

SCE's 2020-2022 Wildfire Mitigation Plan

DECLARATION OF

BILL CHIU

REGARDING THE CONFIDENTIALITY OF CERTAIN DATA

I, Bill Chiu, declare and state:

1. I am Managing Director of Grid Modernization and Resiliency at Southern California Edison (SCE). I was delegated authority to sign this declaration by Philip R. Herrington, senior vice president of Transmission and Distribution at SCE. I have responsibility for overseeing and reviewing the submission of data pursuant to Section 2.7 of the Wildfire Safety Division's Wildfire Mitigation Plan Guidelines.

2. I am making this declaration in accordance with the instructions set forth in Decision 16-08-024 and Decision 17-09-023 of R. 14-11-001, which were issued August 25, 2016, and September 28, 2017, respectively, and govern the submission of confidential documents to the Commission.

3. I have personal knowledge of the facts and representations herein and, if called upon to testify, could and would do so, except for those facts expressly stated to be based upon information and belief, and as to those matters, I believe them to be true.

4. Listed below are the data for which SCE is seeking confidentiality protection and the basis for SCE's confidentiality request.

| Location of Confidential Data | Pages (if available) | Description of Information that is Confidential | Basis for SCE's Confidentiality Claim |
|--|-------------------------------------|--|---|
| 1. CircuitRisk_Confidential.zip 2. AssetRisk_Confidential.zip | NA | 1. Map file included showing the total structure risk scores aggregated up to the circuit level as well as the vegetation only risk scores aggregated to the | 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 information could make SCE's facilities vulnerable to attack and could be valuable information in planning an |

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|-------------------------------|----------------------|--|---|
| | | circuit level 2. Map file showing functional location number (FLOC) of each pole and the REAX score, probabilities, total risk, total probability percentile, and total risk score percentile at each FLOC. | attack on critical infrastructure. There is little to no benefit to making this information publicly available. Third parties do not need this information to evaluate SCE's 2020-2022 Wildfire Mitigation Plan. As such, the public interest in not disclosing this information far outweighs the public interest in disclosing it. |

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on this 18th day of March, 2020 at Rosemead, California.



Bill Chiu

Managing Director, Grid Modernization and Resiliency
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