

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

DATA REQUEST SET O E I S - S C E - 2 2 - 0 0 8

To: Energy Safety
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Received Date: 5/10/2022

Response Date: 5/12/2022

Question 01 :

Landowner non-compliance maturity

a. For referencing purposes, please provide a written response to the following question asked during a call with Energy Safety on April 6, 2022:

In response to question J.II.c of the 2022 Utility Wildfire Mitigation Maturity Survey which asks, “What percent of landowners are non-compliant with utility initiatives (e.g., vegetation management),” SCE reported a level (v) “Less than 0.5%”. This is a significant increase in maturity from its response to the 2021 Maturity Survey, where it reported a level (i) “More than 5%”.

i. Please explain SCE’s significant increase in maturity in this area.

ii. Has SCE taken steps to increase landowner compliance and cooperation with its mitigation initiatives?

(1) If yes, please provide specific examples of such steps (e.g., outreach to or engagement with landowners).

(2) If no, what is this increase in maturity (decrease in landowner non-compliance from >5% to <0.5%) attributed to?

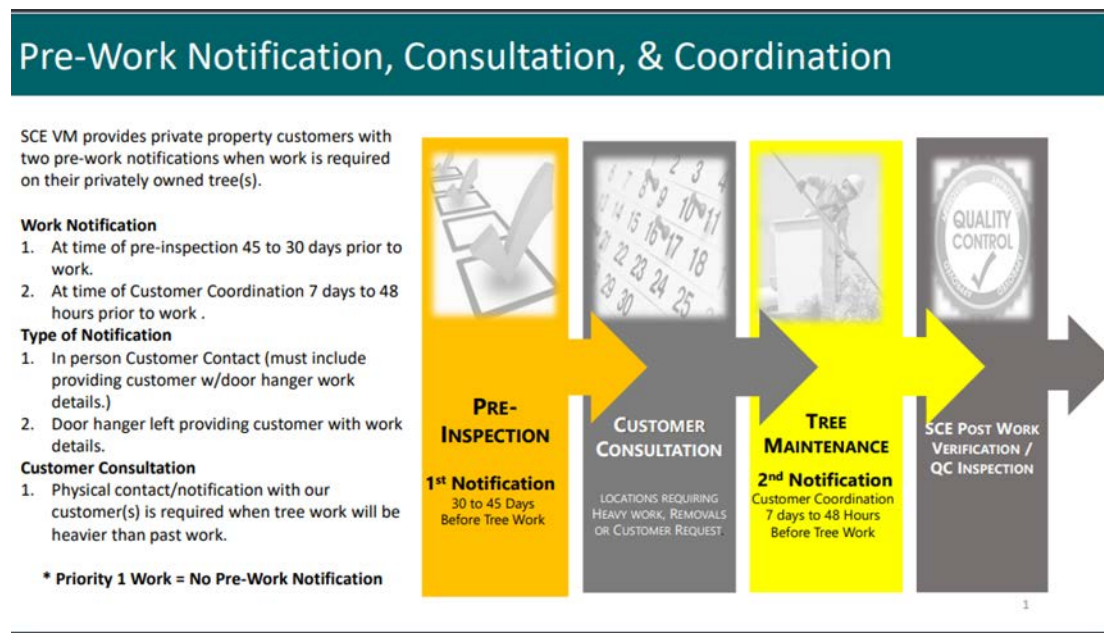
Response to Question 01 :

i. SCE’s increase in maturity score is due to a change in the interpretation of the maturity model question. In prior years, SCE’s response was attributed to including customers that did not allow SCE to obtain enhanced vegetation to conductor clearance. In Q4 2021, SCE determined that refusal of enhanced clearances is not considered "non-compliance" because it is not a regulatory requirement and should not be used to calculate the percentage of non-complaint landowners. SCE’s 2022 Maturity Survey response to this question is derived from formal customer refusals to perform the required work for the Heavy Tree Program and Routine Line Clearing.

ii. As explained in response to (i) above, the maturity model rating change is largely attributed to SCE’s revised interpretation of the model question. However, SCE continues to look for opportunities to improve customer interactions. After the California Public Utilities Commission (“CPUC”) updated General Order 95, Rule 35, Appendix E to recommend enhanced clearances and deeper trims, and with the implementation of SCE’s Hazard Tree Management Program, SCE has needed to engage in more outreach to customers to help them understand the objectives of these programs and why their vegetation may need to be trimmed or removed. These activities also require SCE to enter customers’ property to a greater degree than in the past. As a result, SCE implemented a more formal, robust protocol for customer notifications.

The formal process for customer notifications begins when SCE first attempts to make phone or physical contact with customers in order to obtain permission to proceed with planned work. Should the customer refuse, SCE initiates an escalation process, which varies depending on the type of mitigation and/or customer refusal.¹ If escalated discussion attempts are unsuccessful, SCE sends a certified letter to the customer stating SCE's intention to proceed with work in accordance with Public Resource Code Section §4295.5.

Figure VIII-1
Pre-Work Notification, Consultation, Coordination



Some cities or counties require different pre-work notifications for customers. SCE will typically meet with a city annually to provide the annual maintenance schedule of the vegetation management grids. Some cities also require SCE to provide weekly email notifications to alert the city of the work being performed in the city. Other cities or counties require SCE to acquire permits to perform work in their respective areas. As shown in Figure VIII-39 above, the notification process begins at least 30-45 days ahead of a planned trim or removal.

Additionally, in March of 2021, SCE began performing Voice of the Customer surveys to gather qualitative customer feedback to help SCE understand its performance from the customer's point of view and will use this information to continue to improve customer interactions.

¹ Generally, the notification consultant or tree trimming contractor will attempt to meet face-to-face with the customer to address concerns and explain the mitigation process. When necessary, SCE personnel will also engage with the customer.