

Southern California Edison
2026-WMPs – 2026-WMPs

DATA REQUEST SET M G R A - S C E - 0 0 4

To: MGRA

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Job Title: Data Scientist

Received Date: 6/2/2025

Response Date: 6/5/2025

Question MGRA-4-6:

MGRA-4-6 Repeat MGRA-4-4 except using SCE's estimated effectiveness of a combined CC++/REFCL/PSPS/PEDS combination.

Response to Question MGRA-4-6:

SCE objects to this Question on the grounds that SCE does not have readily available information directly responsive to this request. SCE has not modeled a similar mitigation effectiveness value for the combination of CC++/REFCL/PSPS/PEDS. This request seeks the creation of new studies, analyses, and/or presentation of data in formats that do not exist. SCE is not obligated to conduct new studies or analyses in response to data requests; rather, SCE is only required to produce existing, relevant data and information, to the extent that compiling and producing that information is not unduly burdensome or otherwise legally objectionable. *See* Cal. Code Civ. Proc. § 2031.230 (stating that a representation of an inability to comply with a discovery demand shall "specify whether the inability to comply is because the particular item or category has never existed.")