

*Southern California Edison*  
*R.18-10-007 – SB 901*

**DATA REQUEST SET A b r a m s - S C E - 0 0 1**

**To: Abrams**  
**Prepared by: Brian Stonerock**  
**Job Title: Principal Manager**  
**Received Date: 3/5/2019**

**Response Date: 3/7/2019**

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**Question 13:** Please, provide a risk assessment (probability ratio, relative impact of risk) associated with each execution risk related to personnel, labor or staffing. In each case where “personnel” or “staffing” or “workforce” or like resources is an execution risk indicate number of personnel estimated to achieve target and provide any internal correspondence related to these staffing issues.

**Response to Question 13:**

SCE objects to the question on the grounds that it is ambiguous, overbroad, unduly burdensome, and beyond the scope of this proceeding (which is scoped to examine SCE’s 2019 Wildfire Management Plan). SCE further objects to the question to the extent it calls for the production of internal correspondence protected by the attorney-client privilege and/or attorney work product doctrine. Notwithstanding this objection, SCE responds as follows. SCE provided a snapshot of its current workforce in its 2019 Wildfire Mitigation Plan (WMP) in Appendix E. As described in Section 5.2.4, SCE maintains adequate staff to respond to emergencies and SCE has mutual assistance agreements and access to contract resources to assist in restoring service as described in Section 5.1.1.2.

To execute the additional actions required in HFRA as described in SCE’s 2019 WMP (e.g., see Sections 4.2, 4.3, and 4.4), SCE is in the process of onboarding additional contractors and SCE employees to meet this demand. To date, a detailed risk assessment associated with resource execution risks has not been developed.