## 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 Asset & System Intelligence at Southern California Edison Company (SCE). Shinjini Menon, Senior Vice President, System Planning & Engineering, delegated authority to me to submit this application. I am responsible for overseeing and reviewing SCE's confidential materials described below in connection with SCE's 2026-2028 Wildfire Mitigation Plan data request responses 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 in applicable California Public Utilities Commission precedent that governs the submission of confidential documents. SCE discloses this information pursuant to the bases described in Paragraph 7 as confidential materials and has not disclosed the information publicly.
- 3. The data covered by the confidentiality bases as described in Paragraph 7 is not customarily in the public domain.
- 4. The information has critical infrastructure information and/or critical electric infrastructure information. 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.
  - 5. The data should be kept confidential indefinitely.
- 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
OEIS-P- WMP_2025- SCE-005 Q4_SOB-322 v 02 25 2025 Confidential.pdf	All	Operation of subtransmission and distribution voltage lines traversing High Fire Risk Areas.	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).  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 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.  Critical Infrastructure Information Gov't Code §§ 7927.300, 7927.705, 7929.205, 7922.000, 7922.540; 6 U.S.C. §§ 131(3), 6 CFR § 29.8 (defining CII and restricting its disclosure)
			Information Pub. L. 114-94 (FAST Act -

Location of Confidential Data	Pages	Description of Information that is Confidential	Basis for SCE's Confidentiality Claim
			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

6/13/2025

at Sherman Oaks

, California.

-DocuSigned by:

Raymond Fuzere

Director

Asset & System Intelligence