

*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: Dino Labanca**  
**Job Title: Principal Manager**  
**Received Date: 3/5/2019**

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

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**Question 11:** Please, provide all reports and available correspondence related to egress risk scores from January 1, 2000 to today.

**Response to Question 11:**

SCE objects to the question to the extent it calls for the production of reports and correspondence protected by the attorney-client privilege and/or attorney work product doctrine, as it is overly broad and unduly burdensome to the extent it seeks “all reports and available correspondence,” and because it is beyond the scope of the proceeding (which is scoped to examine SCE’s 2019 Wildfire Management Plan and not “all reports and correspondence” going back two decades). Notwithstanding this objection, SCE responds as follows.

SCE’s wildfire risk analysis does not presently include egress risk scoring. SCE accesses its facilities either through public rights-of-way (such as City streets) or private rights-of-way (such as easements) so that SCE has sufficiently available access to its property and facilities to continue to provide safe and reliable service to our more than 15 million customers. Moreover, SCE affirmatively enforces its tariff-based and legally-protected rights to safeguard its property against illegal and/or unsafe encroachments.