

*Southern California Edison*  
*2022-WMPs – 2022 Wildfire Mitigation Plan Updates*

**DATA REQUEST SET Energy Safety - SCE - 2022 RM - 01**

**To: Energy Safety**  
**Prepared by: Ryan Stevenson**  
**Job Title: Senior Advisor**  
**Received Date: 2/18/2022**

**Response Date: 3/4/2022**

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**Question 03:**

Energy Safety is in the process of evaluating the cost impacts of three regulations that Energy Safety plans to adopt. As part of that effort, we are asking certain electrical corporations, including SCE, to determine the cost impacts those regulations would have on their respective companies. Attached please find the proposed text of these regulations:

- § 29200. Submission of Confidential Information

*[(Excerpt from attachment) § 29200. Submission of Confidential Information*

*Access to information concerning the conduct of the people's business is a fundamental and necessary right of every person in California. All documents submitted to the office are public records.*

*(a) Any person who submits information to the office, and who asserts that the information is exempt from disclosure to the public must, at the time of submission:*

- (1) Specifically identify the information that the submitter asserts to be exempt from disclosure;*
- (2) Segregate the information to the extent reasonably possible;*
- (3) Provide both redacted and unredacted versions of documents that contain the information;*
- (4) Identify the statutory basis for the exemption or exemptions claimed;*
- (5) State the reasons why each exemption claimed applies to the information;*
- (6) State the length of time the person asserts that the exemption or exemptions apply to the information, and explain the basis for the length of time stated.*

*(b) Any person who submits information to the office, and who asserts that the information should not be disclosed to the public because the information contains trade secrets or because disclosure would cause a loss of a competitive advantage, then the person must, at the time of submission comply with all the requirements in subsection (a) and also:*

- (1) Specifically identify the competitive advantage;*
- (2) State how the advantage would be lost through disclosure;*
- (3) State the value of the information to the applicant; and*
- (4) Describe the ease or difficulty with which others could legitimately acquire or duplicate the information.]*

Following are notes regarding the work we are requesting with respect to each regulation.

### § 29200. Submission of Confidential Information

This regulation will apply when a company submits information to Energy Safety that the company maintains is exempt from disclosure to members of the public. We ask that, to the extent there are cost impacts, SCE's account for these requirements in its analysis.

The cost of:

- (1) Identifying the information claimed to be exempt from disclosure;
- (2) Segregating the information to the extent reasonably possible;
- (3) Providing both redacted and unredacted versions of documents that contain the information;
- (4) Identifying the statutory basis for the exemption or exemptions claimed; and
- (5) Stating the reasons why each exemption claimed applies to the information

When the submitter claims that the information is exempt from disclosure because the information contains trade secrets or because disclosure would cause a loss of a competitive advantage. These additional requirements apply:

- (1) Identify the competitive advantage;
- (2) State how the advantage would be lost through disclosure;
- (3) State the value of the information to the submitter; and
- (4) Describe the ease or difficulty with which others could legitimately acquire or duplicate the information.

#### **Response to Question 03:**

Cost impacts to identify, segregate, redact, and explain the basis for confidential data would require a study to determine. Generally, the costs of SCE personnel that identify, segregate, redact, etc. confidential information are already in base rates. However, meeting Energy Safety's increasing requirements continues to require additional resources. In the short term, incremental cost impacts are relatively low, but there can be significant resource time impacts that diverts from other critical work. Below, SCE generally describes its process, the time it takes to prepare all the requested information for confidential treatment pursuant to the nine items listed in the data request and an estimated cost impact range.

#### (1) Identifying the information claimed to be exempt from disclosure:

SCE Subject Matter Experts (SMEs) are tasked to review the questions/requirements and the responses/information/data to be provided for potential information that may be confidential. SMEs assess the information pursuant to a confidential matrix, their knowledge of the information, and can reach out to experts in various fields (e.g., procurement, legal, cyber security, etc.) to confer on confidential treatment. This process can take from as little as 1-2 hours to a week or longer depending on amount/ambiguity of the information and if there is a need to pull experts together to review the information.

#### (2) Segregating the information to the extent reasonably possible:

Once it has been determined that information is confidential, SMEs work with case managers and administrators to identify, mark, and/or redact the specific information in the document/file/etc. (e.g., customer names and addresses, contract payment amounts, etc.) that is confidential rather than

the entire document, as applicable. Cost will depend on the amount of information that needs to be segregated and whether or not it can be done using automated tools or needs to be done manually. Significant data segregation that needs to be performed manually can take several people many hours to complete.

(3) Providing both redacted and unredacted versions of documents that contain the information

The time to redact information is dependent on the volume of data and whether it can be done using automated tools or needs to be done manually. Extensive redactions can take up to a week to complete.

(4) Identifying the statutory basis for the exemption or exemptions claimed

Once the information has been identified as confidential, the time it takes to align the confidential information to the relevant statutes can be done in a few hours. Ambiguous items that require research can take longer.

(5) Stating the reasons why each exemption claimed applies to the information

As noted above, once the information is determined to be confidential and related statutes are identified, stating the reasons why each exemption claimed applies is a relatively short process (a few hours). Extensive confidential information could be a process over 1-2 days.

Similar to part 5, the remaining items: Identify the competitive advantage; State how the advantage would be lost through disclosure; State the value of the information to the submitter; and Describe the ease or difficulty with which others could legitimately acquire or duplicate the information can each be a relatively short process (a few days) or take multiple days.

Given the information above, SCE estimates a cost impact range of \$1,000 to \$60,000 each time confidential information is to be submitted.