

Docket #: 2025-IE

August 22, 2025

Patrick Doherty  
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Office of Energy Infrastructure Safety  
715 P Street, 20th Floor  
Sacramento, CA 95814

**SUBJECT:** Southern California Edison Company's Comments on the 2024 Wildfire Mitigation Plan Independent Evaluator Annual Report on Compliance

Dear Program Manager Doherty:

Pursuant to the Office of Energy Infrastructure Safety's ("Energy Safety") July 23, 2025 notice inviting comments on the 2024 Wildfire Mitigation Plan ("2024 WMP") Independent Evaluator ("IE") Annual Reports on Compliance, Southern California Edison Company ("SCE") submits the following comments on PA Consulting Group Inc.'s ("PA Consulting" or "the IE") 2024 Annual Report on Compliance ("IE Report"), which was published on July 23, 2025.

### **INTRODUCTION**

SCE appreciates the PA Consulting team's significant efforts to conduct the extensive IE review of SCE's compliance with its 2024 WMP. Based on its evaluation of SCE's execution of 2024 WMP initiatives, the IE concluded that "SCE successfully demonstrated meaningful progress across its mitigation categories."<sup>1</sup> Regarding the review of costs incurred to implement SCE's 2024 WMP, the IE generally found that SCE's expenditures were appropriately tracked and aligned with actual work performed.<sup>2</sup> The IE also found that SCE's Quality Assurance/Quality Control ("QA/QC") culture "merits a high score" because it is actively supported by executive leadership and is reinforced through routine engagement from senior subject matter experts.<sup>3</sup>

Despite these well-supported conclusions, the IE Report makes certain unsupported findings requiring corrections or clarifications. SCE respectfully requests that Energy Safety consider the comments below when Energy Safety evaluates SCE's compliance with its 2024 WMP.<sup>4</sup>

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<sup>1</sup> IE Report, p. 17.

<sup>2</sup> See, e.g., IE Report, pp. 49, 61, 66, 72.

<sup>3</sup> IE Report, p. 79.

<sup>4</sup> SCE has limited its comments to the most salient subjects, and SCE's silence on any particular issue should not be interpreted as acceptance of, or agreement to, any finding or recommendation in the IE Report.

## **COMMENTS ON THE IE’S FINDINGS CONCERNING COMPLETION OF 2024 WMP INITIATIVES**

Below, SCE provides clarifications and addresses certain inaccuracies in the IE’s findings relating to its verification of completion of 2024 WMP initiatives.

### **IN-1.2 Transmission High Fire Risk-Informed (HFRI) Inspections and Remediations**

The IE reported that “SCE completed 31,711 inspections and 31,711 remediations”<sup>5</sup> for IN-1.2a and that “SCE completed 30,735 inspections and 30,735 remediations”<sup>6</sup> for IN-1.2b. SCE clarifies that its WMP does not contain a quantitative target for HFRI *remediations* under IN-1.2a and IN-1.2b; those targets only refer to inspections. While remediations may occur as a result of inspections, the remediation count may differ from the inspection count, and the two should not be conflated.

Although the IE Report states that it has reasonable assurance that SCE met the IN-1.2 targets, it finds that certain “documentation [is] unsatisfactory to best evaluate work order success.”<sup>7</sup> SCE received advance approval from the IE team regarding the documentation necessary to verify completion of the IN-1.2 targets. The IE Report’s statement regarding unsatisfactory documentation is inconsistent with another statement that “Overall, the documentation was sufficient to support the verification” of these initiatives.<sup>8</sup>

The IE’s recommendation for IN-1.2a to “strengthen quality assurance protocols to reduce field inspection failure rates”<sup>9</sup> is inconsistent with the actual performance data. The IE Report states that out of 82 field samples reviewed, 81 passed, resulting in a 99% validation rate.<sup>10</sup> This metric demonstrates a high level of quality assurance and does not support a conclusion that enhanced QA protocols are necessary to reduce inspection failure rates. Although the IE Report states that details and photos of a non-conforming sample were provided in Attachment 7.5, SCE is unable to locate such documentation.<sup>11</sup>

It is also important to note that IN-1.2 was not designated as a field-verifiable initiative or included in the IE’s list of such initiatives. Inspection-only initiatives have not been within the scope of field verifications in prior IE reviews in part because the inspections themselves do not produce observable physical changes in the field. Instead, inspections have historically been verified through SCE’s system of record. The IE’s attempt to conduct field verifications of these initiatives contributed to the IE Report’s inconsistent findings.

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<sup>5</sup> IE Report, p. 32.

<sup>6</sup> IE Report, p. 34.

<sup>7</sup> IE Report, p. 33.

<sup>8</sup> IE Report, pp. 33-34.

<sup>9</sup> IE Report, p. 33.

<sup>10</sup> IE Report, p. 34.

<sup>11</sup> IE Report, pp. 32-34.

## **SH-2 Undergrounding of Overhead Conductor**

The IE Report presents inconsistent findings regarding field verifications of completed undergrounding work, and the finding that any sampled undergrounding work “failed” field inspections should be disregarded.<sup>12</sup> The IE Report correctly states that “field verification for undergrounding found all passes despite not completing the entire initiative.”<sup>13</sup> However, the IE Report then states that “out of 81 field samples inspected, 77 passed and 4 failed,” and that “Non-conformances are documented in Attachment 7.5, including photographic evidence.”<sup>14</sup> The statement that four field samples “failed” is inconsistent with the prior statement that the IE found “all passes” for SH-2. Additionally, SCE is unable to locate documentation in Attachment 7.5 showing non-conformances. Without further clarification or substantiation, the statement concerning non-conforming samples should be disregarded.

## **SH-14 Long Spans**

Although the IE correctly found that SCE met the WMP target for the Long Span Initiative, the IE Report contains unsupported and inconsistent findings that merit correction. For example, the IE finds that out of 74 field samples inspected, “73 passed and 1 failed, resulting in a sample validation rate of 99%.”<sup>15</sup> However, the IE report then refers to a “high field fail rate,” apparently based on a single adverse inspection.<sup>16</sup> The IE Report’s assertion that “many of the long span initiatives were cited as a fail” is inconsistent with its own reference to a 99% validation rate.<sup>17</sup>

Moreover, the IE Report contains an inapplicable recommendation regarding documentation of vibration damper location within the section regarding the Long Span Initiative.<sup>18</sup> SCE does not install vibration dampers on long spans; rather, it installs line spacers. As such, the recommendation regarding vibration damper documentation within the discussion of the Long Span Initiative should be disregarded.

## **SH-16 Vibration Dampers**

The IE correctly determined that SCE met its target of retrofitting vibration dampers on 500 structures by completing installations on over 700 structures.<sup>19</sup> However, the IE Report

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<sup>12</sup> IE Report, p. 41.

<sup>13</sup> IE Report, p. 41.

<sup>14</sup> IE Report, p. 41. In response to IE data request set 7, question 2, SCE provided work order maps relating to four structures as evidence of completed undergrounding work at those locations. The IE did not request any further follow-up information relating to those four structures.

<sup>15</sup> IE Report, p. 43.

<sup>16</sup> IE Report, p. 43.

<sup>17</sup> IE Report, p. 43.

<sup>18</sup> IE Report, p. 43 (“Ensure proper documentation of where exactly a vibration damper is installed”).

<sup>19</sup> IE Report, p. 40.

erroneously finds that “the risk reduction goal was not satisfied” based on a misconception that dampers “were not installed on the intended structure listed in the work order for several sites.”<sup>20</sup>

SCE explained in a data request response that the small number (4 out of over 700) vibration damper placements questioned in the IE Report were placed properly, consistent with SCE’s Distribution Overhead Construction Standards (DOH).<sup>21</sup> Under the DOH, spiral vibration dampers are permitted to be installed on either end of a span.<sup>22</sup> After the IE requested information relating to the placement of certain dampers, SCE provided information from its GeoView tool identifying the adjacent structures at both ends of the relevant span for the dampers in question. SCE also provided photo evidence confirming the proper installation. Thus, there is no basis to conclude that SCE did not meet its risk reduction goal in connection with vibration damper retrofits.

### **VM-7 Vegetation Inspection and Management – Distribution**

The IE findings for VM-7 are inconsistent with the scope of VM-7, which focuses on detailed inspections and management practices for vegetation clearances around Distribution electrical lines and equipment. Instead, the IE Report describes *QA function* and associates findings to QA activities.<sup>23</sup> SCE’s QA activities for Vegetation Management are not formal WMP initiatives and SCE was not asked to provide evidence supporting QA activities for Vegetation Management as part of the 2024 IE review.

In SCE’s response to a data request, SCE provided data on VM-7 inspections and clearances from its system of record,<sup>24</sup> demonstrating that the 2024 VM-7 WMP target was successfully completed.

### **VM-1 Hazard Tree Management**

The IE Report concerning VM-1 contains unsupported conclusions and inconsistent findings. The IE Report finds that at several locations, no evidence of recent tree removal was observed and that eucalyptus trees were pruned but not removed.<sup>25</sup> However, the IE does not provide specific evidence supporting these statements that would allow SCE to further verify and

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<sup>20</sup> IE Report, p. 40.

<sup>21</sup> See SCE’s response to IE data request set 16, question 3.

<sup>22</sup> DOH, Figure CC 190-8.

<sup>23</sup> IE Report, p. 55.

<sup>24</sup> Data Request Set IE-SCE-2024 Initial, Question 01, within the file titled “01\_2024 WMP IE Year-End Compliance Evidence.zip.”

<sup>25</sup> IE Report, p. 57.

investigate the claims. These statements are also inconsistent with the IE's own sample validation rate of 99%.<sup>26</sup>

Additionally, SCE clarifies the IE's finding that "[o]ut of 72 field samples inspected, 71 passed and 1 failed"<sup>27</sup> is inaccurate as it does not account for updated data provided to the IE. In a supplemental data requests response, SCE submitted evidence showing that the single "failed" record cited in the IE Report's attachment 7.5 reflects a tree that was in fact removed.<sup>28</sup> For the reasons mentioned above, the IE report's finding of "discrepancies between documented work and observed outcomes" is unsupported and should be disregarded.

#### **VM-4 Dead and Dying Tree Removal**

The IE Report concerning VM-4 contains unsupported conclusions and inconsistent findings. The IE report finds that at several locations no evidence of recent tree removal was observed and that trees were pruned but not removed.<sup>29</sup> However, the IE does not provide specific evidence supporting these statements that would allow SCE to further verify and investigate the claims. The IE Report's finding is also inconsistent with its statement that "[o]verall, the documentation was sufficient to support the verification" for VM-4.<sup>30</sup>

In a data request response, SCE provided data on VM-4 demonstrating that the 2024 VM-4 WMP target was successfully completed.<sup>31</sup> Additionally, SCE responded to follow-up requests and provided additional location information and evidence supporting mitigations completed for VM-4. The IE Report acknowledged SCE's completion of the VM-4 target by stating that "[o]ut of 73 field samples inspected, 73 passed and 0 failed, resulting in a sample validation rate of 100%."<sup>32</sup>

For the reasons mentioned above, the IE Report's finding of trees with "poor structure, were pruned or topped rather than removed [. . .] no evidence of recent tree removals was observed"<sup>33</sup> should be disregarded, especially given the lack of clear examples and evidence.

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<sup>26</sup> IE report, p. 57.

<sup>27</sup> IE report, p. 57.

<sup>28</sup> See SCE's response to Data Request Set IE06-SCE-2024-Veg Work Orders, Question 01. In the file titled "*01\_IE06-SCE-2024-Veg Work Orders\_Q.01.pdf*," SCE provided an image from its Work Management System (WMS) confirming that the relevant tree was removed.

<sup>29</sup> IE report, pp.58-59.

<sup>30</sup> IE report, p. 59.

<sup>31</sup> SCE's response to Data Request Set IE-SCE-2024 Initial, Question 01, within the file titled "*01\_2024 WMP IE Year-End Compliance Evidence.zip*."

<sup>32</sup> IE report, p. 58.

<sup>33</sup> IE Report, pp. 58-59.

## VM-6 Vegetation Work Management Tool

With respect to the vegetation work management tool, the IE Report finds that “the tool appears robust from a compliance process standpoint.”<sup>34</sup> However, its findings that “effectiveness in reducing risk cannot be assessed without direct validation of its outputs which were not directly provided to the IE” are inconsistent with the scope of VM-6.<sup>35</sup> SCE did not claim that risk reduction was part of the 2024 VM-6 initiative. As stated in SCE’s 2023-2025 WMP, the 2024 VM-6 target is to “[m]onitor stabilization of Arbora and develop plan and begin execution of plan to enable additional VM maintenance programs.” SCE submitted evidence demonstrating SCE’s tracking of VM-6 system usage for inspections and mitigations to support its expansion to additional vegetation management programs.<sup>36</sup>

### **COMMENTS ON THE IE’S FINDINGS CONCERNING FUNDING VERIFICATION**

Under Public Utilities Code section 8386.3, the IE report must include an evaluation of whether an electrical corporation “failed to fund any activities” included in its WMP. There is an important distinction between (1) a failure to fund a WMP activity, and (2) recording expenditures at a level below forecast. There is no “failure to fund” if, among other reasons, SCE was able to achieve the activity’s objectives or targets while spending less than forecast. As explained below, there are legitimate reasons why an electrical corporation may ultimately spend less than originally forecasted for a particular activity. The IE Report unreasonably conflates the two.

The IE Report uses the term “failed to fund” to describe certain instances where recorded expenditures for a WMP activity were below forecasted levels.<sup>37</sup> This blanket use of the term “failed to fund” is imprecise and inaccurate. Contrary to the IE Report’s terminology, SCE did not fail to fund any WMP activity in 2024. In a forecast-based budget, it is unreasonable to expect projected expenditures developed years in advance to be perfect, particularly for ongoing wildfire mitigation activities that are impacted by factors outside of SCE’s control such as weather conditions, supply chain challenges, and permitting timelines. In its 2024 electrical corporation annual report on compliance, SCE provided detailed explanations for instances in which expenditures were less than the original forecast amounts in SCE’s 2024 WMP.<sup>38</sup> SCE also held multiple working sessions with the IE to clarify its cost variance explanations, the funding mechanism used for mitigation activities, and the processes in place to ensure adequate funding is available for each activity.

Importantly, there are a variety of reasons unrelated to a failure to fund an activity that may

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<sup>34</sup> IE Report, p. 60.

<sup>35</sup> IE Report, p. 60.

<sup>36</sup> See SCE’s response to data request set IE-SCE-2024 Initial, Question 01, in the file titled “01\_2024 WMP IE Year-End Compliance Evidence.zip.”

<sup>37</sup> IE Report, pp. 16-17; *id.* at Section 7.4.

<sup>38</sup> SCE Annual Report on Compliance, Attachment B.

explain why recorded expenditures are below forecast. For example, spending less than forecasted can reflect cost savings and cost-effective outcomes for customers. But the IE Report labels activities as “failed to fund” regardless of the actual reasons for lower spending or the degree to which spending was below forecast.

In addition, the blanket use of the term “failed to fund” is inconsistent with other specific findings in the IE Report. For example, each WMP initiative includes a section titled “Funding Verification – Findings,” in which the IE confirms that funding for each activity was appropriately tracked.<sup>39</sup> The “failed to fund” label is inconsistent with the IE Report’s findings that the underspend or overspend of CAPEX or O&M was “reasonably assured and reflective [of] SCE’s 2024 initiative portfolio.”<sup>40</sup> The “failed to fund” terminology is also inconsistent with the IE Report’s findings that no differences in levels of spending require further explanation.<sup>41</sup>

In sum, the final 2024 Annual Report on Compliance should not conclude that SCE “failed to fund” a WMP activity simply because recorded expenditures were below forecast.

#### **COMMENTS ON THE IE’S FINDINGS CONCERNING VERIFICATION OF QA/QC PROGRAMS**

In Sections 5 and 6 of the IE Report, the IE reaches certain conclusions regarding SCE’s QA/QC programs that are unsupported. For example, the IE Report’s conclusion in Section 6 that many QA/QC programs “lack the traceability, accountability, and technology integration needed to drive continuous improvement”<sup>42</sup> is unsupported by facts and is disconnected from the substantive discussion of QA/QC programs in Section 5 of the IE Report. That unexplained conclusion should be disregarded.

With respect to QA/QC for vegetation management activities, the IE Report notes that the IE did not receive “formal documentation” of roles in an organizational chart beyond explanations provided during an interview with SCE personnel.<sup>43</sup> Following that interview—one that the IE Report describes as “invaluable”—SCE was unaware that the IE required additional documentation of vegetation management organizational roles. SCE is prepared to provide such documentation to Energy Safety as needed.<sup>44</sup>

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<sup>39</sup> IE Report, pp. 32-75.

<sup>40</sup> See, e.g., IE Report, p. 32.

<sup>41</sup> See, e.g., IE Report, p. 49.

<sup>42</sup> IE Report, p. 80.

<sup>43</sup> IE Report, p. 77.

<sup>44</sup> During the interview, SCE’s vegetation management personnel explained that job descriptions for vegetation management staff within the QA/QC organization are described in human resources documents. Additionally, responsibilities of QA/QC personnel are described in vegetation management procedures such as UVM-07, titled Post Work Verification, and UVM Program Oversight, and UVM-21, titled Internal Controls.

For asset inspection field organization QA/QC oversight, the IE states that it was not able to validate the organizational structure with adequate documentation.<sup>45</sup> During one of the interviews referenced in the IE Report, SCE personnel displayed and discussed high-level organizational charts and the responsibilities of each organization as requested. SCE had no indication that its data request responses and interviews had not satisfied the IE's inquiries on these subjects.<sup>46</sup> SCE is prepared to provide additional documentation to validate the size of the field organization performing asset inspection QA/QC oversight to Energy Safety as needed.

### **CONCLUSION**

SCE appreciates the opportunity to submit these comments on the IE Report and respectfully requests that Energy Safety consider these comments when assessing SCE's compliance with its 2024 WMP.

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//

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<sup>45</sup> IE Report, p. 77.

<sup>46</sup> See, e.g., SCE's response to data request set IE-SCE-2024 QA-QC Follow-up, question 4; IE Report, p. 77.