

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

DATA REQUEST SET Cal Advocates - SCE - 2022 WMP - 07

To: Cal Advocates
Prepared by: Napa Tayavibul
Job Title: Senior Advisor, Compliance
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Response Date: 3/15/2022

Question 05:

On pp. 416-420 of SCE's 2022 WMP, SCE discusses "quality assurance / quality control of vegetation management." SCE reports performing 131,000 individual "Hazard Tree Management Plan" (HTMP) tree assessments in 2021. SCE also states that for the "Hazard Tree Management Plan" in 2021:

QC performed approximately 13,000 independent risk assessments to verify the quality of the assessments performed. Approximately 12,000 of these assessments were focused on tree risk scores in the range of 35-49 where mitigation is typically not required. Of these 12,000 assessments, QC identified approximately 2,700 cases showing a tree risk score of greater than 50. These cases were re-directed to the HTMP assessors for re-evaluation and potential remediation.

In the context of the above quote:

- a) Does SCE consider a QC failure rate of 22.5% for HTMP trees to be acceptable?
- b) What steps is SCE taking in 2022 to improve the quality of initial HTMP inspections?
- c) Given the high QC failure rate, has SCE taken any steps to re-assess additional trees inspected in 2021 beyond the QC sample discussed above?
- d) Of the reported 131,000 individual HTMP tree assessments performed in 2021, how many were performed by contract personnel?
- e) If contract labor was employed for HTMP tree assessments, has SCE evaluated whether specific contractors or personnel have been responsible for a disproportionate share of QC failures?
- f) Of the reported 131,000 individual HTMP tree assessments performed in 2021, how many were performed by SCE employees?
- g) If SCE staff labor was employed for HTMP tree assessments, has SCE evaluated whether specific SCE staff have been responsible for a disproportionate share of QC failures?

Response to Question 05:

a.) SCE does not consider the 2,700 cases mentioned above to be failures. Even among highly qualified and capable ISA-certified arborists, differences in scoring outcomes are expected due to expert judgment applied during the evaluation. When the QC inspector calculates a risk score greater than a certain threshold – this threshold was at 50 for most of 2021, but then was updated to 55 in late 2021 – the tree is returned to the contractor's supervisory or lead assessor for a re-assessment. Any new risk score resulting from the re-assessment by the contractor's supervisory or lead assessor will override the prior risk assessment score. If the lead assessor's score aligns with the QC inspector's score meeting the threshold (or above), mitigation will be prescribed. If the lead assessor's score is consistent with the original assessment that no mitigation is required, no mitigation will be performed. Because assessments require professional judgment and some degree of subjectivity, this approach allows for a review by three qualified arborists, and the agreed-upon

judgment of two out of the three will control.

With respect to 2021, of the 2,700 cases where the QC assessor assessed a score at or above the threshold (50 or 55), upon the reassessment process described above, approximately 13% of the returned scores resulted in a change in mitigation. Thus, of the 2,700 cases, approximately 350 tree assessments resulted in a change in mitigation, for a total non-conformance rate of 2.7% (350 divided by 13,000). To drive continuous improvement, in late 2021, additional QC requirements were implemented to refine the determination of whether mitigation should be required.

b.) There are monthly Heavy Tree Program meetings where QC results of assessments and other items are discussed. Also, annual field meetings are conducted where company supervisory/lead personnel and QC inspectors all assess the same tree(s) and compare results. This is used to re-calibrate and drive assessment consistency. Supervisor/leads are then required to provide training to all their teams.

c.) SCE does not consider the variance in results from the initial assessment and the QC assessment to be a “failure rate,” for the reasons discussed in section (a) above. The QC sample described in the 2022 WMP narrative is the complete sample; in 2021, SCE did not add additional trees to the QC scope based on the results coming out of the QC program during that year.

d.) All. HTMP is only performed by contract personnel.

e.) No.

f.) None.

g.) N/A.