

*Southern California Edison*  
*2023-WMPs – 2023-WMPs*

**DATA REQUEST SET CalAdvocates - SCE - 2023 WMP - 14**

**To: Cal Advocates**  
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**Job Title: Principal Manager**  
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**Response Date: 5/3/2023**

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**Question 01 :**

In response to CalAdvocates-SCE-2023WMP-02, question 1, SCE states, “SCE performs routine Quality Control (QC) of asset and vegetation inspections and routine Quality Assurance (QA) readiness reviews of select wildfire mitigations.”

- a) What criteria does SCE use to determine if a wildfire mitigation initiative merits a QA readiness review?
- b) Please describe the process SCE uses to conduct Quality Assurance (QA) readiness reviews.
- c) Please explain how a “readiness review” differs from a standard QA review.
- d) Please explain why SCE does not conduct QC “readiness reviews” of wildfire mitigation initiatives.

**Response to Question 01 :**

- a) *What criteria does SCE use to determine if a wildfire mitigation initiative merits a QA readiness review?*

The selection process for QA readiness reviews utilizes a risk evaluation approach including, but not limited to, complexity, prior observations identified, implementation status (e.g., pilot vs. full implementation), program maturity/life cycle (e.g., new, ramping up, winding down), budget size, and potential areas of concern.

- b) *Please describe the process SCE uses to conduct Quality Assurance (QA) readiness reviews.*
- The process of conducting the QA readiness reviews includes the following:

- Planning – gain understanding of activities, obtain process/procedure documents, schedule an entrance conference with activity owners and SMEs, define scope and draft review procedures, etc.
- Data/evidence request – obtain recent compliance evidence data files, select samples (if applicable), request supporting documents for validation, etc.
- Process review and data validation – perform the following actions, as applicable:
  - review current policies, procedures, and/or process flows
  - conduct interviews with applicable SMEs
  - review evidence for the defined time periods to ensure it adequately supported the activity as defined in the applicable WMP
  - compare evidence to the System of Record (e.g., SAP), management reporting, and regulatory reporting (e.g., Quarterly Initiative Update (QIU) and Quarterly Notification Letter (QNL))
  - perform analysis on data evidence and/or verify supporting documents to identify anomalies
  - evaluate utilization of a risk informed approach

- Reporting – conduct exit conference to discuss observations/findings, if any, with activity owners and SMEs, obtain management remediation plan, if applicable, and issue final report
- Remediation tracking – track remediation plan to resolution, as applicable

c) *Please explain how a “readiness review” differs from a standard QA review.*

The objective of the QA Readiness Review is to provide management with reasonable assurance on the quality and adequacy of the data/evidence for a specific WMP activity. This may include analysis and assessment on supporting documents, internal business processes, procedures, and controls, along with recommendations to determine remediation action, if applicable.

The objective of the standard QA review is to provide management with reasonable assurance that policies, procedures, compliance program narrative, and supporting data evidence and documentation is relevant, accurate and will adequately supported compliance with relevant internal or external regulatory requirements.

d) *Please explain why SCE does not conduct QC “readiness reviews” of wildfire mitigation initiatives.*

The term “readiness review” refers to a QA desktop review focused on providing management with reasonable assurance on the quality and adequacy of the data/evidence for a specific WMP activity (e.g., accuracy of the record). In contrast, QC field validations evaluate the quality of performance of an activity, outcome, or product (e.g., quality of an inspection). Hence a “readiness review” should be understood as a QA function, not a QC function.