

**Southern California Edison Company's Application for Confidential Designation Pursuant to the Office of Energy Infrastructure Safety's Emergency Rules of Practice and Procedure**

I, Shinjini Menon, declare and state:

1. I am the Vice President of Asset Management and Wildfire Safety 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) in connection with SCE's 2023-2025 Wildfire Mitigation Plan. I am authorized to request confidential treatment via this application and certification on behalf of SCE.

2. I am making this declaration pursuant to California Code of Regulations Title 14, Division 17, Chapter 1, Article 3, § 29200(a) and in accordance with the confidentiality bases set forth in California Public Utilities Commission Decision 16-08-024 and Decision 17-09-023 of R. 14-11-001, which were issued August 25, 2016 and September 28, 2017, respectively, and govern the submission of confidential documents. SCE discloses this information pursuant to these bases as confidential materials and has not disclosed the information publicly.

**Application – Critical Energy Infrastructure Information**

3. The information and data covered by the confidentiality bases described in the following paragraphs is not customarily in the public domain.

4. The information and data should be kept confidential indefinitely because of the sensitive nature of the material.

5. To the best of my knowledge, the information and data has not been voluntarily submitted to the Office of Emergency Services as set forth in Government Code § 7929.205.

6. SCE has designated certain GIS data described below as confidential. SCE does not share the GIS layer data described below with the public. SCE treats all such feature class data as confidential, due to the risks posed to public safety should it be made public. These documents could assist potential malicious actors by providing them operational details about SCE's electricity infrastructure. Such information could be exploited by those malicious actors for harmful purposes.

7. It is in the public interest that the information not be disseminated publicly. Release of circuit and risk level information could make SCE's facilities vulnerable to attack and could be valuable information in planning an attack on critical infrastructure with high risk levels. Further, providing this information in addition to and in relation with circuit information could further the consequences of such an attack. There is little to no benefit to making this information publicly available. Third parties do not need this information to evaluate SCE's 2023-2025 Wildfire Mitigation Plan. As such, the public interest in not disclosing this information far outweighs the public interest in disclosing it.

8. SCE's System Operating Bulletin No. 21 and System Operating Bulletin No. 322 (collectively, the System Operating Bulletins) are not shared with the public. SCE treats these documents as confidential, due to the risks posed to public safety should they be made public. The documents could assist potential malicious actors by providing them details about SCE's operational response to electric system emergencies. That information could be exploited by those malicious actors for harmful purposes.

9. The information in the System Operating Bulletins discuss 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.

10. To the best of my knowledge, the System Operating Bulletins data is not classified as protected critical infrastructure information by the Department of Energy or the Department of Homeland Security.

11. 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 is designated confidential because it presents information in a form that can be taken advantage of by individuals or groups of individuals with ill intentions.

12. The confidential information in this application has not been aggregated or masked because it does not appear practical to do so in light of the information requested. SCE is willing to discuss further the possibility of aggregating or masking the confidential material.

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

<b>Location of Confidential Data</b>	<b>Pages</b>	<b>Description of Information that is Confidential</b>	<b>Basis for SCE's Confidentiality Claim of CEII</b>
Spatial data "WMP_2023_GIS_Layers_CONFIDENTIAL.zip"	All	Specific asset information (attributes) including location of the circuits and their corresponding risk levels. The data includes circuit risk level information provided as a feature class, which reveals the spatial location of the circuit risk level.	<u>Critical Infrastructure Information</u>  Gov't Code §§ 7922.000, 7927.300, 7927.705, 7929.205; 6 U.S.C. §§ 671(3), 6 CFR § 29.2(b); 6 U.S.C. § 673 (a)(1)(E), 6 CFR § 29.8 (defining CII and restricting its disclosure)  <u>Critical Electric Infrastructure Information</u>
PSPS-06-SCE-01, Public Safety Power Shutoff (PSPS) Protocol	All	Plans and Protocol regarding critical preparedness and de-energization strategies in response to public safety emergencies.	Pub. L. 114-94 (FAST Act - Critical Electric Infrastructure Security) Amended December 4, 2015, §§ 61003, 215A; 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)
Southern California Edison Fast Curve Protection Philosophy Review	i, 5-6, 8-16, 27-89	Specific asset information (attributes) including identification, location of the circuits and relays and their corresponding risk levels.	<u>Sensitive Security Information</u>  49 CFR §§1520.5, 1520.9 (defining SSI and restricting its disclosure)
System Operating Bulletin No. 21	All	Electric System Emergency Response Plan	
System Operating Bulletin No. 322	All	Operation of sub-transmission and distribution voltage lines traversing High Fire Risk Areas.	

**Application – Non-Critical Energy Infrastructure Information**

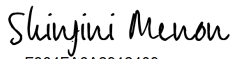
1. The data covered by these confidentiality bases as described in the following paragraphs is not customarily in the public domain.
2. The data should be kept confidential indefinitely because of the sensitive nature of the material.
3. The confidential information in this application has not been aggregated or masked because it does not appear practical to do so in light of the information requested. SCE is willing to discuss the possibility of aggregating or masking the confidential material.
4. Listed below is the information for which SCE is seeking confidential protection and the bases for SCE’s confidentiality request.

<b>Location of Confidential Data</b>	<b>Pages</b>	<b>Description of Information that is Confidential</b>	<b>Basis for SCE’s Confidentiality Claim</b>
Overhead Detail QC Inspection Process	1	Personally identifiable information	Protected under Gov’t Code §§ 7927.700, 7927.705; Civil Code §§ 1798.80, 1798.81.5, 1798.99, 1798.3, 1798.24; Cal. Const., art. I, § 1
SH-12 PSPS Microgrid Site Review	Redactions on pages 4, 7, 10-18.	Microgrid deployment cost information and market sensitive information	Protected under Gov’t Code §§ 7922.000, 7927.605, 7927.705; Evid. Code § 1060; Civil Code § 3426 et seq.; 18 C.F.R. Part 358 (FERC Standards of Conduct, FERC Order 717); Cal. Code Regs. 17 § 95914(c)(1); SEC Rules 10b-5, 10b-5-1, 10b5-2
Southern California Edison All-Hazards Plan	Redactions on pages 6, 95-97	Personally identifiable information	Protected under Gov’t Code §§ 7927.700, 7927.705; Civil Code §§ 1798.80, 1798.81.5, 1798.99, 1798.3, 1798.24; Cal. Const., art. I, § 1
Southern California Edison All-Hazards Plan	Redactions on pages 43, 45-46, 50, 74, 76, 85-93, 100-101	Details of SCE’s Emergency Operations Center facilities; critical incident response plans, strategies, and protocols; and	Protected under Gov’t Code §§ 7922.000, 7927.300, 7927.605, 7927.705; Evid. Code § 1060; Civil Code § 3426 et seq.; 18 C.F.R. Part 358 (FERC Standards of Conduct, FERC Order 717); Cal. Code Regs.

Location of Confidential Data	Pages	Description of Information that is Confidential	Basis for SCE’s Confidentiality Claim
		proprietary and market-sensitive information	17 § 95914(c)(1); SEC Rules 10b-5, 10b-5-1, 10b5-2
Southern California Edison Fast Curve Protection Philosophy Review	Cover; p. 2	Personally identifiable information	Protected under Gov’t Code §§ 7927.700, 7927.705; Civil Code §§ 1798.80, 1798.81.5, 1798.99, 1798.3, 1798.24; Cal. Const., art. I, § 1
Transmission Detail QC Inspection Process	1	Personally identifiable information	
2023 WMP, Appendix F, 2023 WMP SCE Sections 8-4 and 8-5 Large Tables – CONFIDENTIAL	Tab 8-44, column heading labeled, “Point of Contact and Information ”	Personally identifiable information	
2023 WMP, Appendix F, 2023 WMP SCE Sections 8-4 and 8-5 Large Tables – CONFIDENTIAL	Tab 8-46, column heading labeled “Point of Contact and Information ”	Personally identifiable information	

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 2/10/2023 at Pomona, California.

DocuSigned by:  
  
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Shinjini Menon  
 Vice President  
 Asset Management and Wildfire Safety