


SCE	Legal, Regulatory, and Compliance	Transmission & Distribution Utility Vegetation Management	Methodology	Doc. No.	UVM-07	 SOUTHERN CALIFORNIA EDISON [®] Energy for What's Ahead SM
				Version	3	
Effective Date		9/1/19				
Supersedes		Version 2				
Post Work Verification and UVM Program Oversight						

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, defined in section 4.11.


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
- **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

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- **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-16, "Qualification of UVM Senior Specialists".

Contract personnel performing QC inspections for the UVM Program shall be an SCE approved contractor for vegetation management.

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 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.

The volume of SCE circuit mileage for a given inspection priority (refer to section 4.4) is compared to sampling charts where Confidence Level (CL) and Confidence Interval (CI) are calculated. Although these charts are guidelines, SCE's sample size presented in this document will typically exceed the sampling

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recommendations. However, should unforeseen conditions preclude SCE from meeting its sampling targets, actual sampling volume should not fall below the statistical sample size. Sampling targets indicated in Tables 1, 2 & 3 are annual targets.

4.3 Inspection Priority

SCE UVM uses sampling QC to address risk. In High Fire Risk Areas (HFRA) risk-consequence models such as REAX Engineering risk data is used to prioritize circuit mileage for inspection (Reference Table 1). The minimum levels of QC inspection implemented by UVM-07 are referenced below:

- HFRA CL/CI – 99/1.5% Sampling
- Non-HFRA CL/CI – 95/5% Sampling
- Hazard Tree 100% Inspection

4.4 Sample Size for Inspection Priority

There are approximately 49,000 Transmission and Distribution circuit miles in the SCE service territory. Of these, approximately 16,200 are designated within HFRA and approximately 32,500 in non-HFRA.

When HFRA total circuit miles (~16,200) are entered into the sample size calculator, 5077 miles are required to be inspected to achieve a CL/CI of 99/1.5%.


REAX data stratification for HFRA identifies 2161 circuit miles present approximately 93.87% of the risk-consequence for SCE. QC will target to perform 100% inspection of these 2161 miles, as practical.

The remainder of HFRA circuit miles, approximately 14,028 present approximately 6.13% risk-consequence. The 14,028 miles will be inspected using judgmental sampling at a CL/CI of 99/2.2% which results in approximately 2916 circuit miles requiring inspection. Adding 2161 circuit miles (100% inspection) and 2916 circuit miles (99/2.2%), totals 5077 which yields a CL/CI of 99/1.5%. Reference Table 1 for HFRA inspection details.

Non-HFRA (Reference Table 2) – SCE will sample at a CL/CI that will exceed 95/5%.

Hazard Tree remediations will be 100% inspected.

Summary of total circuit miles inspected (Reference Table 3) – SCE will inspect approximately 7097 circuit miles (HFRA + Non-HFRA) which is approximately 14.5% of all circuit miles.

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It is SCE's goal to achieve the circuit mileage inspection specified in Table 3. However, if conditions occur that preclude QC from performing 100% inspection in the applicable REAX zones, actual sampling volume should not fall below a CL/CI of 99/1.5% for HFRA and 95/5% for Non-HFRA.

The QC sample mileage in Table 3 may be adjusted yearly (higher or lower) to address program improvements/concerns. Changes in sample mileage will be identified in the annual Quality Control plan and may result in revision to UVM-07.

Table 1 – CL/CI Based on REAX Stratification for HFRA

REAX % Range	% of Risk	Cumulative Risk %	Circuit Miles	Total Circuit Miles	CL/CI %	Actual CL/CI %
98-100	46.01	46.01	221	221	99/1.5	N/A
95-98	18.02	64.03	278	499		100% Inspection
90-95	16.65	80.68	536	1035		
80-90	13.19	93.87	1126	2161		99/2.2
70-80	4.04	97.91	1100	3261		
60-70	1.41	99.32	1133	4394		
50-60	0.49	99.81	1181	5575		
25-50	0.20	100.00	3493	9068		
0-25	0.09	100.00	7121	16189		


Table 2 – CL/CI for Non-HFRA

Category	SCE Circuit Miles	Statistical Sampling			SCE Sampling	
		CL/CI	Miles	%	%	Miles
Transmission	7997	95/5	367	4.59	10	800
Distribution	24412		378	1.55	5	1220

Note: Circuit mileage sampled should be selected based on density of vegetation, as practical.

Table 3 – Summary of Circuit Miles for Inspection in HFRA and Non-HFRA

Fire Area	T/D	REAX % Range	Risk %	Inspection %	Miles	Total Miles	All Miles
HFRA	T&D	≥ 80	≥ 93.87	100%	2161	5077	7097
	T&D	< 80	< 93.87	99/2.2%	2916		
Non-HFRA	Transmission	N/A	N/A	95/5%	800	2020	
	Distribution				1220		

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4.5 Acceptable Quality Level and Conformance rate

To provide measurement of performance and facilitate trending, the results of QC inspections are communicated using an Acceptable Quality Level (AQL) and Conformance Rate (CR).

- 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%.


Note: Sufficient time is required to establish program maturity to the new UVM Program and expectations. Therefore, establishment of the AQL, scoring criteria and performance trending will occur after sufficient time has passed to allow the program to mature. Typically, maturity should be achieved approximately 12 months after implementation.

4.6 Defense In Depth Oversight Strategy

UVM work primarily consists of: (1) Pre-inspection; (2) Line clearing (pruning); and (3) Hazard Tree Risk Mitigation. To provide reasonable assurance the UVM Program is implemented appropriately, SCE uses a three tiered oversight strategy, "defense-in-depth" oversight. The three levels of oversight 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.

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Post Work Verifications are performed by SCE UVM SSPs and are the initial reviews performed to validate documentation and field work accuracy. Volume of documentation review and field work is recommended 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 organization. Quality Control Inspections are typically performed using judgmental sampling with emphasis on an highest risk areas, and are intended to provide reasonable assurance of compliance. 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. SCE incorporates 4 levels of QA review as follows which are further defined in section 4.9.


- **Internal Quality Review** – Annual internal quality review to assess the design of, and ensure compliance to established UVM policies and procedures, and to provide recommendations for continuous improvement. This activity may be delegated to T&D Quality Oversight (QO) Quality Assurance group (partnering with UVM). – Based on multiple satisfactory reviews, this review may be extended to biennial with UVM Senior Leadership approval
- **Compliance Review** – Annual QA Compliance review to ensure compliance to Federal and State requirements, as applicable. This will include an assessment of compliance evidence and documentation, and key controls testing. Performed by T&D QO Process & Controls (P&C)
- **Risk Assessment** – Triennial Risk Assessment to identify specific compliance and operational risks. Performed by T&D QO P&C partnering with E&C QA
- **Program Governance Review** – Triennial Program Governance review to assess the effectiveness of the UVM Program to govern and manage compliance. This will include an assessment of management controls as well the QA and QC program. This will be performed by E&C QA partnering with T&D QO P&C

4.7 Post Work Verifications

4.7.1 Post Work Documentation Review – Desktop Review

Post Work Documentation Review is performed as follows:

- Submitted work is reviewed for accuracy and completeness according to prescriptions in the Work Management System (WMS)
 - Errors identified through the review process are communicated to the responsible work crew, as applicable
 - Documentation errors are corrected

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- After satisfactory review, the work process is approved and the SSP Post Work Field Validation is planned

4.7.2 Post Work Field Validation – Field Review

Post Work Field Validation is performed as follows:


- Approximately 5% of grid/circuit inventory is reviewed by the SSP for his/her area of responsibility
 - Errors identified through the review process are communicated to the responsible work crew supervision, and reassigned in the WMS, as applicable
 - Clearance violations are remediated and objective evidence validating remediation is provided to the SSP, or the SSP must field validate
- A review criterion includes, but is not limited to, the following:
 - Ensuring clearances required by the Transmission Vegetation Management Plan (TVMP) or Distribution Vegetation Management Plan (DVMP), have been achieved
 - Assessment of any incomplete work submitted by the contractor
 - Appropriate ANSI utility tree pruning criteria
 - Complete and accurate inventory, species, and overall WMS data
 - Ensuring the accuracy of pre-inspections that may have missed trees needing work
- After satisfactory review, the work process is approved

Additionally, if training 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 High Fire Risk Areas (HFRA)

- The HFRA circuits mileage targets of Table 3 shall be inspected
 - 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

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- Appropriate ANSI utility tree pruning criteria
- RCD and CCD clearance violations shall be dispatched to the contractor to achieve the required clearance

4.8.2 Non-High Fire Risk Areas


- The non-HFRA circuits mileage targets of Table 3 shall be inspected
 - 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 dispatched to the contractor to achieve the required clearance

4.8.3 Hazard / Reliability Trees

- Subject Trees identified as a Hazard or Reliability Tree will 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

4.8.4 QC Scheduling, Inspection and Reporting

- The QC scheduler is responsible for selecting the circuit mileage to be inspected
- QC inspection packages should be provided to the QC inspection contractor by the QC scheduler by the 15th 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

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- 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

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


- Transmission – ISO circuit are inspected by SCE's UVM pre-inspection contractor and mitigation is performed by SCE's UVM pruning contractors. 100% of the circuit is reviewed for compliance by SCE SSPs
- 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
- Distribution: High Fire Canyon Patrols – These patrols are scheduled and performed by SCE UVM pre-inspection contractors. Identified conditions are logged into a Canyon Patrol log and mitigated by SCE UVM pruning contractors. High Fire Canyon Patrols are typically performed between June and August with work completion by September 1 of each year

4.9 Quality Assurance Reviews

4.9.1 Internal Quality Review

An annual internal quality review (may be delegated to T&D QO QA) shall 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 shall be reviewed for adherence and improvement opportunities

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- 3rd Party SME's may be engaged to perform field verification assessment(s) under the direction of review lead
- Verification of annual QC plan implementation
 - Final report/feedback is provided to UVM leadership. Internal Corrective Actions may be issued to address performance deficiencies and/or improvement opportunities

4.9.2 Compliance Review


An annual QA Compliance review performed by T&D QO P&C 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 T&D QO P&C procedures
- Compliance evidence from the prior year is reviewed prior to management's declaration of compliance
- Compliance evidence and documentation is reviewed against the applicable regulatory 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

4.9.3 Risk Assessment

A Triennial Risk Assessment led by T&D QO P&C partnering with E&C QA to identify specific compliance and operational risks.

- Performed to assess the risk of noncompliance with regulatory requirements
- Operational risks may also be addressed per management's discretion
- Risk assessments are procedurally controlled by E&C QA-41

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4.9.4 Program Governance Review

A Triennial Program Governance review led by E&C QA partnering with T&D QO P&C to assess the effectiveness of the UVM Program to govern and manage compliance.

- This will include an assessment of management controls as well the QA and QC program
- Program governance reviews are procedurally controlled by E&C QA-08

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 should be developed 4Q of the year preceding the inspection year.

The plan shall be approved by UVM senior leadership (Senior Managers & Principal Manager).

4.11 Performance Analysis and Trending

Sufficient time is required to establish program maturity to the new UVM Program and expectations. Therefore, establishment of the AQL, scoring criteria and performance analysis and trending will occur after sufficient time has passed to allow the program to mature. Typically, maturity should be achieved approximately 12 months after implementation.

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 7 years beyond the inspection date.


5 Approvals

Program Manager	Signature	Date
Melanie Jocelyn, Principal Manager	Melanie Jocelyn / Approved by E-mail	8/28/19

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6 Revision History

Revision Number	Date	Description of Revision	By	Next Review Date
1	12/21/18	Initial Release for UVM Program	Bill Kotteakos	2019
2	5/17/19	Modified Section 4.7, Updated TSP to SSP	Bill Kotteakos	5/17/20
3	9/1/19	Revised QC Mileage Sample Tables to incorporate REAX Risk Data	Bill Kotteakos	9/1/20

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7 References

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

8 Distribution and Data Retention

Distribution list:

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

9 Key Contacts

UVM Senior Manager, Operations: Jeff Copeland, (310) 995-6178

UVM Senior Manager, Compliance & Support: Bill Kotteakos, (949) 379-9470