

*Southern California Edison*  
*R.18-10-007 – SB 901*

**DATA REQUEST SET A b r a m s - S C E - 0 0 1**

**To: Abrams**  
**Prepared by: Ryan Stevenson**  
**Job Title: Senior Advisor**  
**Received Date: 3/5/2019**

**Response Date: 3/7/2019**

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**Question 10:** Please, provide all reports, studies and correspondence related to circuit prioritization based on asset wildfire risk from January 2015 to today. Similarly, provide all correspondence related to these topics with investors, contractors, vendors, insurers and board members during this same time period.

**Response to Question 10:**

SCE objects to the question on the grounds that the phrases “reports, studies and correspondence” and “all correspondences” are vague, overbroad, and ambiguous, and that the question is unduly burdensome as it calls for “all” categories of various documents. SCE further objects on grounds that this calls for information subject to attorney-client privilege and attorney work product protection. Notwithstanding this objection, SCE responds as follows.

SCE’s circuit prioritization in HFRA and associated work papers are part of its Grid Safety and Resiliency Program (GSRP) Application (A.) 18-09-002 and included in SCE’s response to Question No. 1 (along with amendments). Please also see SCE’s response to Question No. 1 regarding wildfire insurance and communications with investors.