**Southern California Edison Company’s Application for Confidential Designation of Geospatial Data 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, Asset Strategy & Planning at Southern California Edison Company (SCE). As such, I had responsibility for overseeing and reviewing SCE’s Q3 2021 Quarterly Data Report being 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 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 to the California Public Utilities Commission. SCE discloses this information to OEIS pursuant to these bases as confidential materials and does not disclose the information publicly or to persons other than employees of OEIS.
3. The data covered by these confidentiality bases as described in the following paragraph is not customarily in the public domain.
4. This data has not been voluntarily submitted to the Office of Emergency services as set forth in Government Code § 6254(ab).
5. This data is not classified as protected critical infrastructure information by the Department of Energy or the Department of Homeland Security.
6. The 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. For example, knowledge of underground line routes and electrical equipment serving a critical facility could facilitate an attack on that critical facility’s power supply. Also, knowledge of the location of specific SCE assets in areas with historical high-fire weather could make them vulnerable to attack during the worst possible time. Further, the precise locations of SCE’s high voltage transmission lines and substations alongside the above-mentioned confidential information, as well as non-confidential data being submitted to OEIS increases risk to the bulk power transmission system.
7. This information was provided confidentially to the California Public Utilities Commission in accordance with the compliance requirements for the Wildfire Mitigation Plan (WSD-011).
8. SCE has designated confidentiality at the data field level pursuant to OEIS requirements even though it believes confidentiality in the geodatabase should be applied at the feature class level. For example, when providing the locations of substation equipment and the transmission lines connected to it, the information in aggregate could create a roadmap for system vulnerabilities. By themselves, these data points are not 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. I have personal knowledge of the facts and representations herein and, if called upon to testify, could and would do so, except for those facts expressly stated to be based upon information and belief, and as to those matters.
9. 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** |
| --- | --- | --- | --- |
| Geospatial data in SCE’s Q3 2021 Quarterly Data Report being submitted to the Office of Energy Infrastructure Safety  | All rows in the attached workbook entitled “SCE\_Q32021\_StatusReport\_11.1.2021” where column L “Confidential? (Yes/No)” equals Yes; also, all rows in the tab entitled “PSPS Event” in the attached workbook entitled “SCE\_Q32021\_StatusReport\_11.1.2021” where column M “Confidential? (Yes/No)” 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.  | California Public Utilities Code Section 364(d). This section permits the Commission to withhold information from the public which could pose a security threat if disclosed. *See* 6 U.S.C. § 131(5); citations under CII and CEII:Protected under Gov’t Code §§ 6254(e), 6255(a); 6 U.S.C. § 131(50; 68 Fed. Reg. 9857 (Dep’t of Energy Mar. 3, 2003) (final rule); Cal. Pub. Util. Code § 364(d).  CEII 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)  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   |

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 November 10, 2021 at Cerritos, California.

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

Erik Takayesu
Vice President
Asset Strategy & Planning