

Southern California Edison
2022-WMPs – 2022 Wildfire Mitigation Plan Updates

DATA REQUEST SET Cal Advocates - SCE - 2022 WMP - 07

To: Cal Advocates
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Job Title: Senior Advisor, Compliance
Received Date: 3/10/2022

Response Date: 3/15/2022

Question 03:

On pp. 409-10 of SCE's 2022 WMP, SCE discusses "improvement of inspections." SCE states that it has "increased training for both internal and external personnel involved with inspections, and requesting contractors to onboard additional contractor QC to provide reasonable assurance contractors are identifying issues before SCE's independent QC identifies them."

- a) Please explain how SCE has increased training for internal personnel in 2021 and 2022.
- b) Please explain how SCE has increased training for external personnel in 2021 and 2022.
- c) On pp. 409-10 of its 2022 WMP, SCE states that it has "requested" that contractors onboard additional contractor QC. Why has SCE requested and not required additional QC?
- d) When did SCE make the request noted in part (c)?
- e) Has SCE followed up on the request noted in part (c)?
- f) To what extent have SCE contractors onboarded additional contractor QC since SCE made this request?
- g) Please explain how contractors currently alert SCE to VM QC issues in the context of vegetation inspections.

Response to Question 03:

a.) SCE's VM inspection manual (UVM-09) was revised in July 2021 to provide additional detail on performing more accurate prescriptions. On August 31, 2021, training on the revised UVM-09 procedure was provided to all internal VM Operations personnel and external pre-inspection contractors. SCE also provided UVM Annual Core Plans training to all VM Operations and contract personnel on January 10 and 11, 2022. The UVM Annual Core Plans training covers detailed information on SCE's TVMP, DVMP, HTMP, Refusal Process, and QC/Oversight process.

b.) Please see response to (a) above.

c.) Each Pre-inspection and Trimming contractor is contractually required to perform QC on their own work. However, they are not required to hire a certain number of QC personnel nor inspect a specific quantity of trees as part of their QC obligation. SCE can suggest contractors bring on additional resources should quality issues be identified, or if a contractor shows a trend of declining performance. Contractually requiring our contractors to hire additional QC resources would require re-negotiations of our vegetation management contracts, and potentially higher rates.

d.) SCE cannot identify a specific date it made these requests, but SCE made the requests during one or more monthly contractor performance meeting held in 2021.

e.) No. These were recommendations only.

f.) One (1) contractor onboarded additional dedicated QC inspectors.

g.). On a monthly cadence, each contractor submits their QC overall performance results in a report to SCE.