

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
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Job Title: Senior Advisor
Received Date: 3/5/2019

Response Date: 3/7/2019

Question 09: Please, provide all reports, studies, assessments and internal correspondence related to reportable ignition data including the modeling of different combinations and permutations of programs produced or completed 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 09:

SCE objects to the question on the grounds that the phrases “all reports, studies, assessments, and internal correspondence” and “all correspondence” are vague, overbroad, and ambiguous, and that the question is unduly burdensome. SCE further objects on grounds that this calls for information subject to the attorney-client privilege and attorney work product protections. Notwithstanding these objections, SCE responds as follows.

SCE’s reportable ignition data including related assessments 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). SCE’s reportable ignition data including related assessments is also included in its Risk Assessment and Mitigation Phase (RAMP) Report submitted in the RAMP Order Instituting Investigation proceeding, I.18-11-006, also included in SCE’s response to Question No. 1. Please also see Section 3 in SCE’s 2019 WMP that includes SCE’s 2015-2017 reportable ignition data in HFRA along with related assess and analyses.