

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

DATA REQUEST SET Cal Advocates - SCE - 2022 WMP - 02

To: Cal Advocates
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Job Title: Principal Manager
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Response Date: 1/24/2022

Question 01:

Please identify and provide a copy of all quality assurance or quality control (QA/QC) reports - conducted by your company - that were completed since January 1, 2021 and that examined any programs, initiatives, or strategies described in your 2021 WMP Update.

Response to Question 01:

SCE performs routine Quality Control (QC) of asset and vegetation inspections and routine Quality Assurance (QA) readiness reviews of select wildfire mitigations.¹ Additionally, QC and 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 (T&D) 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 a sample of completed inspections after the fact. The data from the various QA/QC analyses 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.

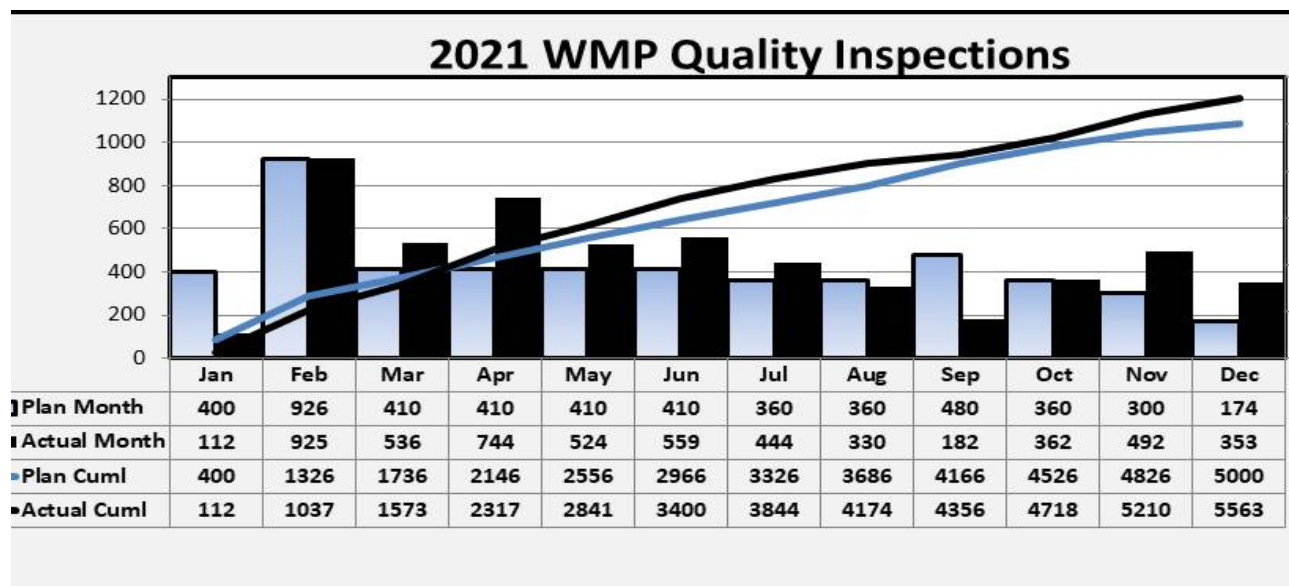
Together, SCE's QA/QC programs help drive continuous improvement by identifying non-conformances with SCE standards, determining causes of non-conformance, or driving corrective actions to improve performance. The quality program will track action plans to identified

¹ The inspection QA/QC initiative was initially discussed as WMP activity IN-2 in SCE's 2020 WMP. As this activity was formalized and operationalized, it is discussed in Section 7.3.4.14 of SCE's 2021 WMP and remains a part of SCE's WMP but will not have program targets specifically tracked by SCE to monitor wildfire mitigation implementation.

corrective actions, which can include changes implemented to inspection processes, training, etc., to continuously improve the inspection programs based on QA/QC findings.

In 2021, SCE performed QC of asset inspections for 5,563 transmission, distribution, and generation structures in HFRA 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 5,000 inspections from SCE's 2021 WMP Update. This activity was tracked as a WMP goal, with a target to complete 5,000 inspections throughout 2021, 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 2021 status and activity for the quality inspections in HFRA area.

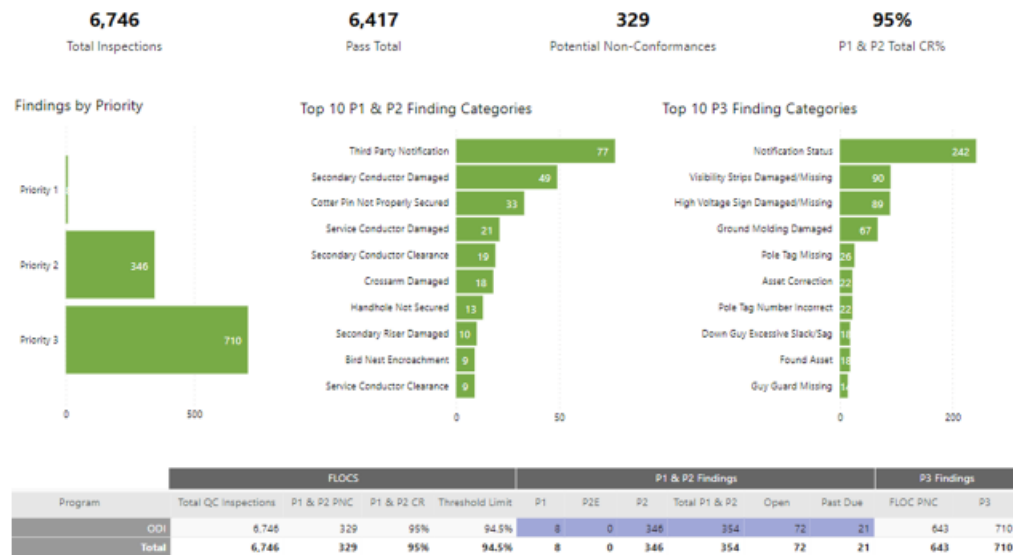
2021 WMP Quality Inspections Through 12/31/21			
Program	Inspected	NC Structures	Findings
Overhead Detailed Inspections	4701	363	431
Transmission Inspections	742	12	16
Generation Inspections	120	8	8
Total	5563	383	455



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 QC 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 2021 results for these WMP related initiatives which include distribution Overhead Detailed Inspections (ODI), transmission inspections, generation 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 various reports presented to program managers and/or management that include the QA/QC dashboard information.

Overhead Detailed Inspection – 2021 Results



Data reflective as of 1/10/2022

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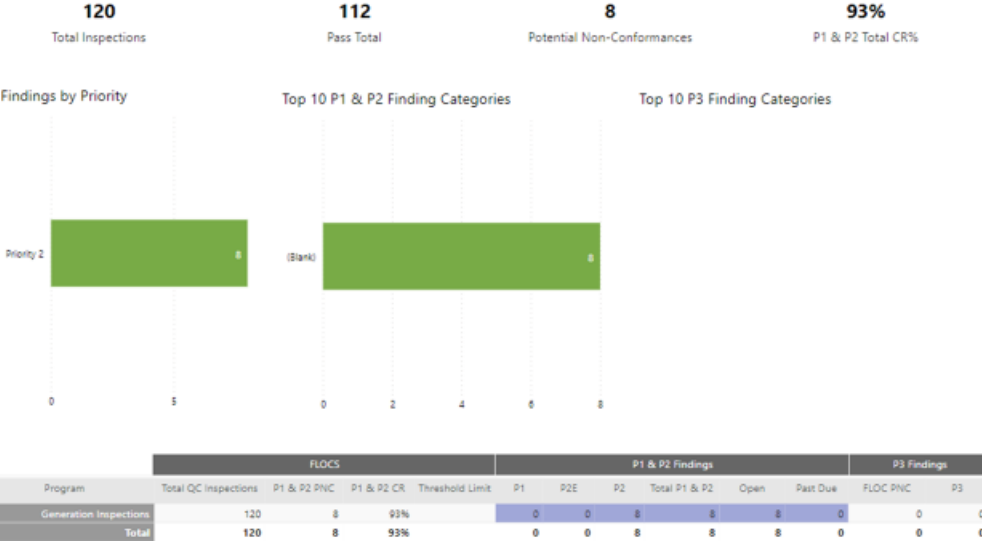
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Transmission Inspections (Overhead) – 2021 Results



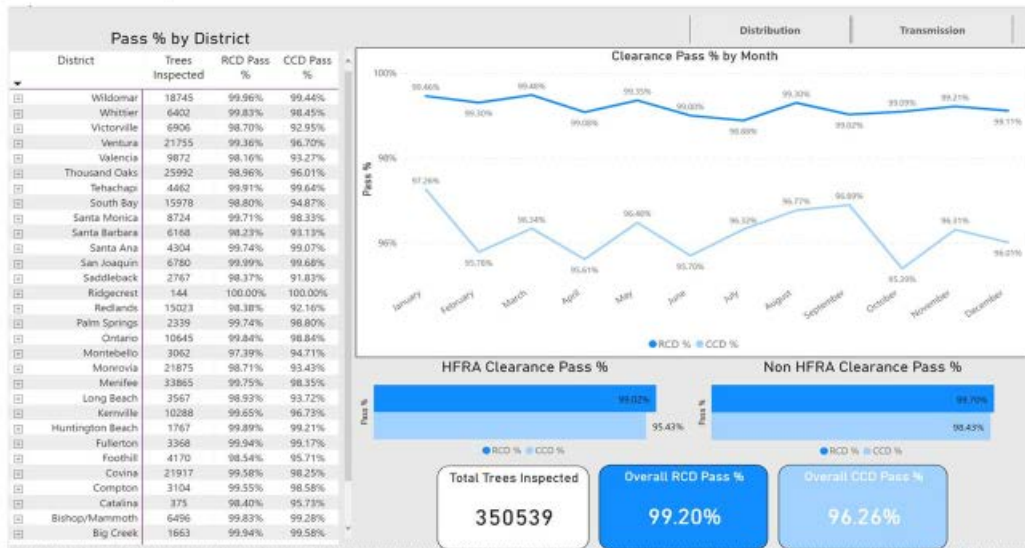
Data reflective as of 1/10/2022

Generation Inspections – 2021 Results



Data reflective as of 1/10/2022

Vegetation Inspections (Distribution & Transmission) – 2021 Results



Data reflective as of 1/10/2022

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Additionally, in 2021, SCE's T&D QA Process & Controls team completed a quality assurance readiness review on compliance documentation supporting the progress of six (6) 2021 WMP activities. These QA readiness review reports are attached and cover the following 2021 WMP activities:

- SH-1 Covered Conductor
- SH-10 Tree Attachment Remediation
- SH-14 Long Span Initiative (LSI)
- SH-15 Vertical Switches
- VM-4 Dead & Dying Tree Removal
- VM-6 Work Management (Arbora) Tool