

**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). As such, I had responsibility for overseeing and reviewing SCE's confidential materials being submitted to the Office of Energy Infrastructure Safety (OEIS) in connection with SCE's 2026-2028 Wildfire Mitigation Plan. Shinjini Menon, Senior Vice President of System Planning and Engineering, delegated authority to me to sign this declaration, and I am authorized to request confidential treatment of the information described below 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 these bases as confidential materials and has not disclosed the information publicly.

Application – Critical Energy Infrastructure Information

3. The information and data covered by the confidentiality bases described in the following paragraphs is not customarily in the public domain.

4. The information and data should be kept confidential indefinitely because of the sensitive nature of the material.

5. To the best of my knowledge, the information and data has not been voluntarily submitted to the Office of Emergency Services as set forth in Government Code § 7929.205.

6. SCE's System Operating Bulletin No. 322 is not shared with the public. SCE treats this document as confidential, due to the risks posed to public safety should the document 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 information in the System Operating Bulletin No. 322 discuss 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. 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
PSPS-06-SCE-01 v5 06 01 2024 Confidential.pdf	All	Plans and Protocol regarding critical preparedness and de-energization strategies in response to public safety emergencies.	<u><i>Critical Infrastructure Information</i></u> Gov't Code §§ 7922.000, 7927.300, 7927.705, 7929.205; 6 U.S.C. §§ 671(3), 6 CFR § 29.2(b); 6 U.S.C. § 673 (a)(1)(E), 6 CFR § 29.8 (defining CII and restricting its disclosure)
PSPS-04-BR-01 v2 09 01 2024 Confidential.pdf	All	Plans and Protocol regarding critical preparedness and emergency response strategies for public safety emergencies.	<u><i>Critical Electric Infrastructure Information</i></u>
PSPS-06-TD-02 v8 03 19 2024 Confidential.pdf	All	Plans and Protocol regarding critical preparedness and de-energization strategies in response to wildfires.	Pub. L. 114-94 (FAST Act - Critical Electric Infrastructure Security) Amended December 4, 2015, §§ 61003, 215A; 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)
SOB-322 v 02 25 2025 Confidential.pdf	All	Operation of sub-transmission and distribution voltage lines traversing High Fire Risk Areas.	<u><i>Sensitive Security Information</i></u> 49 CFR §§1520.5, 1520.9 (defining SSI and restricting its disclosure)

Application – Non-Critical Energy Infrastructure Information

1. The data covered by the confidentiality bases 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. Listed below is the information for which SCE is seeking confidential protection and the bases for SCE's confidentiality request.

Location of Confidential Data	Pages	Description of Information that is Confidential	Basis for SCE's Confidentiality Claim
AHP v4 12 2024 Confidential.pdf	Pages 6-7, 99-100	Personally identifiable information	Protected under Gov't Code §§ 7927.700, 7927.705; Civil Code §§ 1798.80, 1798.81.5, 1798.99, 1798.3, 1798.24; Cal. Const., art. I, § 1
AHP v4 12 2024 Confidential.pdf	Pages 23, 43, 52-54, 59, 87, 90, 103-104, 108-109	Details of SCE's Emergency Operations Center facilities; critical incident response plans, strategies, and protocols; and proprietary and market-sensitive information	Protected under Gov't Code §§ 7922.000, 7927.300, 7927.605, 7927.705; Evid. Code § 1060; Civil Code § 3426 et seq.; 18 C.F.R. Part 358 (FERC Standards of Conduct, FERC Order 717); Cal. Code Regs. 17 § 95914(c)(1); SEC Rules 10b-5, 10b-5-1, 10b5-2

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 May 16, 2025 at Sherman Oaks, California.



Raymond Fugere
Director
Asset & System Intelligence