

Southern California Edison Company's Application for Confidential Designation

Pursuant to California Code of Regulations § 29200

I, Raymond Fugere, declare and state:

1. I am the Director of Wildfire Safety Organization at Southern California Edison Company (SCE). As such, I had responsibility for overseeing and reviewing SCE's confidential materials being submitted to the Office of Energy Infrastructure Safety (OEIS). I am authorized to request confidential treatment via this application on behalf of SCE. I am delegated by Shinjini Menon, Senior Vice President of System Planning and Engineering and have authority to sign this declaration.

2. I am making this declaration pursuant to California Code of Regulations Title 14, Division 17, Chapter 1, Article 1, § 29200 and in accordance with the confidentiality bases set forth and applicable California Public Utilities Commission's precedent that govern the submission of confidential documents. SCE discloses this information pursuant to these bases as confidential materials and has not disclosed the information publicly.

3. The data covered by these confidentiality bases as described in the following paragraph is not customarily in the public domain.

4. One unredacted copy of the record containing the confidential information is included with this submission. A redacted copy of the record containing the information is also included.

5. The information has critical infrastructure information and/or critical electric infrastructure information and discusses vulnerabilities of a facility providing critical energy infrastructure. The 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.

6. Where applicable, SCE has designated confidentiality at the data field level even though it believes confidentiality designation should be applied at the feature class level. By themselves, these data points are not necessarily confidential but when

aggregated the data becomes confidential because it presents information in a form that can be taken advantage of by individuals or groups of individuals with ill intentions.

7. The data should be kept confidential indefinitely.

8. Listed below are the data for which SCE is seeking confidential protection and the basis for SCE's confidentiality request.

Location of Confidential Data	Pages	Description of Information that Is Confidential	Basis for SCE's Confidentiality Claim
Energy Safety- Operations SharePoint Site Documents > General > 01 Inputs > 02 SCE > 00 Drop Folder > 01 QDR Spatial Data > 2024 Spatial Data > Q4 Spatial Data SCE Q4 2024 Geographic Information System Data (SCE_2024_Q4_rev1.gdb.zip)	SCE is indicating the data within its Q4 2024 GIS Data submission that is confidential through its Q4 2024 Spatial Data Status Report file. All rows in the workbook entitled "SCE_2024_Q4_SpatialDataStatusReport_rev1" where column F "Locations Confidential? (Yes/No)" in the Overview tab equals Yes and column H "Confidential" in the Details Tab equals Yes	This file contains information that can reveal vulnerabilities or gaps that could be taken advantage of by a party that intends to do harm to the grid or to the communities that SCE serves.	<u>Critical Infrastructure Information</u> Gov't Code §§ 7922.000, 7922.540, 7927.300, 7927.705, 7929.205; 6 U.S.C. §§ 131(3), 6 CFR § 29.2(b); 6 U.S.C. § 133(a)(1)(E), 6 CFR § 29.8 (defining CII and restricting its disclosure) <u>Critical Electric Infrastructure Information</u> Pub. L. 114-94 (FAST Act - Critical Electric Infrastructure Security) Amended December 4, 2015 18 CFR §388.113(c); FERC Orders 630, 643, 649, 662, 683, and 702 (defining CEII); 68 Fed. Reg. 9862 (Dep't of Energy Mar. 3, 2003) (final rule) <u>Sensitive Security Information</u> 49 CFR §§1520.5, 1520.9 (defining SSI and restricting its disclosure)

I certify under penalty of perjury that the information contained in this application for confidential designation is true, correct, and complete to the best of my knowledge.

Executed on April 25, 2024 at Pomona, California.



Raymond Fugere
Director of Wildfire Safety Organization