

## Process & Controls

# Wildfire Mitigation Plan (WMP) Compliance Assessment Report

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December 15, 2022

To: [REDACTED]

**Subject: 2022 T&D/ASP Wildfire Mitigation Plan (WMP) QA Readiness Review –  
Vibration Damper Retrofit (SH-16)**

Process & Controls (P&C) completed a review of compliance documentation supporting the progress of the 2022 T&D and ASP WMP Vibration Damper Retrofit (SH-16). The objective of this review was to provide management reasonable assurance on the quality and adequacy of the data/evidence by performing analysis and assessment on supporting documents, internal business processes, procedures, and controls, and provide management recommendations to determine remediation action, as applicable.

### **Scope and Methodology**

Our review included Vibration Damper Retrofit (SH-16) assigned to Distribution Project Management – Wildfire Program Management.

To complete our review, we performed the following:

- Reviewed the evidence file as of September 30, 2022 to ensure it adequately supported the activity as defined in the 2022 WMP
- Reviewed the evidence file to identify anomalies
- Performed data analytics on the evidence file to identify incomplete and missing data
- Reviewed 100% SAP Notification records for Long Text comments and Activity Text Codes
- Conducted interviews to determine whether it appeared a risk informed approach was followed
- Reviewed current policies, procedures, and/or process flows, as applicable
- Conducted interviews with applicable Subject Matter Experts
- Performed field visits for seven Notifications to validate existence of vibration dampers

### **Conclusion**

Based on our review of the evidence provided, P&C identified one observation that requires management's attention to ensure work was completed under this retrofit initiative. A summary of the observation, potential risks, our recommendations, and corrective actions are included in the Report Addendum. The corrective actions will be tracked in T&D's Critical Action Item (CAI) Tracker and will be reported to the Senior Leadership Team (SLT) monthly. P&C met with management to review and discuss the details contained in this report.

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We would like to thank the Subject Matter Experts for their timely submittal of review documentation, and for their prompt responses and feedback when requested. If you have any questions regarding report content, please contact [REDACTED] via email or at the number noted below.

### *Process & Controls Team:*

*Prepared By*

[REDACTED]

*Approved By*

[REDACTED]

*Project Lead*

[REDACTED]

cc: Distribution

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

# QA Process & Controls

## Report Addendum: Observations

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### **Observations**

#### **1. Observation #1: Quarterly Result Reporting Errors**

Scope identification and reporting controls were not effective to ensure initiative results contained only retrofits completed in the quarter reported.

Reviews of Q2 2022 results revealed that out of 36 Notifications reported as complete, 3 contained SAP Long Text (LT) indicating the construction crew found the work complete upon arrival at the structure. A further review of Q3 2022 results revealed these errors had not been corrected, and an additional 2 of 26 reported complete contained LT indicating work was complete upon arrival or the structure did not have covered conductor. The 5 (8%) reported Notifications were marked complete (ATCO/NOCO) in SAP, while the corresponding Activity Code Text indicated “Work Found Complete” or “No Action Taken;” however, no action was taken to validate whether results should have been included in quarterly reporting.

Further discussions with the Activity Owner revealed 4 of the 5 structures should have not been included in the vibration damper retrofit initiative.

### **Potential Impact:**

Inaccurate reporting of initiative progress to Wildfire Safety – Wildfire Performance Management and the California Office of Energy Infrastructure Safety (OEIS).

### ***Process & Controls (P&C) recommends management:***

- 1. Scope identification should be refined to ensure only structures requiring vibration damper retrofits are included in annual retrofit scope.*
- 2. Controls should be enhanced to validate the accuracy of Notifications reported as complete (e.g., review of SAP Long Text and/or Activity Code Text).*
- 3. Management should work with the Wildfire Safety – Wildfire Performance Management Team to determine if work identified as complete upon arrival or no action taken should be included in reporting. Corrected 2022 quarterly results should be reported to Wildfire Program Management and the California Office of Energy Infrastructure Safety as appropriate.*

### ***Management Corrective Action:***

- 1. Management action plan: Prior to scope submission, scope will be reviewed to ensure that identified structures have covered conductor installed and it meets the vibration damper retrofit criteria (installed before standard publication) by comparing scope to the covered conductor database and verifying through inspection photos if needed. This was implemented on 11/18/22 when 2023 Vibration Damper Retrofit Scope was submitted.*

*Corrective Action Owner:* [REDACTED]

*Anticipated completion date: Management indicated the action item was completed November 18, 2022.*

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2. *Management action plan: Prior to reporting vibration damper completions, a review of SAP Activity Code Text will be performed to help assure validity and accuracy of Notifications.*

*Corrective Action Owner:* [REDACTED]

*Anticipated completion date: January 31, 2023*

3. *Management action plan: With the anticipated implementation of corrective actions 1 and 2 above, any Notifications identified as complete upon arrival or no action taken should be dispositioned and removed from evidence prior to reporting, if deemed appropriate (i.e., if work was not actually performed). The year-to-date evidence has been corrected and will be reflected in upcoming external quarterly/annual reporting. WPM will meet with Wildfire Safety to inform them of any corrections.*

*Corrective Action Owner:* [REDACTED]

*Anticipated completion date: January 31, 2023*