

Process & Controls

Wildfire Mitigation Plan (WMP) Compliance Assessment Report

February 15, 2023

To: [REDACTED]

Subject: 2022 T&D/ASP Wildfire Mitigation Plan (WMP) QA Readiness Review – IN-1.1 Distribution Ground and Aerial Inspections

Process & Controls (P&C) completed a review of the evidence supporting the implementation of the action plans described in the 2021 WMP Readiness Review for IN-1.1 Distribution Ground and Aerial Inspections. The objective of this review was to provide management reasonable assurance it appears the action plans were implemented and are effective.

Scope and Methodology

Our review included IN-1.1 Distribution Ground and Aerial Inspections assigned to the Integrated Inspections group.

To complete our review, we performed the following:

- Conducted interviews with applicable SMEs to understand the prior year observations and associated action plans
- Performed validations to determine whether it appears the action plans were implemented and were effective
- Reviewed current policies, procedures, and/or process flows, as applicable

Conclusion

Based on our review of the evidence provided, P&C identified two observations that require management's attention to ensure adequate evidence is available. A summary of the observations, potential risks they introduce, our recommendations, and corrective action 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.

We would like to thank the Subject Matter Experts for their timely submittal of review documentation and 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.

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Wildfire Mitigation Plan (WMP) Compliance Assessment Report

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Operational Excellence

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Asset Strategy & Planning

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Ethics & Compliance

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Report Addendum: Observations and Improvement Opportunities

Observations

1. **Observation #1:** Procedural document does not indicate “conformance rate” for potentially missing Distribution ground notifications

Review of the “Integrated Inspections – QA Survey Hazards & Notifications” procedural document revealed a control is performed weekly and/or as required to ensure a notification is created for potential field conditions. However, per discussion with management, the percentage of potentially missed notifications is within the conformance rate. However, P&C noted the procedural document does not indicate an acceptable conformance rate.

Potential Impact:

Control(s) in place to review potentially missed notifications is not operating effectively and as intended

Process & Controls (P&C) recommends management:

Enhance the procedural document to include an acceptable conformance rate to ensure the documentation aligns with the current practice.

Management Corrective Action:

Distribution Management will work with appropriate stakeholders to identify an acceptable conformance rate and incorporate it in the procedural document.

Corrective Action Owner: [REDACTED]

Anticipated completion date: April 30, 2023

2. **Observation #2:** Notification errors may not be followed up to closure

Review of the “Aerial Transmission and Aerial Distribution Inspections - Overview of Notification Controls” procedural document¹ revealed the “Error Log” and “Detailed Notifications” reports are reviewed and monitored on a monthly basis. The intent of the control is to ensure notifications are created to address potential field conditions.

Review of the “Detailed Notifications” report, containing 6,375 records dated 12/13/22 revealed the following:

- a. One (1) (<1%) failed to be created in SAP since 7/27/22. Discussions with the SME revealed this notification is also part of the “Error Log” report and was identified and referred to IT’s InspectForce team in September 2022, however, the error was not followed up to resolution with IT.
- b. Seventy-Seven (77) (1%) were saved as draft with dates as early as September 2022. Discussions with the SME revealed the notifications were saved as draft by design

¹ Last updated on 09/20/22

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Report Addendum: Observations and Improvement Opportunities

and awaiting validation by a Field Specialist (FS) before being pushed to SAP. Consequently, some of these notifications were delayed until the FS review was completed.

Potential Impact:

Notification errors not followed up to closure may lead to notifications not created in SAP

Process & Controls (P&C) recommends management:

1. Review potential errors, confirm the cause and develop, document, and implement a control to prevent issue from re-occurring.
2. Assign a dedicated resource to ensure the control is consistently performed.

Management Corrective Action:

1. *For Observation 2.a., IT was unable to resolve the issue preventing the automated creation of the notification. PA&DI has created the notification manually in SAP. Inspection's PA&DI team will resume monthly monitoring of the InspectForce "Detailed Notifications" report and "Error Log" to identify notifications that aren't created in SAP through our automation for Aerial Transmission scope. Exceptions identified through these reports will be followed up during the review and until closure.*

Corrective Action Owner: [REDACTED]
Anticipated completion date: March 31, 2023

2. *For Observation 2.b., all seventy-seven notifications have been processed through our FS workflow and all validated notifications have been created. For 2023, notifications will be processed through InspectApp and pushed to SAP through automation without an FS review, thus eliminating any potential delays in creating SAP notifications.*

Corrective Action Owner: [REDACTED]
Action Item Completed on January 13, 2023