

*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: Russell Archer**  
**Job Title: Senior Attorney**  
**Received Date: 3/5/2019**

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

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**Question 21:** Please, provide records of all internal communications including meeting minutes and transcripts relative to the re-energization strategy after a de-energization event from January, 2015 to today. Also, include communications with all related contractors during the same time period.

**Response to Question 21:**

SCE objects to the question to the extent it calls for the production of communications and information protected by the attorney-client privilege and/or attorney work product doctrine, as it is overly broad and unduly burdensome to the extent it seeks “records of all internal communications,” and because it is beyond the scope of the proceeding. SCE’s 2019 Wildfire Mitigation plan is comprised of mitigation and activities SCE plans to undertake in 2019 to reduce wildfire risk. Moreover, as explained by Administrative Law Judge Thomas at the February 26, 2019 Prehearing Conference, substantive, detailed issues related to de-energization will be addressed in the Commission’s separate, ongoing de-energization proceeding (*i.e.*, R.18-12-005).