



July 31, 2024

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

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

Pursuant to the requirements of California Public Utilities Code section 8386.3(c)(5)(A), the Office of Energy Infrastructure Safety (Energy Safety) completed its audit of Southern California Edison's (SCE) 2022 vegetation management work pursuant to its 2022 Wildfire Mitigation Plan Update. Energy Safety found that SCE did not provide information consistent with the completion of the work required for two of the 21 vegetation management initiatives. SCE must submit its Corrective Action Plan response to the 2022 SVM docket<sup>1</sup> in Energy Safety's e-filing system within 20 days from the issuance of this audit. If you have any questions concerning this audit, please e-mail me at [Sheryl.Bilbrey@energysafety.ca.gov](mailto:Sheryl.Bilbrey@energysafety.ca.gov) and provide a copy to Julie Rueckheim at [julie.rueckheim@energysafety.ca.gov](mailto:julie.rueckheim@energysafety.ca.gov) and [environmentalsciencedivision@energysafety.ca.gov](mailto:environmentalsciencedivision@energysafety.ca.gov).

Sincerely,

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

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

Cc:

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

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



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

July 2024

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# Executive Summary

The Office of Energy Infrastructure Safety (Energy Safety) completed an audit of Southern California Edison Company's (SCE's) vegetation management commitments from its 2022 Wildfire Mitigation Plan Update (WMP).<sup>1</sup> Energy Safety found that SCE did not provide information consistent with the completion of work for two of its 21 vegetation management initiatives (initiatives 7.3.5.5 Fuels Management (including all wood management) and Reduction of "slash" from Vegetation Management Activities, and 7.3.5.14 Recruiting and Training of Vegetation Management Personnel).

A detailed discussion of the audit findings is provided in Appendix A of this document. For each audit finding, SCE must submit a response to Energy Safety within 20 days of receipt of this audit. SCE must title its response "SCE 2022 SVM Audit Corrective Action Plan" and submit the response on the 2022 SVM Docket in Energy Safety's E-Filing System. Requirements for the response are discussed in Section 3 of this document. Energy Safety is available to meet with SCE to discuss the audit findings and provide any clarification necessary for SCE to respond in a timely manner to Energy Safety's audit.

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<sup>1</sup> [SCE's 2022 WMP Update](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=52051&shareable=true) (Feb. 18, 2022) (hereafter SCE's 2022 WMP Update), p. 392. (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=52051&shareable=true, accessed June 12, 2022).

# 1. OVERVIEW

Pursuant to Public Utilities Code section 8386.3(c)(5)(A), the Office of Energy Infrastructure Safety (Energy Safety) must, on an annual basis, audit the vegetation management work performed by an electrical corporation upon notification that the electrical corporation has completed a substantial portion of the vegetation management requirements in its Wildfire Mitigation Plan (WMP).<sup>2</sup> In each audit, Energy Safety must specify any failure of the electrical corporation to fully comply with the vegetation management requirements in the WMP.

Southern California Edison Company (SCE) submitted its final substantial vegetation management (SVM) 2022 completion notification on January 24, 2023. As a result, Energy Safety has completed its SVM audit of SCE's vegetation management program activities for 2022. The 2022 WMP Update Guidelines included 21 vegetation management initiatives.<sup>3</sup> As part of the SVM audit process, Energy Safety identified both vegetation management quantitative commitments (e.g., number of inspections completed) and verifiable statements (e.g., training of personnel) from the SCE 2022 WMP Update. Energy Safety then compared vegetation management commitments and statements to the work performed by SCE in 2022.

Table 1 of this report includes a list of all vegetation management activities and Energy Safety's determination of whether SCE completed all required work for 2022. The detailed analysis, supporting documents and data, and findings for each initiative are included in Appendix A.

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<sup>2</sup> [leginfo.legislature.ca.gov](https://leginfo.ca.gov), California Legislative Information, Ch. 6 Wildfire Mitigation [8385-8389], Public Utilities Code - PUC § 8386.3, ([California Code, PUC 8386.3](#)), accessed July 26, 2024).

<sup>3</sup> [2022 Wildfire Mitigation Plan Update Guidelines \(published Dec. 2021\) \(hereafter Update Guidelines\)](#), attachment 2, p. 92 (<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=51912&shareable=true>), accessed May 10, 2024).

## 2. AUDIT FINDINGS

The audit findings for the SCE 2022 WMP Update vegetation management initiatives are listed in Table 1 and detailed in Appendix A.

Table 1. SCE 2022 SVM Audit Findings

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

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



### 3. SCE AUDIT RESPONSE

For the initiatives listed in Table 1 with a finding that all required work was not performed, SCE must provide Energy Safety with a response that addresses the following criteria:

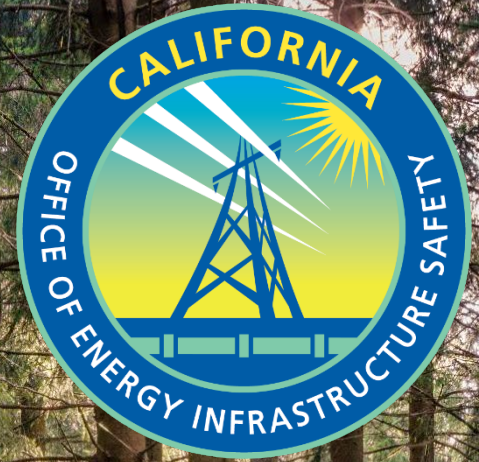
- 1) Should SCE disagree with an audit finding that all work was not performed per the WMP, SCE must provide the basis for that conclusion including detailed supporting documentation and rationale for that response.
- 2) If SCE contends that the intent of the initiative was met because either a large percentage of the work was completed and/or other vegetation management actions taken by SCE addressed the wildfire risk at issue, SCE must provide specific details and documentation supporting that conclusion.
- 3) Should SCE agree with the audit finding that all work was not performed for a vegetation management initiative, SCE must provide the following in a corrective action plan:
  - a. Data and/or supporting documents explaining why a commitment was missed;
  - b. The circumstances or mitigating factors as to why a commitment was missed;
  - c. If SCE was aware of the missed commitment during the 2022 compliance period, a detailed accounting of any corrective action measures implemented since the end of the 2022 compliance period to avoid future missed commitments including long term strategies to reduce or eliminate wildfire risk; and
  - d. Additional actions SCE plans to implement to ensure commitments of a similar nature are not missed in the future.

## 4. 2022 SVM AUDIT CONCLUSION

Energy Safety reviewed the 21 vegetation management initiatives detailed in SCE's 2022 WMP Update and found SCE could not provide documentation demonstrating completion of two of the 21 vegetation management initiatives in its 2022 WMP Update. SCE was unable to provide supporting documentation or information consistent with statements and/or targets regarding pole brushing and its recruitment and training of vegetation management personnel (initiatives 7.3.5.5 Fuel Management (Including all Wood Management) and Reduction of "Slash" from Vegetation Management Activities, and 7.3.5.14 Recruiting and Training of Vegetation Management Personnel).

For each audit finding, SCE must submit a response to Energy Safety within 20 days of receipt of this audit.

This audit is not an assessment of the quality of SCE's execution of its vegetation management program.



**APPENDIX / ANALYSIS,  
SUPPORTING  
DOCUMENTATION AND  
FINDING**

## Appendix A

Each vegetation management initiative listed in Southern California Edison Company's (SCE's) 2022 Wildfire Mitigation Plan (WMP) Update was analyzed by the Office of Energy Infrastructure Safety (Energy Safety) as part of this audit by identifying the WMP numeric commitment or qualitative statement and comparing that commitment or statement to the work performed by SCE in 2022. SCE's 2022 WMP Update included 21 vegetation management initiatives. Energy Safety conducted an audit of all commitments and/or statements for each initiative; therefore, determination of whether all work was complete for each initiative was based on verification that all WMP numeric commitments or qualitative statements were completed for each initiative.

As shown in Table 1, Energy Safety determined SCE could not provide supporting documentation or information demonstrating completion of all work for two of the 21 vegetation management initiatives in its 2022 WMP Update. Below is a summary of each WMP vegetation management initiative commitment or statement, the data or supporting documentation used to verify the commitment or statement, and the associated finding.

## A.1 Initiative 7.3.5.1 Additional Efforts to Manage Community and Environmental Impacts

The purpose of this initiative is the “plan and execution of strategy to mitigate negative impacts from utility vegetation management to local communities and the environment, such as coordination with communities, local governments, and agencies to plan and execute vegetation management work.”<sup>4</sup>

### Statements, Supporting Information and Analysis, and Conclusions

#### Statement 1

Statement: “When vegetation mitigation is necessary, SCE’s standard process is to leave a door hanger at the time of inspection, typically within 1-2 months prior, with information on the work to be performed and contact information for questions or concerns. Additional notification is then provided by the mitigation contractor 1-3 days in advance of the vegetation work.”<sup>5</sup>

Supporting Information and Analysis: SCE provided five different images of door hangers that were distributed in 2022 notifying customers of vegetation management mitigation work. These images notified customers of SCE’s tree removal activities and included information relating to the location, date, and reason for the visit.<sup>6</sup>

SCE also provided an excerpt from its Statement of Work (SOW) for vegetation management contractors, which states that “Contractor shall make two attempts minimum to make physical contact with the customer providing door hanger work notification each time with a request for permission to commence work.”<sup>7</sup> SCE further provided a list of customer notifications from its contractor in 2022 which included locations, date of work, number of contacts, and reasons for the work.<sup>8</sup>

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

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<sup>4</sup> [2022 Wildfire Mitigation Plan Update Guidelines](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=51912&shareable=true); attachment 2, p. 92 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=51912&shareable=true, accessed May 10,2024).

<sup>5</sup> [SCE’s 2022 WMP Update](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=52051&shareable=true), p. 393 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=52051&shareable=true, accessed February 18, 2022).

<sup>6</sup> Response to DR-226, question 1; attachment “Crowe-SCE-2022 SVM 01 Q.001 Answer.pdf.”

<sup>7</sup> Response to DR-239, question 1; attachment “Crowe-SCE-2022 SVM-Followup239 Q.01 Answer.pdf.”

<sup>8</sup> Response to DR-226, question 2, attachment “Crowe-SCE-2022 SVM 01 Q.002 Answer.pdf.”

**Statement 2**

Statement: “Further, SCE also makes note of individual customer requests for items such as advance phone calls or appointment requests before conducting work and notates the work records accordingly to accommodate customers as much as possible.”<sup>9</sup>

Supporting Information and Analysis: SCE provided an Excel file listing records of four vegetation management work orders in 2022. The work orders indicate that customer request information was recorded. The work orders specified to contact customers 24 hours prior to vegetation management work, and specific customer instructions for completing the work. The provided information indicates that SCE recorded and had the ability to record customer request information related to vegetation management work in 2022.<sup>10</sup>

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

**Statement 3**

Statement: “For SCE’s Dead & Dying Tree Removal (formerly Drought Resolution Initiative (DRI)) and HTMP, SCE additionally sends a certified letter to customers before any work is performed.”<sup>11</sup>

Supporting Information and Analysis: SCE provided an image of a certified letter sent to a customer in 2022, outlining the reason for the work, the date of previous contact, and a statement of intention to complete the work.<sup>12</sup>

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

**Statement 4**

Statement: “SCE staffs at least one ISA-certified arborist in each district across its service area to address such concerns [customer objections].”<sup>13</sup>

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<sup>9</sup> [SCE’s 2022 WMP Update](#), p. 393

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

<sup>10</sup> Response to DR-226, question 4; attachment “Q.4 Samples of Prior Contact for 2022 WMP Audit-Public.xlsx.”

<sup>11</sup> [SCE’s 2022 WMP Update](#), p. 393

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

<sup>12</sup> Response to DR-226, question 5; attachment “Crowe-SCE-2022 SVM 01 Q. 005 Answer.pdf.”

<sup>13</sup> [SCE’s 2022 WMP Update](#), p. 393

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

Supporting Information and Analysis: SCE provided a list of its district names and the name of a certified arborist for each district.<sup>14</sup>

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

#### Statement 5

Statement: “In cases where the safety risk cannot be mitigated without superseding the customer’s wishes, SCE will exercise its legal right to protect its infrastructure and community safety with the support of local law enforcement and/or fire authorities. Additionally, in some cases the customer engagement process may take enough time that the tree grows into the electrical facilities or otherwise becomes an imminent public safety risk. If that occurs, the necessary mitigation is then prioritized to occur within next 24 hours, and additional notification may not be made.”<sup>15</sup>

Supporting Information and Analysis: SCE provided four incidents from SCE’s Vegetation Management tracking system that indicate SCE corresponded with local law enforcement in relation to customer refusals for tree mitigations in 2022. These example incidents included the date of the incident, status, date of completion, and refusal details. Notes under each incident included information such as customer refusal details and whether police were involved with the remediation.<sup>16</sup> The provided information indicates that SCE exercised its legal right to protect its infrastructure and community safety with the support of local law enforcement in 2022.

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

#### Statement 6

Statement: “For new or expanded initiatives that are expected to have significant public impact, SCE meets with the affected agency, city, county, and/or the homeowner associations, as applicable, as well as schedules and attends public meetings, and prepares and distributes educational materials.”<sup>17</sup>

Supporting Information and Analysis: SCE provided presentation and educational materials used in meetings between SCE and Los Angeles County to discuss vegetation management

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<sup>14</sup> Response to DR-226, question 7; attachment “Crowe-SCE 2022 SMV-001\_Q.07-Supplemental Arborist 2022 Districts\_Public.xlsx.”

<sup>15</sup> [SCE’s 2022 WMP Update](#), p. 393

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

<sup>16</sup> Response to DR-226, question 8; attachment “Crowe-SCE-2022 Q. 008 Answer.pdf.”

<sup>17</sup> [SCE’s 2022 WMP Update](#), p. 393

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

activities that impacted the public in 2022. The presentation and education materials included upcoming vegetation management activities, completion status of these activities, and maps of expected work locations.<sup>18</sup>

SCE also provided the following four examples highlighting its vegetation management programs that impacted the public in 2022. SCE provided a postcard informing the public of its Palm Removal Program, an image of a presentation with Sequoia Nation Forest to discuss vegetation related pilots, an image of a presentation with Inyo Nation Forest to inform of 2022 vegetation mitigation plans, and images of a presentation with Sierra National Forest discussing SCE's scheduling dynamics for vegetation mitigation work in 2022.<sup>19</sup>

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

#### Statement 7

Statement: "Public activities may also include the use of targeted social media campaigns to increase the local public's awareness of vegetation management work taking place in the community. More targeted engagement activities may also be warranted, such as coordinating field visits with certified arborists employed by local agencies to demonstrate SCE's program and the risk mitigation approach."<sup>20</sup>

Supporting Information and Analysis: SCE provided three examples of targeted social media campaigns to increase public awareness of vegetation management work in 2022. SCE posted a one-minute video on the use of goats for vegetation management to various social media sites.<sup>21</sup> SCE also provided an infographic, and article about tree trimming regulations for vegetation near power lines published by SCE in 2022.<sup>22</sup> Finally, SCE provided an article published on SCE's "Energized" webpage and linked on SCE's Facebook page discussing SCE's Operation Santa Ana (OPSA) program.<sup>23</sup>

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

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<sup>18</sup> Response to DR-226, question 9; attachments "Q.09\_LA County Meeting\_2022\_02-Redacted.pdf," "Q.09\_LA County Meeting\_2022\_06-Redacted.pdf," "Q.09\_LA County Meeting\_2022\_08-Redacted.pdf," and "Q.09\_LA County Meeting\_2022\_11-Redacted.pdf."

<sup>19</sup> Response to DR-226, question 10; attachment "Crowe-SCE-2022 SVM 01 Q.010 Answer.pdf."

<sup>20</sup> [SCE's 2022 WMP Update](#), p. 393

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

<sup>21</sup> Response to DR-226, question 11; attachment "X.com. *Hungry, Four-Legged Wildfire Prevention Specialists* (July 27, 2022). <https://x.com/SCE/status/1552369259455578112>"

<sup>22</sup> Response to DR-226, question 11; attachment "X.com. *Keeping Communities Safe from Big Trees Near Power Lines* (December 21, 2021). <https://x.com/SCE/status/1506751391087439877>"

<sup>23</sup> Response to DR-226, question 11; attachment "Facebook.com. *Protecting Communities Before Dangerous Winds Begin* (September 21, 2022). <https://www.facebook.com/100064682409094/posts/10158612455346831/>"



**Statement 8**

Statement: “Prior to conducting vegetation mitigation activities, SCE conducts an environmental review, obtains any required environmental permits, and performs any necessary environmental field support. SCE leverages [Geographic Information System] GIS layers that integrate with its work management tools to identify environmentally sensitive areas, automating the process where feasible.”<sup>24</sup>

Supporting Information and Analysis: SCE provided an Excel file listing Master Special Use Permits (MSUP), and biological and waters reviews needed for work prescribed in the Angeles National Forest (ANF).<sup>25</sup> The Excel file documented work to be performed, location of the work, and GIS screening and environmental review results.<sup>26</sup>

SCE stated that GIS layers were used to evaluate whether work activities were located on U.S. Forest Service (USFS) land and whether the work activities were subject to MSUP.<sup>27</sup> SCE also provided a screenshot of SCE’s GIS layers that were used to determine work location overlap with ANF.<sup>28</sup>

In addition, SCE provided a copy of SCE’s “LA County Department of Regional Planning Coastal Development Permit Application” for the removal of two deceased trees in 2022.<sup>29</sup> SCE used GIS layers to determine if the tree removal activities were in Local Coastal Program areas.<sup>30</sup> SCE also provided a letter signed by the Los Angeles Director of Regional planning in 2022 approving SCE’s tree removal work within Local Coastal Program areas.<sup>31</sup> Lastly, SCE included the results from the environmental review of the tree removals.<sup>32</sup>

Lastly, SCE provided a copy of SCE’s authorization from the California Department of Fish and Wildfire to conduct routine vegetation management activities to maintain fire abatement clearance. SCE also included the GIS layers used to establish and map jurisdictional extent and work areas for the project.<sup>33</sup>

The provided information indicates that SCE conducted environmental reviews and utilized GIS layers to implement work in 2022.

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<sup>24</sup> [SCE’s 2022 WMP Update](#), p. 394

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

<sup>25</sup> Response to DR-226, question 13; attachment “DR 13 MSUP\_00546\_ANF\_VM\_LineClearing\_IIb\_Table.xlsx.”

<sup>26</sup> Response to DR-226, question 13; attachment “DR 13 MSUP\_00546\_ANF\_VM\_LineClearing\_IIb\_Table.xlsx.”

<sup>27</sup> Response to DR-226, question 13; attachment “Crowe-SCE-SVM 01 Q.013 Anser.pdf.”

<sup>28</sup> Response to DR-226, question 13; attachment “DR 13 Government Lands Layer.PNG.”

<sup>29</sup> Response to DR-226, question 13; attachment “M#\_RPPL2022007206(07272022)\_CDPEX.pdf.”

<sup>30</sup> Response to DR-226, question 13; attachment “DR 13 Local Coastal Program Layer.PNG.”

<sup>31</sup> Response to DR-226, question 13; attachment “DR 13 Combined\_Grid 17 Dead Tree Removal\_20220420.pdf.”

<sup>32</sup> Response to DR-226, question 13; attachment “DR 13 Tree Removal Environmental Reviews\_RPPL2022007206.xlsx.”

<sup>33</sup> Response to DR-226, question 13; attachment “EPIMS-MOO-24596-R6FinalAgreement-JuneLake\_220719.pdf.”

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

#### Statement 9

Statement: “SCE provides vegetation contractors with annual training on environmental requirements and procedures and may supplement that with ad hoc training for specific projects where reinforcement is prudent.”<sup>34</sup>

Supporting Information and Analysis: SCE provided slides from a PowerPoint presentation dated March 2022. The slides indicate that the presentation covered topics including work site access, bird nest surveys, vehicles spill prevention, and environmental permitting requirements.<sup>35</sup> SCE also provided an Excel file containing the names of 61 SCE contractors that attended the presentation.<sup>36</sup> The provided information indicates that SCE provided environmental training to its contractors in 2022.

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

#### Statement 10

Statement: “SCE prioritizes efforts to manage environmental compliance by integrating schedules of environmental/agency permitting timeframes, bundling of permit package submittals, pursuing programmatic agency permitting, and regularly engaging agencies with upcoming work activities.”<sup>37</sup>

Supporting Information and Analysis: SCE provided an Excel file listing recommended pre-inspection mitigation scheduling based on environmental constraints, preferred work timeframes based on the constraints, and the environmental or agency constraints driving the recommendations.<sup>38</sup>

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<sup>34</sup> [SCE's 2022 WMP Update](#), p. 394

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

<sup>35</sup> Response to DR-226, question 14; attachment “Q.14\_Environmental\_Training\_Presentation-public-Redacted-030722.pdf.”

<sup>36</sup> Response to DR-226, question 14; attachment “Q.14\_Environmental Training Log\_Public\_Redacted.xlsx.”

<sup>37</sup> [SCE's 2022 WMP Update](#), p. 394

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

<sup>38</sup> Response to DR-226, question 15; attachment “Example 1, Early Preinspection Recommendations Combined 10042022.xlsx.”

SCE also provided an Excel file listing environmental reviews needed for work prescribed in the San Bernardino National Forest.<sup>39</sup> The Excel file indicates that SCE bundled work from three different VM programs into a single notification package.<sup>40</sup>

SCE also provided a copy of the U.S. Fish and Wildlife Service’s Biological Opinion on the Implementation of Southern California Edison’s (SCE) Operation and Maintenance Work Activities in the Inyo and Sierra National Forests, Fresno, Inyo, Madera, and Mono Counties, California, which authorized implementation of SCE’s operation and maintenance work activities conducted under the U.S. Forest Service’s existing programmatic MSUP to SCE in Yosemite Toad habitat. SCE states that the Yosemite Toad Biological Opinion is an example of a programmatic permit obtained by SCE.<sup>41</sup>

SCE stated that “As part of the terms of SCE’s USFS MSUP, SCE engages in annual meetings with Forest Service personnel to discuss, among other items, SCE’s forecasted work for the year.”<sup>42</sup> SCE provided an agenda from a meeting between SCE and the USFS held in 2022, which outlined SCE’s work on USFS land.<sup>43</sup>

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

#### Statement 11

Statement: “To provide reasonable assurance that SCE continues to comply with environmentally sensitive areas, SCE will continue to manage contractors in accordance with environmental compliance plans and perform post-work validations in partnership with the SCE environmental department.”<sup>44</sup>

Supporting Information and Analysis: SCE provided a screenshot of a post work verification survey, which included a survey question related to environmental observations.<sup>45</sup> SCE also provided an Excel file listing outcomes from four post-work validation surveys conducted in 2022.<sup>46</sup> The provided information indicates that SCE monitored its contractors through field observation and post-work validations to ensure that contractors followed SCE’s environmental policies in 2022.

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<sup>39</sup> Response to DR-226, question 15; attachment “Example 2, DR 15 MSUP\_VM\_00452\_SBNF\_ClassIIB\_Table.”

<sup>40</sup> Response to DR-226, question 15; attachment “Crowe-SCE-2022 SVM 01 Q.015 Answer.pdf.”

<sup>41</sup> Response to DR-226, question 15; attachment “Crowe-SCE-2022 SVM 01 Q.015 Answer.pdf.”

<sup>42</sup> Response to DR-226, question 15; attachment “Crowe-SCE-2022 SVM 01 Q.015 Answer.pdf.”

<sup>43</sup> Response to DR-226, question 15; attachment “Example 4, DR 15 SBNF. Annual Mtg.2022.Excerpt.”

<sup>44</sup> [SCE’s 2022 WMP Update](#), p. 395

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

<sup>45</sup> Response to DR-226, question 19; attachment “Crowe-SCE-2022 SVM 01 Q.019 Answer.pdf.”

<sup>46</sup> Response to DR-226, question 19; attachment “Crowe-SCE 2022 SVM-011\_Q.19 Post-Work Validation\_2022.xlsx.”

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

## Finding

SCE provided information consistent with the completion of work identified in Initiative 7.3.5.1: Additional Efforts to Manage Community and Environmental Impacts.

## A.2 Initiative 7.3.5.2 Detailed Inspections and Management Practices for Vegetation Clearances Around Distribution Electrical Lines and Equipment

The purpose of this initiative is “Careful visual inspections and maintenance of vegetation around the distribution right-of-way, where individual trees are carefully examined, visually, and the condition of each rated and recorded. Describe the frequency of inspection and maintenance programs.”<sup>47</sup>

## Statements, Supporting Information and Analysis, and Conclusions

### Statement 12

Statement: “SCE performs annual inspections and trimming for clearance around conductors in accordance with applicable regulations such as GO 95, PRC 4293 and SCE’s Transmission Vegetation Management Plan and Distribution Vegetation Management Plan. Independent parties perform QA reviews and QC inspections to validate work quality and adherence to internal program and regulatory requirements. Independent parties perform QA reviews and QC inspections to validate work quality and adherence to internal program and regulatory requirements.”<sup>48</sup>

Supporting Information and Analysis: SCE submitted a spatial Quarterly Data Report (QDR) for each quarter of 2022 which is comprised of GIS data.<sup>49</sup> The spatial QDR data indicates the completion of vegetation inspections of distribution and transmission electric lines throughout SCE’s service territory in 2022.

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<sup>47</sup> [2022 Wildfire Mitigation Plan Update Guidelines](#); attachment 2, p. 92

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=51912&shareable=true>, accessed May 10, 2024).

<sup>48</sup> [SCE’s 2022 WMP Update](#), p. 396

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

<sup>49</sup> Spatial QDR data submitted Q1 May 2<sup>nd</sup>, 2022, Q2 August 1, 2022, Q3 November 8<sup>th</sup>, 2022, Q4 February 6<sup>th</sup>, 2023.

SCE provided screenshots from its Vegetation Management “dashboard” which was created using Microsoft Power BI software. The screenshot includes SCE’s quarterly QA reviews and QC inspection results from each quarter of 2022. The screenshot indicates that SCE’s QA reviews and QC inspections found that 99.57%, and 97.85% of vegetation management activities performed in 2022 achieved SCE’s Regulation Clearance Distance (RCD), and SCE’s Compliance Clearance Distance (CCD), respectively.<sup>50</sup>

The provided information indicates that SCE inspected its transmission and distribution systems for vegetation clearances, and performed QA reviews, and QC inspections of vegetation management work in 2022.

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

### Statement 13

Statement: “SCE schedules higher risk HFRA locations for inspection in the months leading up to peak fire season to the extent that resources are available, and it is feasible to schedule the work during this time period.”<sup>51</sup>

Supporting Information and Analysis: SCE provided a screenshot from its vegetation management system software that was used to schedule inspections in 2022.<sup>52</sup> The screenshot indicates that 1,155 trees were inspected in “high fire status” areas between February and August 2022. The provided information indicates that SCE inspected some trees in “high fire status” areas in the first half of the year before the start of fire season which is defined in SCE’s 2022 WMP Update as starting “around mid-to late second quarter and peak in the fourth quarter.”<sup>53</sup>

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

### Statement 14

Statement: “To facilitate routine detailed inspection of vegetation around distribution and transmission lines and equipment, SCE divides its service area geospatially into approximately 2,700 Grids. SCE’s inspections are scheduled such that each of these Grids in SCE’s service territory is inspected annually. Inspection schedules for the grids consider resource availability, appropriate allocation of work throughout the year, permitting lead

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<sup>50</sup> Response to DR-226, question 21; attachment “Crowe-SCE-2022 SVM 01 Q. 021 Answer.pdf.”

<sup>51</sup> [SCE’s 2022 WMP Update](#), p. 399

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

<sup>52</sup> Response to DR-226, question 23; attachment “Crowe-SCE-2022 SVM 01 Q. 023 Answer.pdf.”

<sup>53</sup> [SCE’s 2022 WMP Update](#), p. 6.

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

times and permit availability, and challenges with access to worksites based on seasonal weather conditions.”<sup>54</sup>

Supporting Information and Analysis: SCE provided a table listing the dates of detailed inspections for five grids in 2022. The table also included inspection notes from 2021 associated with each of the five grids. The 2021 notes included inspector comments such as “Area with snow. Move out of winter”, and “move to month 5 due to weather.” The table indicates that the 2022 inspection dates were rescheduled based on the 2021 inspector comments which indicated challenges with access and seasonal weather conditions.<sup>55</sup>

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

#### Statement 15

Statement: “Vegetation management activities to maintain clearance distances from transmission and distribution lines and equipment are conducted throughout SCE’s entire service area on an annual basis.”<sup>56</sup>

Supporting Information and Analysis: SCE provided spatial QDR data for each quarter of 2022.<sup>57</sup> The spatial QDR data indicates that SCE completed vegetation management activities to maintain clearance distances on distribution and transmission electric lines in SCE’s service territory in 2022.

SCE also provided its Transmission Vegetation Management Plan and Distribution Vegetation Management Plan, both of which document SCE’s required clearance distances for vegetation.<sup>58</sup> SCE also provided its Inspection Manual, which includes guidelines for identifying conductor encroachments and prescribing vegetation work to ensure SCE’s required clearance distances are met.<sup>59</sup>

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

#### Statement 16

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<sup>54</sup> [SCE’s 2022 WMP Update](#), p. 399

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

<sup>55</sup> Response to DR-226, question 25; attachment “Crowe-SCE-2022 SVM 01 Q.025 Answer.pdf.”

<sup>56</sup> [SCE’s 2022 WMP Update](#), p. 399

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

<sup>57</sup> Spatial QDR data submitted Q1 May 2<sup>nd</sup>, 2022, Q2 August 1, 2022, Q3 November 8<sup>th</sup>, 2022, Q4 February 6<sup>th</sup>, 2023.

<sup>58</sup> Response to DR-226, question 26; attachments “UVM-02 – V6\_Redacted.pdf,” “UVM-03 V5\_Redacted.pdf.”

<sup>59</sup> Response to DR-226, question 26; attachment “UVM-09 – V4\_Redacted.pdf.”

Statement: “In its HFRA for 2022, SCE plans to inspect approximately 600,000 trees adjacent to distribution lines, based on current unique tree inventory count. Tree inventory is subject to fluctuations based on actual field conditions.”<sup>60</sup>

Supporting Information and Analysis: SCE provided an Excel file listing a “tree ID,” “Inspection ID,” and inspection date for all trees inspected along distribution lines during detailed inspections in 2022. The Excel file indicates that SCE inspected 950,316 trees adjacent to distribution electric lines all within HFRA areas in 2022.<sup>61</sup> Thus, SCE exceeded its target to inspect 600,000 trees adjacent to distribution lines in 2022.

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

#### Statement 17

Statement: “In its HFRA for 2022, SCE plans to inspect approximately 100,000 trees adjacent to transmission lines, based on current unique tree inventory count. Tree inventory is subject to fluctuations based on actual field conditions.”<sup>62</sup>

Supporting Information and Analysis: SCE provided an Excel file listing a “tree ID,” “Inspection ID,” and inspection date for all trees inspected along transmission lines during detailed inspections in 2022. The Excel file indicates that SCE inspected 112,790 trees adjacent to distribution electric lines all within HFRA areas in 2022.<sup>63</sup> Thus, SCE exceeded its target to inspect 100,000 trees adjacent to distribution lines in 2022.

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

#### Statement 18

Statement: “SCE's goal is to perform inspections of SCE's entire tree inventory in HFRA in 2022 in accordance with vegetation management's annual work plans, barring access, permitting, or other constraints.”<sup>64</sup>

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<sup>60</sup> [SCE's 2022 WMP Update](#), p. 141

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

<sup>61</sup> Response to DR-239, question 5; attachment “Crowe-SCE-2022 SVM-Followup239\_Q.05\_FUQ.30.xlsx.”

<sup>62</sup> [SCE's 2022 WMP Update](#), p. 141

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

<sup>63</sup> Response to DR-239, question 5; attachment “Crowe-SCE-2022 SVM-Followup239\_Q.05\_FUQ.30.xlsx.”

<sup>64</sup> [SCE's 2022 WMP Update](#), p. 399

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

Supporting Information and Analysis: SCE provided an Excel file listing SCE’s planned and completed inspections for its Routine Line Clearing program in 2022.<sup>65</sup> The Excel file indicates that SCE estimated that its entire tree inventory in HFRA areas totaled 995,715 trees in 2022. The file also indicates that SCE inspected 112,790 trees along transmission electric lines, and 950,316 trees along distribution electric lines all within HFRA areas totaling 1,063,106 trees in 2022. The provided information indicates that SCE inspected all trees estimated to be in SCE’s territory in 2022, and inspected an additional 67,391 trees that were identified during 2022 inspections.

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

## Finding

SCE provided information consistent with the completion of work identified in Initiative 7.3.5.2: Detailed Inspections and Management Practices for Vegetation Clearances Around Distribution Electrical Lines and Equipment.

## A.3 Initiative 7.3.5.3: Detailed Inspections of Vegetation Around Transmission Electric Lines and Equipment

The purpose of this initiative is to ensure “careful visual inspections and maintenance of vegetation around the transmission right-of-way, where individual trees are carefully examined, visually, and the condition of each rated and recorded.”<sup>66</sup>

## Statements, Supporting Information and Analysis, and Conclusions

In SCE’s 2022 WMP Update, Initiative 7.3.5.3: Detailed Inspections of Vegetation Around Transmission Electric Lines and Equipment directs readers to Initiative 7.3.5.2.<sup>67</sup> Therefore, Energy Safety did not conduct a separate analysis of the work performed for this initiative.

## Finding

See the finding for Initiative 7.3.5.2.

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<sup>65</sup> Response to DR-239, question 5; attachment “Crowe-SCE-2022 SVM-Followup239\_Q.05\_FUQ.30.xlsx.”

<sup>66</sup> [2022 Wildfire Mitigation Plan Update Guidelines](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=51912&shareable=true); attachment 2, p. 92 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=51912&shareable=true, accessed May 10,2024).

<sup>67</sup> [SCE’s 2022 WMP Update](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=52051&shareable=true), p. 400 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=52051&shareable=true, accessed February 18, 2022).



## A.4 Initiative 7.3.5.4 Emergency Response Vegetation Management due to Red Flag Warning or Other Urgent Climate Conditions

The purpose of this initiative is the “plan and execution of vegetation management activities, such as trimming or removal, executed based upon and in advance of forecast weather conditions that indicate high fire threat in terms of ignition probability and wildfire consequence.”<sup>68</sup>

### Statements, Supporting Information and Analysis, and Conclusions

#### Statement 19

Statement: “SCE also modifies its vegetation management activities during RFW periods to help mitigate potential risks, including pausing non-emergency work in HFRA (e.g., use of chainsaws) that has the potential to cause sparks, and instead working in non-HFRA areas.”<sup>69</sup>

Supporting Information and Analysis: SCE provided an email alert distributed to field crews for a weather-related “Period of Concern” in September 2022. The alerts instructed relevant crews to pause maintenance activities across an identified set of circuits, except for emergency scenarios.<sup>70</sup> The email indicates that SCE instructed its contractors to modify vegetation management activities in response to urgent weather conditions in 2022.

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

#### Statement 20

Statement: “Additionally, for any PSPS [Public Safety Power Shut-Offs] events during high fire risk days, vegetation management crews are on standby to mitigate any vegetation-related ignition risks identified during PSPS pre- or post-patrols. SCE also performs incremental

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<sup>68</sup> [2022 Wildfire Mitigation Plan Update Guidelines](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=51912&shareable=true); attachment 2, p. 92 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=51912&shareable=true, accessed May 10, 2024).

<sup>69</sup> [SCE’s 2022 WMP Update](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=52051&shareable=true), p. 401 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=52051&shareable=true, accessed February 18, 2022).

<sup>70</sup> Response to DR-226, question 32; attachment “Crowe-SCE-2022 SVM-001\_Q.32\_VM Pause Work RFW\_2022-09\_Redacted.pdf.”

vegetation management work in preparation for Santa Ana wind events as described in Section 7.3.5.11.”<sup>71</sup>

Supporting Information and Analysis: SCE provided images from a 2022 presentation regarding vegetation management mitigation work completed from PSPS pre-patrols in support of SCE’s emergency response work. The images depict three examples of tree trimmings near power lines in November 2022, ahead of high fire risk days.<sup>72</sup> The images indicate that the trimmings increased clearance distances between vegetation and conductors, and in turn reduced ignition risk of these trees to ignite during high fire risk weather conditions.

SCE also provided a 2022 article describing its OPSA program, the article stated that SCE performed on foot visual inspections of vegetation along SCE’s facilities ahead of extreme wildfire conditions.<sup>73</sup> SCE also provided the agenda from a June 2022 OPSA kickoff meeting, which discussed pole brushing programs, team leaders, joint patrol options, and the fire season forecast to agency and SCE representatives.<sup>74</sup>

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

## Finding

SDG&E provided information consistent with the completion of work identified in Initiative 7.3.5.4: Emergency Response Vegetation Management due to Red Flag Warning or Other Urgent Climate Conditions.

## A.5 Initiative 7.3.5.5 Fuel Management (Including all Wood Management) and Reduction of “Slash” from Vegetation Management Activities

The purpose of this initiative is the “plan and execution of fuel management activities in proximity to potential sources of ignition. This includes pole clearing per PRC 4292 and

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<sup>71</sup> [SCE’s 2022 WMP Update](#), p. 401 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=52051&shareable=true, accessed February 18, 2022).

<sup>72</sup> Response to DR-226, question 33; attachment “Crowe-SCE-2022 SVM 01 Q.033 Answer.pdf.”

<sup>73</sup> Response to DR-226, question 34; attachment “<https://energized.edison.com/stories/protecting-communities-before-dangerous-winds-begin>”

<sup>74</sup> Response to DR-226, question 34; attachment “Crowe-SCE-2022 SVM-01\_Q.34 OPSA 2022 Agenda-Redacted.pdf.”

reduction or adjustments of live fuel (based on species or otherwise) and of dead fuel, including all downed wood and “slash” generated from vegetation management activities.”<sup>75</sup>

## Statements, Supporting Information and Analysis, and Conclusions

### Statement 21

**Statement:** “Removal and disposal of debris generated during SCE vegetation management activity, except as requested by the customer (e.g., for firewood or mulch) or where logistical constraints exist (e.g., steep slope with no vehicular access), is typically performed the same day. Concerted efforts are made to rake up and dispose of green or freshly removed leaves and work sites are to be left in a condition consistent with the condition prior to vegetation management activity.”<sup>76</sup>

**Supporting Information and Analysis:** SCE provided five pictures of completed tree work with associated information including removal type (e.g., “log disposal”, “buck and slash”, “leave wood”), and work completion date. All five example images displayed the removed tree with surrounding conditions consistent with the look of the nearby area.<sup>77</sup>

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

### Statement 22

**Statement:** “SCE has partnered with the USFS on an implementation path for sustained fuel management measures, e.g., putting in low-growing “utility friendly” vegetation to manage undesirable tree species growth or expanding use of alternative debris management methods such as utilization of ruminant animal grazing.”<sup>78</sup>

**Supporting Information and Analysis:** SCE provided images from a presentation given by SCE to Sequoia National Forest at a meeting in 2022. The presentation discussed various vegetation management topics, such as goat grazing and low-growth native plants.<sup>79</sup> SCE’s included images of the presentation indicate that SCE discussed topics regarding SCE’s Integrated Vegetation Management program and a pilot plan of action for SCE’s grazing

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<sup>75</sup> [2022 Wildfire Mitigation Plan Update Guidelines](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=51912&shareable=true); attachment 2, p. 92 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=51912&shareable=true, accessed May 10,2024).

<sup>76</sup> [SCE’s 2022 WMP Update](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=52051&shareable=true), p. 403 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=52051&shareable=true, accessed February 18, 2022).

<sup>77</sup> Response to DR-226, question 35; attachment “Crowe-SCE-2022 SVM 01 Q.035 Answer.pdf.”

<sup>78</sup> [SCE’s 2022 WMP Update](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=52051&shareable=true), p. 404 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=52051&shareable=true, accessed February 18, 2022).

<sup>79</sup> Response to DR-226, question 37; attachment “Crowe-SCE-2022 SVM 01 Q.037 Answer.pdf.”

program.

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

#### Statement 23

Statement: “SCE’s first priority is to complete brushing on those poles required to be brushed under PRC 4292 in SRAs. Second, SCE prioritizes poles in AOC within HFRA. Third, SCE focuses on all other poles identified in HFRA with non-exempt equipment and highest potential wildfire consequence. While SCE is prioritizing scheduling these activities in the first half of the year, actual completion dates will be based on access and operational efficiency.”<sup>80</sup>

Supporting Information and Analysis: SCE provided an Excel file listing the dates of work activities completed on distribution poles in 2022. The file includes the “structure ID” of the poles, if brushing was required by PRC 4292, State Responsibility Area (SRA) or High Fire Risk Area (HFRA) designation, if the pole is in an AOC, and the type of work performed on the pole in 2022.<sup>81</sup>

The Excel file indicates that SCE started brushing a combination of PRC 4292, AOC, and HFRA poles in January 2022, consistent with SCE’s prioritization schedule. The Excel file also indicates that approximately 77,000 poles from the three priority schedules listed in statement 23 above were brushed between July and December 2022. Although this is inconsistent with SCE’s schedule to prioritize work in the first half of the year, SCE stated that work was delayed due to environmental approval, weather, and accessibility issues.<sup>82</sup> SCE’s reason for completing some pole brushing work in the second half of the year is consistent with the language used in statement 23 above.

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

#### Statement 24

Statement: “SCE considers operational efficiency as a major driver in prioritizing other categories of poles to brush. Other categories of poles SCE will strive to brush include: poles identified for HFRI inspections pursuant to the methodology discussed in Sections 7.3.4.9.1 and 7.3.4.11.1; poles with exempt equipment and potential wildfire consequence greater

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<sup>80</sup> [SCE’s 2022 WMP Update](#), p. 405

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

<sup>81</sup> Response to DR-226, question 40; attachment “Crowe-Q.40\_Pole Brushing 3 Categories Prioritization\_2022.xlsx.”

<sup>82</sup> Response to DR-226, question 2; attachment “Crowe-SCE-2022 SVM-Followup245 Q. 01-02 Answer.pdf.”

than or equal to 300 acres; and poles with non-exempt equipment and potential wildfire consequence less than 300 acres.”<sup>83</sup>

Supporting Information and Analysis: SCE provided an Excel file listing poles identified within SCE’s service territory in 2022 as having either exempt equipment and potential wildfire consequence greater than or equal to 300 acres, or non-exempt equipment and potential wildfire consequence less than 300 acres.<sup>84</sup> The Excel file indicates that SCE brushed 51,827 poles with exempt equipment and potential wildfire consequence greater than or equal to 300 acres, and brushed 42,129 poles with non-exempt equipment and potential wildfire consequence less than 300 acres.

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

#### Statement 25

Statement: “SCE will inspect and clear (where clearance is needed) 55,100 poles in State Responsibility Area with the equipment identified by PRC 4292, with the exception of poles for which there are customer access or environmental constraints, or poles that are exempt under 14 Cal. Code of Regulations 1255 (e.g., poles in fruit orchards that are plowed or cultivated).”<sup>85</sup>

Supporting Information and Analysis: SCE provided an Excel file which included pole ID information, and the date pole brushing work was completed. The Excel file indicates that 64,050 poles in State Responsibility Area with equipment identified by PRC-4292 were brushed in 2022.<sup>86</sup>

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

#### Statement 26

Statement: “SCE has created separate pole brushing goals for 2022 that will be specific as to which poles are subject to PRC 4292, and which poles are not. SCE recalibrated its approach for 2022 to brush all non-exempt PRC 4292 poles in SRAs, all poles in AOC within HFRA, all

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<sup>83</sup> [SCE’s 2022 WMP Update](#), p. 404

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

<sup>84</sup> Response to DR-239, question 6; attachment “Crowe-SCE-2022 SVM-Followup239\_Q.06 Exempt & Non-Exempt.xlsx.”

<sup>85</sup> [SCE’s 2022 WMP Update](#), p. 144

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

<sup>86</sup> Response to DR-239, question 7; attachment “07\_Crowe-SCE-2022 SVM-Followup239-Q.07\_FUQ 42\_Supplemental.xlsx.”

poles within HFRA that have the same type of equipment as the non-exempt PRC 4292 poles and have a wildfire consequence of greater than 300 acres burned in eight hours.”<sup>87</sup>

Supporting Information and Analysis: SCE provided an Excel file listing the total distribution poles with non-exempt equipment in 2022. SCE listed work dates of SCE poles that fall into the criteria described in statement 26 above.<sup>88</sup> The Excel file contains three different sets of information including (1) all of SCE’s distribution poles that are non-exempt PRC 4292 poles in SRAs, (2) all distribution poles in AOC within HFRA, and (3) all distribution poles within HFRA with non-exempt equipment and have a wildfire consequence of greater than 300 acres burned in eight hours. The Excel file indicates that some poles in these three sets of information were “not worked.” Because SCE stated that some poles in the file may fall into more than one category; for example, some poles are located in both HFRA and SRA areas,<sup>89</sup> Energy Safety was unable to determine the precise number of poles that were “not worked” in each of the three categories described in statement 26 above. Additionally, SCE explained that the poles with a “not worked” status did not have a date and were not counted toward the WMP goal due to factors such as environmental or customer access constraints and resource availability.<sup>90</sup> Because the Excel file indicates that SCE did not work all the poles meeting the criteria described in statement 26 above, Energy Safety finds that SCE did not provide documentation or information consistent with the completion of work identified in this statement.

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

#### Statement 27

Statement: “SCE will access, inspect and clear (dependent on access and authority) approximately 78,700 distribution poles (separate from and in addition to the 55,100 PRC 4292 poles). SCE will strive to access, inspect, and clear (dependent on access and authority) up to 170,000 distribution poles in HFRA (separate from and in addition to the 55,100 PRC 4292 poles).<sup>91</sup>

Supporting Information and Analysis: SCE provided an Excel file listing the location and work date of poles within HFRA areas. The Excel file indicates that SCE performed inspection and

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<sup>87</sup> [SCE’s 2022 WMP Update](#), p. 406

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

<sup>88</sup> Response to DR-239, question 7; attachment “07\_Crowe-SCE-2022 SVM-Followup239-Q.07\_FUQ 42\_Supplemental.xlsx.”

<sup>89</sup> Response to DR-239, question 7; attachment “Crowe-SCE-2022 SVM-Followup239 Q. 07 Answer.pdf.”

<sup>90</sup> Response to DR-239, question 7; attachment “Crowe-SCE-2022 SVM-Followup239 Q. 07 Supplemental Answer.pdf.”

<sup>91</sup> [SCE’s 2022 WMP Update](#), p. 407

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

pole clearing work at 169,399 poles within HFRA areas in 2022.<sup>92</sup> SCE stated that 64,022 of the poles documented in the Excel file were counted towards SCE's target to brush 55,100 poles in SRAs with the equipment identified by PRC 4292.<sup>93</sup> This information indicates that SCE inspected and cleared 105,377 poles in HFRA that were separate from and in addition to the 55,100 pole target.

The provided information indicates that SCE exceeded its goal to clear 78,700 distribution poles that were separate from and in addition to its 55,100 PRC 4292 poles target. Further, SCE completed 62% of its "strive" target. Because the 170,000 pole target was described as a "strive" target in SCE's 2022 WMP Update, and SCE only stated that it would inspect and clear up to 170,000 poles, Energy safety found that SCE completed the work described in statement 27 above.

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

#### Statement 28

Statement: "SCE prioritizes clearances around Legacy Facilities in HFRA Tiers 2 and 3 over non-HFRA regions. SCE currently uses a risk-informed approach that takes into account the HFRA tier level, voltage levels, and existing vegetation buffer to risk rank the locations."<sup>94</sup>

Supporting Information and Analysis: SCE provided an Excel file listing the names, HFRA status, location, and remediation notes describing the type of vegetation work performed at each of the legacy facilities in 2022. The Excel file indicates that SCE performed vegetation management work to achieve extended clearances at 32 legacy facilities in 2022.<sup>95</sup>

SCE also provided three screenshots from its vegetation management database indicating that legacy facilities were assigned a risk score from 1-4 during vegetation inspections.<sup>96</sup>

The provided information indicates that SCE risk ranked its legacy facilities and performed vegetation management to achieve clearances in legacy facilities in Tier 2 and 3 areas in 2022.

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

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<sup>92</sup> Response to DR-226, question 40; attachment "Crowe-Q.40\_Pole Brushing 3 Categories Prioritization\_2022.xlsx."

<sup>93</sup> Response to DR-226, question 46; attachment "Crowe-SCE-2022 SVM 01 Q.046 Answer.pdf."

<sup>94</sup> [SCE's 2022 WMP Update](#), p. 408

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

<sup>95</sup> Response to DR-226, question 50; attachment "Q.50 VM-3 Gen Expanded Clearances\_2022.xlsx."

<sup>96</sup> Response to DR-226, question 49; attachment "Crowe-SCE-2022 SVM 01 Q.049 Answer.pdf."

**Statement 29**

Statement: “32 [legacy facilities locations] are scheduled for treatment in 2022. The expanded clearances for legacy facilities project will be completed in 2022. This will conclude the expanded clearances project and we will continue to maintain the clearances during regular vegetation maintenance and monitor via the inspections (IN-5) and remediations (SH-11).”<sup>97</sup>

Supporting Information and Analysis: SCE provided an Excel file containing information on these remaining 32 locations scheduled for treatment in 2022, including the facility name, facility type, location, HFTD status, remediation notes, and the date of treatment work completion.<sup>98</sup> The Excel file indicates that all 32 legacy facilities had vegetation management work completed in 2022.

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

**Finding**

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

## A.6 Initiative 7.3.5.6 Improvements of Inspections

The purpose of this initiative is “identifying and addressing deficiencies in inspections protocols and implementation by improving training and the evaluation of inspectors.”<sup>99</sup>

### Statements, Supporting Information and Analysis, and Conclusions

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<sup>97</sup> [SCE’s 2022 WMP Update](#), p. 408

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

<sup>98</sup> Response to DR-226, question 50; attachment “Q.50 VM-3 Gen Expanded Clearances\_2022.xlsx.”

<sup>99</sup> [2022 Wildfire Mitigation Plan Update Guidelines](#); attachment 2, p. 93

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=51912&shareable=true>, accessed May 10, 2024).



**Statement 30**

Statement: “To ensure the overall quality of the vegetation management program and the effectiveness and performance of SCE’s vegetation contract workforce, SCE’s QC Program performs inspection sampling and identified conditions are remediated.”<sup>100</sup>

Supporting Information and Analysis: SCE provided an Excel file documenting the results from QC inspection in Q1 2022, which identified conformance with regulation clearance distance (RCD) and compliance clearance distance (CCD). The Excel file listed 113,064 trees that were inspected, and included the location, fire risk, tree species, and QC date for each QC inspection.<sup>101</sup> The Excel file indicates that SCE’s QC Program performed QC inspections in 2022.

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

**Statement 31**

Statement: “As part of SCE’s continuous improvement efforts, commencing in 2020 and continuing through 2022 SCE began increasing contractor engagement to help ensure that inspectors are appropriately identifying and prescribing tree maintenance. "Add-on" tree rate training was and will continue to be provided to all vegetation management inspection contractors.”<sup>102</sup>

Supporting Information and Analysis: SCE stated that it “did not host a standalone, formal “Add-on” tree rate training session in 2022, but instead provided the process materials and job aids to the internal Vegetation Management Operations team and management of external contractors to distribute to their teams.”<sup>103</sup> SCE provided an email from 2022 sent to the Vegetation Management Operations team that included procedural documentation related to SCE’s “Add-on” tree rating procedure.<sup>104</sup> One attachment to the email described the process of identifying a Priority 1 (P1) tree condition, including guidelines for inspectors on how to properly notify the appropriate resources should a Priority 1 tree be identified.<sup>105</sup> A second attachment included a document outlining procedures to determine if a P1 tree is logged in the SCE vegetation inventory, as well as instructions on how to enter a P1 tree into

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<sup>100</sup> [SCE’s 2022 WMP Update](#), p. 409

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

<sup>101</sup> Response to DR-226, question 53; attachment “Q53\_QC Sample Report for 1Q22.xlsx.”

<sup>102</sup> [SCE’s 2022 WMP Update](#), p. 409

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

<sup>103</sup> Response to DR-226, question 54; attachment “Crowe-SCE-2022 SVM 01 Q.054 – Answer.pdf.”

<sup>104</sup> Response to DR-226, question 54; attachment “Crowe-SCE-2022 SVM 01\_Email Communication\_Redacted.pdf.”

<sup>105</sup> Response to DR-226, question 54; attachment “Crowe-SCE-2022 SVM 01\_Q. 54\_200701\_Pre-Inspector P1 Work Point Process\_Rev\_11102022.pdf.”

the SCE vegetation inventory system.<sup>106</sup> A third attachment included instructions on SCE’s “add-on” procedures. A fourth attachment described the process for approving work points using SCE’s “add-on” process.<sup>107</sup> The last attachment described the process for identifying and reporting a P1 tree, and specified that P1 trees must be remediated within 72 hours after the P1 tree is identified for work.<sup>108</sup> Additionally, SCE provided a list indicating that 13 SCE inspection contractors received the email and attachments described above.<sup>109</sup>

The information provided indicates that SCE provided training material to its inspection contractors to adequately train the contractors on how to implement the "Add-on" tree rate procedure.

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

### Statement 32

Statement: “Additional efforts implemented to support continuous improvement included holding executive level meetings with contractor management to share results of quality performance, increased training for both internal and external personnel involved with inspections, and requesting contractors to onboard additional contractor QC to provide reasonable assurance contractors are identifying issues before SCE’s independent QC identifies them.”<sup>110</sup>

Supporting Information and Analysis: SCE provided five emails that were sent to SCE contractors from SCE’s Vegetation Management QC Team in 2022.<sup>111</sup> The emails included QC pass rate reports that were created using Microsoft PowerBI software, which were to be distributed to share QC results and maintain transparency with contractor staff and QC team leads. The emails provided show that SCE engaged with its contractors to share quality performance results.

SCE also provided excerpts from SCE’s Vegetation Management Pre-Inspection Contractor’s Statement of Work (SOW) in 2022, which outlines SCE’s quality expectations and requirements for its contractors. The SOW requires contractors to “provide a quality control plan detailing the framework for how quality will be managed, monitored, and remediated

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<sup>106</sup> Response to DR-226, question 54; attachment “Crowe-SCE-2022 SVM 01\_Q. 54\_Tree Crew\_Create P1 Work Point\_Rev\_11142002.pdf.”

<sup>107</sup> Response to DR-226, question 54; attachment “Crowe-SCE-2022 SVM 01\_Q. 54\_SSP\_Approve AddOn Process Changes\_Rev\_11102022.pdf.”

<sup>108</sup> Response to DR-226, question 54; attachment “Crowe-SCE-2022 SVM 01\_Q. 54\_Tree Crew\_Create 72 Hour P1 Work Point\_JobAid\_Rev\_11102022.pdf.”

<sup>109</sup> Response to DR-226, question 55; attachment “Crowe-SCE-2022 SVM 01 Q. 055 Answer.pdf.”

<sup>110</sup> [SCE’s 2022 WMP Update](#), p. 410

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

<sup>111</sup> Response to DR-226, question 56; attachment “Crowe-SCE-2022 SVM 01\_Example1\_Redacted.pdf.”

when conducting pre-inspection work for SCE.”<sup>112</sup> The SOW also requires contractors to provide a “quality control oversight and QC team structure.”

The provided information indicates that SCE shared quality performance findings with contractor management, and required contractors to hire quality control staff to help ensure contractor work was satisfactory.

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

## Finding

Energy Safety’s audit found that SCE provided information consistent with the completion of work identified in Initiative 7.3.5.6: Improvement of Inspections.

## A.7 Initiative 7.3.5.7 Remote Sensing Inspections of Vegetation Around Distribution Electric Lines and Equipment

The purpose of this initiative is to perform “Inspections of right-of-way using remote sensing methods such as LiDAR, satellite imagery, and UAV.”<sup>113</sup>

## Statements, Supporting Information and Analysis, and Conclusions

### Statement 33

Statement: “For 2022, SCE is prioritizing the use of LiDAR to inspect Distribution circuits in select AOCs. Current scope for this effort involves 60 circuits with at least 500 miles in HFRAs. These circuits were selected due to their inspection scheduling timelines to ensure vegetation clearances in SCE’s AOCs.”<sup>114</sup>

Supporting Information and Analysis: SCE’s spatial QDR submission from Q2 and Q3 of 2022 indicates that SCE completed 1,135 circuit miles of LiDAR inspections of vegetation around distribution electric lines and equipment in 2022.<sup>115</sup> SCE stated that the LiDAR inspections documented in the spatial QDR data were performed across only 47 Distribution circuits.<sup>116</sup>

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<sup>112</sup> Response to DR-239, question 10; attachment “Crowe-SCE-2022 SVM-Followup239 Q. 10 Answer.pdf.”

<sup>113</sup> [2022 Wildfire Mitigation Plan Update Guidelines](#); attachment 2, p. 93

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=51912&shareable=true>, accessed May 10, 2024).

<sup>114</sup> [SCE’s 2022 WMP Update](#), p. 411

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

<sup>115</sup> Spatial QDR data submitted Q2 August 1, 2022, Q3 November 8, 2022.

<sup>116</sup> Response to DR-226, question 60; attachment “Crowe-SCE-2022 SVM 01 Q. 060 Answer.pdf.”

Although SCE inspected 12 less circuits using LiDAR in 2022, SCE also stated that the “AOC scope is analyzed by [SCE’s Fire Science group] and has potential to change based on the latest conditions. SCE stated that in 2022, the original estimated need was 60 circuits and was later reduced to 48 circuits.”<sup>117</sup> Because SCE’s spatial QDR submission indicates that SCE exceeded its 500-mile LiDAR inspection target in HFRA areas, Energy Safety found SCE provided information consistent with the work described in statement 33 above.

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

## Finding

SCE provided information consistent with the completion of work identified in Initiative 7.3.5.7: Remote Sensing Inspections of Vegetation around Distribution Electric Lines and Equipment.

## A.8 Initiative 7.3.5.8 Remote Sensing Inspections of Vegetation Around Transmission Electric Lines and Equipment

The purpose of this initiative is “to describe the electrical corporation’s methods for inspecting transmission rights-of-way using LiDAR.”<sup>118</sup>

## Statements, Supporting Information and Analysis, and Conclusions

### Statement 34

Statement: “SCE will continue using LiDAR in 2022 in accordance with SCE’s LiDAR inspection plan, and SCE expects at least 1,600 HFRA circuit miles to be inspected in 2022.”<sup>119</sup>

Supporting Information and Analysis: SCE provided an Excel file listing the circuit name, mileage, and completion date of LiDAR inspections of Transmission lines in 2022.<sup>120</sup> The Excel file indicates that SCE inspected 1,696 miles of Transmission lines using LiDAR in 2022.

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<sup>117</sup> Response to DR-226, question 60; attachment “Crowe-SCE-2022 SVM 01 Q. 060 Answer.pdf.”

<sup>118</sup> [2022 Wildfire Mitigation Plan Update Guidelines](#); attachment 2, p. 93 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=51912&shareable=true, accessed May 10,2024).

<sup>119</sup> [SCE’s 2022 WMP Update](#), p. 413 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=52051&shareable=true, accessed February 18, 2022).

<sup>120</sup> Response to DR-239, question 7; attachment “07\_Q.07\_IE03-SCE-2022 Transmission HFRA LiDAR Inspections.pdf.”

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

## Finding

SCE provided information consistent with the completion of work identified in Initiative 7.3.5.8: Remote Sensing Inspections of Vegetation Around Transmission Electric Lines and Equipment.

## A.9 Initiative 7.3.5.9 Other Discretionary Inspections of Vegetation Around Distribution Electric Lines and Equipment, Beyond Inspections Mandated by Rules and Regulations

The purpose of this initiative is to inspect “rights-of-way and adjacent vegetation that may be hazardous, which exceeds or otherwise go beyond those mandated by rules and regulations, in terms of frequency, inspection checklist requirements or detail, analysis of and response to problems identified, or other aspects of inspection or records kept.”<sup>121</sup>

## Statements, Supporting Information and Analysis, and Conclusions

### Statement 35

Statement: “SCE conducts detailed inspection and evaluation of trees outside of the compliance zone but still within striking distance that pose risks despite trimming and pruning, and appropriate mitigations up to removal of these trees.”<sup>122</sup>

Supporting Information and Analysis: SCE provided an Excel file indicating that 5,921 trees were inspected and prescribed work during SCE’s HTMP in 2022.<sup>123</sup> As stated in SCE’s 2022 WMP, the HTMP program was created “to address residual risk associated with green trees

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<sup>121</sup> [2022 Wildfire Mitigation Plan Update Guidelines](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=51912&shareable=true); attachment 2, p. 93 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=51912&shareable=true, accessed May 10, 2024).

<sup>122</sup> [SCE’s 2022 WMP Update](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=52051&shareable=true), p. 414 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=52051&shareable=true, accessed February 18, 2022).

<sup>123</sup> Response to DR-226, question 86; attachment “Q86 HTP 2022 Removals.xlsx.”

further away from the conductors.”<sup>124</sup> The provided information indicates that SCE evaluated and prescribed work to trees outside of the compliance zone but still within striking distance in 2022.

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

## Finding

SCE provided information consistent with the completion of work identified in Initiative 7.3.5.9: Other Discretionary Inspection of Vegetation Around Distribution Electric Lines and Equipment, Beyond Inspections Mandated by Rules and Regulations.

### A.10 Initiative 7.3.5.10 Other Discretionary Inspections of Vegetation Around Transmission Electric Lines and Equipment, Beyond Inspections Mandated by Rules and Regulations

The purpose of this initiative is to conduct “inspections of rights-of-way and adjacent vegetation that may be hazardous, which exceeds or otherwise go beyond those mandated by rules and regulations, in terms of frequency, inspection checklist requirements or detail, analysis of and response to problems identified, or other aspects of inspection or records kept.”<sup>125</sup>

## Statements, Supporting Information and Analysis, and Conclusions

In SCE’s 2022 WMP Update, Initiative 7.3.5.10 Other Discretionary Inspection of Vegetation Around Transmission Electric Lines and Equipment, Beyond Inspections Mandated by Rules and Regulations directs readers to Initiative 7.3.5.9.<sup>126</sup> Therefore, Energy Safety did not conduct a separate analysis of the work performed for this initiative.

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<sup>124</sup> [SCE’s 2022 WMP Update](#), p. 409

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

<sup>125</sup> [2022 Wildfire Mitigation Plan Update Guidelines](#); attachment 2, p. 93

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=51912&shareable=true>, accessed May 10, 2024).

<sup>126</sup> [SCE’s 2022 WMP Update](#), p. 415

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

## Finding

See the finding for Initiative 7.3.5.9.

### A.11 Initiative 7.3.5.11 Patrol Inspections of Vegetation Around Distribution Electric Lines and Equipment

The purpose of this initiative is to conduct “visual inspections of vegetation along rights-of-way that is designed to identify obvious hazards. Patrol inspections may be carried out in the course of other company business.”<sup>127</sup>

## Statements, Supporting Information and Analysis, and Conclusions

### Statement 36

Statement: “SCE performs supplemental vegetation inspections to verify certain circuits are free from vegetation encroachments into the minimum vegetation clearance distance. SCE assesses the need for patrols based on various risk factors and analyzes all methods of alternative patrols, selecting the most appropriate patrol based on the need for inspection. Supplemental vegetation inspections provide added assurance that vegetation encroachments will not occur during peak fire season and high wind conditions. These patrols include Canyon Patrols, Summer Readiness Verification Patrols, and Operation Santa Ana.”<sup>128</sup>

Supporting Information and Analysis: SCE provided a report and Excel file that detailed the total inspection units completed by each of SCE’s supplemental vegetation inspections in 2022. The report and Excel file indicate the following:

- 59 canyons were inspected during the Canyon Patrols Program.
- 66 structures were inspected during the Operation Santa Ana Program.
- 669 work points were inspected during the Summer Readiness Verification Program.

That report also described the various risk factors that were analyzed to select the most appropriate inspection types in 2022. The report included risk factors such as fire history, expected weather conditions, impact to SCE infrastructure, and ingress/egress issues as some

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<sup>127</sup> [2022 Wildfire Mitigation Plan Update Guidelines](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=51912&shareable=true); attachment 2, p. 93 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=51912&shareable=true, accessed May 10,2024).

<sup>128</sup> [SCE’s 2022 WMP Update](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=52051&shareable=true), p. 415 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=52051&shareable=true, accessed February 18, 2022).

risk factors considered during inspection planning in 2022.<sup>129</sup> The provided information indicates that SCE completed supplemental vegetation inspections in 2022, and that SCE considered various risk factors during SCE’s scheduling of each Inspection.

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

#### Statement 37

Statement: “Inspectors performing work for SCE’s ODI program throughout the year also inspect the structure for potential vegetation encroachments.”<sup>130</sup>

Supporting Information and Analysis: SCE provided four work orders from its Systems, Applications, and Products (SAP) reporting system generated from Overhead Detail Inspections (ODI). The examples indicate that inspectors performing ODI work reported vegetation encroachment issues using the SAP reporting system in 2022.<sup>131</sup>

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

#### Statement 38

Statement: “SCE has begun to implement a TRI model which prioritizes vegetation management inspections by the probability of ignition based on species, locations, etc. and Technosylva consequence. For example, SCE may identify locations where more, or less, frequent inspections are warranted and adjust inspection cycles accordingly.”<sup>132</sup>

Supporting Information and Analysis: SCE provided a table listing patrol inspection dates for 17 of SCE’s grids in 2022 and 2023. The file indicates that the 17 grids were assigned TRI rankings in 2022 and that 11 of the subsequent 2023 inspection dates were scheduled up to 3 months earlier in the year based on TRI rankings that were established in 2022.<sup>133</sup>

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

## Finding

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<sup>129</sup> Response to DR-226, question 64; attachment “Crowe-SCE-2022 SVM 01\_Q.64\_2022 Supplemental Mitigations.xlsx,” “Crowe-SCE-2022 SVM 01\_Q.64\_2022 Supplemental Mitigations.xlsx.”

<sup>130</sup> [SCE’s 2022 WMP Update](#), p. 415

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

<sup>131</sup> Response to DR-226, question 65; attachment “Q65 2022 SAP VM ODI Notifications.xlsx.”

<sup>132</sup> [SCE’s 2022 WMP Update](#), p. 416

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

<sup>133</sup> Response to DR-226, question 68; attachment “Crowe-SCE-2022 SVM 01 Q.068 Answer.pdf.”



SCE provided information consistent with the completion of work identified in Initiative 7.3.5.11: Patrol Inspections of Vegetation Around Distribution Electric Lines and Equipment.

## **A.12 Initiative 7.3.5.12: Patrol Inspections of Vegetation Around Transmission Electric Lines and Equipment**

The purpose of this initiative is to conduct “visual inspections of vegetation along rights-of-way that is designed to identify obvious hazards. Patrol inspections may be carried out in the course of other company business.”<sup>134</sup>

### **Statements, Supporting Information and Analysis, and Conclusions**

In SCE’s 2022 WMP Update, Initiative 7.3.5.12: Patrol Inspections of Vegetation Around Transmission Electric Lines and Equipment directs readers to Initiative 7.3.5.11.<sup>135</sup> Therefore, Energy Safety did not conduct a separate analysis of the work performed for this initiative.

### **Finding**

See the finding for Initiative 7.3.5.11.

## **A.13 Initiative 7.3.5.13 Quality Assurance / Quality Control of Vegetation Management**

The purpose of this initiative is the “establishment and function of audit process to manage and oversee the work completed by employees or contractors, including packaging QA/QC information for input to decision-making and workforce management processes. This includes identification of the percentage of vegetation inspections that are audited annually, as a program target, as a program target in Table 5.3-1.”<sup>136</sup>

### **Statements, Supporting Information and Analysis, and Conclusions**

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<sup>134</sup> [2022 Wildfire Mitigation Plan Update Guidelines](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=51912&shareable=true); attachment 2, p. 93 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=51912&shareable=true, accessed May 10,2024).

<sup>135</sup> [SCE’s 2022 WMP Update](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=52051&shareable=true), p. 416 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=52051&shareable=true, accessed February 18, 2022).

<sup>136</sup> [2022 Wildfire Mitigation Plan Update Guidelines](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=51912&shareable=true); attachment 2, p. 93-94 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=51912&shareable=true, accessed May 10,2024)..

**Statement 39**

Statement: “In Q1 of 2022, QC is transitioning to the TRI model, which is informed by Technosylva WRRM data...The TRI includes risk areas for both HFRA and non-HFRA.”<sup>137</sup>

Supporting Information and Analysis: SCE provided excerpts from its 2021 and 2022 “Annual QC Plans”.<sup>138</sup> The two excerpts include tables that divide SCE’s service territory into differing risk levels. A comparison of the tables from the 2021 and 2022 plan indicates that SCE transitioned from ranking the risk within its system using REAX scores in 2021 to using the TRI model in 2022. The table from the 2022 “Annual QC Plan” indicates the amount of line miles that were inspected during QC inspections in 2022 and disaggregates the inspection mileage into TRI risk ratings and HFRA and non-HFRA areas.<sup>139</sup> The provided information indicates that SCE transitioned to using the TRI model for QC inspections in 2022.

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

**Statement 40**

Statement: “In 2022, QC plans to inspect approximately 8,000 total circuit miles, of which approximately half of the miles will be selected from HFRA. In 2022, OEIS has requested that utilities report the Vegetation Inspections Audited Annually program target in terms of percentage of vegetation inspections audited. The QC plan set forth herein represents approximately 15% of the total tree inventory in SCEs service territory.”<sup>140</sup>

Supporting Information and Analysis: SCE included screenshots from its QC Power BI dashboard indicating that SCE inspected a total of 9,241 circuit miles in 2022, of which 5,535 miles were in HFRA.<sup>141</sup> The provided information indicates that SCE exceeded its goal to inspect approximately 8,000 total circuit miles, of which half of the miles in HFRA.

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

## Finding

SCE provided information consistent with the completion of work identified in Initiative 7.3.5.13: Quality Assurance / Quality Control of Vegetation Management.

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<sup>137</sup> [SCE’s 2022 WMP Update](#), p. 419

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

<sup>138</sup> Response to DR-226, question 69; attachment “Crowe-SCE-2022 SVM 01 Q. 069 Answer.pdf.”

<sup>139</sup> Response to DR-226, question 69; attachment “Crowe-SCE-2022 SVM 01 Q. 069 Answer.pdf.”

<sup>140</sup> [SCE’s 2022 WMP Update](#), p. 419

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

<sup>141</sup> Response to DR-226, question 70; attachment “Crowe-SCE-2022 SVM 01 Q. 070 Answer.pdf.”

## A.14 Initiative 7.3.5.14 Recruiting and Training of Vegetation Management Personnel

The purpose of this initiative is to facilitate “programs to ensure that the utility can identify and hire qualified vegetation management personnel and to ensure that both employees and contractors tasked with vegetation management responsibilities are adequately trained to perform vegetation management work, according to the utility’s wildfire mitigation plan, in addition to rules and regulations for safety. Include discussion of continuous improvement of training programs and personnel qualifications.”<sup>142</sup>

### Statements, Supporting Information and Analysis, and Conclusions

#### Statement 41

Statement: “For line clearing work, SCE requires any person supervising or advising pre-inspection activities in the field to be ISA-certified. For workers performing pre-inspections without supervision responsibilities, SCE requires a two-year degree or four years’ worth of field experience in arboriculture or related field.”<sup>143</sup>

Supporting Information and Analysis: SCE stated that it did not maintain copies of contractors’ certifications or degrees in 2022 since vegetation management pre-inspection work is performed by contract personnel. Further, SCE stated that contractors were expected to provide documentation of certifications or degrees to SCE upon request.<sup>144</sup> Energy Safety could not verify that pre inspectors and pre-inspection supervisors held the credentials listed by SCE in statement 41 above.

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

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<sup>142</sup> [2022 Wildfire Mitigation Plan Update Guidelines](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=51912&shareable=true); attachment 2, p. 94 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=51912&shareable=true, accessed May 10, 2024).

<sup>143</sup> [SCE’s 2022 WMP Update](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=52051&shareable=true), p. 421 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=52051&shareable=true, accessed February 18, 2022).

<sup>144</sup> Response to DR-226, question 72; attachment “Crowe-SCE-2022 SVM 01 Q.072 Answer.pdf.”

**Statement 42**

Statement: “SCE provides annual training to all vegetation management employees and vegetation contractor lead personnel, called “Utility Vegetation Management (UVM) Core Plans Training.”<sup>145</sup>

Supporting Information and Analysis: SCE provided a training agenda that included an outline for a UVM training program. The agenda indicates that the training was held over two days from January 10<sup>th</sup> through January 11<sup>th</sup> 2022, and covered topics related to vegetation management safety, and various SCE procedures (e.g., UVM-02, UVM-03, UVM-04, UVM-07, UVM-08, and UVM-14A/B).<sup>146</sup> The provided information indicates that SCE held a training for its vegetation management employees related to UVM in 2022.

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

**Statement 43**

Statement: “To address future needs and potential industry-wide shortages of ISA-certified arborists, SCE created a pipeline for future grooming of ISA-certified arborists with sufficient skills, knowledge and experience needed to support all SCE vegetation management activities. SCE started hiring experienced, but non-certified personnel as Specialists (SPs), with the intent that SPs will be mentored by SSPs in arboriculture and SCE program standards. After acquiring sufficient experience, the SPs will be prepared to take the required examinations to become ISA-certified.”<sup>147</sup>

Supporting Information and Analysis: SCE stated that since it does not utilize a tracking program during the mentoring process, SCE was unable to provide specific documentation of mentorship of Senior Specialists (SSPs) to SPs.<sup>148</sup> Without documentation of the mentorship process, Energy Safety was unable to verify that SCE had a program to mentor SPs in 2022.

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

**Statement 44**

Statement: “The goal for 2022 is to maintain the current staffing levels of certified arborists performing work within SCEs service territory (90-100 ISA certified arborists) across the

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<sup>145</sup> [SCE's 2022 WMP Update](#), p. 421

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

<sup>146</sup> Response to DR-226, question 74; attachment “Crowe-SCE-2022 SVM 01 074 – Attachment\_Redacted.”

<sup>147</sup> [SCE's 2022 WMP Update](#), p. 422

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

<sup>148</sup> Response to DR-226, question 76; attachment “Crowe-SCE-2022 SVM 01 Q. 076 Answer.pdf.”

various vegetation programs, unless work demands significantly change due to new regulatory requirements, or unforeseen labor constraints exist.”<sup>149</sup>

Supporting Information and Analysis: SCE stated that it “had approximately 40 ISA-certified arborists employed in the Vegetation Management organization in 2022. SCE also utilizes contract staff that are ISA certified; however, it does not maintain a count nor a list of their certifications.”<sup>150</sup> Without contract staff credentials, Energy Safety could not verify that 90-100 ISA certified arborists were employed in SCE’s various vegetation programs in 2022. Additionally, SCE failed to explain how it intended to maintain staffing levels of 90 to 100 ISA-certified arborists without records of 2022 contract staff credentials.

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

## Finding

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

## A.15 Initiative 7.3.5.15 Identification and remediation of “At-Risk Species”

The purpose of this initiative is “specific actions, not otherwise described in other WMP initiatives, taken to reduce the ignition probability and wildfire consequence attributable to “at-risk species”, such as trimming, removal, and replacement.”<sup>151</sup>

## Statements, Supporting Information and Analysis, and Conclusions

### Statement 45

Statement: “SCE manages at-risk species and implements clearances to reduce the probability of vegetation contacting electric facilities. One objective of this initiative is to avoid “grow-ins” into the area directly beneath the line by allowing a greater buffer for

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<sup>149</sup> [SCE’s 2022 WMP Update](#), p. 422

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

<sup>150</sup> Response to DR-226, question 77; attachment “Crowe-SCE-2022 SVM 01 Q.077 Answer.pdf.”

<sup>151</sup> [2022 Wildfire Mitigation Plan Update Guidelines](#); attachment 2, p. 94

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=51912&shareable=true>, accessed May 10, 2024).

individual tree growth rates that may be faster than typical or anticipated. Another objective is to reduce “blow-ins,” by reducing opportunity for nearby trees to shed limbs or branches that can blow into conductors, especially during heavy winds.”<sup>152</sup>

Supporting Information and Analysis: SCE provided excerpts from its Distribution Vegetation Management Plan, which provides procedural information related to prescribing tree work related to “Grow In”, and “Blow in” risk. The plan states that inspectors are required to prescribe work to any vegetation with “Blow In” or “Grow In” risk that is within 9’ of a conductor in HFTD areas. SCE also provided screenshots from an Excel file that identified the top ten potentially problematic tree species and specific attributes. The Excel file also includes species with greater “Grow in”, and “Blow In” risk.<sup>153</sup> The Distribution Vegetation Management Plan, and the list of top ten at-risk species indicates that SCE had a procedure to mitigate ignition risk from at risk species in 2022.<sup>154</sup>

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

#### Statement 46

Statement: “SCE has categorized tree inventory species within three growth rate selections (fast, medium, slow). In addition, SCE has documented the list of species contained in SCE’s service area that have historically caused problems such as TCCIs.”<sup>155</sup>

Supporting Information and Analysis: SCE provided an Excel file that identified approximately 1.56 million trees in SCE’s inventory and categorized them by the growth rates of Fast, Medium, Slow or Unknown.<sup>156</sup> Further, SCE provided screenshots from an Excel file that identified the top ten potentially problematic tree species and specific attributes that have historically resulted in Tree Caused Circuit Interruptions (TCCIs). According to these screenshots, the top ten problematic species included the following: Ailanthus, Ash, Athel/Salt Cedar, Bamboo, Eucalyptus, Mulberry, Palm Pepper, Poplar/Aspen/Cottonwood, and Vine.<sup>157</sup> The provided information indicates that SCE documented a list of species within its service territory that have caused TCCIs.

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

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<sup>152</sup> [SCE’s 2022 WMP Update](#), p. 423

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

<sup>153</sup> Response to DR-226, question 81; attachment “Crowe-SCE-2022 SVM 01 Q. 081 Answer.pdf.”

<sup>154</sup> Response to DR-226, question 79; attachment “Crowe-SCE-2022 SVM 01 Q. 079 Answer.pdf.”

<sup>155</sup> [SCE’s 2022 WMP Update](#), p. 423

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

<sup>156</sup> Response to DR-226, question 80; attachment “Tree Inventory Growth Rates.xlsx.”

<sup>157</sup> Response to DR-226, question 81; attachment “Crowe-SCE-2022 SVM 01 Q. 081 Answer.pdf.”

## Finding

SCE provided information consistent with the completion of work identified in Initiative 7.3.5.15: Identification Remediation of “At-Risk Species.”

### A.16 Initiative 7.3.5.16 Removal and Remediation of Trees with Strike Potential to Electric Lines and Equipment

The purpose of this initiative is "Actions taken to identify, remove, or otherwise remediate trees that pose a high risk of failure or fracture that could potentially strike electrical equipment.”<sup>158</sup>

## Statements, Supporting Information and Analysis, and Conclusions

### Statement 47

Statement: “SCE plans to continue HTMP program efforts in 2022 and plans to continue targeting 90% active inventory removal within six months of identification, subject to having access and authority, for HTMP program efforts.”<sup>159</sup>

Supporting Information and Analysis: SCE provided an Excel file indicating that 5,921 trees were inspected and prescribed work during SCE’s HTMP in 2022. Of those trees, nine were mitigated 185-246 days after inspection.<sup>160</sup> Based on this information, SCE removed nearly 100% of its active inventory of trees prescribed work during the HTMP program in 2022.

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

## Finding

SCE provided information consistent with the completion of work identified in Initiative 7.3.5.16: Removal and Remediation of Trees with Strike Potential to Electric Lines and Equipment.

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<sup>158</sup> [2022 Wildfire Mitigation Plan Update Guidelines](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=51912&shareable=true); attachment 2, p. 94 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=51912&shareable=true, accessed May 10,2024).

<sup>159</sup> [SCE’s 2022 WMP Update](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=52051&shareable=true), p. 426 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=52051&shareable=true, accessed February 18, 2022).

<sup>160</sup> Response to DR-226, question 86; attachment “Q86 HTP 2022 Removals.xlsx.”

## A.17 Initiative 7.3.5.17 Substation Inspections

The purpose of this initiative is to inspect “vegetation surrounding substations.”<sup>161</sup>

### Statements, Supporting Information and Analysis, and Conclusions

#### Statement 48

Statement: “SCE has 169 total substations in HFRA. Of these, substation inspections for the 146 substations reportable under CPUC GO 174 are performed a minimum of five times per year and will continue in 2022 and beyond. Substation inspections of the 23 substations subject to the CAISO-control and/or NERC reliability standards are also performed five times per year and will continue in 2022 and beyond.”<sup>162</sup>

Supporting Information and Analysis: SCE provided an Excel file listing 169 total substations in HFRA that were inspected in 2022.<sup>163</sup> For each substation, SCE included its corresponding HFRA Tier (Tier 2 or Tier 3), substation compliance type (GO 174 or ISO), total number of inspections, and the date of each inspection. The Excel file indicates that 146 of the substations, reportable under CPUC GO 174, were inspected at least five times in 2022. Similarly, all 23 substations subject to the CAISO-control and/or NERC reliability standards were inspected at least five times in 2022. Based on this data, SCE inspected all 169 substations five times in 2022 and inspected some substations more than five times, having conducted 1,283 substation inspections in 2022.

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

### Finding

SCE provided information consistent with the completion of work identified in Initiative 7.3.5.17: Substation Inspections.

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<sup>161</sup> [2022 Wildfire Mitigation Plan Update Guidelines](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=51912&shareable=true); attachment 2, p. 93 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=51912&shareable=true, accessed May 10,2024).

<sup>162</sup> [SCE's 2022 WMP Update](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=52051&shareable=true), p. 429 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=52051&shareable=true, accessed February 18, 2022).

<sup>163</sup> Response to DR-226, question 87; attachment “Crowe-SCE-2022 SVM 01\_Q. 87\_2022 Substation Inspection.xlsx.”



## A.18 Initiative 7.3.5.18 Substation Vegetation Management

The purpose of this initiative is to take actions “to reduce the ignition probability and wildfire consequences attributable to contact from vegetation to substation equipment.”<sup>164</sup>

### Statements, Supporting Information and Analysis, and Conclusions

#### Statement 49

Statement: “SCE will perform Vegetation Management substation inspections in Tier 2 & Tier 3 totaling 169 substations.”<sup>165</sup>

Supporting Information and Analysis: SCE provided an Excel file listing 169 total substations in HFRA that were inspected in 2022.<sup>166</sup> For each substation, SCE included its corresponding HFRA Tier (Tier 2 or Tier 3), substation compliance type (GO 174 or ISO), total number of inspections, and the date of each inspection. The Excel file indicates that SCE met its target.

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

### Finding

SCE provided information consistent with the completion of work identified in Initiative 7.3.5.18: Substation Vegetation Management.

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<sup>164</sup> [2022 Wildfire Mitigation Plan Update Guidelines](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=51912&shareable=true); attachment 2, p. 93 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=51912&shareable=true, accessed May 10, 2024).

<sup>165</sup> [SCE’s 2022 WMP Update](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=52051&shareable=true), p. 146 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=52051&shareable=true, accessed February 18, 2022).

<sup>166</sup> Response to DR-226, question 87; attachment “Crowe-SCE-2022 SVM 01\_Q. 87\_2022 Substation Inspection.xlsx.”

## A.19 Initiative 7.3.5.19 Vegetation Management System

The purpose of this initiative is “inputs, operation, and support for a centralized vegetation management enterprise system updated based upon inspection results and management activities such as trimming and removal of vegetation.”<sup>167</sup>

### Statements, Supporting Information and Analysis, and Conclusions

#### Statement 50

Statement: “SCE maintains multiple digital tools for Vegetation Management, including Collector/Survey 123 for line clearing inspections and FULCRUM for HTMP, Dead & Dying Tree Removal and Pole Brushing.”<sup>168</sup>

Supporting Information and Analysis: SCE provided a screenshot that showed several applications for vegetation management work within Collector/Survey 123.<sup>169</sup> For its Dead & Dying Tree Removal program, SCE provided documentation and images of select trees that were updated through Fulcrum.<sup>170</sup> SCE provided similar records for its Pole Brushing program, which contained information such as access constraints, QC completion, and contractor notes updated through Fulcrum.<sup>171</sup> SCE also provided documentation of Fulcrum updates for HTMP, which logged information such as customer requests and tree defects.<sup>172</sup> The provided information indicates that SCE maintained multiple digital tolls for vegetation management in 2022.

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

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<sup>167</sup> [2022 Wildfire Mitigation Plan Update Guidelines](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=51912&shareable=true); attachment 2, p. 94 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=51912&shareable=true, accessed May 10,2024).

<sup>168</sup> [SCE's 2022 WMP Update](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=52051&shareable=true), p. 431 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=52051&shareable=true, accessed February 18, 2022).

<sup>169</sup> Response to DR-226, question 90; attachment “Crowe-SCE-2022 SVM 01 Q.090 Answer.pdf.”

<sup>170</sup> Response to DR-226, question 90; attachment “Dead and dying Tree- 2022 Mitigation Example\_Redacted.pdf.”

<sup>171</sup> Response to DR-226, question 90; attachment “Structure Brushing 2022 Record\_Redacted.pdf.”

<sup>172</sup> Response to DR-226, question 90; attachment “HTMP 2022 Mitigation Example\_Redacted.pdf.”

**Statement 51**

Statement: “For 2022, SCE will implement the following programs within the VM Work Management Tool, Arbora: the Hazardous Tree Program (HTP) (including: Dead & Dying Tree Removal and Hazard Tree Mitigation) and Routine Line Clearing.”<sup>173</sup>

Supporting Information and Analysis: SCE provided three screenshots of the Work Management System (Arbora) and its integration with various vegetation management programs. The screenshots depicted an HTMP inspection with completion date of November 2022, a Dead and Dying Tree Removal inspection completed in April of 2022, and a Routine Line Clearing inspection from November 2022.<sup>174</sup> The provided information indicates that SCE integrated its HTP, Dead and Dying Removal inspections, and Routine Line Clearing into the Arbora software in 2022.

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

**Finding**

SCE provided information consistent with the completion of work identified in Initiative 7.3.5.19 Vegetation Management System.

## **A.20 Initiative 7.3.5.20 Vegetation Management to Achieve Clearances Around Electric Lines and Equipment**

The purpose of this initiative is “actions taken to ensure that vegetation does not encroach upon the minimum clearances set forth in Table 1 of GO 95, measured between line conductors and vegetation, such as trimming adjacent or overhanging tree limbs.”<sup>175</sup>

### **Statements, Supporting Information and Analysis, and Conclusions**

**Statement 52**

Statement: “To mitigate the risk of wildfire and reduce the probability and consequence of potential ignitions, vegetation management activities to maintain clearance distances from

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<sup>173</sup> [SCE's 2022 WMP Update](#), p. 432

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

<sup>174</sup> Response to DR-226, question 92; attachment “Crowe-SCE-2022 SVM 01 Q.092 Answer.pdf.”

<sup>175</sup> [2022 Wildfire Mitigation Plan Update Guidelines](#); attachment 2, p. 95

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=51912&shareable=true>, accessed May 10, 2024).

transmission and distribution lines and equipment are conducted in HFRA and non-HFRA. This work includes two distinct activities: (1) expanding clearances, where achievable, to GO 95 Rule 35E19 Appendix E recommendations; (2) maintaining expanded clearances from SCE's lines for trees that have previously been trimmed."<sup>176</sup>

Supporting Information and Analysis: SCE provided four tables from its Transmission Vegetation Management Plan and Distribution Vegetation Management Plan. These tables contain the clearance distance for each of the clearance distances described in statement 52 above, broken down between HFRA and non-HFRA areas.<sup>177</sup>

SCE also provided a table of SCE's average Grid Resiliency Clearance Distance (GRCD) achievement for all districts within SCE's service territory in 2022 as well as a screenshot from a Power BI dashboard of SCE's total average GRCD for 2022 by month.<sup>178</sup> The provided information indicates that SCE had documented procedures for attaining the clearance distances described in statement 52 above, and that audit results indicate that SCE achieved expanded clearance distances from tree work in 2022.

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

## Finding

SCE provided information consistent with the completion of work identified in Initiative 7.3.5.20: Vegetation Management to Achieve Clearances Around Electric Lines and Equipment.

## A.21 Initiative 7.3.5.21 Vegetation Management Activities Post-Fire

The purpose of this initiative is "activities or protocols that differentiate post-fire VM from programs described in other WMP initiatives; supporting documentation for the tool and/or standard the utility uses to assess the risk presented by vegetation post-fire; and how the utility includes fire-specific damage attributes into its assessment tool/standard."<sup>179</sup>

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<sup>176</sup> [SCE's 2022 WMP Update](#), p. 433

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

<sup>177</sup> Response to DR-226, question 93; attachment "Crowe-SCE-2022 SVM 01 Q. 093 Answer.pdf."

<sup>178</sup> Response to DR-226, question 96; attachment "Crowe-SCE-2022 SVM 01 Q. 096 Answer.pdf."

<sup>179</sup> [2022 Wildfire Mitigation Plan Update Guidelines](#); attachment 2, p. 95

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=51912&shareable=true>, accessed May 10, 2024).

## Statements, Supporting Information and Analysis, and Conclusions

### Statement 53

Statement: “In 2022, Vegetation Management will implement standard operating procedures for addressing post-fire work in a timely and more efficient manner. SCE will also evaluate how to standardize its process of documenting data collection related to post-fire work among existing programs, leading to more efficient use of resources and more complete data records.”<sup>180</sup>

Supporting Information and Analysis: SCE provided a copy of a manual published by SCE on October 24, 2022.<sup>181</sup> Energy Safety reviewed the IMT Storm Manual, which provides guidance to SCE Vegetation Management and contractors regarding storm response and mobilization. Specific topics included contractor mobilization, emergency action plans, and the Vegetation Management Strike Team organization roles and responsibilities.<sup>182</sup> The manual indicates that SCE implemented standard operating procedures for addressing emergency responses such as post-fire vegetation management activities in 2022.

To show how the data records will be completed toward more efficient use of resources, SCE also provided two Excel files listing completed inspections and tree work associated with restoration efforts following the Fairview and Wishon fires which occurred in SCE’s service territory in 2022.<sup>183</sup> The files indicate that SCE tracked vegetation management work associated with fire events in 2022.

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

### Statement 54

Statement: “SCE will also refine its contracts to secure more resources to respond to fire events. Lastly, SCE is developing general debris management strategies, partially informed by a Fuel Study expected for completion at the end of Q1 of 2022, to identify the appropriate methodologies to address dealing with fuel loads for 2023 and beyond.”<sup>184</sup>

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<sup>180</sup> [SCE’s 2022 WMP Update](#), p. 436

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

<sup>181</sup> Response to DR-226, question 97; attachment “VM\_IMTstormManual\_Version0\_Redacted.”

<sup>182</sup> Response to DR-226, question 97; attachment “VM\_IMTstormManual\_Version0\_Redacted.”

<sup>183</sup> Response to DR-226, question 98; attachment “Q98 Restoration Tracking Fairview Fire 2022 – Copy.xlsx,” “Q98 Restoration Tracking Wishon Fire 2022 – Copy.xlsx.”

<sup>184</sup> [SCE’s 2022 WMP Update](#), p. 436

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

Supporting Information and Analysis: SCE provided a copy of a “fire clean-up efforts contract” signed in 2022. The contract outlines employee qualifications, standard SCE protocol, and service requirements.<sup>185</sup>

SCE also provided a copy of a fuel study report completed by SCE’s consultant in 2022. The report includes a section on post fire fuel reduction activities, and recovery techniques to manage areas affected by fire.<sup>186</sup>

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

## Finding

SCE provided information consistent with the completion of work identified in Initiative 7.3.5.21: Vegetation Management Activities Post-Fire.

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<sup>185</sup> Response to DR-226, question 99; attachment “Crowe-SCE-2022 SVM 01\_Q.99\_CONFIDENTIAL\_UTS CW2270776 FIRE CLEAN UP\_executed.pdf.”

<sup>186</sup> Response to DR-226, question 100; attachment “Crowe-SCE-2022 SVM 01\_Q.100\_FullReportFuelMgmt.pdf.”

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