

Southern California Edison
WSD-011 – 2021 WMP

DATA REQUEST SET M G R A - S C E - 0 0 2

To: MGRA
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Job Title: Senior Advisor
Received Date: 1/25/2021

Response Date: 2/10/2021

Question 004:

To the extent that there are any records or fields considered confidential in the above datasets, please provide a list of the type of record (for example, transmission with voltage above 200 kV) and specific fields that are considered confidential, including explanation and legal justification for why the particular type of record or field is considered confidential.

Response to Question 004:

Pursuant to the WSD's Draft GIS Schema requirements, SCE identified confidentiality at the data field level in its GIS Status Report. As such, the list of fields considered confidential are included in SCE's GIS Status Report. SCE's GIS Status Report can be found on its WMP webpage (www.sce.com/wmp). Pursuant to CPUC rules, SCE submitted a confidentiality declaration to the WSD regarding data it deems confidential. That declaration explains the confidentiality basis as follows:

The information meets the balancing test of California Government Code section 6255. 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. Third parties do not need this information to evaluate SCE's 2021 WMP Update. As such, the public interest in not disclosing this information far outweighs the public interest in disclosing it.

In addition, public disclosure of customer information could compromise privacy to the potential harm of customers. In addition, public disclosure of this information could identify the company, customer, or the location/site or other private information that could be advantageous to a competitor. Gov't Code § 6254(c); Gov't Code § 6254(k); Civil Code §§ 1798.3 & 1798.24 (the California Information Practices Act); Cal. Const., Art. I, § 1 (California constitutional right to privacy); Gov't Code §§6254(k), 6254.7(d); Evid. Code §1060; Civil Code §3426 et seq.; Competitive Data: Gov't Code §§ 6254(k), 6254.7(d); Evid. Code §1060; Civil Code §3426 et seq.