



SCE	Legal, Regulatory, and Compliance	Transmission & Distribution Utility Vegetation Management	Methodology	Doc. No.	UVM-07	 SOUTHERN CALIFORNIA <b>EDISON</b> <sup>®</sup> Energy for What's Ahead <sup>SM</sup>
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<b>Post Work Verification and UVM Program Oversight</b>						

# UVM-07

## Utility Vegetation Management


### Post Work Verification and UVM Program Oversight

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## 1 Purpose

The purpose of this document is to define the Utility Vegetation Management (UVM) Program oversight requirements used to provide reasonable assurance SCE is meeting the applicable Federal and State requirements pertaining to utility vegetation management.

SCE UVM maintains and implements a scheduling process in order to meet Federal and State mandated annual compliance inspection requirements, as applicable. Maintenance work (pre-inspection/prescriptions, pruning and removal) is typically performed by non-SCE resources (contractors). The oversight required in this document is intended to provide several levels of defense-in-depth (DID) strategy to provide reasonable assurance that inspection and maintenance work is being effectively performed.

This document also describes the oversight provided for SCE Summer Readiness activities.

## 2 Applicability


This document is applicable to the Operating Units (OU's) impacted by Energy Regulatory Compliance Program (ERCP) Compliance Requirements including, but not limited to: Transmission & Distribution

## 3 Definitions

Refer to the NERC Glossary of Terms, the E&C Shared Services Glossary of Terms (ECSS-02), and UVM Program Glossary of Terms (UVM-16) for any capitalized terms used in this document.

- **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.
- **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.
- **Confidence Interval/Margin of Error (CI)** – Is the amount of error that is considered tolerable.
- **Judgmental Sampling** – Is a type of nonrandom sample that is selected based on the opinion of an expert. Results obtained from a judgment sample are subject to some degree of bias, due to the frame and population not being identical
- **Random Sampling** – Random sampling is a sampling technique in which each sample has an equal probability of being chosen



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- **Population Size** – The total number of items (equipment/assets/people) from which to choose a sample. The sample size doesn't change much for populations larger than 20,000
- **Quality Control** – Typically verifies a product by testing a sample of the product against a specification, standards, or other criteria. Quality control measures are aimed at checking, measuring, or inspecting a sample of one or more product characteristics and evaluating the results against requirements to confirm compliance
- **Quality Assurance** - Typically assesses a process through analysis of objective evidence that supports the program or process for adherence and/or compliance with specific requirements
- **Reasonable Assurance** – A high, but not absolute, level of assurance
- **Sample Size** – This is the minimum recommended size for sampling

## 4 Detail

### 4.1 Personnel Qualifications

Personnel performing UVM Post Work Verification shall be qualified in accordance with UVM-11, "Qualification of UVM Senior Specialists".

Contract personnel performing QC inspections for the UVM Program shall be an SCE approved contractor for vegetation management. Additionally, contract personnel performing QC on Tree Risk Assessments for SCE's Hazard Tree Management Plan (HTMP) shall be Certified Arborists with the International Society of Arboriculture.


SCE personnel performing QC inspections for the UVM Program shall have their Quality Program approved by UVM leadership.

SCE personnel performing QA activities shall be qualified in accordance with a SCE approved Quality Assurance Program.

### 4.2 Sampling Methodology

QC inspections for UVM are based on judgmental sampling and may incorporate 100% inspection in certain High-Risk Areas. The intent of QC inspections is to provide Reasonable Assurance that high quality work is being performed and program requirements are being achieved.

Sampling is typically performed in production and controlled environments. Even under these conditions, there is an inherent risk that some nonconforming products (non-inventoried vegetation) may be introduced into the population. The sampling performed for SCE's UVM program will identify nonconforming conditions for those items subject to QC inspection. However, items not subject to QC inspection may also contain nonconforming conditions.

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The volume of SCE circuit mileage for a given inspection category is compared to sampling charts where Confidence Level (CL) and Confidence Interval (CI) are calculated. SCE uses the sampling calculator from <https://www.calculator.net>

#### 4.3 Inspection Sampling for Risk Area and/or Program Type

Compliance Program (DVMP): SCE's Tree Risk Index (TRI) risk model is applied to sampling for Distribution circuits. Within the TRI model, each structure in HFRA is evaluated for the risk of vegetation contact and is assigned a probability of ignition (POI) as well as a Technosylva consequence score (which estimates the potential number of acres burned should an ignition occur at the location of the structure).


The TRI risk model applies to grids in HFRA and identifies four risk categories A, B, C & D, with category A being the highest risk. HFRA grids may also contain some non-HFRA circuit miles within the grids which is included in the sample population. Sampling for Distribution Routine Line Clearing is performed using the following Confidence Level (CL)/Confidence Interval (CI) levels:

- TRI Category A 100%
- TRI Category B, C, D 99/3% CL/CI
- Non-TRI Distribution 99/5% CL/CI
- Non-TRI Transmission 99/5% CL/CI

In addition to the sampling % identified above, QC will further stratify QC mileage targets as follows:

- 75% +/- 5% of mileage for work completed within 60 days of completion confirmation
- 25% +/- 5% of mileage for work completed greater than 60 days after completion confirmation

Compliance Program (TVMP): SCE has approximately 13,000 transmission circuit miles. QC plans to inspect these miles using a CL/CI of 99/5% with a concentration on High Fire circuit miles, when practical. A lower sample of transmission miles is selected for several reasons which include but not limited to fewer TCCIs are recorded in transmission, greater vegetation to conductor clearances and routine scheduled LiDAR flight patrols.

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Hazard Tree Management Plan (HTMP): SCE's HTMP applies to HFRA only. The minimum levels of QC inspection implemented for HTMP are provided below:

- 99/2% CL/CI for selected population of Risk Scores
- 100% Verification of Remediation

Dead and Dying Trees (D&DT): D&DT applies to HFRA Tier 2 and Tier 3 applicable areas. The minimum levels of QC inspection implemented for D&DT is provided below:

- 100% Verification of Remediation

Structure Brushing Oversight: QC of Distribution Structures which require brushing in accordance with Public Resource Code 4292.

- 99/2% for Non-exempt Distribution and Sub-transmission structures


#### 4.4 Sampling Strategy

Routine Line Clearing:

Table 1 below identifies the four TRI risk categories and targeted circuit miles to be inspected for Distribution (HFRA and Non-HFRA). Table 2 below identifies the targeted circuit miles to be inspected for all other areas not part of the TRI risk ranking.

Table 1 – Distribution HFRA / Non-HFRA					
TRI Category	HFRA	Non-HFRA	Total Miles	CL/CI %	Miles Inspected
A	5134	1479	6613	100%	6613
B	1610	1110	8095	99/3	1506
C	1105	858			
D	1328	2084			
Total	9177	5531	14708	N/A	8119

Table 2 – All other Miles				
T / D	HFRA / Non-HFRA	Total Miles	CL/CI %	Miles Inspected
Transmission	Both	≈ 13000	99/5	634
Distribution	Both	≈ 31680		652
Total	N/A	≈ 44680	N/A	1286

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#### Hazard Tree Management Plan (HTMP):

HTMP is a commitment (VM-1) in SCE's Wildfire Mitigation Plan. To provide reasonable assurance the HTMP assessments are being performed accurately, QC will target to perform a minimum of 4,000 assessments which result in a CL/CI of 99/2% for a population of 100,000 trees. Additionally, QC performs 100% inspection of all mitigations.

HTMP risk scores range from 0 to 100, and risk scores  $\geq 50$  typically require remediation. QC will sample assessments where the calculated risk score is approximately  $\geq 50$  and no remediation is required. QC may also sample assessment scores ranging from 35 to 60 if needed to obtain the sampling volume. The intent of sampling is to provide reasonable assurance that trees are not inadvertently missed for remediation, thus creating potential risk.

#### Structure Brushing Oversight:

QC inspectors will focus structure brushing QC on Distribution and Sub-transmission structures subject to Public Resource Code 4292. The intent of the QC will be to confirm: (1) Structures brushed have met the requirements of PRC 4292, and: (2) reasonable assurance that structures are maintaining clearance requirements during the declared fire season.


- QC will target to inspect PRC 4292 Distribution Structures using a CL/CI of 99/2%, approximately 330 structures monthly

#### 4.5 Acceptable Quality Level and Conformance rate

To provide measurement of performance and facilitate trending, the results of QC inspections for Routine Line Clearing are communicated using an Acceptable Quality Level (AQL) and Conformance Rate (CR). The AQL for RCD is 100% and the AQL for CCD is 95%.

- An AQL is recommended by the UVM Leadership Team and agreed upon by the assessed work group/organization's management
- The CR is used to assess whether performance is meeting or is below the established AQL
- The CR is determined by the number of nonconforming assets (trees) identified within the circuit mile population compared to the number of assets inspected. An example of how the CR is determined is provided below:
  - If 100 assets are inspected in one month and 19 assets are found nonconforming, the CR is 81%. If the AQL for acceptable performance is determined to be 95% CR, then a CR of 81% falls short of the performance expectation by 14%.



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#### 4.6 Defense in Depth Oversight Strategy

UVM work primarily consists of: (1) Pre-inspection; (2) Line clearing (pruning); (3) Hazard Tree Risk Mitigation; and (4) Structure Brushing. To provide reasonable assurance the UVM Program is implemented appropriately, Vegetation Management (VM) uses a three-tiered oversight strategy, “defense-in-depth” oversight.

The “defense-in-depth” oversight strategy performed by VM provides three levels of assurance activities that overlay one another to provide a depth of coverage. VM's three levels of defense are as follows:

- Post Work Verification
- Quality Control Inspections
- Quality Assurance Reviews


SCE also evaluates and remediates (as applicable) vegetation management issues identified from: (1) annual transmission patrols performed by qualified transmission Senior Patrolman; (2) distribution overhead detailed inspections; and (3) Summer Readiness programs. These activities are not included as part of the defense-in-depth oversight strategy. Additionally, LiDAR inspections are performed on specific high risk/high fire transmission circuits in accordance with LiDAR procedure UVM-06 which compliments SCE's DID strategy and oversight sampling approach to prevent encroachment.

**Post Work Verifications** are performed by SCE UVM SSPs and are the initial reviews performed to validate field work accuracy. Details are provided in section 4.7.

**Quality Control Inspections** are performed by appropriately trained and qualified internal or external entities whose function and organizational reporting is independent to the UVM Operations organization. Quality Control Inspections are intended to provide reasonable assurance of compliance and are typically performed using judgmental sampling with emphasis on the highest risk areas. Details are provided in section 4.8.

**Quality Assurance Reviews** are performed to provide reasonable assurance the UVM program and processes are designed and implemented effectively. The reviews are performed to assess the design of, and ensure compliance to established UVM policies and procedures, and to provide recommendations for continuous improvement. The reviews are also intended to provide reasonable assurance VM is complying with Federal and State requirements, as applicable, in addition to SCE's VM Wildfire Mitigation Plan commitments. Details are provided in section 4.9.

Separate to the UVM Program, other compliance QA reviews are performed by T&D QA Process and Controls group and by the Corporate Audit Services Division.

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## 4.7 Post Work Verification

### 4.7.1 Post Work Verification

- Pre-inspection inventory is approximately 1.6 million trees inspected annually, (~133K monthly), and mitigation of approximately 950,000 trees annually (~80K monthly) for a total estimated monthly pre-inspection/trimming of 213,000 trees
- SSPs will target a cumulative monthly Post Work Verification (PWV) quantity of approximately 7148<sup>1</sup> resulting in a Confidence Level (CL) / Confidence Interval (CI) of 99/1.5%
- PWV should target to include a mixture of Pre-Inspection (PI) and Tree Trimming (TT) work of approximately 20% and 80% respectively, when practical
- PWV should include a mixture of HFRA and non-HFRA grids/circuits, and when practical, should include higher risk areas
- PWV of PI should be performed before the TT
- PWV of TT should be performed within 45 days after the TT has been completed, when practical, to avoid being performed after QC inspection.
  - SSPs may also perform PWV at any time while in the field
- PWV shall be documented in the Work Management System (WMS)
- PWV PI Criteria includes, but is not limited to the following:
  - Ensuring clearances required by the Transmission Vegetation Management Plan or Distribution Vegetation Management Plan have been achieved
    - Any tree that is not expected to maintain CCD for an annual cycle and not identified for work shall be considered a failure
      - Any tree that is within CCD and not identified for work shall have a documented reason for not being listed (e.g., exception tree, MWS etc.)
    - Obvious hazard and/or dead and dying trees missed by the PI shall be considered a failure

<sup>1</sup> The 7148 target is based on a full staff of 56 SSPs



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- Complete and accurate inventory, species, and overall WMS data<sup>2</sup>
- PI's consistently over prescribing trees for mitigation should receive feedback/coaching when practical. Continued over prescribing may result in additional corrective actions.
- PWV TT Criteria includes, but is not limited to the following:
  - Ensuring clearances required by the Transmission Vegetation Management Plan or Distribution Vegetation Management Plan have been achieved
    - Any tree inside RCD at time of inspection shall be considered a failure, unless it's an approved exception (i.e., Major Woody Stem)
    - Any tree that is not expected to maintain RCD clearance for an annual cycle shall be considered a failure, unless it's an approved exception
    - Assessment of any incomplete work submitted by the contractor
  - Appropriate ANSI utility tree pruning criteria
  - Verifying trees delisted by the trimming contractor did not require mitigation<sup>3</sup>
    - When determined that a delisted tree requires mitigation, the SSP shall have the work point created and provide feedback to the applicable contractor, when practical
- Additionally, if training/coaching provided to the pre-inspection or pruning contractors and/or feedback provided after a SSP review fails to yield satisfactory performance, additional controls will be added to the process to correct performance deficiencies.


## 4.8 Quality Control Inspections

### 4.8.1 Quality Control Inspections for TVMP and DVMP

- Transmission circuit miles are inspected using a CL/CI of 99/5% and Distribution circuit miles are inspected using the mileage targets of Table 1

<sup>2</sup> Errors identified should be communicated to the applicable contractor, when practical. PIs consistently making errors may have the issues escalated to VM Compliance for additional corrective actions


<sup>3</sup> Quantity of delisted trees verified by SSPs may be included in the PWV monthly target counts

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- If significant inspection criteria violations are identified, the QC inspector (or their representative) must provide timely notification to the applicable SSP(s) and QC scheduler for potential scope expansion, feedback to contractor, or other action deemed appropriate
- QC inspection criteria includes, but is not limited to, the following:
  - Ensuring clearances established in the TVMP/DVMP (as applicable) are achieved
  - Complete and accurate inventory, species identification
  - Appropriate ANSI utility tree pruning criteria
- RCD and CCD clearance violations shall be annotated in the work management system for remediation to achieve the required clearance
- Delisted Trees – Any trees identified for mitigation (trimming and/or removal) by the Pre-Inspection contractors and determined by the tree trimming contractor that no work is required (delisted) shall have a monthly list provided to QC
  - The list shall be provided to the QC Scheduler from the Resource Planning and Performance Management (RPPM) group and subsequently provided to the QC inspectors
  - If the area being sampled by QC includes a delisted tree, QC shall verify the delisting was appropriate. If the tree was identified by QC to be within CCD and work was required and the tree was delisted, a work point shall be generated

#### 4.8.2 Hazard Trees

- QC shall perform an independent tree risk assessment in accordance with the sampling recommendations referenced in section 4.4
  - Tree risk assessment scoring shall be performed using the latest approved version of the HTMP Assessor Field Guide and Tree Risk Calculator
  - QC should target performing tree risk assessments, as practical, for risk scores  $\geq 50$  where no mitigation was required
- Subject Trees identified as a Hazard Tree will also be inspected for the following criteria:
  - Prescription was completed (Prune or Removal)
  - ANSI criteria was met on Prune
  - Mitigation did not impact other trees adjacent to where mitigation was performed
  - Site Conditions are stable

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- Upon QC Inspections of Hazard Trees, QC Inspectors will review adjacent Subject Trees for inventory accuracy and add any “Missed” Subject Trees to the HTMP inventory for assessment.

#### **4.8.3 Targeted QC Inspections for Negative PI Performance**

- VM Program Management produces monthly reports identifying add-on/Scope changes performed by tree trimmers due to poor Pre-Inspector (PI) performance
- When PI outliers in performance are identified, QC may perform targeted inspections (performed before any trimming) to confirm the outlying trends being observed
- Results of the targeted QC inspections will be shared with VM operations to determine the need for corrective actions being issued to the respective contractor

#### **4.8.4 QC Scheduling, Inspection and Reporting**

- The QC scheduler is responsible for selecting the circuit mileage to be inspected
- The QC scheduler is responsible for selecting Subject, Reliability and/or Hazard Trees to be inspected for HTMP
- QC inspection packages should be provided to the QC inspection contractor by the QC scheduler by the 15<sup>th</sup> of the month prior to the planned QC inspection
- QC inspections should be performed within 60-90 days of a completed work assignment by contractor
- QC inspection results/reports shall be provided to the QC scheduler for review in a timely manner
  - If significant conditions are identified that require immediate attention, the QC contractor shall notify the applicable SSP(s) of such conditions prior to issuing the subsequent report
  - Noted deficiencies are remediated
  - Performance feedback is provided to the appropriate contractor
  - Reworked conditions are verified for completion
- QC inspection reports are filed in the UVM SharePoint folder
  - Note: QC inspection reports are not Critical Business Records

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#### 4.8.5 Inventory Reconciliation

- If issues are identified with inventory, the issues shall be provided to, and reconciled by the appropriate pre-inspection contractor, and appropriate records updated in the Work Management System.
- The QC inspections are intended to be a validation that SCE's tree inventory is correct.


#### 4.8.6 Summer Readiness/Supplemental Patrols

- Distribution: Operation Santa Ana – SCE SSPs in conjunction with Local Fire Authorities (LFA) perform an inspection of assets/vegetation to ensure no encroachment conditions exist. Identified conditions are scheduled for mitigation by SCE UVM contractors and validation of work completion is performed by the LFA
- Area of Concerns: Weather conditions such as high wind or extended heat during periods of low fuel moisture have greater potential to generate significant fire events if an ignition occurs. Supplemental inspection plans vary year-to-year based on SCE's fire science team recommendation and risk evaluations. These patrols may be performed by UVM pre-inspection contractors, SCE SSP's, or by review of LiDAR data.

#### 4.8.7 Transmission Circuits under FERC jurisdiction

- Transmission circuits under FERC jurisdiction (ISO) are inspected annually by SCE's UVM pre-inspection contractors in accordance with FAC-003 R6 requirements. Required mitigations (FAC-003 R7) are completed by SCE's UVM pruning contractors.
- SSPs are required to perform 100% circuit verification for circuits identified by the pre-inspectors as zero inventory circuits. SSPs should verify the zero-inventory circuit within 30 days of notification the circuit inspection has been completed.
- The SSP review shall be performed on the entire circuit, from source origination to destination (substation to substation) and may be performed using a combination of foot patrol, driving patrol, aerial inspection, or similar. The SSP verification may be performed by a single SSP, or in partnership with other SSP's (District hand-off), to ensure the circuit is zero-inventory.
- Documentation reviews for zero inventory circuits shall be documented on the appropriate inspection form (Grid Cover Sheet or equivalent) and be submitted to Program Management for retention.



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## 4.9 Quality Assurance Reviews

### 4.9.1 Internal Program Review

- An annual internal quality review should be performed to assess the design of and provide reasonable assurance of compliance to established UVM policies and procedures, and to provide recommendations for continuous improvement. The review should include the following areas:
  - All UVM Program elements defined in UVM-01 for adherence and improvement opportunities
  - Key areas identified in UVM-21, "Internal Controls"
  - 3rd Party SME's may be engaged to perform field verification assessment(s) under the direction of the review lead if field engagements are included in the assessment
  - Verification of annual QC plan implementation

### 4.9.2 Compliance Review

- Annual QA Compliance reviews are performed by Compliance and Quality Process & Controls to provide reasonable assurance of compliance to Federal and State requirements, as applicable. This review includes an assessment of compliance evidence and documentation, and key controls testing.
  - Review is intended to identify compliance gaps and improvement opportunities
  - Review complies with ERCP-06, and applicable P&C procedures
  - Compliance evidence from the prior year is reviewed prior to management's declaration of compliance
  - Compliance evidence from the prior year is reviewed to provide assurance to Wildfire Mitigation Plan (WMP) commitments
  - Compliance evidence and documentation is reviewed against the applicable regulatory and WMP requirements to assess:
    - Accuracy – Evidence substantiates assertions in the RSAW and/or the RSAW accurately describes the process performed
    - Relevancy – Evidence substantiates all parts of the Requirement
    - Completeness – Evidence is comprehensive and sufficient to demonstrate compliance
  - Key controls testing is performed to assess the design and effectiveness of these controls
  - Final report/results are provided to UVM Program Owner and other relevant stakeholders

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#### 4.10 Annual Quality Control Inspection Plan

An annual QC inspection plan is required to identify the planned strategy for QC inspections that will be performed during the calendar year.

Scope identified in the QC plan may be adjusted to account for any unforeseen schedule issues contingent upon the minimum sampling volume being maintained.

The plan shall be issued at the start of 2Q of the inspection year.

The plan shall be approved by the appropriate UVM senior leadership (Regulatory and Compliance Senior Manager and Operations Principal Manager).

#### 4.11 Performance Analysis and Trending

Results of QC inspections shall be reviewed monthly and compared to the AQL requirements. Results shall be communicated to vegetation contractors during monthly performance review meetings. Declining performance and/or other adverse trends may require the implementation of Corrective Actions.

If the following thresholds for declining performance are identified in VM's routine line clearing program, VM Compliance may initiate a cause evaluation to identify the probable cause of the performance decline and work with VM stakeholders to develop and implement corrective actions to reverse the performance decline:

- 2% decline in overall T&D RCD performance within 3 consecutive months
- 2% decline in overall T&D RCD performance from prior Year-end performance to next Year-End performance
- 3 consecutive months where CCD performance (Corporate goal target) is not achieved

Cause evaluations should be documented in accordance with the requirements of UVM-22, "Corrective Action Program."


#### 4.12 Records

SSP review records are maintained electronically in the Work Management System.

The annual QC plan and QC reports are maintained in the Vegetation Management SharePoint site.

Electronic and/or hardcopy records shall be retained for 10 years beyond the inspection date.




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Post Work Verification and UVM Program Oversight					

#### Approvals


Compliance Program Owner	Signature	Date
[NAME REMOVED]	<i><b>[NAME REMOVED]</b></i>	3/20/25

#### 5 Revision History

Revision Number	Date	Description of Revision	By	Next Review Date
1	12/21/18	Initial Release for UVM Program	[NAME REMOVED]	2019
2	5/17/19	Modified Section 4.7, Updated TSP to SSP	[NAME REMOVED]	5/17/20
3	9/1/19	Revised QC Mileage Sample Tables to incorporate REAX Risk Data	[NAME REMOVED]	9/1/20
4	4/1/20	Revised QC Mileage Sample Tables and incorporated additional HTMP QC inspection requirements	[NAME REMOVED]	4/1/21
5	2/9/22	Updated program sampling requirements and general document refresh for currency	[NAME REMOVED]	2/9/23

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6	1/25/23	Added QC of Structure Brushing and revised QC and PWV Criteria	[NAME REMOVED]	1/25/24
7	2/10/23	Revised QC Sampling Criteria	[NAME REMOVED]	2/10/24
8	6/1/23	Added CAP performance thresholds in section 4.11	[NAME REMOVED]	6/1/24
9	4/1/24	Revised QC Criteria due to Tree Risk Index Changes	[NAME REMOVED]	4/1/25
10	3/24/25	General document refresh/update. Revised Table 1 QC sample mileage to reflect current HFRA/non-HFRA Distribution Miles. Modified SSP PI/TT sampling from 50/50 to 20/80.	[NAME REMOVED]	3/24/26

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## 6 References

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### External References

- NERC Glossary of Terms

### Internal References

- UVM-11, Qualification of UVM Senior Specialists
- UVM-16, UVM Program Glossary of Terms
- ECSS-02, E&C Shared Services Glossary of Terms (ECSS-02)
- ERCP-06, Self-Certification Procedure

## 7 Distribution and Data Retention

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The approved version of the document shall be stored on the Vegetation Management SharePoint site while in effect and for at least ten (10) years thereafter.

### Distribution list:

- UVM Managers
- Impacted ERCP OU Compliance Touchpoints
- E&C PMO
- UVM Quality Control Contractors

## 8 Key Contacts

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UVM Senior Manager, Regulatory and Compliance: [NAME AND PHONE NUMBER REMOVED]