# DECLARATION OF ERIK TAKAYESU

# VICE PRESIDENT OF ASSET STRATEGY AND PLANNING

# REGARDING THE CONFIDENTIALITY OF CERTAIN DATA

I, Erik Takayesu, declare and state:

1. I am Vice President of Asset Strategy and Planning at Southern California Edison (SCE). As such, I am responsible for overseeing and reviewing SCE’s confidential information being submitted herein to the California Public Utilities Commission. I am authorized to request confidential treatment via this declaration on behalf of SCE.
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 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** |
| --- | --- | --- | --- |
| WMP\_2022\_7\_1\_F\_Distribution\_CONFIDENTIAL  WMP\_2022\_7\_1\_F\_Subtransmission\_CONFIDENTIAL  WMP\_2022\_7\_1\_F\_Transmission\_CONFIDENTIAL | All | GIS layer showing wildfire risk  Asset Management and Inspections GIS layer 2022 | *Critical Infrastructure Information*  Gov’t Code §§ 6254 (e), (k), (ab), 6255(a); 6 U.S.C. §§ 131(3), 6 CFR § 29.2(b); 6 U.S.C. § 133(a)(1)(E), 6 CFR § 29.8 (defining CII and restricting its disclosure)  *Critical Electric Infrastructure Information*  Pub. L. 114-94 (FAST Act - Critical Electric Infrastructure Security) Amended December 4, 2015  18 CFR §388.113(c); FERC Orders 630, 643, 649, 662, 683, and 702  (defining CEII); 68 Fed. Reg. 9862 (Dep’t of Energy Mar. 3, 2003) (final rule)  *Sensitive Security Information*  49 CFR §§1520.5, 1520.9 (defining SSI and restricting its disclosure) |
| System Operating Bulletin 322 | pages 6-48 | Operation of Subtransmission and Distribution Voltage Lines Traversing High Fire Areas | *Id.* |
| WMP\_2022\_4\_5\_2\_AFN\_Customer\_Distribution\_CONFIDENTIAL | All | AFN customer data, transmission & distribution lines and other relevant electrical equipment (e.g., substations | *Personally identifiable information or regulated entity customers protected by Gov’t. Code Sec. 6524(c)*  Gov’t Code §6254(c) (PRA expressly protects “Personnel, medical, or similar files, the disclosure of which would constitute an unwarranted invasion of personal privacy”).  15 U.S.C. §§ 1681 et seq.  Protected also under Gov’t Code §§ 6254(a), (d), (k), 6254.7(d), 6255(a); Civil Code §§ 1798.21, 1798.80, 1798.81.5, 1798.82, 1798.85 to 1798.89, 1798.90.1, 1798.98, 1798.99, 3426, 1798.3, 1798.24; Pub. Util. Code § 8380(d) (and associated CPUC Decisions D.11-07-056, D.12-08-045); Evid. Code § 1060; Cal. Const., art. I, § 1; and G.O. 77-M; Health Insurance Portability and Accountability Act of 1996 (HIPAA), 42 U.S.C. § 1320d-6; HITECH Act, American Recovery and Reinvestment Act of 2009, PL 111-5, Feb. 17, 2009, 123 Stat 115 |
| WMP\_2022\_7\_1\_G\_CC\_System\_Hardening\_2022\_CONFIDENTIAL  WMP\_2022\_7\_1\_G\_TUG\_System\_Hardening\_2022\_CONFIDENTIAL  WMP\_2022\_7\_1\_G\_CC\_System\_Hardening\_2023\_CONFIDENTIAL  WMP\_2022\_7\_1\_G\_TUG\_System\_Hardening\_2023\_CONFIDENTIAL  WMP\_2022\_7\_1\_I\_Transmission\_Circuit\_Patrol\_Asset\_Management\_CONFIDENTIAL  WMP\_2022\_7\_1\_I\_Conductor\_Sample\_Target\_Asset\_Management\_CONFIDENTIAL  WMP\_2022\_7\_1\_I\_Distribution\_Infrared\_Asset\_Management\_CONFIDENTIAL  WMP\_2022\_7\_1\_I\_Generation\_Inspections\_Asset\_Management\_CONFIDENTIAL  WMP\_2022\_7\_1\_I\_Grid\_Patrol\_Asset\_Management\_CONFIDENTIAL  WMP\_2022\_7\_1\_I\_IRD\_Distribtuion\_Aerial\_Asset\_Management\_CONFIDENTIAL  WMP\_2022\_7\_1\_I\_IRD\_Distribution\_Ground\_Asset\_Management\_CONFIDENTIAL  WMP\_2022\_7\_1\_I\_IRD\_Transmission\_Aerial\_Asset\_Management\_CONFIDENTIAL  WMP\_2022\_7\_1\_I\_IRD\_Transmission\_Ground\_Asset\_Management\_CONFIDENTIAL  WMP\_2022\_7\_1\_I\_Line\_Vue\_Target\_Asset\_Management\_CONFIDENTIAL  WMP\_2022\_7\_1\_I\_Splice\_Target\_Asset\_Management\_CONFIDENTIAL  WMP\_2022\_7\_1\_I\_Substation\_Inspections\_Asset\_Management\_CONFIDENTIAL  WMP\_2022\_7\_1\_I\_Transmission\_Infrared\_Asset\_Management\_CONFIDENTIAL | All | Grid Design and System Hardening mitigations GIS layer 2022, 2023, 2024 | *Critical Infrastructure Information*  Gov’t Code §§ 6254 (e), (k), (ab), 6255(a); 6 U.S.C. §§ 131(3), 6 CFR § 29.2(b); 6 U.S.C. § 133(a)(1)(E), 6 CFR § 29.8 (defining CII and restricting its disclosure)  *Critical Electric Infrastructure Information*  Pub. L. 114-94 (FAST Act - Critical Electric Infrastructure Security) Amended December 4, 2015  18 CFR §388.113(c); FERC Orders 630, 643, 649, 662, 683, and 702  (defining CEII); 68 Fed. Reg. 9862 (Dep’t of Energy Mar. 3, 2003) (final rule)  *Sensitive Security Information*  49 CFR §§1520.5, 1520.9 (defining SSI and restricting its disclosure) |

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

Executed on February 17, 2022 at Cerritos, California.

/s/ Erik Takayesu\_\_\_\_\_\_\_\_

Erik Takayesu

Vice President  
Asset Strategy and Planning