State of California – A Natural Resources Agency
Gavin Newsom, Governor

OFFICE OF ENERGY INFRASTRUCTURE SAFETY
715 P Street, 15th Floor | Sacramento, CA 95814
916.902.6000 | *www.energysafety.ca.gov*

Caroline Thomas Jacobs, Director

February 18, 2025

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

SUBJECT: Office of Energy Infrastructure Safety's Audit on Southern California Edison's Substantial 2023 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 Company's (SCE) 2023 vegetation management work pursuant to its 2023-2025 Wildfire Mitigation Plan.

Energy Safety found that SCE did not provide information consistent with the completion of the work required for three of the 13 vegetation management initiatives. SCE must submit its Corrective Action Plan response to the 2023 SVM docket[1] in Energy Safety's E-filing system within 30 days from the issuance of this audit. If you have any questions concerning this audit, please e-mail Karen McLaughlin (Karen.McLaughlin@energysafety.ca.gov) and provide a copy to Julie Rueckheim (Julie.Rueckheim@energysafety.ca.gov) and environmentalsciencedivision@energysafety.ca.gov.

Sincerely,

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

Cc:
Forest Kaser, CPUC

[1] All documents related to SCE's 2023 SVM audit are available on Energy Safety's e-filing under the "2023-SVM" docket and available here:
https://efiling.energysafety.ca.gov/EFiling/DocketInformation.aspx?docketnumber=2023-SVM

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

Attachment: Southern California Edison 2023 SVM Audit

OFFICE OF ENERGY INFRASTRUCTURE SAFETY

2023 SUBSTANTIAL VEGETATION MANAGEMENT AUDIT

SOUTHERN CALIFORNIA EDISON COMPANY

February 2025

TABLE OF CONTENTS

LIST OF TABLES

EXECUTIVE SUMMARY

The Office of Energy Infrastructure Safety (Energy Safety) completed an audit of Southern California Edison (SCE) Company's vegetation management commitments from its 2023-2025 Wildfire Mitigation Plan Update (WMP).[1] The SCE 2023-2025 WMP had 13 vegetation management initiatives in six programmatic areas. Energy Safety found that SCE did not provide information consistent with the completion of all work commitments for three of its 13 vegetation management initiatives.

For each audit finding for which Energy Safety determined SCE did not provide information supporting completion of all work commitments in a vegetation management initiative in the WMP, SCE must address that deficiency as part of a corrective action plan. SCE must title its response "Southern California Edison 2023 SVM Audit Corrective Action Plan" and submit the response on the 2023 SVM Docket in Energy Safety's E-Filing System within 30 days of receipt of this audit. Requirements for the response are discussed in Section 4 of this document.

Energy Safety is available to meet with SCE to discuss the audit findings and provide any clarification necessary for SCE to timely respond to Energy Safety's audit.

[1] SCE's 2023-2025 WMP (Rev. #1, October 26, 2023) (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55866&shareable=true).

1. OVERVIEW

Pursuant to Public Utilities Code section 8386.3(c)(5), 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). Specifically, the Vegetation Management and Inspections requirements audited in this document are in Section 8.2 of the WMP. Vegetation Management and Inspections include the following programmatic areas:

- Vegetation inspections
- Vegetation and fuels management
- Vegetation management enterprise system
- Quality assurance / quality control
- Open work orders
- Workforce planning

The WMP identifies the electrical corporation's objectives in each of these programmatic areas as well as the initiatives that will achieve the stated objectives. Initiatives include one or more specific work commitments. These commitments include both quantitative targets (e.g., completion of a specified number of inspections) and verifiable narrative statements (e.g., implementation of personnel training programs). Work commitments for each initiative may include only quantitative targets, both quantitative targets and narrative statements, or only narrative statements. Energy Safety assessed completeness of all relevant targets and statements.

The substantial vegetation management (SVM) audit includes Energy Safety's analysis of the electrical corporation's work products over the audit year and determines if the electrical corporation provided documentation sufficient to determine if all work commitments were completed for each initiative in its WMP. While the WMP lists the initiatives under programmatic headings, Energy Safety assessed work completion at the initiative level.

2023 Southern California Edison Company (SCE) Substantial Vegetation Management Audit

SCE submitted its final notification of completion of its SVM 2023 initiatives on December 29, 2023. [2]

Energy Safety has completed its SVM audit of SCE's vegetation management program activities for 2023. As part of the SVM audit process Energy Safety identified both quantitative targets and verifiable statements from Section 8.2 of the SCE 2023-2025 WMP. Energy Safety then compared the WMP vegetation management targets and statements to the work performed by SCE in 2023 using data request responses submitted by SCE. Normally, Energy Safety would also use SCE's Quarterly Data Reports (QDR), including spatial Geographic Information System (GIS) data and tabular Wildfire Mitigation Data, in its assessment of completion. The Data Guidelines require electrical corporations to submit QDRs and set forth the requirements for their preparation and submittal.[3] However, Energy Safety did not use the QDR in its assessment of completion of 2023 SVM initiatives because SCE acknowledged that there were inaccuracies in these data. In its response to Data Request #266, SCE stated: "SCE's Quarterly Data Report (QDR) should not be used to assess year-end work completion. The QDR provides a quarterly snapshot of progress, but the QDR process presents challenges that prevent combining data from all quarters at year end…. SCE prepares separate year-end evidence for the Annual Report on Compliance (ARC) and the Independent Evaluator (IE) Review. The 2023 iteration of this evidence, supporting year-end completion of each WMP target, has been provided to the IE and Energy Safety and is available upon request." [4] However, the Data Guidelines require SCE to submit a revision to previously submitted data when it identifies errors or updates at the next quarterly submission date.[5] While Energy Safety used SCE's updated data in the form of Data Request Responses for this audit, it is incumbent upon SCE to update QDR data in accordance with Data Guidelines to demonstrate that SCE completed all work and that work was appropriately documented and reported to Energy Safety.

---

[2] SCE Notification of Substantial Compliance VM 12_29_2023 (December 29, 2023), (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56135&shareable=true). SCE Notification of Substantial Compliance VM_10.20.23 (October 20, 2023), (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55851&shareable=true) SCE Notification of Substantial Compliance VM_09.25.2023 (September 25, 2023), (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55634&shareable=true). SCE Notification of Substantial Compliance VM_08.22.2023 (August 22, 2023), (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=54525&shareable=true).

[3] Energy Safety's Data Guidelines (version 3.0, December 14, 2022), p. 1 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53314&shareable=true).

[4] Data Request 266, Note; attachment: "ES266-SCE-2023-SVM-01_Q.01-Routine.xlsx."

[5] Energy Safety's Data Guidelines (version 3.0, December 14, 2022), p. 6 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53314&shareable=true).

Table 1 of this report includes a list of all vegetation management initiatives and Energy Safety's findings of whether SCE completed all required work.

The appendix includes a summary of targets and/or narrative statements, supporting information and analysis, conclusions, and findings for each initiative.

2. 2023 SVM AUDIT FINDINGS

The SCE 2023-2025 WMP had 13 vegetation management initiatives in six programmatic areas. Energy Safety's findings regarding completion of work for each initiative are shown in Table 1. Audit findings in bold indicate that SCE was unable to provide sufficient documentation demonstrating that all work was completed for that initiative. A detailed analysis of quantitative targets and narrative statements, supporting information, conclusions, and findings for each initiative are included in the appendix.

Table 1. SCE 2023 SVM Audit Findings

Programmatic Area	Vegetation Management Initiative	Audit Finding
8.2.2 Vegetation Management Inspections	8.2.2.1 - 8.2.2.4 Vegetation inspections	Completed all work
8.2.3 Vegetation Fuels Management	8.2.3.1 Pole clearing	Completed all work
8.2.3 Vegetation Fuels Management	**8.2.3.2 Wood and slash management**	**Did not complete all work**
8.2.3 Vegetation Fuels Management	**8.2.3.3 Clearance**	**Did not complete all work**
8.2.3 Vegetation Fuels Management	8.2.3.4 Fall-in Mitigation	Completed all work
8.2.3 Vegetation Fuels Management	8.2.3.5 Substation Defensible Space	Completed all work
8.2.3 Vegetation Fuels Management	8.2.3.6 High-Risk Species	Completed all work
8.2.3 Vegetation Fuels Management	8.2.3.7 Fire-resilient Rights-of-Way	Completed all work
8.2.3 Vegetation Fuels Management	8.2.3.8 Emergency Response Vegetation Management	Completed all work

Programmatic Area	Vegetation Management Initiative	Audit Finding
8.2.4 Vegetation Management Enterprise	8.2.4 Vegetation Management Enterprise System	Completed all work
8.2.5 Quality Assurance / Quality Control	8.2.5 Quality Assurance / Quality Control	Completed all work
8.2.6 Open Work Orders	**8.2.6 Open Work Orders**	**Did not complete all work**
8.2.7 Workforce Planning	8.2.7 Workforce Planning	Completed all work

3. 2023 SVM AUDIT CONCLUSION

Energy Safety reviewed the thirteen vegetation management initiatives in SCE's 2023-2025 WMP and found SCE provided documentation or information demonstrating it performed all work in 10 vegetation management initiatives but was unable to provide supporting documentation or information demonstrating completion of work described in statements and/or targets for the remaining three vegetation management initiatives.

For each audit finding for which Energy Safety determined SCE did not provide documentation or information demonstrating completion of all work in its vegetation management commitments, SCE must submit a response per the requirements outlined in Section 4 to Energy Safety within 30 days of receipt of this audit.

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

4. SCE AUDIT RESPONSE

SCE must provide Energy Safety with a response for each initiative in Table 1 with a finding of "did not complete all work" that includes a response addressing the following criteria as described in the Compliance Guidelines[6]:

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 compliance period, a detailed accounting of any corrective action measures implemented since the end of the 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. The response must be titled "The Southern California Edison Company's 2023 SVM Audit Corrective Action Plan YYYYMMDD".[7]

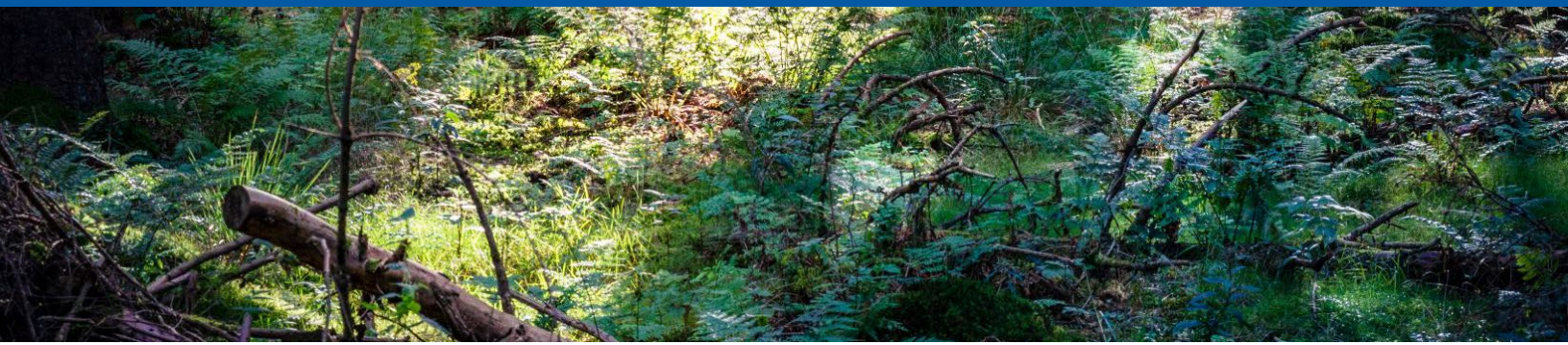
[6] Energy Safety Compliance Guidelines (September 2024), pgs. 12-13 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57320&shareable=true)

[7] "YYYYMMDD" represents the date of submission.

DATA DRIVEN
FORWARD-THINKING
INNOVATIVE
SAFETY FOCUSED

APPENDIX

WORK COMMITMENTS, SUPPORTING INFORMATION AND ANALYSIS, CONCLUSIONS, AND FINDINGS



APPENDIX SUMMARY

Energy Safety analyzed each of the 13 vegetation management initiatives listed in the Southern California Edison (SCE) Company's 2023-2025 WMP Update as part of this audit. Energy Safety identified the vegetation management work commitments, including quantitative targets and verifiable narrative statements, relevant to each initiative and compared that to the work performed by SCE in 2023. Determination of whether all work was complete for each initiative was based on documentation submitted by SCE. For any target or statement for which SCE was not able to provide supporting documentation or information to support completion, SCE must submit a response as part of a corrective action plan per the requirements outlined in Section 4.

INITIATIVE ANALYSIS

For each initiative in Section 8.2 (Vegetation Management and Inspections) of SCE 's 2023-2025 Wildfire Mitigation Plan (WMP), Energy Safety assessed completion of all quantitative targets and/or narrative statements. For each target/statement, Energy Safety documented the supporting information provided by SCE, Energy Safety's analysis of that information, and Energy Safety's conclusion regarding completion of work described by the target/statement. Energy Safety then provided a finding for each initiative. A finding of "Completed all work" was given only if SCE provided sufficient documentation or supporting information demonstrating completion of all targets and/or statements within that initiative. If any target or statement was incomplete or insufficiently documented, the overall finding for the initiative was "did not complete all work."

8.2.2 Vegetation Management Inspections

The purpose of this initiative was to describe the "Inspections of vegetation around and adjacent to electrical facilities and equipment that may be hazardous by growing, blowing, or falling into electrical facilities or equipment."[8]

8.2.2.1 Routine Line Clearing

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

SCE provided the following targets in its 2023-2025 WMP. [9] For ease of comparison, the WMP target and work completed is summarized below:

Initiative Activity	SCE's 2023 WMP Target	Actual Completed in 2023
Detailed Inspections - Distribution	770 grids	805 grids
Detailed Inspections - Transmission	416 circuits	440 circuits

Detailed Inspections – Distribution

Supporting Information and Analysis: SCE provided an Excel file listing the distribution grids where routine line clearing was inspected in 2023 which included the grid ID, grid name, inspection date, and HFTD categorization.[10] According to this file, SCE inspected 805 grids in 2023 along distribution lines in the High Fire Threat District (HFTD), thus exceeding its VM-7 target of inspecting 770 grids.

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

---

[8] Energy Safety's 2023-2025 Wildfire Mitigation Plan Technical Guidelines (December 6, 2022), p. A-24 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true).
[9] SCE's 2023-2025 WMP (Rev. #1, October 26, 2023), pp. 379-380 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55866&shareable=true). This table was modified for Energy Safety's data request to include statements and targets relevant to 2023.
[10] Data Request 266, Question 12; attachment: "10 VM Initiatives Year End Evidence_VM-7 Distribution Expanded Clearances Inspection.xlsx."

Detailed Inspections – Transmission

Supporting Information and Analysis: SCE provided an Excel file listing the transmission circuits where routine line clearing was inspected in 2023 and included the circuit ID, circuit name, inspection date and HFTD categorization.[11] According to this information, SCE inspected 440 circuits in 2023 along transmission lines in the HFTD, exceeding its VM-8 target of inspecting 416 circuits.

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

Narrative Statements, Supporting Information & Analysis, and Conclusion

Statement 1

Statement: "SCE performs annual inspections and trimming for clearance around conductors in accordance with applicable regulations and internal processes such as GO 95, PRC 4293 and SCE's Transmission Vegetation Management Plan (UVM-02) and Distribution Vegetation Management Plan (UVM-03)."[12]

Supporting Information and Analysis: SCE provided an Excel file listing all the vegetation management inspections and trims for clearance conducted in the HFRA in 2023 as a part of its Routine Line Clearing programs under VM-7 and VM-8.[13] Based on this file, SCE conducted 271,634 total routine line clearing inspections in 2023, of which 93% occurred along distribution lines and the remaining 7% along transmission. SCE mitigated 7,824 trees in 2023.[14]

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

Statement 2

Statement: "Additionally, SCE performs level 1 assessments to address fall-in risk. In level 1 assessments, the inspectors conduct an assessment from the side of the tree nearest to the

---

[11] Data Request 266, Question 12; attachment: "10 VM Initiatives Year End Evidence_VM-8 Transmission Expanded Clearances Inspection.xlsx."
[12] SCE's 2023-2025 WMP, (Rev. #1, October 26, 2023), p. 389 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55866&shareable=true).
[13] Data Request 266, Question 1; attachment: "ES266-SCE-2023-SVM-01_Q.01-Routine.xlsx."
[14] While Energy Safety finds that SCE provided documentation that it conducted inspections and trimming in furtherance of these requirements, this audit makes no findings as to full compliance with the laws and regulations cited.

electrical facilities, focusing on identifying obvious tree defects (e.g., dead branches or leaning) that are observable."[15]

Supporting Information and Analysis: SCE provided an Excel file identifying all trees in 2023 that received a level 1 assessment under the Routine Line Clearing program in HFRA. According to this file, SCE identified 500,019 trees along distribution lines (VM-7) and 67,526 trees along transmission lines (VM-8) that received a level 1 assessment during routine line clearing inspections and were prescribed for mitigation work in 2023.[16] SCE explained that all Routine Line Clearing inspections were considered level 1 assessments and focus on identifying tree defects that can be seen from the side of the tree nearest the electric facilities.[17] Energy Safety concluded that all work was completed associated with the level 1 assessments; however, analysis of work mitigating tree defects identified by these assessments is assessed under Initiative 8.2.3.4 Fall-In Mitigation.

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

Statement 3

Statement: "SCE also conducts supplemental patrols to help ensure that vegetation encroachments do not occur during peak fire season and high wind conditions. The risks are higher in certain locations, such as canyons, which experience higher winds. SCE also uses the TRI model to optimize and help reduce the need for supplemental patrols, which incorporates a number of risk factors into the POI value. SCE analyzes all methods of alternative patrols, selecting the most appropriate patrol based on the location-specific need for inspection."[18]

Supporting Information and Analysis: SCE provided an Excel file listing all supplemental patrols conducted in HFRA and the resulting mitigation work completed in 2023. [19] Based on this file, SCE completed 177 patrol inspections and completed 561 mitigations in 2023. The Excel file also included dates of inspection, inspection type, circuit, inspection clearance, and prescribed work completed. SCE noted that it generally considers peak 2023 fire season from May through October. During this timeframe, 154 (87%) inspections and 505 (90%) mitigations were completed; 23 inspections and 56 mitigations were completed outside of this timeframe.[20] Thus, SCE demonstrated that it conducted supplemental patrols and that

---

[15] SCE's 2023-2025 WMP, (Rev. #1, October 26, 2023), p. 389 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55866&shareable=true).
[16] Data Request 266, Question 2; attachment: "ES266-SCE-2023-SVM-01 Q. 02 Answer.pdf" and "Copy of ES266-SCE-2023-SVM-Q.02_Level1Inspections"
[17] Data Request 278, Question 2; attachment: "ES278-SCE-2023-SVM Q. 02 Answer.pdf."
[18] SCE's 2023-2025 WMP, (Rev. #1, October 26, 2023), pp. 390-391 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55866&shareable=true).
[19] Data Request 266, Question 3; attachment: "ES266-SCE-2023-SVM-01_Q.03.xlsx."
[20] Data Request 266, Question 3; attachment: "ES266-SCE-2023-SVM-01_Q.03 Answer.pdf."

the majority of these occurred during peak fire season and therefore performed work consistent with the statement.

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

Statement 4

Statement: "In 2023, SCE will introduce a new centralized tree inspection schedule for its three largest inspections programs: Routine Line Clearing, HTMP, and Dead & Dying Tree Removal. Historically, SCE has hired different inspection personnel for each program. With the new centralized tree inspection schedule, SCE will assign one inspection contractor company to inspect the entire designated district and apply the criteria for all three inspection programs, as needed."[21]

Supporting Information and Analysis: SCE provided an Excel file listing the 2022 and 2023 inspection schedules for the following programs: Routine Line Clearing, HTMP, and Dead and Dying Tree Removal.[22] According to the file, SCE streamlined its inspection schedule in 2023 such that one contractor company inspected the entire designated district (grid) for one inspection program, as opposed to assigning a different contractor to each inspection program, as was scheduled in 2022.

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

8.2.2.2 Hazard Tree Management Program

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

SCE provided the following target in its 2023-2025 WMP. [23] For ease of comparison, the WMP target and work completed is summarized below:

Initiative Activity	SCE's 2023 WMP Target	Actual Completed in 2023
Hazard Tree Management Program (HTMP)	412 grids/circuits	427 grids/circuits

[21] SCE's 2023-2025 WMP, (Rev. #1, October 26, 2023), p. 392 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55866&shareable=true).
[22] Data Request 266, Question 4; attachment: "ES266-SCE-2023-SVM-01_Q.04 2022-2023 MS_REDACTED.xlsx."
[23] SCE's 2023-2025 WMP, (Rev. #1, October 26, 2023), pp. 379-380 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55866&shareable=true). This table was modified for Energy Safety's data request to include statements and targets relevant to 2023.

Supporting Information and Analysis: SCE provided an Excel file listing the grids and circuits inspected as part of SCE's Hazard Tree Management Program (HTMP) in 2023 and included the inspection date, grid/circuit ID and name, and HFTD tier.[24] According to the information in this file, SCE inspected 63 transmission circuits and 364 distribution grids in 2023, thus inspecting a total of 427 grids/circuits as part of the HTMP. The WMP noted that in 2023, SCE's HTMP program for distribution assets was on a grid basis and not a circuit basis;[25] transmission assets were reported on a circuit basis. The WMP did not specify how many of each type of asset should be inspected, only that the inspection scope and frequency were driven by the Tree Risk Index (TRI) model. Therefore, SCE completed work consistent with its VM-1 target of 412 grids/circuits associated with the HTMP.

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

Narrative Statements, Supporting Information & Analysis, and Conclusion

Statement 5

Statement: "HTMP inspectors use the Tree Risk Calculator (TRC) to document tree defects and likelihood of failure and target impact. The certified arborist assigns a risk score based on six criteria: (1) Voltage Impact; (2) Fire Impact; (3) Likelihood of Impact; (4) Tree Lean; (5) Tree Height Factor; and (6) Site Condition Attributes. The final scoring results can range from 1-100 (100 being the highest risk score)."[26]

Supporting Information and Analysis: SCE provided an Excel file, generated from its Arbora and Fulcrum work management systems, of the HTMP risk assessments conducted in 2023.[27] The Excel file included the risk assessment date, outcome (prune, removal, or no work required on "subject tree"), HFTD designation, risk score, and defects / conditions identified. According to this file, SCE conducted 57,781 total risk assessment inspections, of which 34,632 assessment inspections (60%) were recorded in Arbora and the remaining 23,149 inspections (40%) were recorded in the Fulcrum database. Of the total risk assessment inspections conducted, 56,068 trees (97%) were categorized as subject trees and did not require work while the remaining 1,701 trees (3%) were identified as hazardous and required removal or pruning activities. SCE noted that some of the data provided in this file did not transfer correctly during the data transfer and software updates between the Fulcrum to

[24] Data Request 266, Question 18; attachment: "10 VM Initiatives Year End Evidence_VM-1 Hazard Tree Management Program Inspection.xlsx."
[25] SCE's 2023-2025 WMP, (Rev. #1, October 26, 2023), p. 394, footnote 202. (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55866&shareable=true).
[26] SCE's 2023-2025 WMP, (Rev. #1, October 26, 2023), p. 394 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55866&shareable=true).
[27] Data Request 266, Question 5; attachment: "ES266-SCE-2023-SVM-01_Q.05 and Q.06.xlsx."

Arbora data management systems; however, all of the work was accounted for by referring to both databases.[28]

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

8.2.2.3 Dead and Dying Tree Removal Program

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

SCE provided the following target in its 2023-2025 WMP. [29] For ease of comparison, the WMP target and work completed is summarized below:

Initiative Activity	SCE's 2023 WMP Target	Actual Completed in 2023
Dead and Dying Tree Removal Program	509 grids/circuits	567 grids/circuits

Supporting Information and Analysis: SCE provided an Excel file listing the grids and circuits inspected as part of SCE's Dead and Dying Tree Removal Program (HTMP) in 2023 and included the inspection date, grid/circuit ID and name, and HFTD tier.[30] According to the information in this file, SCE inspected 63 transmission circuits and 504 distribution grids in 2023, thus inspecting a total of 509 grids/circuits as part of the Dead and Dying Tree Removal Program. The WMP noted that in 2023, SCE's Dead and Dying Tree Program for distribution assets was on a grid basis and not a circuit basis;[31] transmission assets were reported on a circuit basis. The WMP did not specify how many of each type of asset should be inspected, only that the inspection scope and frequency were driven by the Tree Risk Index (TRI) model. Therefore, SCE completed work consistent with its VM-4 target of 509 grids/circuits associated with the HTMP

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

Narrative Statements, Supporting Information & Analysis, and Conclusion

---

[28] Data Request 278, Question 5; attachment: "ES278-SCE-2023-SVM Q. 05 Answer.pdf."
[29] SCE's 2023-2025 WMP, (Rev. #1, October 26, 2023), pp. 379-380 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55866&shareable=true). This table was modified for Energy Safety's data request to include statements and targets relevant to 2023.
[30] Data Request 266, Question 4; attachment: "ES266-SCE-2023-SVM-01_Q.04 2022-2023 MS_CONFIDENTIAL
[31] SCE's 2023-2025 WMP, (Rev. #1, October 26, 2023), p. 394, footnote 202. (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55866&shareable=true).

Statement 6

Statement: "SCE uses its ground crews to patrol its HFRA to identify dead and dying trees for removal in its Dead and Dying Tree Removal Program. A tree is classified as dead when the canopy has declined 75% or greater and/or is significantly infected with bark beetles or other invasive insects. After an inspection is performed and the prescription is generated, SCE will remove the tree consistent with industry practice. This is discussed further below in Section 8.2.3.4 Fall-In Mitigation."[32]

Supporting Information and Analysis: SCE provided an Excel file listing all dead and dying trees identified during its dead and dying tree removal inspection program in 2023 and included the tree's coordinates, patrol date, work type (removal), work/mitigation completion date, and HFTD designation. [33] Based on this Excel file, SCE identified 6,644 dead and dying trees, of which approximately 28% were subsequently removed in 2023. Under Initiative 8.2.2, Energy Safety was only assessing the completion of identification of dead and dying trees during inspection, not the removal timeframes or completion which were evaluated under Initiative 8.2.3.4 Fall-In Mitigation.

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

[32] SCE's 2023-2025 WMP, (Rev. #1, October 26, 2023), p. 397 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55866&shareable=true).
[33] Data Request 266, Question 8; attachment: "ES266-SCE-2023-SVM-01_Q.08-D&D.xlsx."

8.2.2.4 Remote Sensing Inspections: LiDAR

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

SCE provided the following targets in its 2023-2025 WMP.[34] For ease of comparison, the WMP target and work completed is summarized below:

Initiative Activity	SCE's 2023 WMP Target	Actual Completed in 2023
LiDAR Distribution Vegetation Inspections	1,020 HFRA circuit miles	1,066 HFRA circuit miles
LiDAR Transmission Vegetation Inspections	1,820 HFRA circuit miles	2,113 HFRA circuit miles

Supporting Information and Analysis: SCE provided Excel files indicating that it conducted LiDAR inspections along approximately 1,066 Distribution and 2,113 Transmission circuit miles, spanning 63 Distribution and 141 Transmission circuit sites, respectively.[35] Both files included the inspection date, circuit name, and number of miles inspected per circuit. Thus, SCE exceeded both of its LiDAR vegetation inspection targets related to the number of HFRA circuit miles along distribution (VM-9) and transmission (VM-10) lines.

SCE also provided an Excel file listing the LiDAR vegetation inspections and mitigation work completed in 2023 during supplemental patrols in HFRA.[36] Based on this file, SCE conducted 19 supplemental patrols via LiDAR in 2023 and mitigated 53 trees as a result.

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

Finding- 8.2.2 Vegetation Management Inspections

SCE provided information consistent with the completion of work identified in Initiative 8.2.2 Vegetation Management Inspections.

---

[34] SCE's 2023-2025 WMP, (Rev. #1, October 26, 2023), pp. 379-380 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55866&shareable=true). This table was modified for Energy Safety's data request to include statements and targets relevant to 2023.

[35] Data Request 266, Question 9; attachments: "10 VM Initiatives Year End Evidence_VM-9 Distribution LiDAR Inspections.xlsx" and "10 VM Initiatives Year End Evidence_VM-10 Transmission LiDAR Inspections.xlsx."

[36] Data Request 266, Question 9; attachment: "ES266-SCE-2023-SVM-01_Q.03.xlsx."

8.2.3.1 Vegetation and Fuels Management- Pole Clearing

The purpose of this initiative is to describe the "Plan and execution of vegetation removal around poles per Public Resources Code section 4292 and outside the requirements of Public Resources Code section 4292 (e.g., pole clearing performed outside of the State Responsibility Area)."[37]

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

SCE provided the following target in its 2023-2025 WMP. [38] For ease of comparison, the WMP target and work completed is summarized below:

Initiative Activity	SCE's 2023 WMP Target	Actual Completed in 2023
Structure Brushing (PRC 4292 exempt structures only)	63,700 structures	88,904 structures

Supporting Information and Analysis: SCE provided an Excel file listing all structures inspected in HFRA, excluding poles subject to PRC 4292, which included the pole ID, inspection (clearing) date, inspection (clearing) results, and location.[39] According to this file, SCE cleared 88,904 poles that were exempt from PRC 4292 in 2023, exceeding its Structure Brushing (VM-2) target.

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

Finding- 8.2.3.1 Pole Clearing

SCE provided information consistent with the completion of work identified in initiative 8.2.3.1 Pole Clearing.

---

[37] Energy Safety's 2023-2025 Wildfire Mitigation Plan Technical Guidelines (December 6, 2022), p. A-24 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true).
[38] SCE's 2023-2025 WMP, (Rev. #1, October 26, 2023), p. 379 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55866&shareable=true). This table was modified for Energy Safety's data request to include statements and targets relevant to 2023.
[39] Data Request 266, Question 11; attachment: "ES266-SCE-2023-SVM-01_Q.11-SB.xlsx."

8.2.3.2 Vegetation and Fuels Management-Wood and Slash Management

The purpose of this initiative was to take actions "to manage all downed wood and "slash" generated from vegetation management activities."[40]

Narrative Statements, Supporting Information & Analysis, and Conclusion

Statement 7

Statement: "SCE's contract crews strive to remove all wood and material resulting from mitigation for Routine Line Clearing, Structure Brushing, HTMP, and the Dead and Dying Tree Program typically within 100 feet of a dirt or paved road, subject to site conditions. On private property, crews will typically strive to remove all wood, providing that crews are able to maneuver and operate their equipment close enough to the area (e.g., skid steers)."[41]

Supporting Information and Analysis: SCE provided screenshot images from its database and excerpts from Statement of Works (SOWs) of wood and slash management associated with the following programs: 1) Routine Line Clearing, 2) Structure Brushing, 3) HTMP, and 4) Dead and Dying Tree Removal.[42]

1) Routine Line Clearing Program – SCE provided a screenshot image from its vegetation management work management system documenting the removal of vegetation for five locations in 2023. The screenshot included the date of completion, type of property, and mitigation activity performed. SCE also included an excerpt from its SOW that requires vendors to properly cleanup and dispose of vegetation debris.

2) Structure Brushing Program – SCE included an excerpt from its SOW, which states that contractors were responsible for managing and disposing of vegetation debris and that they must haul away excessive brush that would require stacking and/or present a hazard on the same date.

3) HTMP Program – SCE provided a screenshot image from its vegetation management work management system documenting the removal of vegetation debris for five locations as part of the HTMP Program in 2023. SCE also included an excerpt from its SOW that requires vendors to properly cleanup and dispose of vegetation debris.

---

[40] Energy Safety's 2023-2025 Wildfire Mitigation Plan Technical Guidelines (December 6, 2022), p. A-24 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true).
[41] SCE's 2023-2025 WMP, (Rev. #1, October 26, 2023), p. 411 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55866&shareable=true).
[42] Data Request 266, Question 13; attachment: "ES266-SCE-2023-SVM-01_Q.13 Answer.pdf."

4) Dead and Dying Tree Removal Program – SCE provided a screenshot image from its vegetation management work management system documenting the removal of vegetation debris for five locations as part of the Dead and Dying Tree Removal Program in 2023. SCE also included an excerpt from its SOW that requires vendors to properly cleanup and dispose of vegetation debris.

In its WMP, SCE used the phrases "strive to remove" and "typically remove" when referring to activities related to wood and slash management. Energy Safety interprets phrases including this language as SCE committing to remove debris unless the debris cannot be removed due to constraints beyond SCE's control, such as being unable to "maneuver and operate [the] equipment" in the area or when material was on private property.

SCE stated the debris clearing work was completed by contractors and was not tracked in its database. While the screenshot images and SOW excerpts indicate that some work was completed, Energy Safety could not confirm that debris was removed in all or most instances. Failure to remove wood and slash debris following tree trimming and removal activities would contribute to unnecessary risk on the system. Therefore, documenting those activities is necessary to demonstrate that SCE met the objective of the WMP. For Energy Safety to determine debris clearing was completed, SCE must submit documentation demonstrating that wood and slash resulting from mitigation work for Routine Line Clearing, Structure Brushing, HTMP Program, and the Dead and Dying Tree Program was removed from the site except when beyond SCE's control, and if constraints prevented removal, SCE should provide detail describing the circumstances. Without this documentation, Energy Safety could not conclude that the work was completed.

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

Finding- 8.2.3.2 Wood and Slash Management

SCE did not provide information consistent with the completion of work identified in initiative 8.2.3.2 Wood and Slash Management. While SCE could demonstrate some work was done to satisfy the commitments in this initiative, Energy Safety was unable to verify that the work was typically completed. In its CAP response, SCE should provide documentation from its vegetation management system showing all instances of wood and slash removal, including instances where material was not removed due to constraints.

8.2.3.3 Vegetation and Fuels Management- Clearance

The purpose of this initiative was to take actions "after inspection to ensure that vegetation does not encroach upon electrical equipment and facilities, such as tree trimming."[43]

Routine Line Clearing

Statement 8

Statement: "At a minimum, SCE's Routine Line Clearing work within HFRA maintains at least the required four feet clearance for Distribution lines and the required 10 feet clearance for Transmission lines for a full annual inspection cycle."[44]

Supporting Information and Analysis: SCE provided an Excel file documenting the clearances work along distribution and transmission lines within the HFRA in 2023, which included the inspection date, clearance completion date, fire risk rating, and clearance designation (GRCD, CCD, TCD, RCD, or Non-Compliant).[45,46] Based on this file, SCE conducted 125,596 total inspections of its distribution and transmission lines in HFRA in 2023. Of the 125,596 total inspections conducted, 10 prescribed trees were non-compliant post clearance. Because the statement committed to maintaining the minimum required clearance (RCD) for all trees in HFRA, Energy Safety concluded that not all work was completed, although the number of trees that were out of compliance was relatively small.

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

8.2.3.3.1 Expanded Clearing

Narrative Statements, Supporting Information & Analysis, and Conclusion

Statement 9

Statement: "In HFRA, SCE strives to obtain expanded clearances of 12 feet for Distribution lines, and 30 feet for Transmission lines... Where [Grid Resiliency Clearance Distance (GRCD)] has been achieved historically, SCE strives to maintain the expanded clearance thereafter."[47]

---

[43] Energy Safety's 2023-2025 Wildfire Mitigation Plan Technical Guidelines (December 6, 2022), p. A-24 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true).
[44] SCE's 2023-2025 WMP, (Rev. #1, October 26, 2023), pp. 412-413 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55866&shareable=true).
[45] Data Request 266, Question 15; attachment: "ES266-SCE-2023-SVM-01_Q.15-RLC Clearance.xlsx."
[46] In order, the listed acronyms stand for Grid Resiliency Clearance Distance, Compliance Clearance Distance, Trigger Clearance Distance, and Regulation Clearance Distance.
[47] SCE's 2023-2025 WMP, (Rev. #1, October 26, 2023), pp. 412-413 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55866&shareable=true).

Supporting Information and Analysis: SCE provided an Excel file documenting the clearances and expanded clearances achieved along distribution and transmission lines within the HFRA in 2023, which included the inspection date, clearance completion date, fire risk rating, and clearance designation (GRCD, CCD, TCD, RCD, or Non-Compliant).[48,49] Based on this file, SCE conducted 125,596 total inspections of its distribution and transmission lines in HFRA in 2023. Of the 125,596 total inspections conducted, 12,932 inspections (10%) met GRCD during the initial inspection clearance, indicating that SCE made an effort to obtain expanded clearances on its distribution and transmission lines.

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

8.2.3.3.2 Expanded Clearances for Legacy Facilities

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

SCE provided the following target in its 2023-2025 WMP. [50] For ease of comparison, the WMP target and work completed is summarized below:

Initiative Activity	SCE's 2023 WMP Quantitative Target	Actual Completed in 2023
Expanded Clearances for Generation Legacy Facilities	50 sites	63 sites

Supporting Information and Analysis: SCE provided an Excel file listing all Legacy Facilities inspected and treated in 2023, which included the completion date, location, and facility name.[51] According to this file, SCE treated 63 Legacy Facilities in 2023, all of which were rated with a High Fire Threat District (HFTD) tier risk score. SCE also included screenshot images and records from ArcGIS, the system that maintains records of treated sites, of the 63

[48] Data Request 266, Question 15; attachment: "ES266-SCE-2023-SVM-01_Q.15-RLC Clearance.xlsx."
[49] In order, the listed acronyms stand for Grid Resiliency Clearance Distance, Compliance Clearance Distance, Trigger Clearance Distance, and Regulation Clearance Distance.
[50] SCE's 2023-2025 WMP, (Rev. #1, October 26, 2023), p. 378 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55866&shareable=true).This table was modified for Energy Safety's data request to include statements and targets relevant to 2023.
[51] Data Request 266, Question 16; attachment: "10 VM Initiatives Year End Evidence_VM-3 Expanded Clearances Legacy Facilities Inspections.xlsx."

Generation Legacy Facilities treated in 2023.[52] [53] These images and records included the treatment completion date, location, and facility name in addition to the work order number, land ownership type, and inspector comments, if applicable.

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

Finding 8.2.3.3 Clearance

SCE provided information consistent with completion of work identified for 8.2.3.3.1 Expanded Clearing and 8.2.3.3.2 Expanded Clearances for Legacy Facilities. However, SCE did not maintain minimum clearances for distribution and transmission lines in its Routine Line Clearing Program. Therefore, Energy Safety concluded that SCE did not complete all work related to initiative 8.2.3.3 Clearance. The CAP response should address the non-compliance of the 10 trees that did not meet the minimum clearance requirements.

[52] SCE's 2023-2025 WMP, (Rev. #1, October 26, 2023), pp. 667 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55866&shareable=true).

[53] Data Request 266, Question 16; attachment: "ES266-SCE-2023-SVM-01_Q.16 Answer.pdf."

8.2.3.4 Vegetation and Fuels Management- Fall-in Mitigation

The purpose of this initiative was to take actions "to identify and remove or otherwise remediate trees that pose a high risk of failure or fracture that could potentially strike electrical equipment."[54]

8.2.3.4.1 Hazard Tree Management Program (HTMP)

Narrative Statements, Supporting Information & Analysis, and Conclusion

Statement 10

Statement: From Section 8.2.2.2: "Depending on the inspector's assessment results, a tree is classified into one of two categories: (1) a subject tree which does not need mitigation but is added to SCE's tree inventory for continued monitoring or (2) a hazard tree needing mitigation (trim) or removal…SCE performs inspections using a risk-based approach encompassed in the TRI model, as described in the below section Frequency or Trigger. Based on the results of the inspection, SCE generates prescriptions and performs the required remediations."[55]

Supporting Information and Analysis: The SCE WMP states that the HTMP was focused on SCE's HFRA service area.[56] SCE provided two Excel files of the 2023 risk assessment inspections and patrols conducted in HFRA (also referenced in section 8.2.2.3 Dead and Dying Tree Removal Program[57]) that identified trees within strike potential in this area. These records were from both the Arbora and Fulcrum databases, which included the risk assessment date, patrol date, high fire threat, location, outcome (prune, removal, no work required on "subject tree"), HFTD designation, risk score, and defects / conditions identified.[58] The data in these files demonstrated that SCE tracked trees with strike potential in HFRA and mitigated the risk, thus completing the work commitment in this statement.

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

---

[54] Energy Safety's 2023-2025 Wildfire Mitigation Plan Technical Guidelines (December 6, 2022), p. A-24 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true).
[55] *SCE's 2023-2025 WMP, (Rev. #1, October 26, 2023), p. 394-395 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55866&shareable*=true).
[56] SCE's 2023-2025 WMP, (Rev. #1, October 26, 2023), p. 395 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55866&shareable=true).
[57] Data Request 266, Question 8; attachment: "ES266-SCE-2023-SVM-01_Q.08-D&D.xlsx and ES266-SCE-2023-SVM-01 Q.08 Answer"
[58] Data Request 266, Question 18 and Question 8; attachment: "ES266-SCE-2023-SVM-01 Q.18.xlsx, ES266-SCE-2023-SVM-01_Q.08-D&D.xlsx, and ES266-SCE-2023-SVM-01 Q.08 Answer"

8.2.3.4.2 Dead and Dying Tree Removal Program

Statement 11

Statement: "Under this [Dead and Dying Tree Removal] program, SCE conducts patrols in HFRA to identify and remove dead, dying, or diseased trees affected by drought conditions and/or insect infestation. All trees that are identified within strike distance of SCE overhead facilities that are dead or expected to die within one year are prescribed for removal."[59]

Supporting Information and Analysis: SCE provided an Excel file listing all dead and dying trees identified during its dead and dying tree removal inspection program in 2023, which included the tree's coordinates, patrol date, work type (removal), work/mitigation completion date, and HFTD designation. [60] According to this Excel file, SCE identified 6,644 dead and dying trees in 2023, of which 1,883 trees (28%) were subsequently removed in 2023. According to the two work management systems and excluding trees with no mitigation completion dates, SCE removed dead and dying trees recorded in Fulcrum within an average of 231 days and trees recorded in Arbora within an average of 147 days following the initial patrol inspection. Energy Safety concluded that SCE identified all the dead and dying trees and removed the trees within one year, performing work consistent with that identified in this statement.

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

Finding- 8.2.3.4 Fall-in Mitigation

SCE provided information consistent with the completion of work for initiative 8.2.3.4 Fall-in Mitigation.

[59] SCE's 2023-2025 WMP, (Rev. #1, October 26, 2023), p. 419 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55866&shareable=true).
[60] Data Request 266, Question 8; attachment: "ES266-SCE-2023-SVM-01_Q.08-D&D.xlsx."

8.2.3.5 Vegetation and Fuels Management- Substation Defensible Space

The purpose of this initiative was to take actions "to reduce ignition probability and wildfire consequence due to contact with substation equipment."[61]

Narrative Statements, Supporting Information & Analysis, and Conclusion

Statement 13

Statement: "SCE inspects vegetation around its substations for potential risks from encroachment or blow-in or fall-in hazards and manages vegetation around its substations by performing pruning, removal, and weed abatement. The primary risk to be mitigated is vegetation contact with energized conductors and equipment, as well as preventing fire damage to substations."[62]

Supporting Information and Analysis: SCE provided an Excel file listing all the inspections it conducted around its substations and included the inspection dates, substation ID and name, HFRA categorization, number of inspections per substation, work order records, and prescribed work identified in 2023.[63] According to this file, SCE completed 1,252 total inspections on all 167 substations. As a result of these substation inspections, SCE identified 165 mitigations needed and documented completion of prescribed work such as crown reductions, pruning, and tree removals.

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

Finding- 8.2.3.5 Substation Defensible Space

SCE provided information consistent with the completion of work identified in initiative 8.2.3.5 Vegetation and Fuels Management- Substation Defensible Space.

---

[61] Energy Safety's 2023-2025 Wildfire Mitigation Plan Technical Guidelines (December 6, 2022), p. A-25 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true).
[62] SCE's 2023-2025 WMP, (Rev. #1, October 26, 2023), p. 421 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55866&shareable=true).
[63] Data Request 266, Question 19; attachment: "ES266-SCE-2023-SVM-01_Q.19.xlsx."

8.2.3.6 Vegetation and Fuels Management-High-Risk Species

The purpose of this initiative was to take actions "to reduce the ignition probability and wildfire consequence attributable to high-risk species of vegetation."[64]

Narrative Statements, Supporting Information & Analysis, and Conclusion

Statement 12

Statement: "Additionally, all fast-growing species in grow-in zones are targeted for removal, if possible, when the species has the capacity to encroach into the clearance distance. When practical, SCE removes immature vegetation in the drop-in zone (e.g., overhangs) within HFRA and removes or makes safe palms that have the potential to dislodge fronds."[65]

Supporting Information and Analysis: SCE provided an Excel file documenting all instances where SCE removed fast-growing species in grow-in zones and immature vegetation in the drop-in zones within the HFRA in 2023, which included the work completion date, species type, and vegetation growth rate.[66] According to this file, SCE removed 854 fast-growing species identified for removal in 2023, including but not limited to, Eucalyptus, Athel, Ash, Bamboo, and Palm varieties, which was consistent with the work commitment in this statement.

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

Finding- 8.2.3.6 High Risk Species

SCE provided information consistent with the completion of work identified in 8.2.3.6 High-Risk Species under initiative 8.2.3.

[64] Energy Safety's 2023-2025 Wildfire Mitigation Plan Technical Guidelines (December 6, 2022), p. A-25 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true).
[65] SCE's 2023-2025 WMP, (Rev. #1, October 26, 2023), p. 421 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55866&shareable=true).
[66] Data Request 266, Question 20; attachment: "ES266-SCE-2023-SVM-01_Q.20_Fast Growing Species.xlsx."

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

The purpose of this initiative was to take actions "to promote vegetation communities that are sustainable, fire-resilient, and compatible with the use of the land as an electrical corporation right-of-way."[67]

Narrative Statements, Supporting Information & Analysis, and Conclusion

Statement 13

Statement: "SCE's Fuel Management Program demonstrates SCE's commitment to wildfire safety through active management of Rights-of-Way (ROW) and reduction of hazardous fuel loading on the landscape that is not captured by routine VM operations… SCE currently manages several pilot programs, that if successful and subject to an assessment of constraints and feasibility, may be incorporated into this initiative in future years. Several of these pilot programs have been implemented in conjunction with environmentally approved Integrated Vegetation Management (IVM) practices." [68]

Supporting Information and Analysis: In its WMP, SCE listed a number of pilot programs it planned to initiate to enhance its Fuel Management Program: the herbicide program (and related ROW Low Growth Program), hydroseeding, goat grazing, and tree growth regulators,[69] SCE documented progress on the following pilot programs:

Herbicide/ROW Low Growth Program: In its data request response, SCE explained the Herbicide program was the same as the ROW Low Growth Program. SCE provided an Excel file that documented all instances in 2023 where SCE employed pre-emergent herbicide treatment on parcels within its Transmission Rows.[70] The Excel file included the site name, parcel size, treatment date, and county. Based on this file, SCE applied pre-emergent herbicides on 256 parcels across approximately 1,133 acres. Additionally, SCE explained that because of the total acreage treated, "no additional follow up vegetation work was required for these parcels in 2023 (i.e., mowing, hand-clearing, post-emergency herbicide)."[71]

Hydroseeding: In its data request response, SCE explained this program was under assessment and had potential to be incorporated in the future, however, in 2023 "SCE

---

[67] Energy Safety's 2023-2025 Wildfire Mitigation Plan Technical Guidelines (December 6, 2022), p. A-25 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true).
[68] SCE's 2023-2025 WMP, (Rev. #1, October 26, 2023), p. 422(https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55866&shareable=true).
[69] SCE's 2023-2025 WMP, (Rev. #1, October 26, 2023), p. 423 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55866&shareable=true).
[70] Data Request 266, Question 22; attachment: "ES266-SCE-2023-SVM-01_Q.22-ROW Low Growth.xlsx."
[71] Data Request 266, Question 22; attachment: "ES266-SCE-2023-SVM-01_Q.22 Answer.pdf."

determined the use of hydroseeding was not a feasible vegetation management program and was not a sustainable treatment method based on certain weather and climate characteristics in SCE's service area."[72]

Goat Grazing: In its data request response, SCE explained that it utilized goat grazing in two passes on SCE's private forest land around the Balsam Forebay area from (1) July to August and (2) October to November in 2023. SCE noted that the goats grazed about 60 total acres and targeted various species, including Willow, Ponderosa Pine, White Fir, and more. Additionally, SCE provided screenshot images of invoices SCE received for the two goat grazing passes conducted. [73]

Tree Growth Regulators (TGR): In its data request response, SCE explained it piloted this program in the City of Visalia on 410 TGR treated trees out of a total of 650 trees in the control group. The goal was to reduce growth and the need for trims from October 2021 through January 2024. However, according to the provided images of the list of species with growth rate records, SCE determined the TGR material did not achieve the desired results to reduce growth, and the pilot program was discontinued in March of 2024.

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

Finding- 8.2.3.7 Fire-Resilient Right-of-Way

SCE provided information consistent with the completion of work identified in initiative Vegetation and Fuels Management- Fire Resilient Right-of-Ways.

[72] Data Request 310, Question 1; attachment: "ES310-SCE-2023-SVM Q. 01 Answer.pdf"
[73] Data Request 266, Question 22; attachment: "ES266-SCE-2023-SVM-01_Q.22 Answer.pdf."

8.2.3.8 Vegetation and Fuels Management- Emergency Response Vegetation Management

The purpose of this initiative was the "planning and execution of vegetation activities in response to emergency situations including weather conditions that indicate an elevated fire threat and post-wildfire service restoration."[74]

Narrative Statements, Supporting Information & Analysis, and Conclusion

Statement 14

Statement: "As part of mitigating increased wildfire risk, SCE performs incremental vegetation inspections and remediations in certain locations within its HFRA during the fire season based on weather conditions and other factors."[75]

Supporting Information and Analysis: In its WMP, SCE noted that it conducts its Emergency Response Vegetation Management activities within its inspection and line clearing programs (relating to VM-7 and VM-8).[76] SCE provided an Excel file listing all the Routine Line Clearing inspections conducted in 2023 along Distribution (VM-7) and Transmission (VM-8) lines within the HFRA and in designated Areas of Concern (AOC) during fire season.[72] According to this file, SCE inspected a total of 26,571 sites comprising of 14,403 distribution sites (VM-7) and 12,168 transmission sites (VM-8), which included 4,403 mitigations in AOCs along distribution lines and 63 mitigations along transmission lines. The total number of prescribed mitigations showed to be 38,694 for both distribution and transmission sites that include AOCs and non-AOCs.[77] While the Excel file documents work done within the fire season, SCE noted that "vegetation management inspections do not document weather conditions at the time of inspection."[78] However, the lack of documentation on weather conditions did not detract from the objective of this initiative. Because the statement indicates this work in HFRA during fire season was in response to weather conditions and other factors, SCE could better represent this work if those factors are included in future data submittals related to this initiative.

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

---

[74] Energy Safety's 2023-2025 Wildfire Mitigation Plan Technical Guidelines (December 6, 2022), p. A-25 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true).
[75] SCE's 2023-2025 WMP, (Rev. #1, October 26, 2023), p. 424 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55866&shareable=true).
[76] SCE's 2023-2025 WMP, (Rev. #1, October 26, 2023), p. 424 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55866&shareable=true).
[77] Data Request 266, Question 23; attachment: "ES266-SCE-2023-SVM-01_Q.23_FireSeasonInspections.xlsx."
[78] Data Request 266, Question 23; attachment: "ES266-SCE-2023-SVM-01_Q.23 Answer.pdf."

Finding- 8.2.3.8 Emergency Response Vegetation Management

SCE provided information consistent with the completion of work identified in Initiative 8.2.3.8: Vegetation and Fuels Management- Emergency Response Vegetation Management.

8.2.4 Vegetation Management Enterprise System

The purpose of this initiative was to describe the "Operation of and support for centralized vegetation management and inspection enterprise system(s) updated based upon inspection results and activities such as hardening, maintenance, and remedial work."[79]

Narrative Statements, Supporting Information & Analysis, and Conclusion

Statement 15

Statement: "Throughout 2023, SCE will transition from legacy work management systems to the Arbora system… Arbora, a Salesforce-based platform, is being developed to integrate programs from Survey123 and Fulcrum into a single work management system. SCE began integrating HTMP and the Dead and Dying Tree Program inventory data into Arbora in 2022 and will incorporate Routine VM inspection data in 2023…. The primary systems that Arbora integrates with are SAP and GIS (consolidated geographic information system). All integrations are documented in the Solution Architecture Document for the Arbora application. SCE is currently integrating Arbora with other systems, primarily for purposes related to Vegetation Management reporting. SCE is integrating Arbora with Snowflake, which SCE plans to use for operational reporting. Snowflake allows for a greater degree of reporting for Arbora along with legacy data from previous work management systems. "[80]

Supporting Information and Analysis: In its WMP, SCE committed to a multi-year transition from its legacy work management system to a more comprehensive work management system that integrates across its asset and vegetation management workstreams. SCE provided a screenshot image from its vegetation management work management tool, Arbora, highlighting the emergent work process flow.[81] SCE explained that it enabled its SAP (Systems, Applications & Products) risk model software notifications related to emergent work in November 2023. In addition to the process flow, the image showed the acceptance criteria used to create the notifications and priority level. SCE also included a screenshot image of the production validation process, which enables emergent E1/E2 SAP notifications in Arbora. Thus, SCE met its VM-6 target associated with enhancing Arbora capabilities related to emergent tree work and maintenance in 2023. SCE also provided documentation demonstrating its efforts to integrate Arbora with Snowflake, by providing a screenshot image of an example Snowflake query from October 2023, which pulls data across multiple SCE systems.[82] SCE also provided a screenshot image of SCE's Landing page, which leads

---

[79] Energy Safety's 2023-2025 Wildfire Mitigation Plan Technical Guidelines (December 6, 2022), p. A-25 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true).
[80] SCE's 2023-2025 WMP, (Rev. #1, October 26, 2023), p. 427 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55866&shareable=true).
[81] Data Request 266, Question 24; attachment: "ES266-SCE-2023-SVM-01_Q.24 Answer.pdf."
[82] Data Request 266, Question 24; attachment: "ES266-SCE-2023-SVM-01_Q.25 Answer.pdf."

users to Power BI dashboards (i.e., Routine, HTP) generated from Snowflake queries.[83] Thus, SCE provided sufficient documentation to demonstrate that it has continued the process of integrating its distinct work management systems, which will ultimately result in increased capability in managing both its vegetation management and asset management workstreams. As the program matures, Energy Safety will continue to evaluate the completion of this integration in future audit years.

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

Finding- 8.2.4 Vegetation Management Enterprise System

SCE provided information consistent with the completion of work identified in Initiative 8.2.4 Vegetation Management Enterprise System.

[83] Data Request 266, Question 24; attachment: "ES266-SCE-2023-SVM-01_Q.25 Answer.pdf."

8.2.5 Quality Assurance and Quality Control

The purpose of this initiative was to describe the "Establishment and function of audit process to manage and confirm work completed by employees or contractors, including packaging QA/QC information for input to decision-making and related integrated workforce management processes."[84]

Targets, Supporting Information, and Analysis

SCE provided the following targets in its 2023-2025 WMP. [85] For ease of comparison, the WMP target and work completed is summarized below:

Activity Being Audited	2023 Target Pass Rate	Actual 2023 Pass Rate
Distribution Vegetation Management Plan	RCD[86] Target Pass Rate is 100% CCD[87] Target Pass Rate is 95%	RCD Pass Rate = 100% CCD Pass Rate = 98%
Transmission Vegetation Management Plan	RCD Target Pass Rate is 100% CCD Target Pass Rate is 95%	RCD Pass Rate = 100% CCD Pass Rate = 99%
Dead & Dying Tree Removal	100% remediation	100% remediated
HTMP	100% remediation	100% remediated

Supporting Information and Analysis: Thes pass rates and sampling strategies were described in more detail in procedure UVM-07 ("Post Work Verification and UVM Program"[88] and section

[84] Energy Safety's 2023-2025 Wildfire Mitigation Plan Technical Guidelines (December 6, 2022), p. A-25 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true).
[85] SCE's 2023-2025 WMP, (Rev. #1, October 26, 2023), pp. 431-432 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55866&shareable=true). This table was modified for Energy Safety's data request to include statements and targets relevant to 2023.
[86] Definition: Regulation Clearance Distance (RCD).
[87] Definition: Compliance Clearance Distance (CCD).
[88] UVM-07: "Post Work Verification and UVM Program Oversight".

8.2.5 Quality Assurance and Quality Control of the 2023-2025 WMP.[89] SCE noted that the target pass rate (or AQL[90]) for RCD is 100% and the AQL for CCD is 95%.

Distribution Vegetation Management Plan – SCE provided a table of RCD and CCD pass rates and a screenshot image of its QC Performance Dashboard which tabulated monthly distribution clearance pass rates.[91] According to the dashboard, SCE inspected a total of 368,543 trees along its distribution lines in 2023 and 1226 trees did not meet the acceptance criteria for RCD and 6255 did not meet the acceptance criteria for CCD, which resulted in RCD and CCD pass rates of 100% and 98%, respectively. Thus, SCE met its target pass rates associated with its Distribution Vegetation Management Plan.

Transmission Vegetation Management Plan – SCE provided a table of RCD and CCD pass rates and a screenshot image of its QC Performance Dashboard which tabulated monthly transmission clearance pass rates.[92] According to the dashboard, SCE inspected 10,825 trees along its transmission lines in 2023 and 14 did not meet the RCD acceptance criteria and 72 did not meet the CCD acceptance criteria, which resulted in RCD and CCD pass rates of 100% and 99%, respectively. Thus, SCE met its target pass rates associated with its Transmission Vegetation Management Plan.

Dead & Dying Tree Removal – SCE provided an Excel file listing all the QC removal verifications performed in 2023 as part of the Dead and Dying Tree Removal Program.[93] According to this file, SCE verified removals of 2,696 trees in 2023. Thus, SCE met its 100% QC verification target associated with the Dead and Dying Tree Removal Program.

Hazard Tree Management Program (HTMP) – SCE provided an Excel file listing all the QC removal verifications performed in 2023 as part of the HTMP.[94] Based on this file, SCE verified removals of 634 trees. Thus, SCE met its 100% QC verification target associated with the HTMP.

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

---

[89] SCE's 2023-2025 WMP, (Rev. #1, October 26, 2023), pp. 428- 432. (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55866&shareable=true). This table was modified

[90] Definition: Acceptable Quality Level (AQL)- Is the maximum number of nonconforming products considered acceptable in a particular sample size based on business, financial and safety levels.

[91] Data Request 266, Question 29; attachment: "ES266-SCE-2023-SVM-01_Q.29 Answer.pdf."

[92] Data Request 266, Question 29; attachment: "ES266-SCE-2023-SVM-01_Q.29 Answer.pdf."

[93] Data Request 266, Question 29; attachment: "ES266_Q29_HTP_QC_Removals.xlsx."

[94] Data Request 266, Question 29; attachment: "ES266_Q29_HTP_QC_Removals.xlsx."

Narrative Statements, Supporting Information & Analysis, and Conclusion

Statement 16

Statement: "For VM's Hazard Tree and Dead and Dying Tree programs, 100% QC is performed to verify the remediation was performed. Additionally, for SCE's Hazard Tree program, independent QC tree assessments are performed to provide assurance the assessments performed by the Hazard Tree assessments are accurate."[95]

Supporting Information and Analysis: SCE provided an Excel file listing all the QC removal verifications performed in 2023 as part of its Hazard Tree and Dead and Dying Tree programs.[96] Based on this file, SCE conducted 100% of the QC verifications for the 3,330 trees removed in 2023. Additionally, SCE provided an Excel file listing the independent QC risk assessments performed in 2023 and included the grid and tree id, QC completion date, QC risk scores, species identified, and location coordinates.[97] Based on this file, the 5,149 independent QC risk assessments performed in 2023 had an average risk score of 38, ranging in risk scores from 0 to 78, showing that SCE performed the independent QC tree assessments consistent with the work commitment in this statement.

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

Statement 17

Statement: "QC will target to inspect PRC 4292 Distribution Structures using a CL[98]/CI[99] of 99/2%, approximately 330 structures monthly."[100]

Supporting Information and Analysis: To achieve a CL/CI of 99/2%, SCE used "calculator.net" to determine an appropriate sampling size. A CL/CI of 99/2% for 50,000 to 100,000 items results in a sample size ranging from 3841 to 3995 per year, or approximately 320 to 332 samples monthly. SCE provided two Excel files containing results from QC inspections conducted on structures subject to PRC 4292 in 2023. Based on these files, SCE conducted 3,027 total QC inspections from March to December 2023, of which 1,582 structures (52%) completed inspection. SCE averaged about 303 QC inspections per month of PRC 4292

---

[95] SCE's 2023-2025 WMP, (Rev. #1, October 26, 2023), p. 429 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55866&shareable=true).
[96] Data Request 266, Question 26; attachment: "ES266_Q26_HTP_QC_Removals.xlsx."
[97] Data Request 266, Question 26; attachment: "ES266_Q26_HTP_QC_Independent.xlsx."
[98] Confidence Level (CL): Is the amount of uncertainty considered tolerable. The higher the CL, the more certain the results. With a CL of 95%, one would expect an error one in 20 times. With a CL of 99%, one would expect an error one in 100 times.
[99] Confidence Interval/Margin of Error (CI) – Is the amount of error that is considered tolerable.
[100] SCE's 2023-2025 WMP, (Rev. #1, October 26, 2023), pp. 429-430 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55866&shareable=true).

structures (March through December), or 324 QC inspections per month when excluding the month of December due to holidays.[101] Although individual monthly inspections of 330 structures were not always achieved, between March and November 2023, SCE performed QC inspections on a monthly average of 324 structures which met the objective of sampling at CL/CI of 99/2%."[102]

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

Statement 18

Statement: "QC findings are tabulated using a dashboard system that identifies conformance rate and specific locations where work is performed and by the specific contractor. Monthly reports are generated documenting the results of the QC inspections in addition to monthly performance review meetings where performance in general is discussed."[103]

Supporting Information and Analysis: SCE provided a screenshot image of its QC Performance Dashboard depicting its 2023 QC findings in a tabulated format.[104]

SCE explained that the monthly performance reports were generated based on data from the QC Performance Dashboard and included a screenshot image of example monthly QC and performance results for a Pre-Inspection Contractor.[105] Based on this example, the Pre-Inspection Contractor inspected 130,921 total trees and had an overall RCD and CCD pass rate of 100% and 100%, respectively. The Dashboard also depicts monthly RCD and CCD performance scores based on the contractor's performance, the missed rate, inflation rate, and work type accuracy by month.

SCE stated that it conducted 12 contractor meetings each month in 2023 with each of the six pre-inspection and six tree trimming contractors, respectively. SCE provided screenshot images of email correspondence between SCE and a pre-inspection contractor and tree trimming contractor.[106] The emails included the contractor's respective performance scorecards for the month of August and summarized the contractors' individual safety, quality, and compliance scores. SCE explained that these emails were sent to its contractors in preparation for their performance review meetings in September 2023. [107]

---

[101] Data Request 266, Question 27; attachments: "March through June 2023 QC.xlsx" and "July through December 2023 QC.xlsx."
[102] Data Request 278, Question 7; attachment: "ES278-SCE-2023-SVM Q. 07 Answer.xlsx"

[103] SCE's 2023-2025 WMP, (Rev. #1, October 26, 2023), p. 430 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55866&shareable=true).
[104] Data Request 266, Question 28; attachment: "WS266-SCE-2023-SVM-01 Q.28 Answer.pdf."
[105] Data Request 266, Question 28; attachment: "WS266-SCE-2023-SVM-01 Q.28 Answer.pdf."
[106] Data Request 266, Question 28; attachment: "WS266-SCE-2023-SVM-01 Q.28 Answer.pdf."
[107] Data Request 266, Question 28; attachment: "WS266-SCE-2023-SVM-01 Q.28 Answer.pdf."

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

Finding- 8.2.5 Quality Assurance and Quality Control

SCE provided information consistent with the completion of work identified in Initiative 8.2.5 Quality Assurance and Quality Control.

8.2.6 Open Work Orders

The purpose of this initiative was to describe the "Actions taken to manage the electrical corporation's open work orders resulting from inspections that prescribe vegetation management activities."[108]

Narrative Statements, Supporting Information & Analysis, and Conclusion

For the following WMP statements, SCE stated this vegetation management scope in the WMP were limited to HFRA. SCE also stated that it did not consider the various time frames (24 hours, 72 hours, 30 days, 90 days, and 180 days) associated with SCE's Threat Management procedure, UVM-08, official vegetation management initiatives or targets for SCE's 2023-2025 WMP (including the 2023 annual cycle). SCE also noted that it "strives to meet these internal time frames contingent on not having constraints preventing work completion." [109] However, while these may not be official targets for SCE, due to the potential ignition risk, Energy Safety assessed completion of the work orders in statements 19-23 within these timeframes to ensure that SCE met the overall objective of the WMP, which is to minimize wildfire risk.

Statements 19-23 refer to specific timeframes for committed work. For comparison these tables are summarized in the table below:[110]

P1 Remediation in HFRA		P2 Remediation in HFRA	
Proposed Hazard	**Remediation Timeline**	**Activity or Program**	**Remediation Timeline**
Vegetation Contact	24 Hours	Closer than regulatory distance, beyond 18"	30 days
Vegetation within 18"	72 Hours	Routine Line Clearance	90 days
		HTMP/Dead and Dying Tree	180 days

[108] Energy Safety's 2023-2025 Wildfire Mitigation Plan Technical Guidelines (December 6, 2022), p. A-25 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true).
[109] Data Request 278, Question 30; attachment: "ES278-SCE-2023-SVM Q. 30 Answer.pdf."
[110] SCE's 2023-2025 WMP, (Rev. #1, October 26, 2023), pp. 432-435 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55866&shareable=true). This table was modified for Energy Safety's data request to include statements and targets relevant to 2023.

Statement 19

Statement: "SCE endeavors to remediate P1s where there is vegetation contact or evidence of contact (e.g., scarring or burn marks) within 24 hours."[111]

Supporting Information and Analysis: SCE provided an Excel file listing all the P1 trees identified in HFRA areas in 2023 and the identification date, condition identified, type of remediation completed, remediation date, fire risk categorization, and location. According to this file, SCE identified 4,012 P1 trees, of which 2,260 P1s (56%) were remediated within 24 hours, and 952 P1s (24%) were remediated outside of the 24-hour time frame (between 2 and 483 days following their identification date), and 800 P1s (20%) had a reported work completion date that occurred before the inspection date. [112] SCE stated this pre-date entry occurs when the tree trimmer completed the work in the field before the notification was entered into SCE's administrative system. Because 952 P1 trees were mitigated outside 24 hours, SCE did not complete the work commitments in this statement.

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

Statement 20

Statement: "SCE endeavors to remediate P1s in HFRA only, where vegetation is within approximately 18 inches of energized equipment and thus an imminent threat, but there is no evidence of actual contact (e.g., scarring or scorch marks) within 72 hours."[113]

Supporting Information and Analysis: SCE provided an Excel file listing all the P1 trees identified in the HFRA in 2023 and included the identification date, condition identified, type of remediation completed, remediation date, fire risk categorization, and location. According to this file, SCE identified 828 P1 trees within 18 inches of equipment which were remediated within 72 hours, 32 trees that were remediated outside the 72-hour time frame, and 232 P1 trees that reported a work completion date before the reported inspection date. [114] SCE stated this pre-date entry occurs when the tree trimmer completed the work in the field before the notification was entered into SCE's administrative system.[115] Because 32 P1 trees

---

[111] SCE's 2023-2025 WMP, (Rev. #1, October 26, 2023), p. 433 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55866&shareable=true).
[112] Data Request 266, Question 30 and Question 31; attachments: "WS266-SCE-2023-SVM-01_Q30-33.xlsx and ES266-SCE-2023-SVM-01 Q.31 Answer.pdf."

[113] SCE's 2023-2025 WMP, (Rev. #1, October 26, 2023), p. 433 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55866&shareable=true).
[114] Data Request 266, Question 30 and Question 31; attachments: "WS266-SCE-2023-SVM-01_Q30-33.xlsx and ES266-SCE-2023-SVM-01 Q.31 Answer.pdf."

[115] Data Request 266, Question 31; attachment: "WS266-SCE-2023-SVM-01_Q30-33.xlsx."

were mitigated outside the 72 hour time frame, SCE did not complete the work commitments in this statement.

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

Statement 21

Statement: "SCE endeavors to remediate P2s when vegetation is closer than the regulatory required distance (e.g., four feet) but beyond 18 inches within 30 days."[116]

Supporting Information and Analysis: SCE provided an Excel file listing all P2 trees identified in the HFRA in 2023, which included the identification date, condition identified, type of remediation completed, remediation date, fire risk categorization, and location.[117] The file indicated that SCE identified 6,427 P2 trees and 58 of those P2 trees were closer than the regulatory required distance of four feet. SCE remediated 24 of these P2 trees within 30 days and eight out of the 24 trees had a reported work completion date that occurred before the inspection date. [118] SCE stated this pre-date entry occurs when the tree trimmer completed the work in the field before the notification was entered into SCE's administrative system. Because 26 P2 trees closer than the regulatory distance were not mitigated within 30 days, SCE did not complete the work commitments in this statement.

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

Statement 22

Statement: "For all other P2s related to Routine Line Clearing, SCE endeavors to remediate them within 90 days, unless there is a limited timeframe triggered by permitting requirements or customer requests."[119]

Supporting Information and Analysis: SCE provided an Excel file listing all the P2 trees related to Routine Line Clearing in 2023, which included the identification date, vegetation condition, type of remediation completed, remediation date, fire risk categorization, and location.[120] SCE identified 6,427 P2 trees, of which 5,211 (81%) were remediated within 90 days, 1,154 (18%) were remediated outside of the 90-day time fame, 46 (1%) were not completed, and 16

---

[116] SCE's 2023-2025 WMP, (Rev. #1, October 26, 2023), p. 434 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55866&shareable=true).
[117] Data Request 266, Question 32; attachment: "WS266-SCE-2023-SVM-01_Q30-33.xlsx."
[118] Data Request 266, Question 30 and Question 31; attachments: "WS266-SCE-2023-SVM-01_Q30-33.xlsx and ES266-SCE-2023-SVM-01 Q.31 Answer.pdf."

[119] SCE's 2023-2025 WMP, (Rev. #1, October 26, 2023), p. 434 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55866&shareable=true).
[120] Data Request 266, Question 33; attachment: "WS266-SCE-2023-SVM-01_Q30-33.xlsx."

had a reported work completion date that occurred before the inspection date.[121] SCE stated this pre-date entry occurs when the tree trimmer completed the work in the field before the notification was entered into SCE's administrative system.[122] Because 1,154 trees were not mitigated within 90 days, SCE did not complete the work commitments in this statement.

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

Statement 23

Statement: "For P2s related to HTMP and the Dead and Dying Tree Removal Program, SCE endeavors to address them within 180 days. Currently SCE addresses these based on a first-in/first-out methodology but starting in 2023 SCE anticipates utilizing Tree Risk Calculator scores to help prioritize P2 work orders based on the various conditions that the score incorporates, such as root defects, cracks, rot, pest infestations, lean, height, and fire impact."[123]

Supporting Information and Analysis: SCE provided an image of its HTMP remediation timeline table from UVM-08 (Managing Vegetation threats) and an Excel document showing record data from both the Arbora and Fulcrum databases, which included P2 HTMP and Dead and Dying Tree Removal (DRI) tree record data entries. In total for HTMP, there were 1,685 trees and out of those entries 352 trees were remediated within 180 days. The Dead and Dying Tree Removal (DRI) data contained a total of 6,618 trees and out of those entries 1,727 trees were remediated within 180 days. SCE explained the remediation timeline applies to both HTMP and Dead and Dying Tree programs and stated it strives to remediate Priority 2 (P2) "Hazard and Dead and Dying Trees" with a risk score of 50-100 within 180 days contingent on there being no constraints related to environmental hold, customer refusals, and weather impacts.[124] SCE also stated remediations for the HTMP program were still addressed under the "first-in/first-out" method unless the condition was a P1 with a 24-hour remediation time requirement. SCE stated it did anticipate on using the Tree Risk Calculator in 2023 to prioritize HTMP and Dead and Dying Tree Removal for P2 work orders; however, SCE continued using the first in/first out methodology with the 180-day due date. SCE stated the 180-day timeline was contingent upon access authorization, which can be constrained due to environmental holds, customer refusals, and weather. However, the data provided did not indicate delays due to constraints, therefore Energy Safety was unable to determine which, if any, of the late removals were subject to a constraint that caused the delay or if SCE met their

[121] Data Request 266, Question 30; attachments: "WS266-SCE-2023-SVM-01_Q30-33.xlsx."
[122] Data Request 266, Question 30 and Question 31; attachments: "WS266-SCE-2023-SVM-01_Q30-33.xlsx and ES266-SCE-2023-SVM-01 Q.31 Answer.pdf."
[123] SCE's 2023-2025 WMP, (Rev. #1, October 26, 2023), p. 434 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55866&shareable=true).
[124] Data Request 266, Question 34; attachment: "ES278-SCE-2023-SVM Q. 34 Answer.pdf" and "ES266-SCE-2023-SVM-01_Q34.xlsx."

intended goal to support this statement. As such, Energy Safety concluded that SCE did not remediate it's P2 trees within 180 days and did not demonstrate that delays were due to constraints, and therefore did not complete all work commitments in this statement.

Conclusion: SCE did not provided information consistent with the work identified in this statement.

Statement 24

Statement: "To mitigate the risk of an overdue vegetation work order becoming a fire risk, SCE monitors overdue work orders related to Routine Line Clearing that involve vegetation breaching the required compliance distance from SCE's lines by revisiting them every 30 days to help ensure they do not become imminent threats."[125]

Supporting Information and Analysis: SCE provided screenshot images from its reporting systems. The images included Survey 123 (S123) and Arbora showing the monthly breakdown of overdue work orders with P2 notifications related to Routine Line Clearing that were created and completed in 2023.[126] Based on these images, S123 reported 4,415 pending notifications and Arbora reported 655 pending notifications. SCE was unable to provide individual dates of the 30-day field visits due to record system limitations.

SCE's monitoring of overdue work order process was as follows: If P2 conditions were found and mitigation was delayed due to constraints, SCE implemented two processes: (1) If work was assigned to the tree trimming contractor they were required to visit the location of the P2 condition site every 30 days to ensure a P1 condition did not occur, (2) If work was not assigned to the tree trimer contractor, SCE required the VM Senior Specialist (ISA Arborist) to visit the site approximately every 30 days to ensure a P2 condition did not become a P1 condition. Also, SCE noted, that contractors were expected to reinspect the UVM P2s (not mitigated within 30 days) on a weekly basis. [127]

The supporting documentation shows that SCE did monitor overdue work orders, therefore, SCE provided information consistent with completion of the work commitment in this statement.

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

Finding- 8.2.6 Open Work Orders

SCE did not provide all information consistent with the completion of work identified in Initiative 8.2.6 Open Work Orders.

---

[125] SCE's 2023-2025 WMP, (Rev. #1, October 26, 2023), p. 434 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55866&shareable=true).
[126] Data Request 266, Question 35; attachment: "WS266-SCE-2023-SVM-01 Q.35 Answer.pdf."
[127] Data Request 278, Question 35; attachment: "ES278-SCE-2023-SVM Q. 35 Answer.pdf"

8.2.7 Workforce Planning

The purpose of this initiative was to describe "Programs to ensure that the electrical corporation has qualified vegetation management personnel and to ensure that both employees and contractors tasked with vegetation management responsibilities are adequately trained to perform relevant work"[128]

Narrative Statements, Supporting Information & Analysis, and Conclusion

Statement 25

Statement: SCE provided the following information regarding Vegetation Management Qualifications and Training listing the minimum qualifications and special certifications for Inspections personnel in Table 8-20 of its WMP. [129]

List of Worker Titles and Qualifications:

1. Specialist
    - Special Certification Requirements: N/A
    - Three or more years of experience in Utility Vegetation Management
2. Senior Specialist[130]
    - Special Certification Requirements: ISA Arborist
    - Electrical Corporation % Special Certifications: 100%
    - Contractor % Special Certifications: 47%
3. Inspector[131]
    - Special Certification Requirements: ISA Arborist
    - Contractor % Special Certifications: 100%
4. Lead Inspector[132]
    - Special Certification Requirements: ISA Arborist
    - Recommended Certification: Tree Risk Assessment Qualification
    - Contractor % Special Certifications: 62%
5. Customer Coordinator
    - Special Certification Requirements: ISA Arborist
    - Contractor % Special Certifications: 9%

---

[128] Energy Safety's 2023-2025 Wildfire Mitigation Plan Technical Guidelines (December 6, 2022), p. A-26 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true).
[129] SCE's 2023-2025 WMP, (Rev. #1, October 26, 2023), p. 438, 439, and 442 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55866&shareable=true).
[130] ISA Certified Arborist is required for SCE-employed Senior Specialists. For contractor Senior Specialists who may perform some work duties on a temporary basis, ISA certification is encouraged, but not required.
[131] ISA Certified Arborist is not a requirement for Inspectors and Customer Coordinators, but they are encouraged to obtain certification when eligible.
[132] ISA Certified Arborist is a requirement for SCE-employed Lead Inspectors.

6. General Foreman
    - Special Certification Requirements: ISA Arborist
    - Contractor % Special Certifications: 12%
7. Quality Control Inspector
    - Special Certification Requirements: ISA Arborist
    - Contractor % Special Certifications: 67%

Supporting Information and Analysis: SCE provided three Excel files documenting required and not required staff certifications for its HTMP QC Inspectors, HTMP QC Lead Inspectors, Specialists, Senior Specialists and their respective ISA certification numbers. According to these files, SCE staffed a total of 111 HTMP ISA Arborists and 27 out of the 111 also served as HTMP QC Inspectors in 2023.[133] Also, 46 Senior Specialist and Specialist hold ISA certifications.[134] Thus, SCE's HTMP and QC assessors maintained the required vegetation management qualifications in 2023.

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

Statement 26

Statement: SCE committed to implementation of training programs for both its inspections and projects staff stating: "SCE provides onboard and annual training– Utility Vegetation Management Core Plans Training – to all vegetation management employees and vegetation contractor lead personnel. This training provides detailed reviews of program requirements, practices, and procedures, and any updates or enhancements pertaining to SCE's vegetation management program." [135] And "Training for HTMP, the Dead and Dying Tree Removal Program, and Structure Brushing includes: Training of specific work processes; refusal management; vegetation threat management; QC requirements; Tree Risk Calculator training for those involved in HTMP; and environmental-specific training." [136]

Supporting Information and Analysis: SCE provided a copy of the Utility Vegetation Management- Core Plans Training document used for the training conducted January 9th and 10th in 2023, and an Excel document which was a roster for the two-day mandatory UVM Core Plans Training with redacted names of the attendees. Thus, SCE provided information

[133] Data Request 266, Question 37; attachments: "DR266_Q37_HTP ISA Arborisits_Redacted.xlsx." and "DR266_Q37_QC HTP ISA Arborists_Redacted.xlsx."

[134]Data Request 314, Question 1; attachments: 2023 ISA Certified Arborists_Redacted Confidential_2023 ISA Certified Arborists.xlxs and ES314-SCE-2023-SVM Q.01 – Answer.pdf

[135] SCE's 2023-2025 WMP, (Rev. #1, October 26, 2023), p. 441 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55866&shareable=true).

[136] SCE's 2023-2025 WMP, (Rev. #1, October 26, 2023), p. 444 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55866&shareable=true).

consistent with the implementation of training programs for its SVM personnel, consistent with the work commitment in this statement.

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

Finding- 8.2.7 Workforce Planning

SCE provided information consistent with the completion of work identified in Initiative 8.2.7 Workforce Planning.