

QA Process & Controls

Wildfire Mitigation Plan (WMP) Compliance Assessment Report

February 15, 2023

To: [REDACTED]

Subject: 2022 T&D/ASP Wildfire Mitigation Plan (WMP) QA Readiness Review – SH-14 Long Span Initiative

Process & Controls (P&C) completed a review of compliance documentation supporting the progress of the 2022 T&D and ASP Wildfire Mitigation Plan (WMP) SH-14 Long Span Initiative. 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 SH-14 Long Span Initiative, assigned to Distribution Project Management - Wildfire Program Management (WPM).

To complete our review, we performed the following:

- Reviewed the evidence as of June 30, 2022 to ensure it adequately supported the activity as defined in the 2022 WMP
- Compared evidence to the System of Record (SAP) and management reporting (e.g., Quarterly Initiative Update (QIU) and Quarterly Notification Letter (QNL))
- Reviewed evidence to identify anomalies
- Selected a sample size of 33 notifications and reviewed the SAP Long Text and Activity Text Codes
- Conducted interviews and compared the Q2 completed notifications to the 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
- Coordinated with the Quality Assurance team on field verification of 23 notifications in Ventura and an additional 64 across the SCE regions, to validate remediation work appeared to be complete

Conclusion

Based on our review of the evidence provided, P&C identified three observations that require management's attention to ensure adequate evidence is available. A summary of the observations, potential risks they introduce, our recommendations, and corrective actions are included in the Report Addendum. The corrective actions will be tracked in T&D's Critical Action Item (CAI) Tracker and will be reported to the Senior Leadership Team (SLT) monthly.

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Furthermore, an Opportunity for Improvement (OFI) was also identified, however, it may not impact compliance or pose significant risk; therefore, a management action plan was not required. A summary of the OFI is also included in the Report Addendum. P&C met with management to review and discuss the details contained in this report.

We would like to thank the Subject Matter Experts for their timely submittal of review documentation and their prompt responses and feedback when requested. If you have any questions regarding report content, please contact [REDACTED] via email or at the number noted below.

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cc: **Distribution**

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Report Addendum: Observations and Improvement Opportunities

Observations

1. **Observation #1: Quarterly Result Reporting Errors**

A desktop review of all completed LSI notifications (e.g., NOCO status) as of Q2 2022 revealed 25 of 1,482 (2%) stated “No Action Taken” or “Work Found Complete” in the “Task Code Text”. No required documentation was added in the long text comments stating the remediation was found complete per LSI guidance given to the Region/District office. In addition, our review revealed 14 notifications appears to have the same FLOC# and similar work scope description on the long-text comments.

Potential Impact:

Inaccurate reporting of initiative progress to Wildfire Safety – Wildfire Performance Management and the California Office of Energy Infrastructure Safety (OEIS).

Process & Controls (P&C) recommends management:

Management should verify the work completion and its timeline of all potential exceptions identified from our desktop reviews and work with the Wildfire Safety – Wildfire Performance Management Team to determine if the notifications are qualified to include in the regulatory reporting. Corrected 2022 quarterly results should be reported to Wildfire Program Management and the Office of Energy Infrastructure Safety as appropriate.

Management Corrective Action:

WPM will work to perform desktop verification the completion of work for the exceptions and will report any necessary revisions to 2022 completion evidence to the Wildfire Performance Management Team by 1/31/23.

Corrective Action Owner: [REDACTED]

Anticipated completion date: 1/31/23 - Closed – Corrective action has been resolved as of the report date. WPM confirmed the 25 notifications in question were remediated under covered conductor related work. Additionally, the duplicate records were removed from the Q4 2022 reporting.

2. **Observation #2: Unable to Validate Work Completion from a Desktop Review Due to Limited Information**

A desktop review of the long text description for a sample of 33 completed notifications revealed the following:

- a. 1 (3%) did not describe a long span potential concern and/or remediation completion, but rather described “INSTLD BRD GRD BASUL” issue (i.e., potentially no LSI remediation was completed).

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- b. 7 (21%) did not provide additional description of work or remediation was completed. Discussions with SMEs revealed that update of long text description is optional and in free form only, where notification policy & practices do not require photos to be uploaded/provided in order to close a notification in SAP. Additionally, there is a lack of formal and clear LSI guidance on notification documentation requirements available to provide to the Region/District office, e.g., when there is a deviation from notification problem statement. Currently, the notification status (i.e., NOCO) is the sole key indicator utilized by management when reporting work is complete. Without providing long text description update or pictures to reflect actual field condition, the setting of NOCO status alone does not appear to be sufficient to validate work completion through desktop review.

Potential Impact:

Inaccurate reporting of initiative progress to Wildfire Safety – Wildfire Performance Management and the California Office of Energy Infrastructure Safety (OEIS).

Process & Controls (P&C) recommends management:

1. *Management should verify the work completion and its timeline of all potential exceptions identified from our desktop reviews and work with the Wildfire Safety – Wildfire Performance Management Team to determine if the notifications are qualified to include in the regulatory reporting. Corrected 2022 quarterly results should be reported to Wildfire Program Management and the Office of Energy Infrastructure Safety as appropriate.*
2. *To provide better data evidence to support proper work completion, management should evaluate the existing notification documentation¹ and communication process to determine whether:*
 - a. *Engineering team to ensure the LSI remediation strategy/guideline is finalized and published in the Distribution Overhead Standard (DOH), including a process flow.*
 - b. *Controls can be implemented to prevent/monitor the issues from reoccurring (e.g., policies & procedures, dashboards, etc.).*
 - c. *Contractor & SCE crew should take before and after pictures to substantiate the work completed and attach them with the notification or workorder.*
 - d. *Guidelines should be refined to outline long text documentation and task code text description requirements (e.g., deviation from remediation instructions, description of work completed, and task code category, etc.).*
 - e. *Frequent reminders and/or training to field and office personnel to ensure the remediation and guideline process are followed (e.g., identification and documentation of appropriate notification).*

¹ Specifically for O&M or B material related notification

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Management Corrective Action:

1. *Management action plan: Management Response (1a, 1 structure) - WPM will work to perform desktop verification the completion of work for the exception and will report any necessary revisions to 2022 completion evidence to the Wildfire Performance Management Team by 1/31/23.*

Corrective Action Owner: [REDACTED]

Anticipated completion date: 1/31/23 - Closed – Corrective action has been resolved as of the report date. WPM confirmed incorrect notification was reported. The notification in question was remediated with SAP long text updated indicating specific remediation type completed.

2. *Management action plan: Management Response (1b, 7 structures) - In accordance with the established notification policy and practices, use of NOCO status to indicate completed work is acceptable. No further action will be taken.*

Corrective Action Owner: [REDACTED]

Anticipated completion date: N/A

3. *Management action plan (2a): Grid Hardening Prioritization will work to update and finalize the LSI remediation strategy/guideline and ensure that it is published in the Distribution Overhead Standard (DOH). Updates, such as the addition of a process flow, will be completed so that the April publication deadline is met.*

Corrective Action Owner: [REDACTED]

Anticipated completion date: 5/31/23

4. *Management action plan (2b,c,d,e): Currently, there is no owner for the oversight of notifications due to the ASP re-org (M&IPO) in late 2021. No action is needed at this time until an owner is identified.*

Corrective Action Owner: TBD

Anticipated completion date: 6/30/23

3. Observation #3: Field Verification Revealed Acceptable LSI Remediation Work Did Not Appear To Be Complete

1. A field verification of 23 completed LSI notifications (i.e., with NOCO status) in Ventura area revealed 2 (9%) potential exceptions where no acceptable LSI remediation work appeared complete (e.g., line spacers or ridge pins). Additional inquiries also confirmed only draft remediation strategy/ methodologies are in place and are not documented in the SCE Standards to provide clear guidance for SCE crews or contractors, which may cause confusion as to which remediation is acceptable.
2. An additional field verification of 64 completed LSI notifications (i.e., with NOCO status) revealed the followings:

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- a. 11 (17%) potential exceptions where no acceptable LSI remediation work appeared completed (e.g., line spacers or ridge pins).
- b. 2 LSI notifications appeared to be not meeting long span definition.

Potential Impact:

Inaccurate reporting of initiative progress to Wildfire Safety – Wildfire Performance Management and the California Office of Energy Infrastructure Safety (OEIS).

Process & Controls (P&C) recommends management:

Based on the results of our field validation, management should:

1. *Perform validation to determine if the exceptions (13) identified are completed with the acceptable LSI remediation and work with the Wildfire Safety – Wildfire Program Management group to determine if the notifications are qualified to include in the regulatory reporting.*
2. *Based on validation performed, determine whether additional actions are needed to provide management assurance on remediations reported.*

Management Corrective Action:

1. *Management action plan (2 exceptions): WPM will work to coordinate a field visit to determine if 2 exceptions identified are completed and appropriate for inclusion in regulatory reporting, tentatively by 12/14. Photo evidence will be provided to demonstrate current condition at structure (if not completed, we will remove from reporting).*

Corrective Action Owner: [REDACTED]

Anticipated completion date: 12/14/22 - Closed – Corrective action has been resolved as of the report date. The two exceptions were remediated with updated pictures on these structures as evidence.

2. *Management action plan (11 exceptions): WPM will perform a desktop review to determine if the 11 exceptions identified are completed and appropriate for inclusion in regulatory reporting. Based on the results of the desktop review, recommendations for additional actions (if appropriate) may also be identified.*

Corrective Action Owner: [REDACTED]

Anticipated completion date: 1/31/23 - Closed – Corrective action has been resolved as of the report date. WPM completed its verification of the 11 items in question called out in the draft LSI QA report. The 17% exception rate called out in the draft report now appears to have dropped to only 9.3%, less than previously thought (5 remediated, 6 not). Items not appropriate for inclusion in 2022 completion reporting have been communicated to Wildfire Safety and removed from compliance evidence. For the items

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that require an approved mitigation type WPM is working with the regions now to get those remedied.

For 5 of the 6 not remediated these might be attributed to lack of a clear definition of what is acceptable mitigation to remedy an LSI condition. DC&M has been operating off the only guidance material available, which is a draft process describing approved methods. Formalizing this definition in the Distribution Overhead Standard (DOH) looks to be addressed as part the corrective action assigned to Wildfire Safety (Observation #2, Corrective Action #3), and may minimize these types of scenarios moving forward.

WPM is a program management organization that provides oversight to the DC&M execution teams. It is not appropriately staffed nor trained to perform field validations. WPM will not be performing any additional field validations, however, WPM can provide assistance in coordinating additional validations with DC&M, if necessary.

Opportunities for Improvement (OFI)

1. **OFI #1: Compliance evidence file was missing information and contained incorrect dates**
 - a. Q3 2022 compliance evidence file contained missing information (i.e., work order numbers) on some notifications when compared to Q2 2022 compliance evidence file.
 - b. Q3 2022 compliance evidence file showed Completion Date and Notification Due Date different from the Q2 2022 compliance evidence file.

Potential Impact:

Inaccurate reporting of data to Wildfire Safety – Wildfire Performance Management and the California Office of Energy Infrastructure Safety (OEIS).

Process & Controls (P&C) recommends management:

*Develop a procedural document that describes the columns to include in the data file.
Ensure the data submitted aligns with the procedural documents.*

Management Corrective Action:

WPM acknowledges the improvement opportunity and will consider it for future continuous improvement efforts.