

Process & Controls

Wildfire Mitigation Plan (WMP) Compliance Assessment Report

December 15, 2022

To: [REDACTED]

Subject: 2022 T&D/ASP Wildfire Mitigation Plan (WMP) QA Readiness Review – Dead & Dying Tree Removal (VM-4)

Process & Controls (P&C) completed a review of compliance documentation supporting the progress of the 2022 T&D and ASP WMP Dead & Dying Tree Removal (D&DTR; VM-4). 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 D&DTR (VM-4) assigned to Vegetation Management & Compliance.

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
- Compared evidence to the management reporting (e.g., Quarterly Initiative Update (QIU), Quarterly Notification Letter (QNL))
- Reviewed the evidence file to identify anomalies, and incomplete or missing data
- Selected a sample size of 33 from each of the Circuit Tracker, Assessment, and Mitigation files and reviewed the detailed records, based on the NERC ERO Sample Handbook Revision 1.0.
- Compared Q3 2022 completed inspections against 2022 plan 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

Conclusion

Based on our review of the evidence provided, we concluded there is reasonable assurance the evidence appears adequate to support the progress of the activity. However, we noted the Q3 evidence did not match the QNL and QIU. Going forward, Wildfire Performance Management (WPM) will work with impacted stakeholders to ensure the evidence, QNL, and QIU match. Additionally, our results indicate Vegetation Management should continue to enhance Arbora extracts and reporting to provide evidentiary support for quarterly and year-end reporting.

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

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questions regarding report content, please contact [REDACTED] via email or at the number noted below.

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