

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

DATA REQUEST SET Cal Advocates - SCE - R1810007-04

To: Cal Advocates
Prepared by: Ryan Stevenson
Job Title: Senior Advisor
Received Date: 9/20/2019

Response Date: 9/30/2019

Question 01:

For SCE's initial 2019 Safety Certification issued on July 25, 2019, please provide the record and content of all communications between SCE and the CPUC. SCE does not need to include its July 19, 2019 Request for Initial Safety Certification, nor the July 25, 2019 Safety Certification in its response to this request.

Response to Question 01:

SCE objects to this data request as vague and overly broad. Key terms such as "record and content" are undefined and the phrase "for SCE's 2019 Safety Certification" is vague. Further, SCE objects to this data request pursuant to Rule 10.1 of the Commission's Rules of Practice and Procedure on the grounds that it seeks the production of information that is outside the scope of the issues in the pending proceeding and is not reasonably calculated to lead to the discovery of admissible evidence. Subject to those objections, SCE responds as follows: Laura Genao, managing director of regulatory affairs at SCE, had conversations with Elizaveta Malashenko during which Ms. Genao asked Ms. Malashenko questions concerning the format and process of submitting a request for an initial safety certification pursuant to Public Utilities Code Section 8389. Ms. Genao also asked Ms. Malashenko about the documentation expected to accompany such a request and the timing of a response from the Commission. These conversations took place between July 8, 2019 and July 25, 2019. Ms. Genao and Ms. Malashenko also exchanged emails, which are attached to this response.