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 at Southern California Edison Company (SCE). As such, I am responsible for overseeing and reviewing SCE's confidential materials in connection with SCE's 2023-2025 Wildfire Mitigation Plan and related Data Requests submitted to the Office of Energy Infrastructure Safety (OEIS). I am authorized to request confidential treatment via this application on behalf of SCE.
- 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. A redacted copy of the record is not included because the confidential material is a spatial data file that can only be viewed using GIS software.
- 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. The data should be kept confidential indefinitely.
- 7. 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
The confidential data are located in the Geodatabase, OEIS04Q2b_Gri dID_TRIRankin g_CONFIDENT IAL.gdb And OEIS04Q2b_Gri dID_TRIRankin g_Dist50_Circui ts_CONFIDENT IAL.gdb These GIS layers are attachments to SCE's response to Data Request Set OEIS-P-WMP_2023-SCE-004, Question 2	N/A	The Geodatabase includes two GIS layers showing the distribution grids with their assigned Tree Risk Index category that can be combined with publicly-available asset locational data to identify detailed risks of SCE's infrastructure and Critical Facilities in High Fire Risk Areas (HFRA).	General Protected under Gov't Code §§ 7927.300, 7922.000, 7922.540; 6 U.S.C. § 131(5); 68 Fed. Reg. 9857 (Dep't of Energy Mar. 3, 2003) (final rule); Cal. Pub. Util. Code § 364(d). Critical Infrastructure Information Gov't Code §§ 7927.300, 7927.705, 7929.205, 7922.000, 7922.540; 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) Critical Electric Infrastructure Information 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)

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 May 18, 2023 at Pomona, California.

—Docusigned by:

Raymond Fugere

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Raymond Fugere
Director

Wildfire Safety