

Southern California Edison
WSD-001 – 2020 WMP

DATA REQUEST SET M G R A - S C E - 0 0 1 W M P - 2 0 2 1

To: MGRA
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Job Title: Senior Advisor
Received Date: 1/7/2021

Response Date: 1/12/2021

Question 001:

Please provide the most recent available geodatabase comprised of the non-confidential portion of the GIS data uploaded to the WSD website. This should contain the least the version of GIS data provided to WSD in September pursuant to the Draft WSD GIS Data Reporting Requirements and Schema for California Electric Corporations (Draft GIS Data Schema) along with any updates provided in December. Where confidential data is intermixed in tables with non-confidential data, fields containing confidential data should be left blank or removed. Confidentiality should not be applied at the feature class level.

Response to Question 001:

As explained in its Quarterly Reports, SCE has reservations regarding confidentiality of data. Data is confidential when it is in the public interest that the information not be disseminated publicly. Release of the precise location, age, and other attributes of SCE's assets alongside the precise location of critical facilities may significantly increase safety risk to the public. For example, knowledge of underground line routes and electrical equipment serving a critical facility could facilitate an attack on that critical facility's power supply. Also, knowledge of the location of specific SCE assets in areas with historical high fire weather could make them vulnerable to attack during the worst possible time. Further, the precise locations of SCE's high voltage transmission lines and substations alongside the abovementioned confidential information, as well as the non-confidential information requested increases risk to the bulk power transmission system. The Commission recognizes the importance of safeguarding critical energy infrastructure information and although maps of varying age and detail of SCE's transmission system may be publicly available from other sources, SCE does not believe it is prudent to further propagate that information, in this level of detail, accompanying other information that, taken together, could prove to be useful to a bad actor. According to CAL FIRE, arson arrests through September/October 2020 are approximately 60% greater than the annual average over 2016 through 2019.¹ This is concerning to SCE and should be a concern to stakeholders and the Commission. For these reasons, SCE applied confidentiality at the feature class level for each provided dataset as opposed to the data field level. Notwithstanding these concerns, SCE is working towards identifying confidentiality at the field level for its next Quarterly Report submission. Given the constraints of the draft GIS Data Schema, it may not be possible to replicate the Geodatabase with

¹ See <https://www.fire.ca.gov/media/1bqlpsdu/arsonarrests.pdf>.

just non-confidential data. Moreover, while a data element such as equipment age may be deemed non-confidential on a standalone basis, when that data is related to location and probability and consequence of ignition information, it could provide critical information to a bad actor putting SCE facilities and communities at grave risk. As such, even non-confidential data elements in a relational Geodatabase could pose a significant risk. Standard Commission confidential processes require stakeholders to enter into Non-disclosure Agreements (NDAs) to protect confidential information and SCE recommends these processes be used with stakeholders requesting the Geodatabase until the WSD creates its data portal with strict security protocols. To meet this request, SCE is providing four data layers that it determined are non-confidential. Also, SCE plans to identify confidentiality at the data element level with its next Quarterly Report submission and will assess if it is possible and in the public interest to recreate a non-confidential Geodatabase that could be provided. The four non-confidential data layers (Camera, Weather Station, OH Primary Distribution Line, and OH Secondary Distribution Line) are attached.