

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

**DATA REQUEST SET CalAdvocates-SCE-2022WMP-12**

**To: Cal Advocates**  
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**Job Title: Senior Advisor, Compliance**  
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**Response Date: 4/6/2022**

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**Question 02:**

In response to DR CalAdvocates-SCE-2022WMP-11, Q1, SCE states that in 2021, 87 trees remediated through the Dead and Dying Tree Program (DDTP) did not include a cause for failure in their subsequent Quality Control (QC) report. SCE states that:

The 87 blank entries were wholly attributed to verifications being performed in Q1 and Q2 by SCE's DDTP contractor's QC staff and not through SCE's formal QC program. SCE subsequently took over its DDTP contractor's QC program commencing in Q3 2021. Since SCE took over the QC program for DDTP, SCE no longer has these same data quality issues.

Please provide answers to the following:

- a) Clarify the statement in bold above. Has SCE staff taken over the QC program for DDTP, or is the QC work now performed by contractors in the same fashion as SCE's other vegetation management QC programs?
- b) Why did SCE take over its DDTP contractor's QC program, as referenced above?
- c) Does SCE retain a single contractor for the DDTP program?
- d) What additional issues with the DDTP contractor's QC program (other than that referenced above) has SCE identified, if any?

**Response to Question 02:**

a) Currently, QC of DDTP is performed by SCE's QC contractor California Forestry Vegetation Management (CFVM), who also performs SCE's QC for Line Clearing and HTMP. Although QC is performed by CFVM, SCE's QC program methodology is determined by SCE. With respect to DDTP, SCE requires CFVM verify that 100% of remediation work has been performed and accurately logged in its data management system pursuant to specific SCE guidelines. Additionally, a dedicated SCE Vegetation Management Advisor in the Compliance Department schedules and tracks all QC work to be performed by CFVM. SCE also requires a bi-weekly check-in with CFVM to discuss findings or adjustments to the upcoming work schedule.

b) Prior to SCE taking over QC, the contractors performing the DDTP work (assessments, mitigations/removals) performed their own QC, which lacked independent review. As discussed in SCE's response to CalAdvocates-SCE-2022WMP-11, Question 1, the contractors were not recording their work in Fulcrum to the standards required by SCE (resulting in the 87 blank entries). The QC now performed by CFVM, and managed by SCE, has more rigor, formality, and is an independent review of work performed.

c) For DDTP, SCE uses four contractors that perform assessments and six contractors that perform

mitigations/removals.

d) None.