

Docket #: 2023 SVM

March 19, 2025

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

**SUBJECT:** The Southern California Edison Company's 2023 SVM Audit Corrective Action Plan  
20250319

Southern California Edison Company (SCE) appreciates the opportunity to provide a response to the Office of Energy Infrastructure Safety (Energy Safety)'s 2023 Substantial Vegetation Management (SVM) Audit. SCE recognizes the effort required of Energy Safety to conduct this audit and the level of collaboration with SCE achieved to complete it.

#### **INTRODUCTION**

California Public Utilities Code (PUC) Section 8386.3(c)(5)(A) requires an electrical corporation to notify Energy Safety "within one month after it completes a substantial portion of the vegetation management requirements in its wildfire mitigation plan." Pursuant to this directive, throughout 2023 SCE tracked progress of the vegetation management initiatives in its WMP and notified Energy Safety of substantial completion.

Upon receiving notice from the electrical corporation, Energy Safety must "promptly audit the work performed by, or on behalf of, the electrical corporation" and "specify any failure of the electrical corporation to fully comply with the vegetation management requirements in the wildfire mitigation plan." The electrical corporation has a reasonable time to correct and eliminate any deficiency specified in the audit.

Energy Safety's 2023 SVM Audit findings were provided to SCE on February 18, 2025. In performing the 2023 SVM Audit, 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. These findings were related to (1) Wood and Slash Management; (2) Clearance; and (3) Open Work Orders. Below, **SCE provides a response to each of the stated findings and any corrective actions, as needed.**

## ENERGY SAFETY FINDING 1

### 8.2.3.2 Wood and Slash Management

**Finding:** "SCE did not provide information consistent with the completion of work identified in initiative 8.2.3.2 Wood and Slash Management."

#### Statement 7

SCE Statement 7: "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)." (emphasis added).

Energy Safety Comments: "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."

#### SCE Response:

As mentioned in SCE's response to Data Request Set ES266-SCE-2023-SVM-01, Q.13 and stated in SCE's WMP, SCE's contractors are responsible for performing and managing removal of wood and slash material as part of their vegetation management (VM) mitigation work. However, as emphasized in SCE's WMP statement, not all material is removed from every location, as the expectation is that crews **strive** (i.e., use best efforts) but are not required to do so 100% of the time, as there may be site conditions or circumstances where removal is not safe, practicable, or desired (for example, customers may specifically request that material be left as habitat, mulch, or chopped into firewood).

In response to Energy Safety's Comments, SCE highlights the following:

- Debris removal is documented in the Transmission Vegetation Management Plan (TVMP) and Distribution Vegetation Management Plan (DVMP) Line Clearing Statement of Work (SOW) for SCE's contractors.
- In SCE's response to Data Request Set ES266-SCE-2023-SVM-01, Q.13, SCE provided illustrative examples from the referenced vegetation management programs to demonstrate removal of vegetation. However, this is not a mandatory data field within SCE's vegetation management work management system (WMS).
- Because tree trimming and removal work inherently produces cuttings and woody material, SCE considers debris removal as part of completing

vegetation mitigation work. Thus although SCE could provide additional examples where wood and slash removal is specifically described for particular locations, not all mitigation records have detailed information on this because it is not a mandatory field within SCE's WMS that is required to be separately documented by contractors.

- As illustrative examples, SCE is providing images below which are exports from SCE's WMS documenting removal of vegetation.
  - For Routine Line Clearing, SCE's WMS includes a drop-down menu that the contractor may use (not mandatory) to document the status of debris removal.

A screenshot of a web-based form showing a list of debris removal options, each with a checked checkbox. The options are: (Select All), Buck & Slash, Buck & Slash; Chip & Haul, Buck & Slash; Chip & Haul; Log Disposal, Chip & Haul, Cleanup All Debris, Cut and Scatter, Cut to Firewood, Leave Brush, and (Blanks).

- For HTMP and Dead & Dying Tree Removal Program, SCE's WMS includes columns that can be inputted by the contractor (not mandatory) identifying the type of debris removal performed.

N	O	P	Q
buck_slash	chip_haul	log_dispos	leave_wood
yes	yes	yes	yes
yes	no	no	yes
yes	yes	no	no

AT
Slash
Buck & Slash; Chip & Haul; Log Disposal
Buck & Slash; Chip & Haul; Log Disposal
Buck & Slash; Chip & Haul; Log Disposal
Chip & Haul

- For Structure Brushing, SCE relies on its contractors to perform this work as stated in its SOW and does not track this activity separately. However, SCE does perform QC on debris cleanup for Structure Brushing, as described further below.
  - Please also reference SCE's response to Data Request ES278-SCE-2023-SVM Q. 13, where SCE further explained the debris

	<p>removal process to Energy Safety, stemming from discussion during the October 30, 2024 monthly meeting with Energy Safety.</p> <ul style="list-style-type: none"><li>• Vegetation debris cleanup is not a formal 2023-2025 WMP target. In SCE’s 2023-2025 WMP, SCE did not commit to tracking or reporting all instances of vegetation debris cleanup.<ul style="list-style-type: none"><li>○ Since this activity is performed and managed by SCE’s contractors, SCE is not required to formally track all instances associated with the cleanup of debris generated by vegetation activities.</li><li>○ SCE’s contractors are not required to track or document all instances of debris removal. As part of completing vegetation mitigation work and described in the Statement of Work, SCE requires contractors to strive to properly cleanup and remove debris, subject to constraints.</li></ul></li><li>• Customers may ask for vegetation to be left, but it is not always noted by the contractor.</li><li>• Energy Safety did not identify any specific locations where debris was left at a location inappropriately or against customers’ wishes.</li><li>• As part of SCE’s forthcoming 2026-2028 WMP, SCE plans to include a formal qualitative WMP target for debris management. This includes reviewing and identifying potential updates to contract terms for debris management.</li></ul> <p>Finally, SCE performs post-work verification by internal Senior Specialists (SSPs) who are ISA Certified arborists, who are required to look for debris removal and site clean-up as part of their oversight and review. In addition, specifically for SCE’s Structure Brushing program, QC Inspectors assess whether all debris was removed as part of their QC procedure. Below is an excerpt from SCE’s Structure Brushing QC form, which includes confirming debris cleanup:</p> <table><tr><td>QC Fail/YesReason (Choose all that apply)</td><td><ul style="list-style-type: none"><li>• Insufficient Clearance (Green/Dead material not cleared) Choose: Yes or No</li><li>• Insufficient Clean-Up (clearing-related brush or branches left on site) Choose: Yes or No</li><li>• Poor Documentation (Before/after photos inaccurate, Photos not showing full clearance, structure number incorrect, etc.) Choose Yes or No</li></ul></td></tr></table> <p>While Energy Safety states it could not confirm that debris was removed in all or most instances, SCE reiterates that Energy Safety did not identify any specific locations where debris was left improperly. SCE is not aware of any reported issues with debris removal in 2023.</p> <p>As such, SCE requests that Energy Safety reconsider this finding in their final compliance report.</p>	QC Fail/YesReason (Choose all that apply)	<ul style="list-style-type: none"><li>• Insufficient Clearance (Green/Dead material not cleared) Choose: Yes or No</li><li>• Insufficient Clean-Up (clearing-related brush or branches left on site) Choose: Yes or No</li><li>• Poor Documentation (Before/after photos inaccurate, Photos not showing full clearance, structure number incorrect, etc.) Choose Yes or No</li></ul>
QC Fail/YesReason (Choose all that apply)	<ul style="list-style-type: none"><li>• Insufficient Clearance (Green/Dead material not cleared) Choose: Yes or No</li><li>• Insufficient Clean-Up (clearing-related brush or branches left on site) Choose: Yes or No</li><li>• Poor Documentation (Before/after photos inaccurate, Photos not showing full clearance, structure number incorrect, etc.) Choose Yes or No</li></ul>		

## **ENERGY SAFETY FINDING 2**

### **8.2.3.3 Clearance**

**Finding:** "SCE did not maintain minimum clearances for distribution and transmission lines in its Routine Line Clearing Program."

#### **Statement 8**

**SCE Statement 8:** "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."

**Energy Safety Comments:** "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. The CAP response should address the non-compliance of the 10 trees that did not meet the minimum clearance requirements."

#### **SCE Response:**

SCE clarifies that Data Request Set ES266-SCE-2023-SVM-01, Question 15 sought supporting documentation that "SCE ***strives*** to obtain expanded clearances" (i.e., GRCD) within HFRA in 2023 (emphasis added). The referenced Excel spreadsheet contained in SCE's response *ES266-SCE-2023-SVM-01-Q.15-RLC Clearance.xlsx* provided records for 125,596 inspections that had prescribed mitigations. Of those, SCE clarifies that **only seven records, not 10**, were marked "NonCompliance" in the "POSTCLEARANCE" field.

SCE's data response included an explanatory footnote that stated: "While gathering information for this data request, SCE identified certain data discrepancies (e.g., missing inspection clearance and post clearance information). Although ***SCE believes these data discrepancies are caused by incorrect selection of work management system drop-down menus in the field***, and not entering clearance information as required, SCE plans to issue an internal corrective action to investigate and implement corrective measures, if practical, to prevent recurrence." (emphasis added). This corrective action was issued on October 17, 2024, and SCE implemented changes as described further below.

In response to Energy Safety's Comments, SCE highlights the following:

- SCE identified certain data anomalies while gathering data for this data request and issued an internal corrective action to determine the cause of the data anomalies.
- SCE is confident the issue was caused by contractor human error when selecting the incorrect drop-down menu option in the work management tool while in the field, which resulted in inaccurate data capture even though the work was performed correctly.

- Below, SCE provides corroborating evidence that appropriate clearance was obtained and explains changes made to the work management tool to prevent inadvertent selection of inapplicable drop-down menus following work completion in the future.

First, reviewing the 2023 data for the seven records, it is likely the contractor selected the wrong drop-down menu option by mistake, as in several of the examples, the clearance identified at time of inspection (field "INSPECTIONCLEARANCE") was greater than the clearance identified after completion of the mitigation work (field "POSTCLEARANCE", shown as "Non Compliance"). For example, in the table below, for OI 2116835, the inspection date was 1/27/23 and the tree was found to have a clearance of >GRCD, which is >12 feet. Mitigation was completed on 5/2/23, but the as left "post clearance" was marked as "non-compliance," which would be <4 feet in HFRA. In other words, this appears to indicate that the clearance distance at time of inspection was greater than the clearance distance left after performing trimming. This is highly unlikely.

OBJECTID	PRESCRIBEDQTY	INSPECTIONDATE	COMPLETIONDATE	INSPECTIONCLEARANCE	POSTCLEARANCE
2315930	1	8/31/2023	8/31/2023	72 hour P1	Non Compliance
2317148	1	8/31/2023	9/2/2023	72 hour P1	Non Compliance
2159885	3	3/16/2023	5/25/2023	RCD	Non Compliance
2159889	2	3/16/2023	5/23/2023	CCD	Non Compliance
2116835	1	1/27/2023	5/2/2023	>GRCD	Non Compliance
2217404	1	5/12/2023	5/16/2023	72 hour P1	Non Compliance
2180695	1	4/6/2023	5/19/2023	CCD	Non Compliance

Second, to further support SCE's belief that the work was performed correctly and these trees were left with adequate clearance, SCE also reviewed the next annual inspection data for the same seven records. The following year's data shows that the pre-inspection clearance exceeded the minimum clearance requirements, and therefore, could not have been left as non-compliant. For example, OI 2317148 in the above table was marked as having a post clearance distance on 9/2/23 of "non-compliance" (<4 feet), but as shown in the table below, the clearance distance found at the next inspection performed on 1/7/25 found the tree at GRCD (> 12 feet). In all the records in the table below, except for two trees which were removed, the trees that had been mitigated in 2023 were found to have clearance greater than the minimum distance at the next inspection. For reference, CCD is 1.5 times the clearance required by regulation, and GRCD is the expanded clearance recommended by GO95 Rule 35 Appendix E. Therefore, they could not have been left "non compliant" in the previous year.

Object ID	Inspection Date	Identified Clearance
2315930	Inactive / Tree was removed	N/A
2317148	01/07/2025	GRCD
2159885	09/09/2024	GRCD
2159889	Inactive / Tree was removed	N/A

	2116835	08/14/2024	CCD
	2217404	08/16/2024	GRCD
	2180695	01/15/2025	GRCD

Third, it is unlikely that “Non Compliance” conditions would have been left in the field, as SCE’s Post Work Verification and/or QC process would have identified and corrected any post-trimming issues. SCE performs a high rate of sampling in HFRA to monitor compliance. The QC process requires inspectors to look for missed trees, noncompliant trees and any trees that have not achieved SCE’s standards.

Finally, as a result of the internal corrective action that was issued, SCE implemented a software solution in the new Arbora work management system. Previously, inspection contractors working in the field could select from P1, P1 72-hours, Non Compliance, RCD, CCD, TCD, RCD, GRCD, or >GRCD in the drop down menu under the “inspection clearance” field. Tree trimming contractors had the same options available under the “post clearance” field. Since tree trimmers should be mitigating any encroachments to achieve clearance distances of RCD or greater, now the crews can no longer accidentally select P1, P1 72-hours, or Non Compliance in the “post clearance” field; they can only select from RCD, CCD, TCD, GRCD, or >GRCD. SCE performed an extent of condition review for 2024/2025 work documented in Arbora and confirmed no further instances of post clearances accidentally being marked as non-compliance, P1, or P1 72-hours.

Given the relatively small number of records at issue, the likelihood that the work was performed correctly in the field, and SCE’s update to the work management system, SCE requests that Energy Safety reconsider this finding in their final compliance report.

**ENERGY SAFETY FINDING 3**

**8.2.6 Open Work Orders**

**Finding:** "SCE did not provide information consistent with the completion of all work identified in Initiative 8.2.6 Open Work Orders"

**Statements 19-23**

<b>Statement s 19 &amp; 20</b>	<p><b><u>SCE Statement 19:</u></b> "SCE <i>endeavors</i> to remediate P1s where there is vegetation contact or evidence of contact (e.g., scarring or burn marks) within 24 hours." (emphasis added).</p> <p><b><u>Energy Safety Comments:</u></b> "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</p>
--------------------------------	---

(24%) were remediated outside of the 24-hour time frame [. . .] Because 952 P1 trees were mitigated outside 24 hours, SCE did not provide information consistent with the completion of work identified in this statement."

**SCE Statement 20:** "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." (emphasis added).

**Energy Safety Comments:** "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 [. . .] Because 32 P1 trees were mitigated outside the 72-hour time frame, SCE did not provide information consistent with the completion of work identified in this statement."

**SCE Response:**

In Data Request Set ES266-SCE-2023-SVM-01, Energy Safety requested that information for Questions 30 and 31 be included in the same Excel file to "condense similar documentation." Accordingly, SCE clarifies that tab "P1 Data" in the referenced Excel spreadsheet contained in SCE's response *31\_ES266-SCE-2023-SVM-01\_Q30-33.xlsx* provided records for 4,012 P1 conditions identified in HFRA in 2023, which includes both those that SCE endeavors to remediate within 24 hours (vegetation contact or evidence of contact), as well as those that SCE endeavors to remediate within 72 hours (within 18 inches but no evidence of actual contact). Because Q.30 and Q.31 both asked for "Supporting documentation (i.e. Excel file) of *all instances* of P1 remediation" in HFRA in 2023 (emphasis added), SCE provided a comprehensive list in one consolidated file, as requested by Energy Safety. The spreadsheet does not distinguish between those P1s to be remediated within 24 hours versus those P1s to be remediated within 72 hours.

To evaluate SCE Statement 19, it appears that Energy Safety took the P1 Data tab and compared the "Creation Date" (Column D) with the "Complete Date" (Column E), then counted 952 records where the Complete Date was more than 24 hours (i.e., 2 days or more) after the Creation Date. However, many of these P1s may not have had vegetation contact or evidence of actual contact, and therefore were not expected to be remediated within 24 hours.

Further, to evaluate SCE Statement 20, it appears that Energy Safety used the same spreadsheet, then attempted to filter by "Work Type" (Column B) and



	<p>“Complete Work Type” (Column C) to only include records with “WOOD TREE REMOVAL - &gt; 4" TO ≤ 12" DBH” AND “WOOD TREE REMOVAL - &gt; 12" TO ≤ 24" DBH”. This results in a count of 828 records, of which 32 records have a Complete Date more than 72 hours (i.e., 4 days or more) after the Creation Date. However, SCE clarifies that 4” to 24” DBH refers to the diameter at breast height – <b>which is the thickness of the tree to be removed, not the clearance distance between the tree and energized equipment.</b> The fields Energy Safety selected have nothing to do with the type of P1 condition or the applicable timeline for remediation. Further, by using the exact same file, these records are already included in the 952 records that Energy Safety identified as being completed outside of 24 hours in SCE Statement 19.</p> <p>Therefore, Energy Safety is not correctly identifying which P1s should be remediated within 24 hours and which P1s should be remediated within 72 hours, nor is it evaluating their completion against the appropriate timeline. It is also double counting its (incorrect) populations of P1s.</p> <p>SCE also notes that the WMP stated that “SCE <i>endeavors</i> to remediate P1s” within 24 or 72 hours, respectively (emphasis added). Although GO95 Rule 18A establishes priority levels for resolution of safety hazards, it directs companies to establish internal timelines for corrective action and allows correction times to be extended under reasonable circumstances.</p> <p>Furthermore, SCE’s response to Question 31 and Energy Safety’s audit findings noted that tree trimmers often complete the work in the field before the notification is able to be entered into SCE’s administrative system. For P1 notifications, SCE relies on the contractors to enter data and close out Work Orders. This step is often performed by the contractor’s office staff, and not by field personnel. This means that even though the remediation work has been completed timely in the field, the back office record may not be updated immediately to reflect that, and may therefore show a “Complete Date” that is more than 24 or 72 hours after the “Creation Date.”</p> <p>SCE has implemented several measures in an effort to remedy this issue for P1s. In 2024, SCE revised the TVMP/DVMP Statement of Work (SOW) to include potential penalties for late or incomplete work order closure documentation in the vegetation work management system, as shown in the excerpt below:</p>
--	--

	<p><b>6.2. Remediation Timeline Requirements</b></p> <p>The tree contractor shall comply with all mitigation completion requirements to ensure reliability and compliance. Contractors’ failure to comply with these requirements may result in consequences including but not limited to rendering the services at no cost to SCE.</p> <table><tr><th>Priority</th><th>Encroachment Zone or UVM Program</th><th>Remediation Timeline</th><th>Consequence for Failure to Comply</th></tr><tr><td>One (1)</td><td>Priority 1</td><td>24-72 Hours (Based on P1 definition in UVM)</td><td>Once a P1 becomes late it shall be billed at a unit rate contractor will also be subject to a deduction of \$100 for every 24-hour period that the work is late until it is completed in the field and documented completely and correctly in the WMS.</td></tr></table> <p>In the annual UVM Core Plans Training (most recently conducted on February 12 and 13, 2025), SCE emphasized the need for timely P1 work order closure in discussion with contractors. SCE has drafted potential letters to tree trimming contractors advising them of the data entry requirements and the need for timely work order closure, and the proposed penalty phase may be implemented in Q2 2025 if timely work order closure and other documentation do not improve.</p> <p>Given the inaccuracies in Energy Safety’s analysis; the likelihood that most P1s were timely completed before the work orders were updated by contractors’ office staff; and SCE’s efforts to improve contractor recordkeeping, SCE requests that Energy Safety reconsider this finding in their final compliance report. SCE believes it has provided information consistent with its WMP statement that it “<b>endeavors</b> to remediate P1s” within 24 or 72 hours, as applicable (emphasis added).</p>	Priority	Encroachment Zone or UVM Program	Remediation Timeline	Consequence for Failure to Comply	One (1)	Priority 1	24-72 Hours (Based on P1 definition in UVM)	Once a P1 becomes late it shall be billed at a unit rate contractor will also be subject to a deduction of \$100 for every 24-hour period that the work is late until it is completed in the field and documented completely and correctly in the WMS.
Priority	Encroachment Zone or UVM Program	Remediation Timeline	Consequence for Failure to Comply						
One (1)	Priority 1	24-72 Hours (Based on P1 definition in UVM)	Once a P1 becomes late it shall be billed at a unit rate contractor will also be subject to a deduction of \$100 for every 24-hour period that the work is late until it is completed in the field and documented completely and correctly in the WMS.						
Statements 21 & 22	<p><b>SCE Statement 21:</b> “SCE <b>endeavors</b> to remediate P2s when vegetation is closer than the regulatory required distance (e.g., four feet) but beyond 18 inches within 30 days.” (emphasis added).</p> <p><b>Energy Safety Comments:</b> “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. 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 [ . . . ] Because 26 P2 trees closer than the regulatory distance were not mitigated within 30 days, SCE did not provide information consistent with the completion of work identified in this statement.”</p>								

**SCE Statement 22:** "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.***" (emphasis added).

**Energy Safety Comments:** "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. 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 [ . . . ] Because 1,154 trees were not mitigated within 90 days, SCE did not provide information consistent with the completion of work identified in this statement."

**SCE Response:**

See SCE's response to Statements 19 & 20. As explained above, in Data Request Set ES266-SCE-2023-SVM-01, Energy Safety requested that information for Questions 32 and 33 be included in the response to Question 31 to "condense similar documentation." Accordingly, SCE clarifies that tab "P2 Data" in the referenced Excel spreadsheet contained in SCE's response *31\_ES266-SCE-2023-SVM-01\_Q30-33.xlsx* provided records for 6,427 P2 conditions identified in HFRA in 2023, which includes both those that SCE endeavors to remediate within 30 days (clearance between 18 inches and 4 feet), as well as those that SCE endeavors to remediate within 90 days (other P2s). Because Q.32 and Q.33 both asked for "Supporting documentation (i.e. Excel file) of ***all instances*** of P2 remediation" in HFRA in 2023 (emphasis added), SCE provided a comprehensive list in one consolidated file, as requested by Energy Safety. The spreadsheet does not distinguish between those P2s to be remediated within 30 days versus those P2s to be remediated within 90 days.

To evaluate SCE Statement 21, it appears that Energy Safety may have taken the P2 Data tab, then attempted to filter by "Work Type" (Column B) and/or "Complete Work Type" (Column C) to only include records with "WOOD TREE REMOVAL" of 4" to >36" DBH, then identify those records with Complete Dates more than 30 days after the Creation Date. SCE is not able to ascertain the various counts listed in Energy Safety's Comments. In any event, the numbers are meaningless, as DBH refers to the diameter at breast height – **which is the thickness of the tree to be removed, not the clearance distance between the tree and energized equipment.** The fields Energy Safety selected have nothing to do with the type of P2 condition or the applicable timeline for remediation. Some of these trees may have had clearance greater than 4 feet, and therefore would not have been expected to be remediated within 30 days.

In addition, to evaluate SCE Statement 22, it appears that Energy Safety took the same spreadsheet and compared the “Creation Date” (Column D) with the “Complete Date” (Column E), then counted 1,154 records where the Complete Date was more than 90 days after the Creation Date. However, by using the exact same file, these records may include some of the same records that Energy Safety already counted as being completed outside of 30 days in evaluating SCE Statement 21.

In other words, Energy Safety is not correctly identifying which P2s should be remediated within 30 days and which P2s should be remediated within 90 days, nor is it evaluating their completion against the appropriate timeline. It is also potentially double counting its (incorrect) populations of P2s.

Furthermore, as previously noted, the WMP stated that “SCE ***endeavors*** to remediate” P2s within 30 or 90 days, respectively (emphasis added). Although GO95 Rule 18A establishes priority levels for resolution of safety hazards, it directs companies to establish internal timelines for corrective action. SCE’s P2 remediation timelines are self-imposed timelines or targets<sup>1</sup> that are significantly more restrictive than the GO95 Rule 18A timelines for Level 2, and these P2 conditions are often subject to constraints that are beyond the control of SCE. Indeed, GO95 Rule 18A explicitly allows correction times to be extended under reasonable circumstances, such as third party refusal, customer issue, no access, permits required, and system emergencies (e.g. fires, severe weather conditions). SCE Statement 22 acknowledged these constraints, stating that “SCE ***endeavors*** to remediate [all other P2s related to Routine Line Clearing] within 90 days, ***unless there is a limited timeframe triggered by permitting requirements or customer requests.***” (emphasis added).

Finally, as with P1 conditions, contractors may rely on back office staff to mark P2 remediations as complete and close work orders, which also impacts the length of time a P2 condition may be shown as open within the work management record system.

For the above reasons, SCE requests that Energy Safety reconsider this finding in their final compliance report. Of the 6,427 total P2 records SCE provided in HFRA for 2023, more than 30% showed completion within 30 days and more than 80% showed completion within 90 days. SCE therefore believes it has provided information consistent with its statement that it “***endeavors*** to

---

<sup>1</sup> In SCE’s Managing Threat Procedure (UVM-08), SCE defines “targets” as: “a self-imposed objective that an individual or organization aims to achieve. Targets are aspirational to reach a certain result, yet the achievement of the target is not mandatory, nor carry any consequences if not met.”

	remediate” P2s within 30 or 90 days, as applicable, and subject to various constraints (emphasis added).
<b>Statement 23</b>	<p><u>SCE Statement 23</u>: "For P2s related to HTMP and the Dead and Dying Tree Removal Program, SCE <b>endeavors</b> to address them within 180 days." (emphasis added).</p> <p><u>Energy Safety Comments</u>: "SCE did not remediate its 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."</p> <p><u>SCE Response</u>: Based on the Excel file, SCE is not able to ascertain the various counts and number of records that Energy Safety asserts were not remediated within 180 days.</p> <p>Nonetheless, SCE clarifies that Data Request Set ES266-SCE-2023-SVM-01, Question 34 asked for SCE to provide instances of P2 remediation related to HTMP and Dead and Dying Tree Removal Program in 2023 and did not ask SCE to identify the reasons for any delays in remediation; therefore, the referenced Excel spreadsheet contained in SCE’s response <i>34_ES266-SCE-2023-SVM-01_Q34.xlsx</i> did not include information on constraints. SCE’s WMS does contain certain information on constraints, but due to SCE’s transition between WMS systems some of the data for 2023 may not be complete or directly comparable.</p> <p>Moreover, as previously noted, the WMP stated that “[f]or P2s related to HTMP and the Dead and Dying Tree Removal Program, SCE <b>endeavors</b> to address them within 180 days” (emphasis added).</p> <p>As stated in SCE’s data request response, the 180 day timeline is contingent on having appropriate access and authorization to perform the required mitigation. This can include constraints related to environmental holds, customer refusals, and weather impacts. This is also reflected in SCE’s “Manage Vegetation Threats” document (UVM-08), which targets an internal remediation timeline of 180 days contingent upon not having constraints.</p> <p>SCE made good faith efforts to comply with this internal remediation timeline and requests that Energy Safety reconsider this finding in their final compliance report. SCE believes it has provided information consistent with its statement that it “<b>endeavors</b> to address” P2s related to HTMP and the Dead and Dying Tree Removal Program within 180 days, subject to constraints (emphasis added).</p>

**CONCLUSION**

SCE appreciates the opportunity to submit this response to the 2023 Substantial Vegetation Management Audit prepared by Energy Safety and looks forward to continued collaboration and partnership in this space.

Please direct any questions or requests for additional information to Liz Leano (Elizabeth.Leano@sce.com), Johnny Parker (Johnny.Parker@sce.com), and Cynthia Childs (Cynthia.Childs@SCE.com).

Sincerely,

//s//

Gary Chen

Director, Safety & Infrastructure Policy

Gary.chen@sce.com