

*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: Thomas Jacobus**  
**Job Title: Principal Manager**  
**Received Date: 3/5/2019**

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

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**Question 08:** Please, provide any and all weather-based or wildfire-based risk assessments, reports or studies specific to any parts or components answered in questions 4, 5 or 6 above that could significantly or substantially contribute to additional risk of failure, wildfire ignition or wildfire propagation (conducted or completed at any time within the January, 2008 to December, 2018 time-period).

**Response to Question 08:**

SCE objects to the question on the grounds that the phrases “wildfire-based risk assessments, reports, [or] studies” and “any parts and components” 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) proposed programs and activities. 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 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 SCE’s response to Question No. 1 (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.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 a description of its wildfire risk analysis and risk drivers. In addition, SCE will continue to assess the impacts of climate change on wildfire risk and develop measures to continue to mitigate and adapt to climate change over time.