

Southern California Edison

WSD-011 – Resolution implementing the requirements of Public Utilities Code Sections 8389(d)(1), (2) and (4) related to catastrophic wildfire caused by electrical corporations subject to the Commission’s regulatory authority

DATA REQUEST SET Cal Advocates - SCE - 2021 WMP - 01

To: Cal Advocates
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Job Title: Principal Manager
Received Date: 1/15/2021

Response Date: 2/17/2021

Question 012:

Please identify and provide a copy of all quality assurance or quality control (QA/QC) reports — conducted by both internal and external entities — that were completed since January 1, 2020 and that examined any programs, initiatives, or strategies described in your 2020 Wildfire Mitigation Plan. External entities include, but are not limited to, contractors, auditors, and Independent Evaluators.

Response to Question 012:

As described in our 2021 WMP Update (See Sections 7.3.4.14 and 7.3.5.13), SCE performs routine Quality Control (QC) of asset and vegetation inspections. Additionally, QC and Quality Assurance (QA) efforts may be *ad hoc* during a given year. SCE’s response includes a description of these routine and *ad hoc* QA/QC efforts and the associated complete and final QA/QC reports.

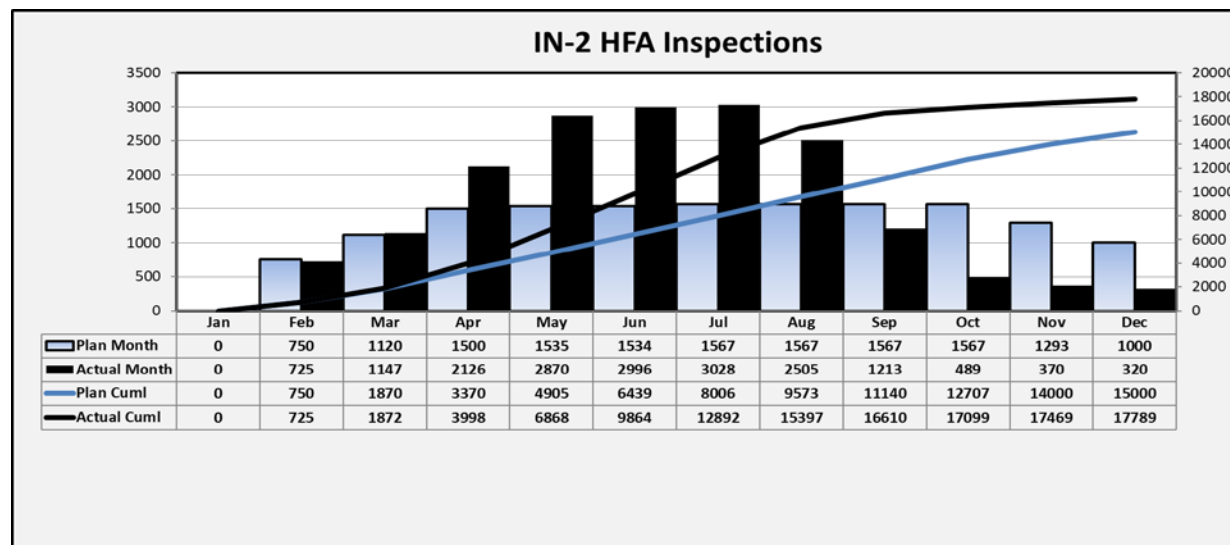
SCE’s Transmission & Distribution QA/QC programs are intended to help ensure that inspection activities conform to the requirements of SCE’s inspection programs. A QC inspection is conducted by evaluating the results of completed inspections after the fact. The data from the various QA/QC analysis are used to understand status of programs, help identify challenges and root causes (for example, permitting and customer access challenges for line clearance), and identify issue that need follow-up actions. Actionable findings identified during QC inspections are used for performance scoring to measure the ability of SCE inspectors to accurately identify and classify the potential safety and reliability risks of General Order 95 violations, potential ignition risks, and other safety hazards. All findings identified during the QC review are remediated, and in some instances, corrective actions are initiated. Reports from various QC programs are described below.

SCE’s QA programs evaluate the process as opposed to the evaluation of the finished product done by QC reviews. The QA review evaluates the process and supporting evidence to provide reasonable assurance to management that the WMP goals/activities have been met. The QA review can also provide recommendations to improve quality and consistency of data evidence. An example of a QA review is described below.

Together, SCE’s QA/QC programs help drive continuous improvement by identifying non-conformances with SCE standards, determining causes of non-conformance, or driving corrective actions to improve performance. The quality program will track action plans to identified corrective actions, which can include changes implemented to inspection processes, training, etc., to continuously improve the inspection programs based on QA/QC findings.

In 2020, SCE performed QC of asset inspections for 17,789 transmission, distribution, and generation structures in HFRA (WMP initiative IN-2) to assess the inspections conformance to the requirements of SCE's overhead inspection programs by evaluating the results of the inspection after-the-fact. This exceeded the target of 15,000 inspections from SCE's 2020 WMP. The IN-2 initiative was tracked as a WMP goal, with a target to complete 15,000 inspections throughout 2020, and monthly goal updates would report progress towards completion of the annual inspection target. Details regarding overall inspection program findings and quality scores are displayed in an online quality dashboard and reports are provided throughout the year to management. The following charts show the year-end 2020 status and activity for the 2020 WMP IN-2 initiative:

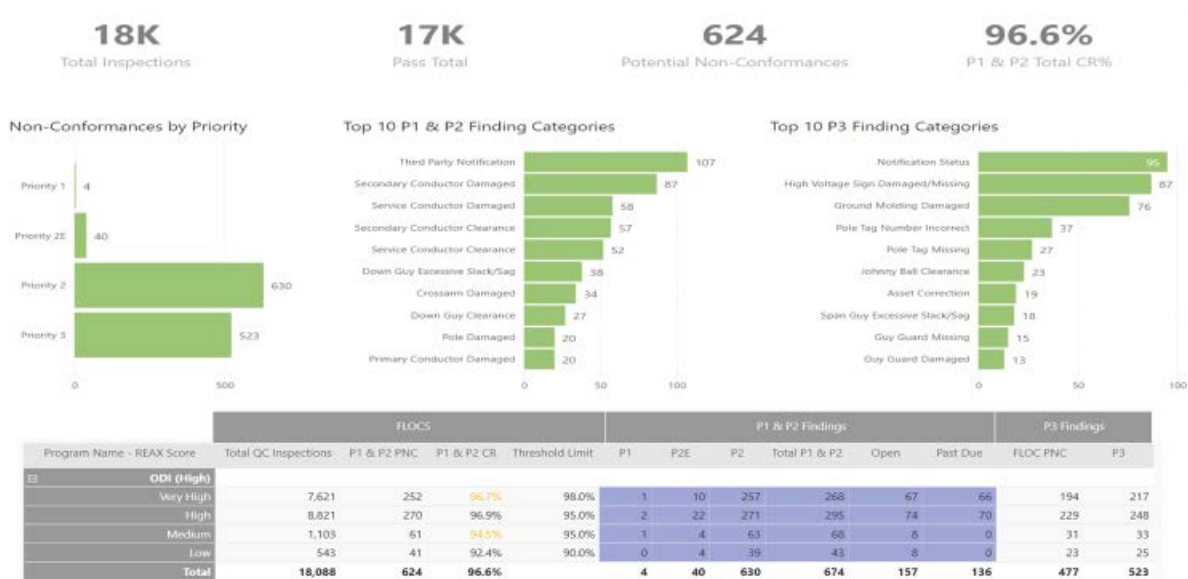
IN-2 Status Through 12/31/20			
Program	Inspected	NC Structures	Findings
Overhead Detailed Inspections	17371	570	616
Transmission Inspections	380	2	2
Generation Inspections	38	3	3
Total	17789	575	621



SCE also performed QC inspections of other WMP initiatives. These QC activities are displayed in a quality dashboard and program results are typically reported to management monthly. The quality dashboard is an online tool that displays results for various QC programs in a centralized location and is assessable by SCE employees through SCE's internal web browser. Information displayed on

the dashboard includes the number of inspections performed, program conformance rate details, and top findings by category. A conforming structure is one that does not have an actionable finding identified during the quality review or inspection, i.e., the QC inspection matched the previous inspection performed by the inspector. SCE calculates a monthly conformance rate by dividing the count of conforming structures inspected by the count of inspected structures. For example, if 90 structures are found to be conforming out of 100 structures reviewed by quality inspectors, the conformance rate would be 90%. Depending upon the complexity of the structure, there can be several items that can lead to a finding of nonconformance, and only one condition needs to be identified for the structure to be deemed nonconforming. The following screen shots from the quality dashboard show year-end 2020 results for WMP related initiatives regarding distribution Overhead Detailed Inspections (ODI), transmission inspections, generation inspections, distribution Aerial inspections, and the Vegetation Management program. These screen shots represent the type of information that is typically reviewed with program owners and management monthly. Also, attached are reports presented to program managers and/or management that include the QA/QC dashboard information. These attached reports can also contain information beyond QA/QC, including attorney-client privileged information. SCE has redacted material from the reports that is attorney-client privileged/attorney work product.

QC Results thru December (ODI)



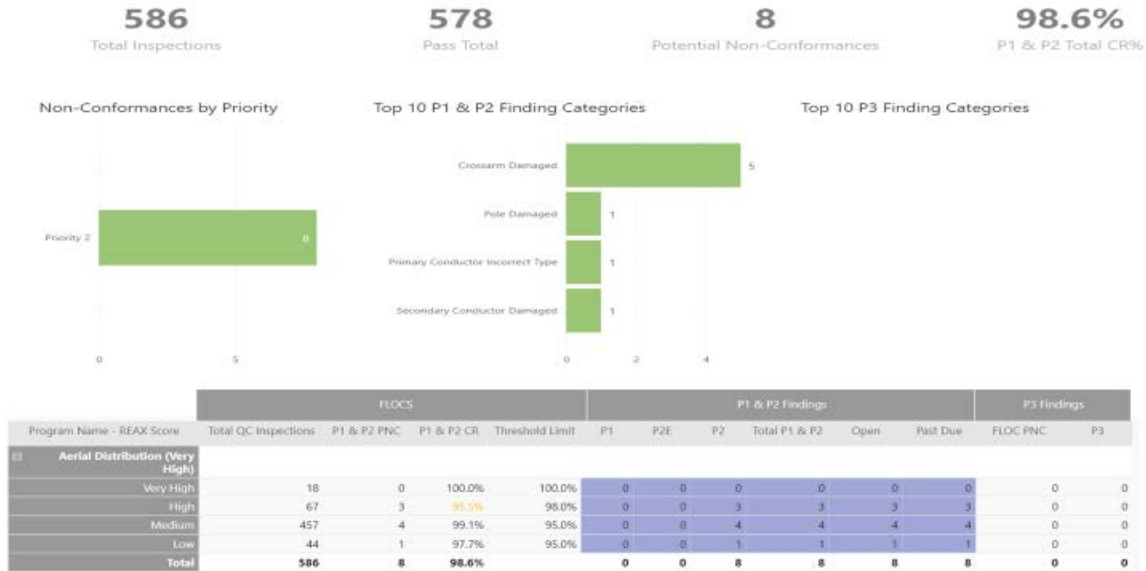
QC Results thru December 2020 (Transmission Inspections)



QC Results thru December 2020 (Generation Inspections)



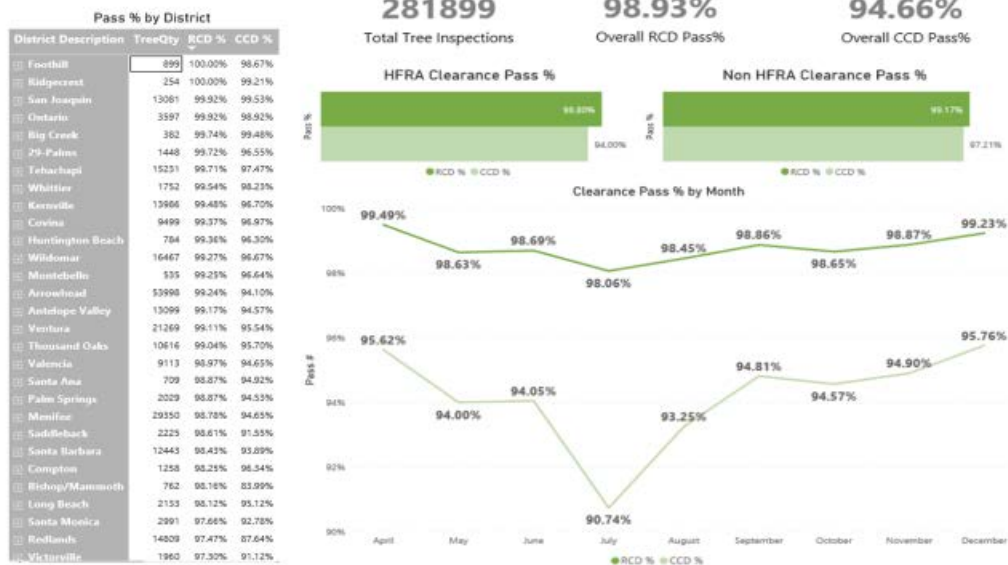
QC Results thru December 2020 (Distribution Aerial Inspections)



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December YTD Vegetation Management – Distribution

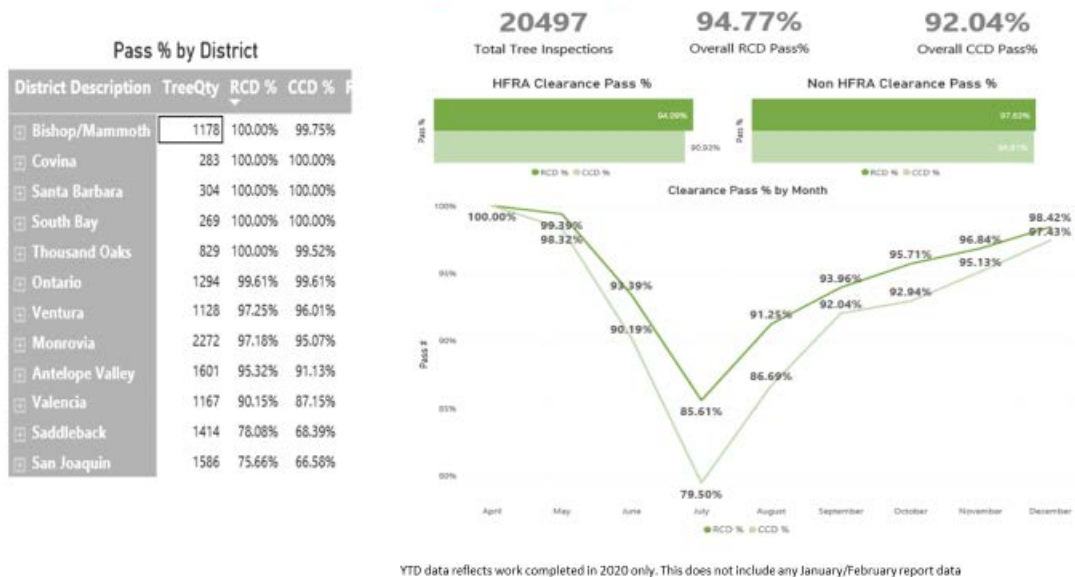


YTD data reflects work completed in 2020 only. This does not include any January/February report data

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December YTD Vegetation Management – Transmission



Additionally, and as noted above, SCE may conduct *ad hoc* QA/QC during a given year. SCE is attaching the following four *ad hoc* QA/QC reports.

The document entitled "2020 TD WMP QA Review" is a status update for a one-time QA review performed in 2020 that examined several 2020 WMP activities. The purpose of this QA review was to evaluate WMP activities and look for potential areas of improvement. The attached copy of that initial status report, was presented to SCE management on October 14, 2020. This report contains staff's preliminary findings. SCE is still reviewing and addressing the potential findings noted in the report. Many of the potential findings identified in this initial report have been resolved or are being actively worked on by SCE. A final report has not been produced. Below are some of the action items SCE has taken or is currently taking to proactively address the potential issues contained identified in the report:

- Revisions to questions on the inspection form to reduce the potential for confusion
- Drafted revisions to the inspection form to note instances where corrective action is required
- Development of a dashboard to monitor distribution ground questions
- Development of a Transmission dashboard to monitor questions
- Development of training material

The document entitled "Covered Conductor Inspections- Results and Next Steps" is a report on an engineering review to validate that installation of covered conductor is conforming to the new SCE Standards. SCE's engineering team reviewed a sample set of inspections of installed covered conductor. This report contains engineering's findings and recommendations. SCE has and is addressing the issues found as described in the report. Many of the issues identified in this report have been resolved or are being actively worked on by SCE.

Two other documents that may be responsive are QA reviews of documentation to support compliance with NERC's transmission vegetation management standards, CPUC Resolution ESRB-4 (vegetation management), and Public Resource Codes 4292-4296. Because these requirements involve reviews of vegetation management documentation that may overlap with WMP initiatives, SCE is including them in the attached reports.