitigation Plan (WMP).¹ Energy Safety then provides the audit to the electrical corporation and grants it a reasonable time to correct and eliminate any deficiency specified in the audit.² Following receipt and review of the electrical corporation's Corrective Action Plan, Energy Safety issues an audit report to the electrical corporation identifying whether the electrical corporation substantially complied with the substantial portion of the vegetation management requirements in the applicable year.³ This document is Energy Safety's Report on the 2021 Substantial Vegetation Management (SVM) Audit of Southern California Edison Company (SCE).

To conduct the 2021 SVM Audit, Energy Safety identified both quantitative commitments (e.g., miles of lines to inspect) and verifiable statements (e.g., training of personnel) in the vegetation management section of SCE's 2021 WMP Update and conducted an audit to determine if SCE performed the work required by each of those commitments and statements.

Energy Safety reviewed all 20 initiatives pertaining to vegetation management in SCE's 2021 WMP Update. Energy Safety's audit found that SCE did not perform all the work specified in five out of the 20 vegetation management initiatives in its 2021 WMP Update. For these five initiatives, Energy Safety's audit found that SCE was unable to provide supporting documentation or information reflecting completion of commitments made in its 2021 WMP Update regarding its vegetation management initiatives.

On September 29, 2023, Energy Safety provided its 2021 SVM Audit⁴ of SCE's work that identified where SCE did not perform all the vegetation management work required by its WMP, specified corrective actions pertaining to the audit, and required SCE to provide a

¹ Pub. Util. Code, § 8386.3(c)(5)(A)

² *Ibid.*

³ 2023 Compliance Guidelines, Section 6.1, page 14

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55586&shareable=true>, accessed 12/18/2023); Pub. Util. Code, §8386.3(c)(5)(C)

⁴ SCE SVM Audit is published on Energy Safety's e-filing system in the 2021 WMP Substantial Vegetation Management Audits docket and available here: <https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55743&shareable=true>, accessed 1/12/2024)

Corrective Action Plan. On October 13, 2023, SCE timely provided its Corrective Action Plan and included supporting documentation.⁵

2. 2021 SVM Audit Finding

Table 1 below summarizes Energy Safety’s findings from its 2021 SCE SVM Audit. Within the five initiatives where SCE did not perform all the work specified in its WMP, there were six unique findings.

Table 1: Findings from Energy Safety’s 2021 SVM Audit of SCE

Initiative Number and Name ⁶	Finding	Corrective Action
7.3.5.5: Fuel Management and Reduction of “Slash” from Vegetation Management Activities	1. SCE failed to implement a fuel management standard based on the Electric Power Research Institute’s study, as stated in SCE’s 2021 WMP Update.	SCE shall detail the steps it is taking to ensure vegetation management operations are consistent with statements made in its WMP.
7.3.5.5: Fuel Management and Reduction of “slash” from Vegetation Management Activities	2. SCE stated in its 2021 WMP Update that it would perform pole brushing on approximately 200,000 to 300,000 distribution poles in 2021, but it only performed pole brushing on 82% of poles in 2021.	SCE shall detail the steps it is taking to ensure vegetation management operations are consistent with statements made in its WMP.
7.3.5.16: Removal and Remediation of Trees with Strike Potential to Electric Lines and Equipment	5. SCE stated in its 2021 WMP Update that it would assess 150,000 to 200,000 Hazard Tree Management Plan (HTMP) trees, but it	SCE shall a) provide a reason why it failed to inspect each substation multiple times per year, and b) detail the steps it is taking to ensure

⁵ SCE SVM Audit Corrective Action Plan is published on Energy Safety’s e-filing system in the 2021 WMP Substantial Vegetation Management Audits docket and available here:

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55788&shareable=true>, accessed 12/28/2023)

⁶ The number is the order in which the finding was listed in the SCE SVM Audit. For the purpose of this report, they are ordered in terms of order of discussion in section 3 below.

	only assessed 87% of this target.	vegetation management operations are consistent with statements made in the WMP.
7.3.5.8: LiDAR Inspections of Vegetation Around Transmission Electric Lines and Equipment	3. SCE stated in its 2021 WMP Update that it would inspect approximately 80 transmission circuits using LiDAR in 2021 but inspected only 72 transmission circuits in 2021.	SCE shall a) provide a reason why it failed to perform LiDAR on the expected number of transmission circuits; and b) detail the steps it is taking to ensure vegetation management operations are consistent with statements made in its WMP.
7.3.5.14: Recruiting and Training of Vegetation Management Personnel	4. SCE stated in its 2021 WMP Update that it would assess 150,000 to 200,000 HTMP trees, but it only assessed 87% of this target.	SCE shall detail steps it is taking to ensure accurate targets are stated in the WMP.
7.3.5.17: Substation Inspections	6. SCE stated in its 2021 WMP Update that it performs inspections at each substation multiple times per year, but it did not do so for 95% of its substations in 2021.	SCE shall a) provide a reason why it failed to inspect each substation multiple times per year, and b) detail the steps it is taking to ensure vegetation management operations are consistent with statements made in the WMP.

3. Analysis of Corrective Action Plan

3.1 Initiative 7.3.5.5 Fuel Management and Reduction of “Slash” from Vegetation Management Activities

3.1.1 Implementing a New Fuel Management Program

In its 2021 WMP Update SCE states that at the end of 2020 it procured a consultant to conduct a study for determination of best practices for fuel management.⁷ It further stated that “Through 2021, SCE plans will [sic] review and analyze the results of the study and implement more regionally appropriate fuel management standards.”⁸ Energy Safety’s SVM Audit found that SCE did not implement a new fuel management standard based on the study.⁹

Energy Safety’s SVM Audit provided the following corrective action:

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

In its Corrective Action Plan, SCE states the study was not a formal WMP target, and SCE did not intend to characterize this issue as something that would be fully settled within 2021.¹⁰ SCE states that it will explore opportunities to incorporate recommendations from the study regarding fuel management and other vegetation management activities.¹¹ SCE further states that it will work with Energy Safety to meet WMP targets and other requirements.¹²

Energy Safety finds SCE’s rationale for not adopting a new fuel management program in 2021 credible and reasonable. The results of the study are intended to inform an ongoing effort to inform fuel management best practices. Therefore, Energy Safety finds that SCE sufficiently addressed the audit finding and corrective action.

⁷ SCE 2021 WMP Update, page 263

⁸ SCE 2021 WMP Update, page 263

⁹ Response to DR-141, question 3b

¹⁰ SCE 2021 SVM Audit Corrective Action Plan, page 2

¹¹ SCE 2021 SVM Audit Corrective Action Plan, page 2

¹² SCE 2021 SVM Audit Corrective Action Plan, page 2

3.1.2 Pole Brushing

In its 2021 WMP Update, SCE states it would perform pole brushing on approximately 200,000 to 300,000 distribution poles in 2021. Energy Safety's SVM Audit found that SCE only performed pole brushing on 82% of poles in 2021.¹³

Energy Safety's SVM Audit provided the following corrective action:

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

In its Corrective Action Plan, SCE states that it was unable to reach the target because of contractor performance, loss of crews, access constraints, and delays in obtaining permits. SCE states that, after 2021, it hired additional contractors and implemented improvements in contractor processes, such as reducing the required number of in-person access attempts and increasing internal coordination efforts to reduce the environmental hold periods.¹⁴

SCE further states it will examine each vegetation management WMP initiative monthly to evaluate its progress and identify constraints to meeting its annual WMP targets. If an initiative target is not on track to reach its goal, SCE states it will evaluate and implement potential solutions.¹⁵

Energy Safety finds SCE's response to this finding to be acceptable, and finds the corrective action proposed appropriate. Energy Safety also notes that SCE completed the remaining missed pole brushing in 2022.¹⁶ In Energy Safety's bi-weekly meetings, SCE will report on off-track initiatives and its strategies for remedying the deficiencies in real time. Therefore, Energy Safety finds that SCE sufficiently addressed the audit finding and corrective action.

3.2 Initiative 7.3.5.16 Removal and Remediation of Trees with Strike Potential to Electric Lines and Equipment

In its 2021 WMP Update, SCE states that it would perform between 150,000 to 200,000 Hazard Tree Mitigation Program (HTMP) assessments in 2021.¹⁷ Energy Safety's SVM Audit found that SCE only performed 131,307 HTMP assessments.¹⁸

Energy Safety's SVM Audit provided the following corrective action:

¹³ Correction: SCE SVM audit table 4 stated SCE only performed 71%, The correct percentage is 82%

¹⁴ SCE 2021 SVM Audit Corrective Action Plan, page 3

¹⁵ SCE 2021 SVM Audit Corrective Action Plan, page 3

¹⁶ 01_ES145-SCE-2021 IE ARC Follow up Q. 01 Answer

¹⁷ SCE 2021 WMP Update, page 279

¹⁸ IE02-SCE-2021, response to question 2

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

In its Corrective Action Plan, SCE notes that the HTMP program was first developed in 2019, and the 2021 targets were developed in late 2020. SCE states that during this time, it did not know how many trees were within its “utility strike zone,” (i.e., how many trees were tall enough to fall and hit SCE equipment).¹⁹ For that reason, SCE identifies that it overestimated the number of hazard trees to be assessed under its program.²⁰ SCE states that it has since modified the metrics upon which 2022 program targets are based, to be based upon number of circuits rather than the number of trees.²¹

SCE further states it will examine each vegetation management WMP initiative monthly to evaluate its progress and identify constraints to meeting its annual WMP targets. If an initiative target is not on track to reach its goal, SCE states it will evaluate and implement potential solutions.²²

Energy Safety finds SCE’s explanation regarding its HTMP assessment shortfall acceptable given the maturity of its HTMP program in 2021. As SCE’s understanding of the appropriate metric for assessing hazard trees has matured, it has shifted to a circuit mile approach, which is a more appropriate method of measuring the progress of the program. Moving forward, Energy Safety expects SCE to have a better understanding of its service territory hazards. Energy Safety also finds the corrective action proposed appropriate. In Energy Safety’s bi-weekly meetings, SCE will report on off-track initiatives and its strategies for remedying the deficiencies in real time. Therefore, Energy Safety finds that SCE sufficiently addressed the audit finding and corrective action.

3.3 Initiative 7.3.5.8 LiDAR Inspection of Vegetation Around Transmission Electrical Lines and Equipment

In its 2021 WMP Update, SCE states that it would inspect approximately 80 transmission circuits using Light Detection and Ranging (LiDAR) in 2021.²³ Energy Safety’s SVM Audit found that SCE only inspected 72 transmission circuits using LiDAR.²⁴

Energy Safety’s SVM Audit provided the following corrective action:

¹⁹ SCE 2021 SVM Audit Corrective Action Plan, page 4

²⁰ SCE 2021 SVM Audit Corrective Action Plan, page 4

²¹ SCE 2021 SVM Audit Corrective Action Plan, page 4

²² SCE 2021 SVM Audit Corrective Action Plan, page 3

²³ SCE 2021 WMP Update, page 269

²⁴ Response to DR-141, question 7

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

In its Corrective Action Plan, SCE emphasizes that the target was an approximation. Its LiDAR program was still maturing, and the numbers of circuits change during the year due to combining or separating for operational reasons.²⁵ For 2022 and 2023, SCE states that it changed the metrics for its program target from number of circuits to circuit miles to better reflect the scope of the work.²⁶

SCE further states that it will examine each vegetation management WMP initiative monthly to evaluate its progress and identify constraints to meeting its annual WMP targets. If an initiative target is not on track to reach its goal, SCE states that it will evaluate and implement potential solutions.²⁷

Energy Safety finds SCE's explanation regarding its LiDAR inspection shortfall acceptable given the maturity of its LiDAR program in 2021. Furthermore, SCE made acceptable progress toward completion of its estimated target. As the program has matured, SCE has shifted to using circuit miles instead of number of circuits as a program metric, which is a more appropriate method of measuring progress. Moving forward, Energy Safety expects firm target commitments in SCE's WMP. Energy Safety also finds the corrective action proposed appropriate. In Energy Safety's bi-weekly meetings, SCE will report on off-track initiatives and its strategies for remedying the deficiencies in real time. Therefore, Energy Safety finds that SCE sufficiently addressed the audit finding and corrective action.

3.4 Initiative 7.3.5.14 Recruiting and Training of Vegetation Management Personnel

In its 2021 WMP Update, SCE stated it would perform between 150,000 to 200,000 HTMP assessments in 2021.²⁸ Energy Safety's SVM Audit found that SCE only performed 131,307 HTMP assessments.²⁹ The WMP Update stated this both here and in Initiative 7.3.5.16.

Energy Safety's SVM Audit provided the following corrective action:

SCE shall detail steps it is taking to ensure accurate targets are stated in the WMP.

In its Corrective Action Plan, SCE states that recruitment and training of vegetation management personnel was not a factor in the performance of HTMP tree assessments in

²⁵ SCE 2021 SVM Audit Corrective Action Plan, page 3

²⁶ SCE 2021 SVM Audit Corrective Action Plan, page 3

²⁷ SCE 2021 SVM Audit Corrective Action Plan, page 3

²⁸ SCE 2021 WMP Update, page 274-275

²⁹ IE02-SCE-2021, response to question 2

2021. As described in Section 3.2 above, SCE overestimated the number of hazard trees in its territory when setting this target.³⁰

Energy Safety finds SCE's explanation regarding its HTMP assessment shortfall acceptable given the maturity of its HTMP program in 2021. As SCE's understanding of the appropriate metric for assessing hazard trees has matured, it has shifted to a circuit mile approach, which is a more appropriate method of measuring the progress of the program. Moving forward, Energy Safety expects SCE to have a better understanding of its service territory hazards. Energy Safety also finds the corrective action proposed appropriate. In Energy Safety's bi-weekly meetings, SCE will report on off-track initiatives and its strategies for remedying the deficiencies in real time. Therefore, Energy Safety finds that SCE sufficiently addressed the audit finding and corrective action.

3.5 Initiative 7.3.5.17 Substation Inspection

In its 2021 WMP Update, SCE stated that "substation inspections are performed at each substation several times per year and will continue in 2021 and beyond."³¹ Energy Safety's audit found that approximately 95% of substations were not inspected multiple times in 2021.³²

Energy Safety's SVM Audit provided the following corrective action:

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

In its Corrective Action Plan, SCE states that it did in fact have data that could confirm it met its targets. Further inquiry revealed a misunderstanding between Energy Safety and SCE regarding what information was needed to verify this target during Energy Safety's initial audit. SCE subsequently provided records demonstrating that it performed four or more inspections at each substation in 2021.³³ Therefore, Energy Safety finds that SCE performed all work for Initiative 7.3.5.17.

³⁰ SCE 2021 SVM Audit Corrective Action Plan, page 4

³¹ SCE 2021 WMP Update, page 280

³² SCE SVM Audit, page 39

3.6 Summary of Determination

Table 2 summarizes Energy Safety’s determination regarding the sufficiency of each of SCE’s Corrective Action Plan responses.

Table 2: Summary of Energy Safety’s Analysis of SCE’s Responses and Corrective Action

Initiative Number of Name	Corrective Action Plan Response Determination
7.3.5.5: Fuel Management and Reduction of “Slash” from Vegetation Management Activities	Sufficient
7.3.5.8: LiDAR Inspection of Vegetation around Transmission Electrical Lines and Equipment	Sufficient
7.3.5.14: Recruiting and Training of Vegetation Management Personal	Sufficient
7.3.5.16: Removal and Remediation of Trees with Strike Potential to Electrical Lines and Equipment	Sufficient
7.3.5.17: Substation Inspections	Performed all work

4. Substantial Compliance with the Substantial Portion of Vegetation Management Requirements

Substantial compliance with the substantial portion of vegetation management requirements means that:

- 1) The electrical corporation's deficiencies, after considering its planned corrective actions, have not detracted from the electrical corporation's ability to achieve the objectives of its vegetation management programs;
- 2) The electrical corporation's effort to fulfill the vegetation management requirement constituted a good faith effort to comply with the vegetation management requirements in the approved WMP; and
- 3) The electrical corporation completed the large majority of the vegetation management requirements in its approved WMP.³⁴

4.1 SCE's Performance Under Criteria 1 and 2

Energy Safety's 2021 SVM Audit found that SCE performed the work required for 15 of the 20 initiatives audited. Within the five initiatives where Energy Safety's SVM Audit found that SCE did not fully perform the work required, there were six unique findings.

In SCE's Response and Corrective Action Plan, SCE demonstrated that it had performed all of the work for Initiative 7.3.5.17 "Substation Inspections." For each of the remaining five findings across four initiatives, SCE provided a sufficient response and Corrective Action plan.

Of the 20 vegetation management initiatives contained within SCE's 2021 WMP Update, Energy Safety identified the six initiatives that most directly prevent vegetation contact and manage fuels around electrical infrastructure:

- 7.3.5.2: Detailed Inspections of Vegetation Around Distribution Electric Lines and Equipment
- 7.3.5.5: Fuel Management and Reduction of "Slash" from Vegetation Management Activities
- 7.3.5.11: Patrol Inspections of Vegetation Around Distribution Electric Lines and Equipment
- 7.3.5.16: Removal and Remediation of Trees with Strike Potential to Electric Lines and Equipment
- 7.3.5.18: Substation Vegetation Management
- 7.3.5.20: Vegetation Management to Achieve Clearances Around Electric Lines and Equipment

³⁴ 2023 Compliance Guidelines, Section 6.1, page 15 (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55586&shareable=true>, accessed 12/18/2023); Pub. Util. Code, § 8386.3(c)(5)(C)

Of these six initiatives, Energy Safety's SVM Audit found that SCE did not perform all the required work for two initiatives: 7.3.5.5: Fuel Management and Reduction of "Slash" from Vegetation Management Activities and 7.3.5.16: Removal and Remediation of Trees with Strike Potential to Electric Lines and Equipment. There were three findings within these two initiatives.

4.1.1 Fuel Management Standard and Pole Brushing

Regarding the fuel management standard and pole brushing initiative (Initiative 7.3.5.5), there were two findings. First, SCE failed to implement a fuel management standard based on Electric Power Research Institute's study, as stated in the 2021 WMP Update. The objective of this study is "to support and inform ongoing efforts to implement more regionally appropriate fuel management standards."³⁵ As discussed in Section 3.1 above, during 2021, SCE had not yet implemented, or begun to implement, those improvements to its program. Although SCE has stated that the requirement was not a WMP target, the WMP update stated that SCE would analyze the results of the study and implement new standards. For that reason, Energy Safety considers that analysis and implementation to have been requirements. Due to SCE's lack of work on this objective, Energy Safety concludes that SCE did not make a good faith effort to fulfill the requirement. However, Energy Safety is satisfied with SCE's response and Corrective Action Plan, which indicates that SCE will continue to look for opportunities to improve its fuel management practices based on results of the study.

Second, SCE's WMP Update required SCE perform pole brushing on approximately 200,000 to 300,000 distribution poles³⁶ (Initiative 7.3.5.5), SCE completed 82% of its target. While an 18% miss is significant, SCE completed the remaining 18% in 2022. It has also implemented corrective actions to help resolve the conditions leading to the miss. With this proactive corrective activity, Energy Safety concludes that SCE made a good faith effort to achieve this objective. Nonetheless, the deficit detracted from its ability to reduce risk through its vegetation management program in 2021.

4.1.2 Assessing 150,000 to 200,000 HTMP Trees

SCE's Update, (Initiative 7.3.5.16) required SCE to assess and remove 150,000 to 200,000 HTMP Trees with strike potential.³⁷ Removal and Remediation of Trees with Strike Potential to Electric Lines and Equipment, SCE did not reach its target of assessing 150,000 to 200,000 HTMP trees, instead assessing 87% of this target. Energy Safety finds that SCE made a good faith effort to fulfill this requirement based on SCE's statement that it assessed all the hazard trees in its right of way. If that statement is correct, the failure to meet the stated target is

³⁵ SCE 2021 SVM Audit Corrective Action Plan, page 2

³⁶ 2021 WMP Update, page 265

³⁷ 2021 WMP Update, page 278

inconsequential from an ignition risk perspective and did not detract from SCE's efforts to reduce ignition risk. However, SCE must demonstrate that it has a better grasp of the risks in its territory and has adequately identified all hazard trees requiring an assessment under the program.

Energy Safety's SVM Audit found that the remaining three missed Initiatives (7.3.5.8, 7.3.5.14, and 7.3.5.17) were indirectly related to the reduction of ignition risk.

4.1.3 LiDAR Inspection

First, in Initiative 7.3.5.8 – SCE states that it would inspect approximately 80 transmission circuits using Light Detection and Ranging (LiDAR) in 2021.³⁸ SCE stated it did not reach its target of 80 transmission circuits using LiDAR, instead only completing 72 circuits. Because SCE completed 90% of the work and stated that the total number of circuits completed was affected by changes in the way it counted circuits, Energy Safety concludes that SCE made a good faith effort to satisfy this requirement. For these reasons, and because SCE is maturing its capability, Energy Safety finds that SCE's failure to inspect 80 circuits likely did not detract from SCE's efforts to reduce vegetation contact with energized conductors.³⁹

4.1.4 Initiative Recruiting and Training of Vegetation Management Personnel

In its 2021 WMP Update (Initiative 7.3.5.14), SCE stated it would perform between 150,000 to 200,000 HTMP assessments in 2021.⁴⁰ This target is related to the number of trees that would be assessed under its HTMP program rather than a metric to measure its success in recruiting and training vegetation management personnel. Therefore, Energy Safety is unable to provide further analysis and conclusion regarding this initiative beyond what Energy Safety provided in the SVM Audit.

4.1.5 Substation Inspections

With regard to the finding pertaining to substation inspections (Initiative 7.3.5.17), in its 2021 WMP Update, SCE stated that "substation inspections are performed at each substation several times per year and will continue in 2021 and beyond."⁴¹ SCE's Corrective Action Plan response demonstrated that it completed this initiative.

Findings: Considering SCE's Corrective Action Plan responses, SCE's deficiencies have not detracted from its ability to achieve the objectives of its vegetation management programs.

³⁸ SCE 2021 WMP Update, page 269

³⁹ SCE's 2021 WMP Update, page 269

⁴⁰ SCE 2021 WMP Update, page 274-275

⁴¹ SCE 2021 WMP Update, page 280

Overall, SCE made a good faith effort to fulfill the vegetation management requirements in its WMP.

4.2 SCE's Performance Under Criteria 3

SCE performed all the work required by 16 of the 20 initiatives. After considering its response to the SVM Audit and the Corrective Action Plan, SCE completed all but 5 requirements. For each of those five requirements, SCE provided an acceptable response and Corrective Action Plan.

Finding: SCE completed the large majority of its vegetation management requirements.

5. Conclusion

Energy Safety finds the following:

- Considering SCE's Corrective Action Plan responses, SCE's deficiencies have not detracted from its ability to achieve the objectives of its vegetation management programs.
- Overall, SCE made a good faith effort to fulfill the vegetation management requirements in its WMP.
- SCE completed the large majority of its vegetation management requirements.

Therefore, Energy Safety concludes that SCE substantially complied with the substantial portion of its vegetation management requirements in its 2021 WMP Update.

DATA DRIVEN FORWARD-THINKING INNOVATIVE SAFETY FOCUSED



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