Process & Controls
Wildfire Mitigation Plan (WMP) Compliance Assessment Report

December 17, 2021

To: ███████████

Subject: 2021 T&D Wildfire Mitigation Plan (WMP) QA Readiness Review – SH-10 Tree Attachment Remediation

Process and Controls completed a review of compliance documentation supporting the progress of the 2021 T&D WMP SH-10 Tree Attachment Remediation. The objective of this review was to provide management reasonable assurance on the quality and adequacy of data/evidence by performing analysis and assessment on supporting documents, internal business processes, procedures, and controls, etc. and provide management recommendations to determine remediation action, if applicable.

Scope and Methodology

Our review included SH-10 Tree Attachment Remediation assigned to Wildfire Program Management (WPM).

To complete our review, we performed the following:

- Reviewed the evidence as of 07/01/2021 to ensure it adequately supported the progress of the activity defined in the 2021 WMP
- Compared evidence to the System of Record (e.g., SAP) and June 2021 WMP Executive Dashboard for reasonableness
- Reviewed Storm Work Order #903176008-0840 and obtained supporting documentation to validate evidence appears to support work was completed
- Reviewed current policies, procedures, and/or process flows, as applicable
- Conducted interviews with applicable SMEs

Conclusion

Based on our review of the evidence provided, Compliance and Quality (C&Q) identified observations that require management's attention to ensure adequate evidence is available. A summary of the observations, our recommendations, and corrective action are included in the Addendum. The corrective actions will be tracked in T&D's Critical Action Item (CAI) Tracker and will be reported to the Senior Leadership Team (SLT) monthly. C&Q met with management to review and discuss the details contained in this report.

We would like to thank the Subject Matter Experts for their timely submittal of review documentation and their prompt responses and feedback when requested. If you have any questions regarding report content, please contact Maureen Rosales via email or at the number noted below.

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Process & Controls Team:

Prepared By	*Approved By*
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cc: **Distribution**

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Wildfire Safety

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Ethics & Compliance

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Audit Services Department

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Transmission & Substations

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Report Addendum: Observations and Opportunities for Improvement

1. ## Observation#1: Lack of control to validate supporting data prior to reporting

   One out of 89 (1%) tree attachments reported as remediated in Q1 2021 was deactivated in SAP on 8/9/2014. Structure was not included in the Job Information Sheet (JIS), however, was reported as remediated in the 2021 Executive Dashboard. Further discussions with Field Accounting Organization (FAO) revealed this structure was not removed as part of the 2020 Creek Fire, but rather was removed in years prior to that. Field crews utilized work order maps created in 2016 (RGT Plan Betterment Siphon % Siphon PT TD887257) to account for the number of trees removed from the Creek Fire site for Q1 reporting which led to an overreporting of total tree attachment removal count.

   Compliance & Quality (C&Q) recommends Wildfire Program Management (WPM):
   1. *Develop and implement a process to validate tree attachments remediated were deactivated in SAP (IL03) in the current reporting year. Control should be performed prior to reporting (e.g., quarterly/monthly) and only tree attachments removed and deactivated in the current year should be counted towards the WMP goal.*
   2. *Perform research on structure# OH-16203020E to determine whether it should be removed from the total remediated Tree Attachments reported in the 2021 WMP Executive Dashboard*

   Corrective Action:

   WPM has removed structure# OH-1620302E from the WPM Executive Dashboard. WPM has developed a control to validate alignment between source data and evidence files, as well as check to ensure only work in the current reporting year is counted.
   Corrective Action Owner: ███████
   Anticipated completion date: Completed

2. ## Observation#2: Lack of control to ensure consistent data is used as supporting evidence

   Review of Storm Work Order #903176008-0840 - SIPHON 4KV reported as complete in Q1 2021, revealed the following:

   1. Evidence provided to support Q1 AB1054 figures has a completed work date of 2/2021

   2. Workorder JIS has a completed work date of 3/2/2021

   3. In Service Date (per PowerPlan) has a completed work date of 4/7/2021 (aligns with District Manager Ready for Service (ZRFS) email).

   Although it appears the work was completed in 2021, it is unclear the date the work was completed.

Compliance & Quality (C&Q) recommends Wildfire Program Management (WPM):

Develop a policy/procedure that defines the source document/data utilized to report work completion. Develop a control to ensure the evidence file matches with the source document/data. Control should be performed prior to reporting (e.g., quarterly/monthly).

Corrective Action:

WPM is developing a guideline defining the source data used to report work completion (i.e., ZRFS) for Tree Attachments.
Corrective Action Owner: ▮▮▮▮▮▮
Anticipated completion date: 1/31/2022

3. <u>**Observation#3: Evidence file appears to be missing locational data and critical fields**</u>

    1. Three out of 89 (3%) records appear to be missing a Station Number and Structure Number. As a result, P&C was unable to validate the work reported as complete matches the map and Job Information Sheet (JIS)

    2. Evidence file is missing critical fields such as Lat/Long, Start Work Date, Completion Date and HFTD Tier

Compliance & Quality (C&Q) recommends Wildfire Program Management (WPM):

1. *Develop and implement a process to ensure the evidence file contains the structure and station number for each remediated tree and information aligns with the w/o map. Control should be performed prior to reporting (e.g., quarterly/monthly)*
2. *Perform research on the 3 structures with no station/structure number and determine whether they should be removed from the total completed Tree Attachments Remediated reported in the 2021 WMP Executive Dashboard*
3. *Provide an evidence file that contains the missing critical fields. Complete file should be provided to Wildfire Performance Mgt. quarterly.*

Corrective Action:
WPM has removed the 3 structures from the 2021 WMP Executive Dashboard. WPM has developed a control to validate evidence files contain structure and station numbers that align with the work order map. Lastly, WPM has revised its evidence file format to include Lat/Long, Start Work Date, Completion Date and HFRA Designation.
Corrective Action Owner: ▮▮▮▮▮▮
Anticipated completion date: Completed