

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

Question 01: Please, provide the any and all risk assessments, reports, studies and correspondence to your investors, insurers and board of directors related to any and all wildfire mitigation efforts since January, 2015. Of particular importance would be all assessments and correspondence related to effects on utility company insurance premiums.

Response to Question 01:

SCE objects to the question on the grounds that the phrases “risk assessments, reports, [and] studies” and “all wildfire mitigation efforts” are vague, overbroad, and ambiguous, and that the question is unduly burdensome as it calls for “any and all” categories of various documents. SCE also objects on the grounds that this question requests information and documents beyond the scope of the proceeding, which is scoped to examine SCE’s 2019 Wildfire Mitigation Plan (WMP). 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 historical wildfire risk assessments and associated work papers are part of its Grid Safety and Resiliency Program (GSRP) Application (A.) 18-09-002 and included in this response (along with amendments). SCE’s wildfire risk assessment is also included in its Risk Assessment and Mitigation Phase (RAMP) Report submitted in the RAMP Order Instituting Investigation proceeding, I.1-11-006, which is also included.

SCE discusses the continued deteriorating wildfire insurance market for California’s investor-owned utilities in the attached “Z-Factor” Advice Letter filing (Advice 3768-E) and SCE’s Wildfire Expense Memorandum Account (WEMA) Application, A.18-04-001. SCE is also attaching an “Update on California Wildfire Insurance Market Crisis and Impact” provided to the Commission in January 2019.

SCE’s communications with investors are publicly available at www.edisoninvestor.com.