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

I, Erik Takayesu, declare and state:

1. I am the Vice President of Asset Strategy and Planning 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 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 1, § 29200(a) & 29200(d) 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**

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. To the best of my knowledge, the data labeled as GIS layers has not been voluntarily submitted to the Office of Emergency services as set forth in Government Code § 6254(ab).
4. The GIS layer data described below is not shared 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 details about SCE’s operational details of electricity infrastructure. Such information could be exploited by those malicious actors for harmful purposes.
5. To the best of my knowledge, SCE’s System Operating Bulleting (SOB 322) has not been voluntarily submitted to the Office of Emergency services as set forth in Government Code § 6254(ab).
6. SCE’s System Operating Bulletin No. 322 is not shared with the public. SCE treats certain portions of this document as confidential, due to the risks posed to public safety should it be made public. The document 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.
7. The SOB 322 information 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.
8. To the best of my knowledge, the SOB 322 data is not classified as protected critical infrastructure information by the Department of Energy or the Department of Homeland Security
9. 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.
10. 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. Links in the Standard Operating Bulletin to confidential information have been disabled. SCE is willing to discuss further the possibility of aggregating or masking the confidential material.
11. 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 of CEII** |
| --- | --- | --- | --- |
| WMP\_2022\_7\_1\_F\_Distribution\_CONFIDENTIAL  WMP\_2022\_7\_1\_F\_Subtransmission\_CONFIDENTIAL  WMP\_2022\_7\_1\_F\_Transmission\_CONFIDENTIAL | ALL | GIS layer showing wildfire risk  Grid Design and System Hardening mitigations GIS layer 2022, 2023, 2024  Asset Management and Inspections GIS layer 2022 | *Critical Infrastructure Information*  Gov’t Code §§ 6254 (e), (k), (ab), 6255(a); 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)  *Sensitive Security Information*  49 CFR §§1520.5, 1520.9 (defining SSI and restricting its disclosure) |
| System Operating Bulletin 322 | pages 6-48 | Operation of Subtransmission and Distribution Voltage Lines Traversing High Fire Areas |  |

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

1. The data covered by these confidentiality bases as described in the following paragraph 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 data customer data and disclosure would result in violation of privacy laws and expose them to potential criminal activity.
4. SCE’s access and functional needs customer data along with the accompanying information transmission & distribution lines and other relevant electrical equipment are not public. SCE treats all customer data as confidential due to the risks posed to their safety should it be made public.
5. The confidential information in this response 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.
6. 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 for Non-CEII** |
| --- | --- | --- | --- |
| WMP\_2022\_4\_5\_2\_AFN\_Customer\_Distribution\_CONFIDENTIAL | ALL | AFN customer data, transmission & distribution lines and other relevant electrical equipment (e.g., substations | *Personally identifiable information or regulated entity customers protected by Gov’t. Code Sec. 6524(c)*  Gov’t Code §6254(c) (PRA expressly protects “Personnel, medical, or similar files, the disclosure of which would constitute an unwarranted invasion of personal privacy”).  15 U.S.C. §§ 1681 et seq.  Protected also under Gov’t Code §§ 6254(a), (d), (k), 6254.7(d), 6255(a); Civil Code §§ 1798.21, 1798.80, 1798.81.5, 1798.82, 1798.85 to 1798.89, 1798.90.1, 1798.98, 1798.99, 3426, 1798.3, 1798.24; Pub. Util. Code § 8380(d) (and associated CPUC Decisions D.11-07-056, D.12-08-045); Evid. Code § 1060; Cal. Const., art. I, § 1; and G.O. 77-M; Health Insurance Portability and Accountability Act of 1996 (HIPAA), 42 U.S.C. § 1320d-6; HITECH Act, American Recovery and Reinvestment Act of 2009, PL 111-5, Feb. 17, 2009, 123 Stat 115 |

**Certification** **re Previously Designated Information That Is Substantially Similar**

1. I am seeking a confidential designation for information that is substantially similar to the previously submitted information and that all the facts and circumstances relevant to confidentiality remain unchanged.
2. To the best of my knowledge, the data labeled as “Grid Design and System Hardening mitigations GIS layer 2022, 2023, 2024” were submitted to the OEIS in SCE’s 2021 Fourth Quarter AB 1054 Notification.
3. SCE’s Grid Design and System Hardening mitigations are not shared with the public. SCE treats all 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 details about SCE’s operational details of electricity infrastructure. Such information could be exploited by those malicious actors for harmful purposes.
4. Listed below are the data for which SCE is seeking confidential protection and the basis for SCE’s confidentiality request.

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| --- | --- | --- | --- |
| **Location of Confidential Data** | **Pages** | **Description of Information that is Confidential** | **Basis for SCE’s Confidentiality Claim re Certification of Previously Designated** |
| WMP\_2022\_7\_1\_G\_CC\_System\_Hardening\_2022\_CONFIDENTIAL  WMP\_2022\_7\_1\_G\_TUG\_System\_Hardening\_2022\_CONFIDENTIAL  WMP\_2022\_7\_1\_G\_CC\_System\_Hardening\_2023\_CONFIDENTIAL  WMP\_2022\_7\_1\_G\_TUG\_System\_Hardening\_2023\_CONFIDENTIAL  WMP\_2022\_7\_1\_I\_Transmission\_Circuit\_Patrol\_Asset\_Management\_CONFIDENTIAL  WMP\_2022\_7\_1\_I\_Conductor\_Sample\_Target\_Asset\_Management\_CONFIDENTIAL  WMP\_2022\_7\_1\_I\_Distribution\_Infrared\_Asset\_Management\_CONFIDENTIAL  WMP\_2022\_7\_1\_I\_Generation\_Inspections\_Asset\_Management\_CONFIDENTIAL  WMP\_2022\_7\_1\_I\_Grid\_Patrol\_Asset\_Management\_CONFIDENTIAL  WMP\_2022\_7\_1\_I\_IRD\_Distribtuion\_Aerial\_Asset\_Management\_CONFIDENTIAL  WMP\_2022\_7\_1\_I\_IRD\_Distribution\_Ground\_Asset\_Management\_CONFIDENTIAL  WMP\_2022\_7\_1\_I\_IRD\_Transmission\_Aerial\_Asset\_Management\_CONFIDENTIAL  WMP\_2022\_7\_1\_I\_IRD\_Transmission\_Ground\_Asset\_Management\_CONFIDENTIAL  WMP\_2022\_7\_1\_I\_Line\_Vue\_Target\_Asset\_Management\_CONFIDENTIAL  WMP\_2022\_7\_1\_I\_Splice\_Target\_Asset\_Management\_CONFIDENTIAL  WMP\_2022\_7\_1\_I\_Substation\_Inspections\_Asset\_Management\_CONFIDENTIAL  WMP\_2022\_7\_1\_I\_Transmission\_Infrared\_Asset\_Management\_CONFIDENTIAL | All | Grid Design and System Hardening mitigations GIS layer 2022, 2023, 2024 | *Critical Infrastructure Information*  Gov’t Code §§ 6254 (e), (k), (ab), 6255(a); 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)  *Sensitive Security Information*  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 February 17, 2022 at Cerritos, California.

/s/ Erik Takayesu\_\_\_\_\_\_\_\_

Erik Takayesu

Vice President  
Asset Strategy and Planning