

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

**DATA REQUEST SET M G R A - S C E - 0 0 2**

**To: MGRA**  
**Prepared by: Russell Archer**  
**Job Title: Senior Attorney**  
**Received Date: 3/4/2019**

**Response Date: 3/6/2019**

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**Question 19:** Provide three realistic scenarios in which a utility might start a wildfire and then be held to be imprudent for purposes of cost recovery and in which that imprudence would be tied back to lack of compliance with the Wildfire Mitigation Plan. These scenarios would assume the absence of any other Prudent Manager Standard.

**Response to Question 19:**

SCE objects to the question to the extent that it calls for information protected by the attorney-client privilege and/or work product doctrines. SCE further objects to the question as it is an incomplete hypothetical, because it calls for speculation and for ultimate legal conclusions, and because it would require the production of a study and not underlying facts. SCE has clearly set forth its position that substantial compliance with its Wildfire Mitigation Plan (WMP) should equate to a finding that SCE has met the prudent manager standard for purposes of the recovery of wildfire-related costs and expenses. That ultimate legal conclusion will be determined by the Commission, the courts, and potentially the State Legislature.