# SCE’s 2022-WMPs

# DECLARATION OF RAJDEEP ROY

# REGARDING THE CONFIDENTIALITY OF CERTAIN DATA

I, Rajdeep Roy, declare and state:

1. I am Director, Wildfire Safety at Southern California Edison Company (SCE). Shinjini Menon, Vice President, Asset Management & Wildfire Safety at SCE delegated authority to me to sign this declaration. As such, I had responsibility for overseeing and reviewing the information provided in response to [CalAdvocates-SCE-2022WMP-15](https://edisonintl.sharepoint.com/teams/rcms365/SitePages/DR%20360.aspx?HeaderSPID=6799) Question 4.
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 confidential protection and the bases for SCE’s confidentiality request.

| **No.** | **Location of Confidential Data** | **Pages**  **(if available)** | **Description of Information that is Confidential** | **Basis for SCE’s Confidentiality Claim** |
| --- | --- | --- | --- | --- |
| 04 | Attachment entitled “Fast Curve Protection Philosophy Review, Revision 0\_CONFIDENTIAL.docx” | All | Certain subtransmission substations are under FERC jurisdiction, and the associated data are Critical Energy Infrastructure Information (CEII).  The data also contains Personally Identifiable Information (PII) that identifies or describes an individual. | Providing information regarding critical infrastructure and facilities could enable malicious actors to identify and concentrate attacks on those infrastructure and facilities. In turn, this potentially risks grid security and public safety. In addition to the risks identified by disclosing information about priority infrastructure and facilities, system detail information could be useful to a malicious attacker seeking to attack the electric grid and impact critical customers and facilities.  Additionally, the aggregation of this data could identify customer information and further enable malicious actors in their attempts to attack the grid and critical facilities and customers.  SCE requests this information be kept confidential pursuant to PUC Code § 364(d). This section permits the Commission to withhold information from the public which could pose a security threat if disclosed.  SCE also relies upon the Interim Trial Procedures (ITPs) issued on  December 4, 2020, by the Safety & Enforcement and Safety Policy Division, authorizing use of the ITPs to share sensitive information with CPUC staff.  Gov’t Code Section § 6254[c]. *See* also, Gov’t Code §§ 6254(a),(d),(k), 6254.7(d) Protected under Civ. Code §§1798 *et seq* and15 U.S.C §§ 1681 *et seq,* General Order 77-M |

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

Executed on July 14th, 2022 at Irwindale, California.

/s/ Rajdeep Roy

Rajdeep Roy

Director, Wildfire Safety  
Southern California Edison