

**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 3, § 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 paragraphs is not customarily in the public domain.

4. One unredacted copy of the record containing the confidential information is included with this submission.

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.

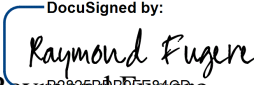
7. Listed below are the data for which SCE is seeking confidential protection and the basis for SCE's confidentiality request.

<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>
<p>The confidential data is located in the files:</p> <p>OEIS-P-WMP_2024-SCE-02 Q3a_CONFIDENTIAL.xlsx</p> <p>OEIS-P-WMP_2024-SCE-02 Q3b_CONFIDENTIAL.xlsx</p> <p>The files are attachments to SCE's responses to OEIS Set 02, Q3.</p>	N/A	<p>The Excel files include specific overhead and underground asset and risk information including circuit-segment, and risk score information 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).</p>	<p><u>General</u> 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).</p> <p>Pursuant to the balancing test of California Government Code §§ 7922.000 and 79.22.540(a), it is in the public interest that the information not be disseminated publicly. Release of detailed asset and risk event information could make SCE's facilities vulnerable to attack and could be valuable information in planning an attack on critical infrastructure. Further, providing this information in addition to and in relation with Critical Facility information could further the consequences of such an attack. There is little to no benefit to making this information publicly available. As such, the public interest in not disclosing this information far outweighs the public interest in disclosing it.</p> <p><u>Critical Infrastructure Information</u> 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)</p> <p><u>Critical Electric Infrastructure Information</u> Pub. L. 114-94 (FAST Act -</p>

<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>
			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 April 26, 2024 at Sherman Oaks, California.

DocuSigned by:  
  
Raymond Eugene  
Director  
Wildfire Safety