

Southern California Edison
2023-WMPs – 2023-WMPs

DATA REQUEST SET Cal Advocates - SCE - 2023 WMP - 15

To: Cal Advocates
Prepared by: Boonping Goh
Job Title: Senior Advisor
Received Date: 5/4/2023

Response Date: 5/9/2023

Question 04:

Regarding SCE's November 19, 2022 PSPS Post-Event Report:

- a) How many MBL customers were not in SCE's original scope for potential de-energization but were ultimately de-energized?
- b) How many AFN customers (including self-certified as sensitive but not enrolled in SCE's MBL or Critical Care Programs) were not in SCE's original scope for potential de-energization but were ultimately de-energized?
- c) How many MBL customers were in SCE's scope for potential de-energization?
- d) How many AFN customers (including self-certified as sensitive but not enrolled in SCE's MBL or Critical Care Programs) were in SCE's original scope for potential de-energization?

Response to Question 04:

SCE objects to Question 4 because the WMP proceeding is not the appropriate venue for this type of data request. Question 4, by its own terms, "regarding SCE's November 19, 2022 PSPS Post-Event Report" which was filed by SCE in the PSPS OIR proceeding (R.18-12-005), not SCE's 2023-2025 WMP. In addition, Cal Advocates has previously submitted through the PSPS OIR proceeding (and SCE has responded to) multiple analogous data requests related to SCE's 2022 PSPS events. As such, this data request will not further the ability to make informed public comments on SCE's WMP.

SCE further objects to Question 4 to the extent it seeks production of information that can readily be found in SCE's responses to Cal Advocates' Data Request No. 48 in the PSPS OIR proceeding. The Commission has made clear that there should be no duplication of information across different reports or proceedings such as the WMP and the PSPS OIR. *See* D. 21-06-034 p. 146 ("We note, however, that many of the items of information recommended by the parties . . . are already required elements of [the IOUs'] Wildfire Mitigation Plans, and we do not seek to duplicate reporting requirements across different reports or proceedings."). For example, SCE provided information on the number of MBL customers in scope for potential de-energization during the November 19, 2022 PSPS event, as well as the number of MBL customers who could not be notified prior to de-energization (because they were not originally in scope), in SCE's responses to

Cal Advocates' Data Request No. 48 in the PSPS OIR proceeding.¹

¹ Cal Advocates' Data Requests 48, Question 2, "Total number of Medical Baseline customers included within the PSPS event scope" and "Number of Medical Baseline customers that did not receive any notification in advance of being de-energized in the PSPS event."