**DATA REQUEST SET  C a l A d v o c a t e s - S C E - 2 0 2 2 W M P - 0 7**

**To: Cal Advocates**
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**Response Date: 4/15/2022**

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**Question 05 Supplemental:**
On pp. 416-420 of SCE's 2022 WMP, SCE discusses "quality assurance / quality control of vegetation management."  SCE reports performing 131,000 individual "Hazard Tree Management Plan" (HTMP) tree assessments in 2021. SCE also states that for the "Hazard Tree Management Plan" in 2021:
QC performed approximately 13,000 independent risk assessments to verify the quality of the assessments performed.  Approximately 12,000 of these assessments were focused on tree risk scores in the range of 35-49 where mitigation is typically not required.  Of these 12,000 assessments, QC identified approximately 2,700 cases showing a tree risk score of greater than 50.  These cases were re-directed to the HTMP assessors for re-evaluation and potential remediation.
In the context of the above quote:
a)      Does SCE consider a QC failure rate of 22.5% for HTMP trees to be acceptable?
b)      What steps is SCE taking in 2022 to improve the quality of initial HTMP inspections?
c)      Given the high QC failure rate, has SCE taken any steps to re-assess additional trees inspected in 2021 beyond the QC sample discussed above?
d)      Of the reported 131,000 individual HTMP tree assessments performed in 2021, how many were performed by contract personnel?
e)      If contract labor was employed for HTMP tree assessments, has SCE evaluated whether specific contractors or personnel have been responsible for a disproportionate share of QC failures?
f)      Of the reported 131,000 individual HTMP tree assessments performed in 2021, how many were performed by SCE employees?
g)      If SCE staff labor was employed for HTMP tree assessments, has SCE evaluated whether specific SCE staff have been responsible for a disproportionate share of QC failures?


**Initial Response to Question 05:**
a.) SCE does not consider the 2,700 cases mentioned above to be failures. Even among highly qualified and capable ISA-certified arborists, differences in scoring outcomes are expected due to expert judgment applied during the evaluation. When the QC inspector calculates a risk score greater than a certain threshold – this threshold was at 50 for most of 2021, but then was updated to 55 in late 2021 – the tree is returned to the contractor's supervisory or lead assessor for a re-assessment. Any new risk score resulting from the re-assessment by the contractor's supervisory or lead assessor will override the prior risk assessment score. If the lead assessor's score aligns with the QC inspector's score meeting the threshold (or above), mitigation will be prescribed. If the lead assessor's score is consistent with the original assessment that no mitigation is required, no mitigation will be performed. Because assessments require professional judgment and some degree

of subjectivity, this approach allows for a review by three qualified arborists, and the agreed-upon judgment of two out of the three will control.

With respect to 2021, of the 2,700 cases where the QC assessor assessed a score at or above the threshold (50 or 55), upon the reassessment process described above, approximately 13% of the returned scores resulted in a change in mitigation. Thus, of the 2,700 cases, approximately 350 tree assessments resulted in a change in mitigation, for a total non-conformance rate of 2.7% (350 divided by 13,000). To drive continuous improvement, in late 2021, additional QC requirements were implemented to refine the determination of whether mitigation should be required.

b.) There are monthly Heavy Tree Program meetings where QC results of assessments and other items are discussed. Also, annual field meetings are conducted where company supervisory/lead personnel and QC inspectors all assess the same tree(s) and compare results. This is used to re-calibrate and drive assessment consistency. Supervisor/leads are then required to provide training to all their teams.

c.) SCE does not consider the variance in results from the initial assessment and the QC assessment to be a "failure rate," for the reasons discussed in section (a) above. The QC sample described in the 2022 WMP narrative is the complete sample; in 2021, SCE did not add additional trees to the QC scope based on the results coming out of the QC program during that year.

d.) All. HTMP is only performed by contract personnel.

e.) No.

f.) None.

g.) N/A.

**Question 05 Supplemental Response:**

a) At the time the 2022 WMP Update was prepared, SCE's data source for the HTMP QC program was being updated which resulted in incomplete data that only included QC assessments for a portion of 2021 (approximately 13,000 assessments). In the 2022 WMP Update and SCE's initial response to this data request, SCE inadvertently reported QC results that were not inclusive of all QC assessments performed in 2021 (15,802 assessments). Additionally, because the data could not be accessed during these updates, the QC program owner estimated the percentage of trees that had the prescription changed at 13%, based on his general knowledge of the program in 2021.  This was an inaccurate estimate, as explained further below.

In 2021, QC performed 15,802 independent tree risk assessments. 13,757 of the 15,802 QC assessments focused on trees where the initial assessment resulted in a risk score between 35-49. In instances where the QC assessor scored the tree at 55 or above,[1] a third assessment was performed by the contractor lead assessor. Of these 13,757 trees, 2,564 were identified with a QC risk score of

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[1] In SCE's initial response to this data request, SCE stated that the QC threshold was at 50 for most of 2021 but was updated to 55 later in 2021. A correction is needed: the QC threshold was at 55 for all of 2021.

$\geq 55$. And of those, 165 trees (165/13,757 = 1.2%) resulted in a prescription of Prune/Remove after the third assessment.[2]

As stated in SCE's initial response, SCE does not consider these 165 instances as "failures." Unlike measuring the distance between a conductor and vegetation, assessing the question of whether a tree is likely to pose a hazard to utility lines and equipment is not a measurement of a fixed value. It is a matter of professional judgment that requires assessing several variables, some of which have some degree of subjectivity. This is why the QC process allows for a review by three qualified arborists when the initial assessment and QC assessment differ, and the agreed-upon judgment of two out of the three will control.  Though it is not reasonable to expect 100% uniformity among the judgment of experienced arborists, the creation of the Tree Risk Calculator and the measures described in Section (b) below help drive consistency, align judgments across the variables being assessed, and drive process improvements.

b) No change to initial response.

c) SCE does not consider the variance in results from the initial assessment and the QC assessment to be a "failure rate," for the reasons discussed in section (a) above. In 2021, SCE did not add additional trees to the QC scope based on the results coming out of the QC program during that year.

d) No change to initial response.

e) No change to initial response.

f) No change to initial response.

g) No change to initial response.

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[2] The recommended mitigation threshold is a tree risk score of 50 or greater; however, the ISA certified arborist/assessor is permitted to use his or her professional judgment to recommend mitigation even in instances where the score is below 50. The rates discussed above are based on the variances/differences in the tree risk scores given by the initial assessor and the risk scores derived from the QC process. Thus, while it can be generally assumed that a tree initially assessed below 50 which is later prescribed for removal after the QC process is complete indicates a change in the mitigation prescription, this will not be true in all cases (i.e., it will not true where the initial assessor recommended removal notwithstanding the risk score below 50).