



June 13, 2025

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

**SUBJECT: Office of Energy Infrastructure Safety's Report on Southern California Edison's 2023 Substantial Vegetation Management Audit**

Pursuant to the requirements of California Public Utilities Code section 8386.3(c)(5)(C), the Office of Energy Infrastructure Safety (Energy Safety) completed its final report on Southern California Edison's (SCE) 2023 Substantial Vegetation Management (SVM) audit. Energy Safety finds that SCE substantially complied with a substantial portion of the vegetation management requirements in its 2023-2025 Wildfire Mitigation Plan for compliance year 2023.

The attached report follows Energy Safety's publication of its SVM audit on February 18, 2024, and SCE's subsequent response on March 19, 2025. Pursuant to statutory requirements, a copy of this report is issued to SCE, published on Energy Safety's 2023 SVM Docket<sup>1</sup> and provided to the California Public Utilities Commission.

Sincerely,

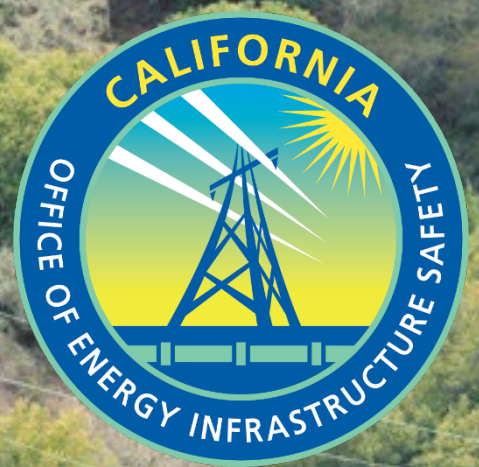
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<sup>1</sup> All documents related to SCE's 2023 SVM audit are available on Energy Safety's e-filing under the "2023-SVM" docket and available here: (<https://efiling.energysafety.ca.gov/Lists/DocketLog.aspx?docketnumber=2023-SVM>)

Attachment: SCE 2023 SVM Audit Report



**OFFICE OF ENERGY INFRASTRUCTURE SAFETY**

**2023 SUBSTANTIAL VEGETATION**

**MANAGEMENT AUDIT REPORT**

**SOUTHERN CALIFORNIA EDISON**

June 2025

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# EXECUTIVE SUMMARY

The Office of Energy Infrastructure Safety (Energy Safety) completed an audit of Southern California Edison Company's (SCE) vegetation management commitments from its approved 2023-2025 Wildfire Mitigation Plan (WMP) on February 18, 2025.<sup>1</sup>

The SCE 2023-2025 WMP had 13 vegetation management initiatives in six programmatic areas.<sup>2</sup> In the SCE Substantial Vegetation Management Audit (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.

SCE submitted its Corrective Action Plan (CAP) addressing the deficiencies identified in the SVM Audit on March 19, 2025.<sup>3</sup> Based on an analysis of SCE's CAP as well as the analysis in the 2023 SVM Audit, Energy Safety found that SCE substantially complied with one of the three deficient initiatives by supplying additional information and clarifications that demonstrated that SCE completed the majority of the work and achieved the program objective. Given that the 2023 SVM Audit found that SCE completed all work in 10 initiatives and this analysis found that it substantially complied with one of the deficient initiatives, SCE substantially complied with a total of 11 of the 13 vegetation management initiatives. Thus, Energy Safety found that programmatically, SCE substantially complied with a substantial portion of the vegetation management requirements in its 2023-2025 WMP for compliance year 2023.

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<sup>1</sup> [SCE's 2023-2025 WMP](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55866&shareable=true) (Rev. #1, October 26, 2023), pp. 379-380

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55866&shareable=true>).

<sup>2</sup> [Energy Safety's 2023 SVM Audit of SCE](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57986&shareable=true) (Feb. 18, 2025)

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57986&shareable=true>).

<sup>3</sup> [SCE's 2023 SVM Audit Corrective Action Plan](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58114&shareable=true)

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58114&shareable=true>).

# 1. INTRODUCTION

Pursuant to Public Utilities Code section 8386.3(c)(5), Energy Safety must annually audit the vegetation management work performed by, or on behalf of, an electrical corporation. The SVM Audit shall specify any failure of the electrical corporation to fully comply with the vegetation management commitments in its Wildfire Mitigation Plan (WMP).<sup>4</sup> Energy Safety then provides the SVM Audit to the electrical corporation and grants it a reasonable time to correct and eliminate any deficiency therein. The electrical corporation submits its response to the SVM Audit in a Corrective Action Plan (CAP). Following receipt and review of the electrical corporation's CAP, Energy Safety completes an analysis of the CAP and issues an Audit Report to the electrical corporation identifying whether it substantially complied with a substantial portion of the vegetation management requirements in the compliance year.<sup>5, 6</sup>

Energy Safety published the 2023 SCE SVM Audit on February 18, 2025.<sup>7</sup> The Audit concluded that SCE did not perform all the work specified in three out of the 13 vegetation management initiatives in its 2023-2025 WMP. In response to the SVM Audit, SCE submitted its CAP on March 19, 2025.<sup>8</sup> Energy Safety reviewed SCE's CAP and supporting information to determine whether it substantially complied with a substantial portion of their vegetation management requirements in its 2023-2025 WMP for compliance year 2023.

This document is Energy Safety's Report on the 2023 SVM Audit of SCE. The document is organized as follows:

- Section 2 is a summary of the 2023 SVM findings published in the February 18, 2025 audit.
- Section 3 includes Energy Safety's initiative level (3.1) and programmatic (3.2) compliance analysis of SCE's CAP and supporting documentation and information.
- Section 4 provides the basis for Energy Safety's conclusion that SCE substantially complied with a substantial portion of the vegetation management requirements in its 2023-2025 WMP.

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<sup>4</sup> Pub. Util. Code, § 8386.3(c)(5)(A).

<sup>5</sup> Pub. Util. Code, § 8386.3(c)(5)(C).

<sup>6</sup> [2024 Compliance Guidelines](#), Section 8.1, (September 2024), p. 13.

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57320&shareable=true>).

<sup>7</sup> [Energy Safety's 2023 SVM Audit of SCE](#)

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57786&shareable=true>).

<sup>8</sup> [SCE's 2023 SVM Audit Corrective Action Plan](#)

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58114&shareable=true>).

## 2. 2023 SVM AUDIT FINDINGS

The 2023 SVM Audit found that SCE performed all required work in ten of the 13 initiatives and was deficient in the remaining three. Table 1 below is reproduced from Energy Safety's 2023 SVM Audit.<sup>9</sup>

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
<b>8.2.3 Vegetation Fuels Management</b>	<b>8.2.3.2 Wood and slash management</b>	<b>Did not complete all work</b>
<b>8.2.3 Vegetation Fuels Management</b>	<b>8.2.3.3 Clearance</b>	<b>Did not complete all work</b>
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
8.2.4 Vegetation Management Enterprise	8.2.4 Vegetation Management Enterprise System	Completed all work
8.2.5 Quality Assurance and Quality Control	8.2.5. Quality Assurance and Quality Control	Completed all work
<b>8.2.6 Open Work Orders</b>	<b>8.2.6 Open Work Orders</b>	<b>Did not complete all work</b>
8.2.7 Workforce Planning	8.2.7 Workforce Planning	Completed all work

<sup>9</sup> [Energy Safety's 2023 SVM Audit of SCE](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57786&shareable=true) pp.5-6

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57786&shareable=true>).

### 3. SVM COMPLIANCE ANALYSIS

Energy Safety must assess whether the electrical corporation substantially complied with a substantial portion of the vegetation management requirements in the compliance year.<sup>10</sup> The determination of substantial compliance is based on an analysis of both the electrical corporation's compliance with each vegetation management initiative as well as the program overall.

The initiative level analysis includes:

- 1) **Achievement of Objective** – Determination of whether the electrical corporation's deficiencies, after considering its planned corrective actions, have not detracted from the electrical corporation's ability to achieve the objectives of its vegetation management programs; and
- 2) **Good Faith Effort** – Determination of whether the electrical corporation's effort to fulfill the vegetation management requirement constituted a good faith effort to comply with the vegetation management requirements in the approved WMP.

The programmatic level analysis includes:

- 3) **Completeness**- Determination of whether the electrical corporation completed the large majority of the vegetation management requirements in its approved WMP.

Energy Safety synthesizes the initiative and programmatic analyses to formulate the conclusion regarding substantial compliance with the substantial portion of the vegetation management requirement in SCE's WMP, which is described in Section 4.

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<sup>10</sup> Pub. Util. Code, § 8386.3(c)(5)(C).



### 3.1 Initiative Level Assessment

#### Summary of Initiative Level Compliance

Table 2 includes the three initiatives from SCE's 2023-2025 WMP for which Energy Safety's 2023 SVM Audit found that SCE did not complete all work. The table includes Energy Safety's determination of substantial compliance for each initiative based on the analysis below. Energy Safety found that SCE substantially complied with one of the three deficient initiatives, but did not provide sufficient documentation to support substantial compliance with the remaining two initiatives.

Vegetation Management Initiative with Deficiency	Determination of Substantial Compliance
<b>8.2.3.2 Wood and Slash Management</b>	<b>Did not substantially comply</b>
8.2.3.3 Clearance	Substantially complied
<b>8.2.6 Open Work Orders</b>	<b>Did not substantially comply</b>

#### 8.2.3.2 Vegetation and Fuels Management: Wood and Slash Management

#### Summary of Initiative Work Commitments and Activities

The purpose of this initiative was to take actions “to manage all downed wood and ‘slash’ generated from vegetation management activities.”<sup>11</sup> In its 2023-2305 WMP, SCE committed to wood and slash management activities stating “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.”<sup>12</sup> Energy Safety interpreted this statement 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. While SCE provided screenshot images from its database

<sup>11</sup> [Energy Safety's 2023-2025 Wildfire Mitigation Plan Technical Guidelines](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true) (December 6, 2022), p. A-24 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true).

<sup>12</sup> [SCE's 2023 SVM Audit Corrective Action Plan](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58114&shareable=true), pp. 2 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58114&shareable=true).

and excerpts from Statement of Works (SOWs) of wood and slash management for contractors indicating that some work was completed, SCE was unable to provide sufficient documentation demonstrating that it removed all wood and slash from its vegetation management activities in 2023.

## 2023 SVM Audit Finding

Failure to remove wood and slash debris following tree trimming and removal activities would contribute to unnecessary risk on the system. Without 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, Energy Safety could not conclude that the work was completed. Therefore, SCE did not provide information consistent with the completion of all work identified in initiative 8.2.3.2 Wood and Slash Management.<sup>13</sup>

## SCE's CAP Response

In its CAP, SCE explained that "because tree trimming and removal work inherently produces cuttings and woody material, SCE considers debris removal as part of completion vegetation mitigation work."<sup>14</sup> As such, SCE's vegetation management work management system (WMS) does not require contractors to specifically document wood and slash removal activities. However, SCE provided screenshots which demonstrate that contractors have the option to document the status of debris removal for the Routine Line Clearing, HTMP, and Dead and Dying Tree Removal programs, but note that this tracking is not mandatory.<sup>15</sup> For Structure Brushing, SCE does not track this activity separately but conducts QCs of its contractors' work of debris cleanup.

SCE also stated that because vegetation debris cleanup is not a formal 2023-2025 WMP target and is performed by SCE's contractors, SCE did not have to commit to tracking this activity nor report all instances of vegetation debris cleanup.

As a corrective measure, SCE committed to including a formal qualitative WMP target for debris management in its forthcoming 2026-2028 WMP, including reviewing and potentially updating contract terms requiring documentation by the contractors for debris management.<sup>16</sup>

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<sup>13</sup> [Energy Safety's 2023 SVM Audit of SCE](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57986&shareable=true), p. A12

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57986&shareable=true>).

<sup>14</sup> [SCE's 2023 SVM Audit Corrective Action Plan](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58114&shareable=true), pp. 2-3

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58114&shareable=true>).

<sup>15</sup> [SCE's 2023 SVM Audit Corrective Action Plan](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58114&shareable=true), p. 3

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58114&shareable=true>).

<sup>16</sup> [SCE's 2023 SVM Audit Corrective Action Plan](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58114&shareable=true), p. 4

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58114&shareable=true>).

## Energy Safety's Analysis of Substantial Vegetation Management Compliance with the 2023-2025 WMP

### *Criteria 1: Achievement of Objective*

In the SVM audit, Energy Safety requested that SCE “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.”<sup>17</sup> SCE did not provide documentation demonstrating debris was removed in all or most instances. SCE only provided screen shot images which indicated it is possible for SCE’s contractors to record wood and slash removal for most of its vegetation management programs but stated that SCE did not require its contractors to document this work. As such, SCE did not provide sufficient documentation that all downed wood and slash generated by vegetation management activities was managed in accordance with its procedures. SCE stated that its Senior Specialists (SSPs) are required to look for debris removal as a part of their QC procedure, but did not submit any documentation collected by the SSPs as part of the CAP response.

SCE’s CAP states that “Energy Safety did not identify any specific locations where debris was left at a location inappropriately or against customers’ wishes.”<sup>18</sup> However, SCE’s procedures state they would remove wood and slash debris associated with all of their vegetation management. Energy Safety’s audit did not provide specific locations where the work was not completed; however, SCE understands the location and scope of their vegetation management field work and should be able to determine locations where work was or was not completed independent of Energy Safety and provide sufficient documentation of those activities. SCE’s CAP also states that “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.” However, Energy Safety notes that Wood and Slash Management is a required initiative in the 2023-2025 Wildfire Mitigation Plan Technical Guidelines, which states “In this [Wood and Slash Management] subsection, the electrical corporation must provide an overview of how it manages all downed wood and “slash” generated from vegetation management activities, including references to applicable

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<sup>17</sup> [Energy Safety's 2023 SVM Audit of SCE](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57986&shareable=true), p. A12

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57986&shareable=true>).

<sup>18</sup> [SCE's 2023 SVM Audit Corrective Action Plan](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58114&shareable=true), p. 4

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58114&shareable=true>).

regulations, codes, and standards.”<sup>19</sup> SCE’s WMP provided several narrative statements in its 2023-2025 WMP in which it committed to manage all downed wood and slash.<sup>20</sup>

Comprehensive management of wood and slash reduces ground fuels which results in a reduction of wildfire risk. SCE should track and keep accurate records of its wood and slash management work. While the screenshots SCE provided demonstrate capacity to track this work, SCE states it’s not a contract requirement. Energy Safety found that SCE’s failure to document that all wood and slash associated with its vegetation management was completed detracted from SCE’s ability to manage its wildfire risk and that SCE did not achieve the objective of this initiative.

### *Criteria 2: Good Faith Effort*

SCE did not require its contractors to document wood and slash removal, despite having the capacity to do so. Furthermore, while SCE had the opportunity to provide SSP QA records in its CAP to demonstrate that wood and slash work was completed, it did not, despite showing evidence that these records likely exist for at least some of SCE’s work locations. While SCE did provide documentation of management procedures and documents supporting incorporation of those requirements into vendor contracts, this information is insufficient to demonstrate that SCE made a good faith effort to complete its Wood and Slash management commitments in its WMP.

### *Initiative Level Determination*

SCE did not demonstrate that all wood and slash debris from routine trimming and removal activities was cleared on the same day the work was performed. Because the initiative’s objective is to “to manage all downed wood and ‘slash’ generated from vegetation management activities,”<sup>21</sup> Energy Safety finds that SCE did not substantially comply with this initiative.

Energy Safety expects SCE will document wood and slash management resulting from its vegetation management programs and provide this documentation to Energy safety upon request. Further, SCE must improve its documentation practices across all work orders to demonstrate compliance with WMP commitments.

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<sup>19</sup> [Energy Safety's 2023-2025 Wildfire Mitigation Plan Technical Guidelines](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true) (December 6, 2022), p 106 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true).

<sup>20</sup> [SCE's 2023-2025 WMP](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55866&shareable=true) (Rev. #1, October 26, 2023) p. 411-412 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55866&shareable=true).

<sup>21</sup> [Energy Safety's 2023-2025 Wildfire Mitigation Plan Technical Guidelines](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true) (December 6, 2022), p. A-24 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true).

### 8.2.3.3 Vegetation and Fuels Management: Clearance

#### Summary of Initiative Work Commitments and Activities

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.”<sup>22</sup> SCE’s 2023-2025 WMP included two narrative commitments, and one quantitative target related to clearance activities for compliance year 2023. SCE provided documentation supporting the two narrative commitments by demonstrating Grid Resiliency Clearance Distances (GRCD) for 12,932 (10%) of its clearance activities and exceeding its expanded clearances quantitative target for legacy facilities by completing work at 63 facilities (compared to its target of 50 sites). However, SCE did not provide documentation to support completion of the one narrative commitment regarding meeting the minimum required clearance distances (RCD) for work associated with Routing Line Clearing in compliance year 2023.<sup>23</sup>

#### 2023 SVM Audit Finding

In its 2023-2025 WMP, SCE committed to maintaining the minimum required clearance distance (RCD) for all trees in HFRA. However, based on the documentation SCE provided, ten of the prescribed trees were categorized as non-compliant with post clearances. Thus, Energy Safety concluded that SCE did not maintain minimum clearances for distribution and transmission lines in its Routine Line Clearing Program.<sup>24</sup>

#### SCE’s CAP Response

In its CAP, SCE stated that only seven records, not ten, were marked as non-compliant with post clearances. As a follow up to the CAP, Energy Safety reanalyzed the Excel file provided in response to Data Request 266 using the explanation provided in the CAP and found that SCE is correct in that seven trees out of 125,596 inspections were found in “Non compliance” post clearance work 2023, not the 10 reported in the 2023 SVM Audit.

The CAP stated that SCE believes the work was completed correctly but that the seven records for which trees were marked as “Non Compliance” were inaccurately marked in the Excel spreadsheet sent to Energy Safety in response to Data Request 266. SCE referenced its explanatory footnote included in SCE’s data response:<sup>25</sup>

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<sup>22</sup> [Energy Safety's 2023-2025 Wildfire Mitigation Plan Technical Guidelines](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true) (December 6, 2022), p. A-24 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true).

<sup>23</sup> [Energy Safety's 2023 SVM Audit of SCE](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57986&shareable=true), pp. A13 - A15 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57986&shareable=true).

<sup>24</sup> [Energy Safety's 2023 SVM Audit of SCE](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57986&shareable=true), pp. A13 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57986&shareable=true).

<sup>25</sup> Data Request 266, Question 15; attachment: “ES266-SCE-2023-SVM-01\_Q.15-RLC Clearance.xlsx.”



SCE identified certain data discrepancies (e.g., missing inspection clearance and post clearance information) ... [and] 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.<sup>26</sup>

SCE's CAP provided a detailed explanation for why it believes these trees were marked non-compliant in error. SCE found that the clearance identified at the time of inspection (recorded in the 'Inspection Clearance field in the WMS) was greater than the clearance identified after completion of the mitigation work (recorded as 'Non Compliance' in the 'Post Clearance' field) for each of the seven records. Further, SCE's review of the next annual inspection data (2024) indicated that pre-inspection clearance for these seven records exceeded the minimum clearance requirements. SCE concluded that the clearance records at the time of inspection in 2023 as well as pre-inspection in 2024 demonstrate that it would be highly unlikely for these seven records to be non-compliant with clearance requirements following the completion of mitigation work (post clearance) in 2023. Therefore, SCE stated with a high degree of confidence that human error was the cause of these seven records with non-complaint post-clearance records in 2023.<sup>27</sup>

Additionally, SCE explained that corrective actions were issued in October 2024 to identify these data anomalies and that it made updates to its work management system to prevent human error of inadvertent selection of inapplicable drop-down menus. More specifically, crews can no longer select 'Non Compliance' in the "post clearance field, and instead, crew can only select the following from the drop-down menu: RCD, CCD, TCD, GRCD, or >GRCD.<sup>28</sup>

## Energy Safety's Analysis of Substantial Vegetation Management Compliance with the 2023-2025 WMP

### *Criteria 1: Achievement of Objective*

SCE was able to provide documentation demonstrating that it achieved minimum clearance distances for all but seven of the 125,596 trees inspected (>99%).<sup>29</sup> SCE provided clarification that the seven non-complaint trees were recorded in error. Energy Safety accepts SCE's explanation regarding this error and the work SCE has done to ensure these errors do not recur in future compliance years. In addition, SCE successfully completed its commitments

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<sup>26</sup> [SCE's 2023 SVM Audit Corrective Action Plan](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58114&shareable=true), p. 5  
(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58114&shareable=true>).

<sup>27</sup> [SCE's 2023 SVM Audit Corrective Action Plan](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58114&shareable=true), pp. 5-7  
(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58114&shareable=true>).

<sup>28</sup> [SCE's 2023 SVM Audit Corrective Action Plan](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58114&shareable=true), p. 7  
(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58114&shareable=true>).

<sup>29</sup> Data Request 266, Question 15; attachment: "ES266-SCE-2023-SVM-01\_Q.15-RLC Clearance.xlsx."

regarding expanded clearing along distribution and transmission lines and expanded clearances for legacy facilities. As a result, Energy Safety found that SCE completed the majority of the work for this commitment and achieved the objective of this initiative.

### *Criteria 2: Good Faith Effort*

SCE properly documented clearances for nearly all the work in this initiative (over 99% of the trees inspected for routine line clearing activities). This demonstrates that SCE made a good faith effort to maintain the minimum required clearance distance for all trees in HFRA.

### *Initiative Level Determination*

Energy Safety accepts SCE's explanation of the error associated with data entry for work within this initiative as provided in its CAP response. SCE performed the majority of the work related to its clearance commitments in its WMP and therefore substantially complied with this initiative. Furthermore, SCE has corrected the field data entry system error and has developed and implemented a solution to prevent such errors in the future, thereby demonstrating program maturity. Furthermore, SCE acknowledged the inherent complexity of its vegetation management data and committed to enhancing the transparency and precision of its responses to future data requests to reduce the potential for misinterpretation.

## 8.2.6 Open Work Orders

### Summary of Initiative Work Commitments and Activities

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."<sup>30</sup> SCE made six narrative commitments in its 2023-2025 WMP designating timeframes in which it planned to complete its Priority 1 (P1) and Priority 2 (P2) trees in High Fire Risk Areas (HFRA). P1 trees represent an imminent risk of wildfire ignition because vegetation is either in contact or within 18 inches of contact of electrified infrastructure and therefore must be mitigated within 24 and 72 hours respectively. P2 trees include trees that are farther than 18 inches from infrastructure but are either closer than the regulatory clearance requirement of 4 feet or were identified in the Dead and Dying Tree Program or HTMP Program. P2 trees must be mitigated within 30 days to 180 days depending on the program. Five of the narrative WMP commitments related to completing mitigation

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<sup>30</sup> [Energy Safety's 2023-2025 Wildfire Mitigation Plan Technical Guidelines](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true) (December 6, 2022), p. A-25 (https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=53286&shareable=true).

work on P1 and P2 trees within these specified time frames. SCE did not complete all mitigation work within the WMP mitigation time frames for a portion of its P1 and P2 trees as described in the 2023 SVM Audit Finding below. The sixth narrative commitment was related to revisiting overdue work orders, and SCE was able to provide documentation showing that it revisited overdue P2 work orders every 30 days as described in its WMP.

## 2023 SVM Audit Finding

In Data Request 266 Questions 30- 34<sup>31</sup>, Energy Safety requested SCE provide documentation for all instances of P1 and P2 mitigations during the 2023 compliance period. The Data Request specified that the response must include: the date the tree was identified, the date of remediation, condition identified, type of work completed, location, and tracking ID. Energy Safety requested this information for P1 trees in contact with infrastructure (Question 30), P1 trees within 18 inches of infrastructure (Question 31), P2 trees closer than the regulatory distance (Question 32), P2 trees associated with Routine Line Clearing (Question 33), and P2 trees associated with HTMP and Dead and Dying Tree program (Question 34) and indicated that this information should be consolidated into a single file. SCE provided one Excel file with all of its P1 and P2 trees, seemingly combining data for Questions 30 and 31 into one workbook and Questions 32-34 into a second workbook.<sup>32</sup> The Excel file was not accompanied by metadata describing columnar data or attributes, but did include measurements of distance, which Energy Safety interpreted to be distance to infrastructure in the absence of metadata. Energy Safety's analysis of the Excel file concluded that SCE did not complete P1 and P2 work orders within the timelines SCE had committed to in its 2023-2025 WMP for compliance year 2023 for a significant number of P1 and P2 trees. Energy Safety sent a follow up request (Data Request 278)<sup>33</sup> requesting additional data regarding imminent threats of contact with infrastructure and clarification on how remediation timeframes are set for compliance year 2023. In its response to Data Request 278, SCE indicated that the mitigation timeframes were internal targets contingent on not having constraints preventing work completion.<sup>34</sup> The response also stated that when a P1 condition is identified, its protocols impose a "stay onsite" requirement until the remediation is complete. SCE did not provide documentation demonstrating that the "stay onsite" requirement was met for P1 trees (but it seems unlikely that this requirement was met for all P1 trees given the long timeframes for some of the P1 mitigation work, one of which was 483 days) and did not provide any additional documentation on constraints that would have delayed the work. Therefore, Energy Safety found that SCE did not complete all work associated with Initiative 8.2.6 Open Work Orders.

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<sup>31</sup> Data Request 266. Questions 30-34. September 12, 2024

<sup>32</sup> Data Request 266 Response, Question 30; attachments: "WS266-SCE-2023-SVM-01\_Q30-33.xlsx."

<sup>33</sup> Data Request 278, 8.2.6 Open Work Orders Questions 30-35, October 31, 2024.

<sup>34</sup> Data Request 278 Response. ES278 - SCE - 2023 – SVM, November 6, 2024.

## SCE's CAP Response

In its CAP, SCE provided additional information regarding the fields and attributes contained in the Excel file and stated that Energy Safety incorrectly identified which P1 and P2 should be remediated within designated time frames and double counted SCE's population of P1 and P2 trees.<sup>35</sup>

Specifically, SCE stated that Energy Safety incorrectly understood the distances in the column titled "Work Type" to be the distances between vegetation and electrified infrastructure. SCE stated that the distances in the Excel spreadsheet were thickness of the tree to be removed. Nowhere in Data Request 266 Questions 30- 34 did Energy Safety ask for the thickness of the tree to be removed. Instead, the relevant measurement required to evaluate SCE's six narrative commitments in its 2023-2025 WMP related to P1 and P2 trees is the distance of the trees from the infrastructure.

Despite identifying that the measurements provided were the thickness of the tree to be removed and thus not relevant to evaluation of the six commitments, SCE did not provide an updated spreadsheet with distance to infrastructure. Energy Safety attempted to reanalyze the data included in the Excel file but without the distance to infrastructure, Energy Safety could not determine which mitigation timeframe to apply to each line item. Data request 266 included a request for each tree priority based on distance to infrastructure including: P1 trees with infrastructure contact, P1 trees within 18 inches of infrastructure, P2 trees between 18 inches and 4 feet of infrastructure, P2 trees for Routine Line Clearing, and P2 trees within the HTMP and DRI programs. The Excel file SCE provided did not include the information requested in the Data Request, therefore, Energy Safety was unable to verify priority categories and associated mitigation timeframes.

Given the clarifications in the CAP, Energy Safety agrees that the analysis that formed the basis of its conclusion in the 2023 SVM Audit used irrelevant data; however, SCE's CAP did not include the relevant data needed to properly assess the completeness of the mitigation work on P1 and P2 trees. Thus, the ultimate Audit finding remains the same: SCE cannot prove that it completed all mitigation work within the WMP mitigation time frames for a portion of its P1 and P2 trees.

In addition to not providing all of the relevant data, SCE also stated that the work completion dates it provided could be incorrect because contractors' office staff, rather than contractors' field personnel, often enter data and close out work orders. For that reason, SCE stated the spreadsheet might indicate the work was performed on a date after it was actually

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<sup>35</sup> [SCE's 2023 SVM Audit Corrective Action Plan](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58114&shareable=true), p. 9-13  
(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58114&shareable=true>).

performed. This statement does not afford Energy Safety confidence that SCE has completed the required mitigation work within the timeframes necessary to reduce wildfire risk. It is incumbent upon SCE to ensure that its internal processes account for accurate data entry and reporting to Energy Safety.

Lastly, SCE stated that some of its tree mitigation work was delayed due to circumstances beyond SCE's control. Specifically, SCE stated that:

SCE's P2 remediation timelines are self-imposed timelines or targets 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).<sup>36</sup>

However, SCE did not provide documentation to support that tree mitigation work was delayed due to circumstances beyond its control.

As a corrective measure, SCE stated that it revised its TVMP/DVMP Statement of Work (SOW) to include potential monetary penalties for its contractors for late or incomplete work order closure documentation and notified contractors of this change during SCE's annual UVM Core Plans Training. SCE stated that these proposed penalties may be implemented in Q2 2025 if improvements are not made by contractors.

## Energy Safety's Analysis of Substantial Vegetation Management Compliance with the 2023-2025 WMP

### *Criteria 1: Achievement of Objective*

SCE's 2023-2025 WMP includes commitments for the timely mitigation of vegetation using a risk-based prioritization scheme primarily based on the distance between the vegetation and electrified equipment. The closer the vegetation was to the infrastructure, the higher the risk of ignition, and the shorter the corresponding mitigation timeframes. Using the CAP, Energy Safety reanalyzed the dataset provided in response to Data Request 266 and determined that SCE identified 4,012 P1 trees, which represent an imminent risk of ignition due to contact or near contact with electrical infrastructure.<sup>37</sup> Vegetation in contact with electrified infrastructure must be mitigated within 24 hours and vegetation within 18 inches of contact must be mitigated within 72 hours. These trees pose such a hazard to infrastructure that

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<sup>36</sup> [SCE's 2023 SVM Audit Corrective Action Plan](#), p. 9-13

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=58114&shareable=true>).

<sup>37</sup> Data Request 266, Question 32; attachment: "WS266-SCE-2023-SVM-01\_Q30-33.xlsx."



SCE's protocols require personnel to "stay onsite" until the remediation is complete.<sup>38</sup> The data that SCE provided showed that 418 (10%) P1 trees were remediated outside the maximum allowable timeframe for P1 trees, 72 hours, and 135 of these (3%) were remediated beyond two weeks (exceeding the maximum allowable time by a factor of 4.7). One P1 tree received mitigation after 483 days, exceeding the mitigation timeframe by over a year. SCE did not provide any documentation to support that its personnel stayed onsite until mitigation on P1 trees was completed. SCE's failure to adhere to risk-based mitigation timeframes for P1 trees results in increased ignition risk on the system.

SCE identified a total of 6,427 P2 records<sup>39</sup> but did not provide sufficient information to determine whether these trees should have been mitigated within a 30-, 90- or 180-day mitigation timeframe as specified in the WMP. The P2 tree data shows that 4,347 trees (68%) had mitigation timeframes greater than 30 days, 1,200 (19%) had mitigation timeframes greater than 90 days, and 386 (6%) had mitigation timeframes greater than 180 days, and 46 (1%) had not been mitigated as of the time of the CAP response submission. Without the data to determine which mitigation timeframe should have applied, it is possible that 68% of P2 trees were not mitigated within the proper timeframe. SCE's failure to adhere to risk-based mitigation timeframes for P2 trees results in increased ignition risk on the system.

SCE's CAP stated that some data inaccuracy was attributed to contractor data entry errors. Specifically, the "Creation Date" and "Complete Date" columns were not necessarily indicative of the actual remediation timelines because the third party contracted staff do not always enter closure dates on the same day the remediation work was completed.<sup>40</sup> Regardless of the data validation issue, Energy Safety determined that SCE did not remediate the P1 and P2 trees within the required mitigation timeframes. Energy Safety will look to SCE to ensure the accuracy of data submitted in response to Data Requests and in future CAP responses.

SCE's CAP stated that the P1 and P2 mitigation timeframes were "internal time frames" and noted that it "strives to meet these internal time frames contingent on not having constraints preventing work completion."<sup>41</sup> Energy Safety recognizes that constraints can prevent completion of work, and requests that future data request or CAP responses include details regarding constraints, as appropriate, to demonstrate that it is executing its WMP.

Energy Safety finds that SCE did not achieve the objective of this WMP initiative.

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<sup>38</sup> Data Request 278 Response. ES278 - SCE - 2023 – SVM, November 6, 2024.

<sup>39</sup> Data Request 266, Question 32; attachment: "WS266-SCE-2023-SVM-01\_Q30-33.xlsx."

<sup>40</sup> Data Request 266, Question 32; attachment: "WS266-SCE-2023-SVM-01\_Q30-33.xlsx."

<sup>41</sup> Data Request 278, Question 30; attachment: "ES278-SCE-2023-SVM Q. 30 Answer.pdf."

### *Criteria 2: Good Faith Effort*

SCE failed to provide sufficient information to demonstrate that it is properly managing its work orders by differentiating between the types of P1 and P2 trees, maintaining accurate records of work completion, and adhering to committed timeframes for each of these different work orders. Therefore, Energy Safety concludes that SCE did not make a good faith effort to manage its work orders.

### *Initiative Level Determination*

SCE did not provide sufficient documentation to demonstrate that it mitigated P1 and P2 trees within the risk-based mitigation timeframes nor did SCE's CAP provide additional information regarding risk-categories for its trees or detailed constraint information for Energy Safety to consider as part of this audit report. Without this information, Energy Safety could not verify that the work was completed to reduce ignition risk on the system.

Energy Safety expects that SCE will develop procedures to collect and record accurate mitigation timeframes and constraint data in future compliance years and provide such data as requested to demonstrate that SCE is executing its WMP.

Given the lack of information regarding prioritization and constraints, Energy Safety finds that SCE did not achieve the objective of this initiative, nor did it make a good faith effort to complete the work. Therefore, SCE did not substantially comply with this initiative.

## 3.2 Programmatic Assessment

Energy Safety's SVM Audit, dated February 18, 2025, found that SCE completed all work in 10 of the 13 initiatives in its 2023-2025 WMP for compliance year 2023 and was unable to provide sufficient documentation to demonstrate that all work was completed for three of the 13 initiatives. SCE's CAP, dated March 19, 2025, provided sufficient documentation to demonstrate substantial compliance for one of the three initiatives identified in the SVM Audit. However, SCE's CAP did not provide sufficient documentation demonstrating that it completed work for the remaining two initiatives, Wood and Slash Management and Open Work Orders, identified in the SVM Audit.

Energy Safety's 2023 SVM Audit identified recordkeeping and documentation issues within several of SCE's vegetation management programs that required corrective actions. For example, SCE did not consistently track the completion of wood and slash management.<sup>42</sup> In its CAP, SCE indicated that wood and slash management requirements are included in SCE's vegetation management work management system (WMS) for SCE contractors, but its work management platform did not require documentation of debris removal work. Removal of wood and slash associated with SCE's vegetation management programs is essential to reduce wildfire risk. Without adequate documentation, Energy Safety could not determine if the wood and slash removal work was completed. SCE also stated that constraints prevented debris removal in some cases but did not provide documentation to support this assertion. If SCE does not require its contractors to log the completion of work in the field, SCE cannot verify that all work associated with the Wood and Slash Management Initiative has been completed. Energy Safety expects SCE to ensure its contractors accurately record field conditions and constraints and provide this documentation upon request to allow Energy Safety to complete the audit process in subsequent compliance years.

With respect to open work orders associated with P1 and P2 tree mitigation, it is imperative that SCE complete all tree mitigation work within the risk-based timeframes to reduce ignition risk on the system. SCE must provide detailed and accurate documentation of this mitigation work to Energy Safety to allow verification that the work was completed. Should constraints arise during the mitigation process, SCE should also provide that data to Energy Safety to inform the audit.

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<sup>42</sup> [SCE's 2023-2025 WMP](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55866&shareable=true), (Rev. #1, October 26, 2023), p. 411  
(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=55866&shareable=true>).

SCE's CAP responses to all SVM audits to date (2020-2023),<sup>43,44,45</sup> include language stating that narrative commitments in its WMP are work that SCE strives to complete. However, mitigating trees within strike distance of infrastructure and removal of wood and slash debris are critical to reducing ignition risk on the system. Therefore, Energy Safety treats the commitments in SCE's approved WMP as necessary components of wildfire risk reduction. SCE must provide Energy Safety with the documentation requested to verify that SCE is completing the vegetation management work commitments in its WMP to reduce wildfire risk. Energy Safety recognizes that work may be incomplete or delayed due to circumstances beyond SCE's control and will consider these constraints in future audits when documentation of these constraints is provided. SCE should not consider work associated with critical wildfire risk reduction initiatives as "internal targets" it strives to complete, but rather it should make every effort to complete the work within the prescribed risk-informed mitigation timeframes to meet the WMP objective of reducing ignitions and wildfire risk throughout SCE's service territory. Energy Safety is concerned that SCE's treatment of WMP commitments as "internal targets" demonstrates an organizational lack of commitment to the wildfire mitigation efforts it presents in its WMP as important to minimizing wildfire risk. In addition to implementing procedures to ensure accurate data recording, it is incumbent on SCE to implement protocols and practices to minimize constraints that would prevent complete and timely mitigation of vegetation risks on its system. SCE must also provide documentation of constraints when they impact vegetation management work in the future to allow Energy Safety to verify that SCE is completing all work described in the approved WMP. Energy Safety also expects SCE to provide detailed metadata in response to future Energy Safety data requests to provide clarity for interpretation regarding data submittals. Energy Safety appreciates that SCE has recognized recordkeeping and data accuracy issues and is working toward corrective actions to prevent reoccurrence.

Considering SCE's CAP made commitments to improve recordkeeping and transparency in data submissions, and the fact that SCE demonstrated compliance with 11 of the 13 WMP initiatives, Energy Safety has concluded that SCE has completed the majority of the vegetation management work outlined in its 2023-2025 WMP. As a result, Energy Safety finds that, programmatically, SCE substantially complied with the vegetation management work described in its 2023-2025 WMP for compliance year 2023.

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<sup>43</sup> [SCE 2020 Substantial Vegetation Management Audit](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=52277&shareable=true), pp. 5-7

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=52277&shareable=true>).

<sup>44</sup> [Report on 2021 SVM Audit of SCE](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56264&shareable=true), pp. 5-7

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=56264&shareable=true>).

<sup>45</sup> [SCE 2022 SCM Audit Report](https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57455&shareable=true), pp. 5-7

(<https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=57455&shareable=true>).

## 4. CONCLUSION

Based upon the analysis discussed in Section 3, Energy Safety concludes that SCE substantially complied with a substantial portion of the vegetation management requirements in its 2023-2025 WMP for compliance year 2023.



# DATA DRIVEN FORWARD-THINKING INNOVATIVE SAFETY FOCUSED



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