

July 10, 2023

**VIA EMAIL ONLY**

Kate Turner  
Staff Counsel  
Legal Division  
CALIFORNIA PUBLIC UTILITIES COMMISSION  
[Kate.Turner@cpuc.ca.gov](mailto:Kate.Turner@cpuc.ca.gov)

**RE:** *SED's May 24, 2023 Notice of Inclusion of Violations  
in Fairview Fire Investigation*

Dear Ms. Turner:

I am writing in response to your letter dated May 24, 2023, regarding the California Public Utilities Commission's (Commission) Safety and Enforcement Division's Wildfire Safety and Enforcement Branch's (SED) intent to include violations of General Order 95, Rule 19; California Public Utilities Code §316; and Rule 1.1 of the Commission's Rules of Practice and Procedure in its investigation of SCE's involvement in the Fairview Fire.

SCE takes its obligation to respond to SED's Data Requests seriously and works diligently to provide SED with complete and accurate information as quickly as possible. Having carefully reviewed the points mentioned in your letter, we want to assure you that SCE is committed to improving upon meeting its obligations and addressing the issues that have been raised. SCE understands the importance of ensuring it fully cooperates with SED in its investigation of the subject (and similar) incident(s) and the impact this has on the overall public interests. However, while SCE acknowledges that there may have been instances during the subject investigation where it regrettably fell short of SED's expectations and unintentionally caused SED additional work or frustration, we believe it is essential to understand the broader context surrounding the situation. By way of this correspondence, we hope to provide a more comprehensive view of the circumstances and contribute to a clearer understanding of the relevant events at hand.

The primary underpinnings of SED's conclusion are what it characterizes as SCE's "lack of cooperation and respect due to the Commission [as] evident in SCE's delay and failure to adequately communicate with SED" and the belief that SCE treated the Data Request SED-SCE-001 Fairview Fire ("Fairview DR") deadline as "unilaterally negotiable and with a lack of seriousness." SED further asserts that "SCE unreasonably stretched out" its response to the Fairview DR "over nearly four months" and "sought to drag its response out even further."

We believe it is important to first provide some historical background, some of which you may recall that SCE shared with SED staff during our March 23, 2023, meeting. When SCE received the first set of Thomas Fire DRs, they were nothing short of voluminous.<sup>1</sup> SCE met and conferred with SED and advised that it was too much and therefore not feasible for SCE to respond in SED's expected timeframe. SCE asked SED whether SED (1) would rather that SCE request a 1-2-month extension right off the bat *or* (2) would prefer a "rolling production" whereby SCE would provide responses to SED as they were completed. SED's stated preference was that SCE proceed in the manner of rolling productions. This involved sending pre-Bates stamped documents to SED as they were completed and following-up with Bates stamped copies as soon as they were available. At some point in the process, SCE began to provide SED with *estimated* dates of production for DRs and advised SED that in the event SCE was unable to provide responses by the *estimated* date, it would provide SED with an update.

Following the Thomas Fire, this arrangement continued for all subsequent DRs received by SCE related to wildfires. SCE never formally requested extensions of DR deadlines, nor did SED require as much. In fact, SCE's counsel sent an email to SED acknowledging receipt of every DR set propounded, which explicitly stated that SCE would be handling the requests in similar fashion to how it had handled other Data Request sets. The same email also stated SCE's presumption that SED would like a rolling production and invited SED to advise if that presumption was incorrect. (*See e.g.*, December 22, 2022, A. Hickerson Email Acknowledgment of SED-001-Fairview and October 27, 2022, M. Gevondyan Email Acknowledgment of SED-001-Ridge Fire, attached hereto as Exhibit A.) SED has never responded to any of these acknowledgement emails to express any disagreement and/or concerns regarding SCE handling the DRs in this manner.

Further, following the Thomas Fire, when SCE provided its first response to a set of DRs, SCE's counsel sent SED a letter which, in pertinent part, noted that the DR issued was substantial and required the gathering of information and documents from various groups within the company, but that SCE was committed to providing SED with all the information sought and making a good faith effort to do so. In the same letter, SCE also made the express caveat that there may be circumstances outside of SCE's control and facts that SCE may not yet be aware of subject to the stage of SCE's own investigation into the subject fire, which is especially true given the large scope of information and documents SED typically seeks in such a short amount of time. (*See e.g.*, December 7, 2022, A. Hickerson Letter re: Data Request Number: SED-01-Ridge Fire and January 30, 2023 A. Hickerson Letter re: Data Request Number: SED-001 Fairview Wildfire, attached hereto as Exhibit B.) Again, until recently, SED had never responded to any of these letters to express any concerns or request a different process.

Up through and including the first set of Fairview DRs, SCE responded to fifty-three (53) sets of SED Wildfire DRs comprising more than 1,000 questions and produced more than 19,000

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<sup>1</sup> Ultimately, the Thomas Fire resulted in SED propounding fifteen (15) sets of DRs on SCE, with a total of 293 questions. In response, SCE produced over 6,000 documents (totaling over 12,000 pages).

documents (nearly 45,000 pages). Because of this long-standing course of conduct and because SED had not expressed disagreement and/or concerns regarding SCE handling the DRs in this manner, SCE had a good faith belief that this was acceptable to SED up until the communications this spring. We wanted to provide this broader context as background for SCE's perspective as the unique circumstances specifically surrounding the Fairview DR occurred, and to emphasize that although SCE regrettably did not meet SED's timing expectations, it was not due to a lack of seriousness or cooperation.

### **Fairview DR**

At 4:30 p.m. on Thursday, December 22, 2022, SED sent the first set of Fairview DRs, which consisted of fifty-five (55) requests and a due date of January 26, 2023. Less than an hour later, SCE's counsel sent an email acknowledging receipt thereof. (*See Exhibit A.*) It is worth noting that not only were the Fairview DRs sent during the holiday season, when many of SCE's key personnel<sup>2</sup> were out of the office and not expected to return until sometime after the new year, but also while SCE was simultaneously working to respond to two other sets of DRs from SED related to two separate wildfire incidents – one of which was *sent just one day prior to* the Fairview DRs, and consisted of forty-seven (47) requests with a due date of January 24, 2023.

On January 20, 2023, SCE sent a status email to SED providing the dates upon which SCE anticipated being able to provide responses to most of the DRs, based on SCE's assessment of the status of gathering responsive data and documents as of that time, and consistent with similar emails sent by SCE in other wildfire contexts. (*See* January 20, 2023, A. Hickerson email to E. Fisher, attached hereto as Exhibit C.) SCE assured SED that it was working diligently to compile the information and thanked SED for its patience. SED did not raise any objections or concerns at that time. On January 30, 2023, SCE sent the first batch of Fairview DR responses.

On February 10, 2023, SCE sent a further/revised status update to SED regarding the status of the then outstanding responses, again setting forth an estimated timeline for providing the responses, consistent with historical practice. This email specifically noted the organizational challenges SCE was facing with limited resources due in significant part to the number of concurrently open sets of DRs from SED.<sup>3</sup> (*See* February 10, 2023, A. Hickerson email to E. Fisher, attached as Exhibit C.)

On February 11, 2023, SCE Senior Attorney Aneiko Hickerson, who had recently transitioned into the role of overseeing SCE's response to SED wildfire-related investigations,

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<sup>2</sup> In many instances there are a limited number of individuals who have the knowledge and/or ability to access and/or provide the documents and data sought.

<sup>3</sup> It is worth noting that by this point, SED had propounded additional sets of DR on SCE. SED-Silverado-007 was sent on January 19, 2023 (24 requests with a deadline of February 20, 2023) and SED-Ridge-002 was sent on February 6, 2023 (12 requests with a deadline of March 6, 2023).

suffered the unexpected death of an immediate family member who resided outside of California, which resulted in Ms. Hickerson needing to travel cross-country unexpectedly. She was out of the office for two weeks, beginning February 20, 2023, and returning on March 6, 2023.

On February 24, 2023, while Ms. Hickerson was out on her unplanned absence due to personal family matters, SCE emailed SED to acknowledge that SCE still had outstanding responses to the Fairview DR and explain that SCE had encountered an unexpected delay. (*See* February 24, 2023, J. Bote email to E. Fisher, attached as Exhibit C.) In response, and for the first time in the course of SCE's practice of responding to the wildfire data requests, SED stated that "SCE should provide an official request for extension to CPUC [sic]" and indicated it was "unacceptable for SCE to just give SED prolonged timings for Data Request questions to be answered in the future." The email further requested that all responses be provided by March 1, 2023, or that a meet and confer be scheduled to address SED's concerns. (*See* February 24, 2023, D. Singh email, attached as Exhibit C.) Thereafter, over the course of three days from March 7, 2023 – March 9, 2023, SED (Emily Fisher) and SCE (Aneiko Hickerson) worked to coordinate a meet and confer meeting, which was scheduled for March 23, 2023.

On March 23, 2023, the SED and SCE teams participated in a call to meet and confer regarding the then-outstanding DR responses, as well as the recent challenges SCE had been facing in timely providing responses. During this meeting SCE shared some of the historical context discussed above, dating back to practices established during the Thomas Fire investigation. SED and SCE reached an understanding that, going forward, SCE would modify its past practice of providing a timeline of dates when SCE anticipated completed responses by also including a formal request to SED for extensions.

On March 23, 2023, pursuant to SED's request, SCE sent an email requesting an extension of time to provide responses to the then-outstanding Fairview DRs, which provided expected production dates and the reasons. (*See* March 23, 2023, A. Hickerson email to E. Fisher, attached hereto as Exhibit C.) SED granted the requested extension.

On March 24, 2023, SED sent an email to SCE indicating that SED had discussed the Bates stamping of SCE's data request responses and proposing that SCE adopt a new process for Bates stamping all data requests, whereby SCE will now Bates stamp its responses in sequential question order once responses to *all* questions in the data request set have been completed.<sup>4</sup> (*See* March 24, 2023, A. Yip-Kikugawa email to A. Hickerson, attached hereto as Exhibit D.) SCE confirmed it would comply with the newly proposed process.

On March 24, 2023, SCE sent another batch of Fairview DR responses to SED.

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<sup>4</sup> This is a small point of correction to your May 24, 2023, letter, which suggests that this new process was proposed and discussed during the March 23, 2023, meet and confer meeting.

On March 28, 2023, SCE sent another request for extension of time to respond to the Fairview DRs, with revised expected production dates and included an acknowledgement that documents would be Bates stamped in accordance with the new process requested by SED. (See March 28, 2023, A. Hickerson email to E. Fisher, attached hereto as Exhibit C.) This extension was approved by SED the following day.

SCE sent two more batches of responses to Fairview DR on March 30 and April 4, 2023. Then on April 11, 2023, SCE sent a further extension request to SED explaining that SCE had once again, and unintentionally, encountered unexpected delays due to key personnel being out of the office.<sup>5</sup> (See April 11, 2023, J. Bote email to E. Fisher, attached as Exhibit C.) Additional responses to Fairview DR were provided to SED on April 17, 2023, but SCE was unfortunately forced to request yet another extension on April 18, 2023. This request was granted by SED with an indication that it was the final extension SED would be granting. SCE followed up by email to SED on April 21, 2023, to explain the extenuating circumstances necessitating the further extension and SCE's ongoing efforts to comply. (See April 21, 2023, P. Cirucci email to E. Fisher, attached hereto as Exhibit C.)

Despite SCE's effort to meet the deadlines, the accumulation of unanticipated lengthy absences, and the time necessary for other employees to try to pick up this matter mid-stream, hindered SCE's ability to respond with accuracy and thoroughness by the April 28 deadline. On April 27, 2023, SCE was unfortunately forced to send SED an update and request another extension of time for the last three outstanding DRs, which SED denied. On April 28, 2023, SCE was able to send responses to all but three outstanding Fairview DRs. Those responses were subsequently sent to SED on May 3 and May 5, 2023.

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We understand that, in hindsight, the cumulative and unanticipated delays and extensions turned out to be voluminous and caused SED inconvenience and frustration. However, with the full picture that much of the struggle stemmed from the confluence of unexpected office absences by key personnel in short succession, SCE's tardiness was not due to lack of cooperation or seriousness but reflected true strain on temporarily insufficient resources as a result of uniquely extenuating circumstances that were largely outside of SCE's anticipation or control. In fact, with the unique and atypical circumstances of the Fairview DR (Set 1) behind us, we have since met the original deadlines for the five most recent wildfire DR sets (Saddle Ridge [Set 3], Ridge [Set 3], Creek [Set 1], Emerald [Set 2], and Fairview [Set 2]). We have appreciated the largely positive and constructive relationship we have shared with SED over the years and sincerely hope that the

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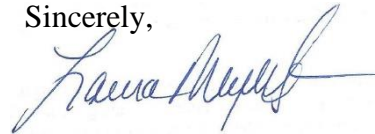
<sup>5</sup> Please note Ms. Hickerson went out on an unexpected medical leave for approximately nine weeks, which presented a significant and unexpected challenge for SCE, which had to work quickly to get another in-house attorney involved and up to speed.

unfortunate and unique delays on the Fairview DR do not tarnish the good will we have established.

We want to emphasize SCE's continued dedication to improving upon our internal processes in responding to Data Requests, including a more effective allocation of manpower and resources, as well as our commitment to leveraging SED's stated concerns to improve SCE's performance moving forward, in a way that both aligns with SED's expectations, but reasonably accommodates the organizational challenges inherent in this process.

If you have any questions or if there is anything further we can do to address this matter, please do not hesitate to reach out.

Sincerely,



Laura A. Meyerson

CC:

Lee Palmer, Director  
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California Public Utilities Commission  
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Tara Kaushik, Managing Director  
Regulatory Affairs  
Southern California Edison  
[tara.kaushik@sce.com](mailto:tara.kaushik@sce.com)

# EXHIBIT A



## Aneiko L Hickerson

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**From:** Margarita Gevondyan  
**Sent:** Thursday, October 27, 2022 12:26 PM  
**To:** Labagh, Layla; Eric Coolidge  
**Cc:** Lee, Chris; Chase, Shelby; Singh, Devla; Pike, Ed; Fisher, Emily; Perez, Martha; Aneiko L Hickerson; June Bote; Margarita Gevondyan  
**Subject:** RE: (External):Data Request SED-001 - Ridge Fire

Dear Layla,

Its nice to virtually meet you Layla. I do not believe we have worked together in the past. I am in-house counsel at SCE. I have also included Aneiko on this email who will be taking over on the SED wildfire-related investigations for me. I have also included June who is with our reg affairs dept. If you can please include them on all emails, that would be great. Also, for the teams awareness as I see that other attorneys at SED who are handling other wildfire investigations are also on this email, I will be transitioning to a new role effective Nov 7<sup>th</sup>. Thus, please include Aneiko and June on all future wildfire-related investigation emails. Thank you!

Acknowledging receipt of the Ridge Fire Set. We will be handling them similar to how we have handled other data request sets such as the Bobcat Fire and Coastal Fire. This week, we will be reaching out to all of our subject matter experts to get some sense re when we can obtain the information sought. As soon as we have some sense re proposed dates, we will let you know. I am assuming that SED would like a rolling production which will consist of producing the data request responses as soon as we are able (in groups) as opposed to waiting for a complete set of responses. If that is not true, please let me know. Also, I am assuming that SED would like us to batestamp our responses and provide an index, similar to what we have done in the past. If that is not true, again please let me know. As for the information to be produced and any applicable objections we may have, we intend on providing similar types of responses and objections as what was done for our prior responses such as Bobcat and the Coastal Fire.

Please let me know if you have any questions or concerns. Otherwise, we will reach back out as soon as we have more information.

Thank you.  
- Rita

### Margarita (Rita) Gevondyan

Senior Attorney and Manager  
T. 626-302-6931 | F. 626-302-6997

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**From:** Labagh, Layla <Layla.Labagh@cpuc.ca.gov>  
**Sent:** Tuesday, October 25, 2022 3:17 PM  
**To:** Margarita Gevondyan <Margarita.Gevondyan@sce.com>; Eric Coolidge <Eric.Coolidge@sce.com>  
**Cc:** Lee, Chris <chris.lee@cpuc.ca.gov>; Chase, Shelby <Shelby.Chase@cpuc.ca.gov>; Singh, Devla <devla.singh@cpuc.ca.gov>; Pike, Ed <Ed.Pike@cpuc.ca.gov>; Fisher, Emily <Emily.Fisher@cpuc.ca.gov>; Perez, Martha

<Martha.Perez@cpuc.ca.gov>

**Subject:** (External):Data Request SED-001 - Ridge Fire

**\*\*\* EXTERNAL EMAIL - Use caution when opening links or attachments \*\*\***

**\*\*\* EXTERNAL EMAIL WITH ATTACHMENT - BE CAREFUL NOT TO OPEN IF THIS DOCUMENT IS NOT EXPECTED OR TRUSTED \*\*\***

Dear Ms. Gevondyan and Mr. Coolidge:

Please reference the attached Data Request SED-001-Ridge Fire. The CPUC requires the attached requested information to further investigate the Ridge Fire incident and asks that SCE provide the requested information and documents by **November 28, 2022**.

Please let us know if you have any questions or concerns.

Thank you,

Layla I. Labagh  
Attorney, Legal Division  
Public Utilities Commission  
505 Van Ness Avenue  
San Francisco, CA 94102  
Direct: 415.696.7372  
[layla.labagh@cpuc.ca.gov](mailto:layla.labagh@cpuc.ca.gov)  
Pronouns: she/her

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## Aneiko L Hickerson

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**From:** Aneiko L Hickerson  
**Sent:** Thursday, December 22, 2022 4:38 PM  
**To:** Fisher, Emily  
**Cc:** Cucu, Mihail; Dundon, Will; Chase, Shelby; Singh, Devla; Perez, Martha; Labagh, Layla; Scott Hayashi; June Bote; Paul Pimentel  
**Subject:** FW: (External):Data Request SED-SCE-001 Fairview Fire  
**Categories:** Green Category

Hello, Ms. Fisher.

This email is to acknowledge receipt of this Data Request set – SED-001-Fairview Fire.

We will be handling these requests in similar fashion to how we have handled other Data Request sets (e.g., Coastal Fire, Ridge Fire). The process will begin with us contacting all of our subject matter experts to get an idea of when we will be able to obtain the information sought. As soon as we have more information regarding proposed dates, we will let you know. Please be aware that we are currently experiencing delays as many people are out of the office/on vacation due to the holidays.

I presume that SEC would like a rolling production, which will involve producing the Data Request responses as soon as we are able to (in groups), as opposed to waiting for a complete set of responses. If this is not correct, please let me know. I am also presuming that SED would like us to Bates stamp our responses and provide an index, similar to what we have done in the past. Again, if this is not the case please let me know.

As for information/documents to be produced and any applicable objections SCE may have, we intend on providing similar types of responses and objections as we've done for our prior responses such as for the Coastal and Bobcat fires.

If you have any questions or concerns, please do not hesitate to contact me. Otherwise, I will follow-up with you as soon as I have more information and am able to provide you with a further update about timing.

Thank you!

Aneiko



**Ms. Aneiko L. Hickerson**  
Senior Attorney

**Law Department | Claims & General Litigation**

2244 Walnut Grove Avenue | Post Office Box 800 | Rosemead, CA 91770

T. 626-302-2812 | PAX 22812

**Upcoming Out of Office Dates: 12/26/2022 – 01/02/2023**



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*Please consider the environment before printing this email.*

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**From:** Fisher, Emily <Emily.Fisher@cpuc.ca.gov>  
**Sent:** Thursday, December 22, 2022 4:30 PM  
**To:** Aneiko L Hickerson <aneiko.hickerson@sce.com>  
**Cc:** Cucu, Mihail <Mihail.Cucu@cpuc.ca.gov>; Dundon, Will <Will.Dundon@cpuc.ca.gov>; Chase, Shelby <Shelby.Chase@cpuc.ca.gov>; Singh, Devla <devla.singh@cpuc.ca.gov>; Perez, Martha <Martha.Perez@cpuc.ca.gov>; Labagh, Layla <Layla.Labagh@cpuc.ca.gov>; Scott Hayashi <Scott.Hayashi@sce.com>; June Bote <June.Bote@sce.com>; Paul Pimentel <Paul.Pimentel@sce.com>  
**Subject:** (External):Data Request SED-SCE-001 Fairview Fire

**\*\*\* EXTERNAL EMAIL - Use caution when opening links or attachments \*\*\***  
**\*\*\* EXTERNAL EMAIL WITH ATTACHMENT - BE CAREFUL NOT TO OPEN IF THIS DOCUMENT IS NOT EXPECTED OR TRUSTED \*\*\***

Dear Mr. Pimentel and Ms. Hickerson:

Please reference the attached Data Request SED-SCE-001 Fairview Fire. The CPUC requires the attached information to further investigate the Fairview Fire Incident, and asks that SCE provide the requested information and documents **on or before January 26, 2023.**

Please let us know if you have any questions or concerns.

Thank you,

**Emily Fisher**  
*Staff Counsel*

California Public Utilities Commission  
**Phone:** (415) 703-1327

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# EXHIBIT B

December 7, 2022

Layla Labagh  
Legal Counsel  
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CALIFORNIA PUBLIC UTILITIES COMMISSION  
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Chris Lee  
Senior Utilities Engineer  
Safety and Enforcement Division  
CALIFORNIA PUBLIC UTILITIES COMMISSION  
[Chris.Lee@cpuc.ca.gov](mailto:Chris.Lee@cpuc.ca.gov)

**RE:** Data Request Number: SED-01-Ridge Fire

Dear Ms. Labagh and Mr. Lee:

Enclosed, please find Southern California Edison Company's ("SCE") first batch of responses to "Data Request Number: SED-01 Ridge Fire" ("Requests") from California Public Utilities Commission ("Commission") Safety and Enforcement Division ("SED"). Per the October 27, 2022 email of Ms. Rita Gevondyan, SCE will submit responses to the Requests on a rolling basis, as soon as they are available with Bate stamps and an index.

Please note that SCE is designating all responses to the Requests as "Confidential Pending Investigation," as it is SCE's understanding that this investigation is confidential and that the Requests are not to be disclosed publicly. SCE will also be providing additional confidential designations on data request responses and/or attachments that contain sensitive employee or customer information, or critical energy/electric infrastructure information (CEII).

Please also note that the Requests issued are substantial and require the gathering of information and documents from various groups within the company. Nonetheless, SCE is committed to providing SED with all the information sought and is making a good faith effort to do so. However, there may be circumstances outside of SCE's control and facts that SCE may not yet be aware of given the early stages of SCE's investigation into the subject fire. This is especially true given the large scope of information and documents sought in such a short amount of time. If SCE later discovers additional information responsive to these Requests, SCE reserves the right to revise and/or supplement its responses.

Layla Labagh  
Chris Lee  
December 7, 2022  
Page 2

Additionally, please note that SCE has listed one lead preparer who is tasked with the responsibility to gather the information and/or documents sought but said person may not be the person most knowledgeable about every aspect of the response itself.

Please do not hesitate to contact me if you have any questions or would like to discuss anything further.

Sincerely,

A handwritten signature in black ink, appearing to read 'Aneiko L. Hickerson', with a long, sweeping horizontal flourish extending to the right.

Aneiko L. Hickerson

Enclosures

January 30, 2023

Mihail Cucu  
Senior Utilities Engineer  
Safety and Enforcement Division  
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Emily Fisher  
Staff Counsel  
California Public Utilities Commission  
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Will Dundon  
Senior Utilities Engineer  
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Jasdeep Lally  
Utilities Engineer  
Safety and Enforcement Division California  
Public Utilities Commission  
[jasdeep.lally@cpuc.ca.gov](mailto:jasdeep.lally@cpuc.ca.gov)

Re: Data Request Number: SED-001 Fairview Wildfire

Dear Ms. Fisher, Messrs. Cucu, Dundon, and Lally:

Enclosed please find Southern California Edison's ("SCE") first batch of responses to the California Public Utilities Commission ("Commission") Safety and Enforcement Division ("SED") "Data Request SED-001-Fairview Wildfire" ("Requests"). Per my email to you on December 22, 2022, SCE will submit responses to the Requests on a rolling basis, as soon as they are available with batestamps and an index.

SCE is designating all responses to the Requests as "confidential pending investigation" as it is SCE's understanding that this investigation is confidential and that the Requests are not to be disclosed publicly. SCE will also be noting additional confidential designations on data request responses and/or attachments that contain sensitive employee or customer information, or critical energy/electric infrastructure information (CEII).

Please note that the data requests issued are substantial and require the gathering of information and documents from various groups within the company. Nonetheless, SCE is committed to providing SED with all the information sought and is making a good faith effort to do so. However, there may be circumstances outside of SCE's control and facts that SCE may not yet be aware of given the early stages of SCE's investigation into the subject fire. This is especially true given the large scope of information and documents sought in such a short amount of time. In the event that SCE later discovers additional information responsive to these data requests, SCE reserves the right to revise and/or supplement its responses.



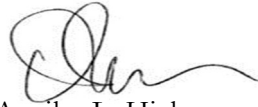
Emily Fisher  
Mihail Cucu  
Jasdeep Lally  
Will Dundon

January 30, 2023  
Page 2

In addition, please note that SCE has listed one lead preparer who is responsible for gathering the information and/or documents sought, and said person may not be the person most knowledgeable about every aspect of the response itself.

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Sincerely,

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Aneiko L. Hickerson

Enclosures

Emily Fisher  
Mihail Cucu  
Jasdeep Lally  
Will Dundon

January 30, 2023  
Page 3

bcc: Jennifer Shigekawa, Assistant General Counsel, Law Department, SCE  
Patricia Cirucci, Director and Managing Attorney, Law Department, SCE

# EXHIBIT C

## Aneiko L Hickerson

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**From:** Patricia Cirucci  
**Sent:** Friday, April 21, 2023 4:31 PM  
**To:** Fisher, Emily; June Bote; Laura Meyerson  
**Cc:** Perez, Martha; Labagh, Layla; Yip-Kikugawa, Amy C.; Turner, Kate; Cucu, Mihail; Singh, Devla; Michelle L Cortez; Aneiko L Hickerson  
**Subject:** RE: (External):RE: [EXTERNAL] RE: (External):Data Request SED-SCE-001 Fairview Fire  
**Categories:** Green Category

Thanks, Emily. We appreciate the professional courtesy. I don't know if you are aware, but Aneiko has been out on medical leave since last week. And before that, was out of the office dealing with some personal family issues. I've assigned Senior Attorney, Laura Meyerson (copied here), to assist with our responses in Aneiko's absence and to continue to work with Aneiko upon her return so that we have two dedicated attorneys working on wildfire data requests going forward. We will do our best to get you responses to the outstanding Fairview requests by Friday, April 28<sup>th</sup>, but as I'm sure you can appreciate, Laura is still getting up to speed, and this was unexpected.

On a related note, your assertion that our responses to Questions 31 and 32 were incomplete is inconsistent with prior understandings reached between SED and SCE wherein we agreed to provide a spreadsheet of work orders and SED agreed to narrow the scope of the request to just those work orders that were actually needed. Are you asking for every open and closed work order on that spreadsheet, or are you planning to narrow the request? Please advise. Thanks.

Patricia A. Cirucci (Trish)  
Director and Managing Attorney  
Claims Litigation  
T. 626-302-6704 | F. 626-302-6997

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**From:** Fisher, Emily <Emily.Fisher@cpuc.ca.gov>  
**Sent:** Tuesday, April 18, 2023 5:44 PM  
**To:** June Bote <June.Bote@sce.com>; Laura Meyerson <Laura.Meyerson@sce.com>  
**Cc:** Perez, Martha <Martha.Perez@cpuc.ca.gov>; Labagh, Layla <Layla.Labagh@cpuc.ca.gov>; Yip-Kikugawa, Amy C. <amy.yip-kikugawa@cpuc.ca.gov>; Turner, Kate <Kate.Turner@cpuc.ca.gov>; Cucu, Mihail <Mihail.Cucu@cpuc.ca.gov>; Singh, Devla <devla.singh@cpuc.ca.gov>; Patricia Cirucci <Patricia.Cirucci@sce.com>; Michelle L Cortez

<michelle.cortez@sce.com>; Aneiko L Hickerson <aneiko.hickerson@sce.com>

**Subject:** RE: (External):RE: [EXTERNAL] RE: (External):Data Request SED-SCE-001 Fairview Fire

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Hi June,

Thank you for providing the updated extension request. SED agrees to a 4/28/23 final deadline for submittal of all remaining Fairview Fire DR-01 responses, along with some items that appear to be missing from previous Data Request SED-SCE-001 Fairview responses, as described below:

	Fairview DR-01 Questions w/Incomplete Responses	SCE Initial Response	Information needed to complete response by 4/28/2023
1	Q9: Records of last three aerial surveys by helicopter or plane of the five structures upstream of the dead end Pole 220029S.	SCE provided an invalid Photos Folder attachment.	Please resubmit the Photos folder attachment for Q9 and confirm that the photos were taken by helicopter for each individual structure referenced in the response.
2	Q10: Copies of the five most recent patrols.	Dates when the patrols were performed	Please submit copies of the field patrol forms from 05/11/2022, 05/11/2021, 05/26/2020, 04/08/2019, and 03/15/2018
3	Q15: Copies of the five most recent drone inspections upstream of the dead-end Pole 220029S.	SCE provided the same file name as for Q9, which could not be opened to determine whether it contained materials responsive to Q15.	Please submit copies of the five most recent drone inspections, including the actual inspection forms as well as photos by drone of the five structures upstream of the dead-end Pole 220029S.
4	Q31: Copies of all open work orders for the portion of the Subject Circuit spanning five structures upstream of the dead-end of the branch line at Pole 220029S.	SCE submitted very generic work orders with no details / only general description.	Please submit copies of the actual open work order forms with details on the work scheduled to be performed.
5	Q32: Copies of all closed work orders for the portion of the Subject Circuit spanning five structures upstream of Pole 220029S.	SCE did not include detailed descriptions of closed work orders.	Please submit copies of the actual closed work order forms with specific details of the work performed.

**Note that SED will be unable to approve further extensions (for initial/non Bates-stamped) Fairview DR-01 responses, and GO 95, Rule 19 violation(s) may apply if SCE has not provided complete responses by April 28, 2023.** SED has determined that the investigation timeline for the Fairview Fire is too far behind schedule to accommodate further extensions, especially with the next fire season on the horizon.

Please let me know if SCE has any questions.

Thanks,

Emily

**Emily Fisher**  
*Staff Counsel*

California Public Utilities Commission

Phone: (415) 703-1327

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**From:** June Bote <[June.Bote@sce.com](mailto:June.Bote@sce.com)>

**Sent:** Tuesday, April 18, 2023 10:50 AM

**To:** Fisher, Emily <[Emily.Fisher@cpuc.ca.gov](mailto:Emily.Fisher@cpuc.ca.gov)>; Laura Meyerson <[Laura.Meyerson@sce.com](mailto:Laura.Meyerson@sce.com)>

**Cc:** Perez, Martha <[Martha.Perez@cpuc.ca.gov](mailto:Martha.Perez@cpuc.ca.gov)>; Labagh, Layla <[Layla.Labagh@cpuc.ca.gov](mailto:Layla.Labagh@cpuc.ca.gov)>; Yip-Kikugawa, Amy C. <[amy.yip-kikugawa@cpuc.ca.gov](mailto:amy.yip-kikugawa@cpuc.ca.gov)>; Turner, Kate <[Kate.Turner@cpuc.ca.gov](mailto:Kate.Turner@cpuc.ca.gov)>; Cucu, Mihail <[Mihail.Cucu@cpuc.ca.gov](mailto:Mihail.Cucu@cpuc.ca.gov)>; Singh, Devla <[devla.singh@cpuc.ca.gov](mailto:devla.singh@cpuc.ca.gov)>; Patricia Cirucci <[Patricia.Cirucci@sce.com](mailto:Patricia.Cirucci@sce.com)>; Michelle L Cortez <[michelle.cortez@sce.com](mailto:michelle.cortez@sce.com)>; Aneiko L Hickerson <[aneiko.hickerson@sce.com](mailto:aneiko.hickerson@sce.com)>

**Subject:** RE: (External):RE: [EXTERNAL] RE: (External):Data Request SED-SCE-001 Fairview Fire

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Hi Emily,

I am emailing this morning to request for an extension of time for SCE to provide responses to Data Request SED-SCE-001 Fairview Fire, in accordance with the revised date set forth below:

Question Nos.	Expected Production Date	Reason
4, 7, 8, 13, 27, 30, 39, 46, 49, 51-53, 55 (13 total)	4/28/23	Confirming accuracy/completeness of information/documents; review process

The above dates reflect when we expect to provide SED with the initial responses without Bates stamping. In accordance with the new process requested by SED, documents will be sent to SCE's vendor for Bates stamping and overlays after all responses to data requests in this set have been provided, and then the complete set of Bates stamped responses will be sent.

Please let me know if you are amenable to this request. If you have any questions or wish to discuss, please do not hesitate to reach out.

Thank you!

**From:** June Bote

**Sent:** Tuesday, April 11, 2023 9:37 PM

**To:** Fisher, Emily <[Emily.Fisher@cpuc.ca.gov](mailto:Emily.Fisher@cpuc.ca.gov)>; Aneiko L Hickerson <[aneiko.hickerson@sce.com](mailto:aneiko.hickerson@sce.com)>  
**Cc:** Perez, Martha <[Martha.Perez@cpuc.ca.gov](mailto:Martha.Perez@cpuc.ca.gov)>; Labagh, Layla <[Layla.Labagh@cpuc.ca.gov](mailto:Layla.Labagh@cpuc.ca.gov)>; Yip-Kikugawa, Amy C. <[amy.yip-kikugawa@cpuc.ca.gov](mailto:amy.yip-kikugawa@cpuc.ca.gov)>; Turner, Kate <[Kate.Turner@cpuc.ca.gov](mailto:Kate.Turner@cpuc.ca.gov)>; Cucu, Mihail <[Mihail.Cucu@cpuc.ca.gov](mailto:Mihail.Cucu@cpuc.ca.gov)>; Singh, Devla <[devla.singh@cpuc.ca.gov](mailto:devla.singh@cpuc.ca.gov)>; Patricia Cirucci <[Patricia.Cirucci@sce.com](mailto:Patricia.Cirucci@sce.com)>; Michelle L Cortez <[michelle.cortez@sce.com](mailto:michelle.cortez@sce.com)>  
**Subject:** RE: (External):RE: [EXTERNAL] RE: (External):Data Request SED-SCE-001 Fairview Fire

Hi Emily,

Per the schedule from the 3/28 email in the thread below, a set of responses for Fairview should have been submitted today, but were not ready. We would like to request an extension, but won't yet be able to provide an updated table with dates for your review and approval. Aneiko and I have been out of office and need to touch base on the status of the responses. Apologies for the after-hours email and delay for this set. If there are any questions that we should prioritize for submission, please let us know. Thank you.

Question Nos.	Expected Production Date	Reason
4, 7, 8, 11, 13, 14, 20, 23, 41, 30, 49, 51-53, 55 (15 total)		Confirming accuracy/completeness of information/documents; review process
27, 39, 46 (3 total)	4/21/23	Confirming complete/accurate information; <i>SME is currently out through mid-April</i> ; review process

---

**From:** Fisher, Emily <[Emily.Fisher@cpuc.ca.gov](mailto:Emily.Fisher@cpuc.ca.gov)>  
**Sent:** Wednesday, March 29, 2023 11:55 AM  
**To:** Aneiko L Hickerson <[aneiko.hickerson@sce.com](mailto:aneiko.hickerson@sce.com)>  
**Cc:** Perez, Martha <[Martha.Perez@cpuc.ca.gov](mailto:Martha.Perez@cpuc.ca.gov)>; Labagh, Layla <[Layla.Labagh@cpuc.ca.gov](mailto:Layla.Labagh@cpuc.ca.gov)>; Yip-Kikugawa, Amy C. <[amy.yip-kikugawa@cpuc.ca.gov](mailto:amy.yip-kikugawa@cpuc.ca.gov)>; Turner, Kate <[Kate.Turner@cpuc.ca.gov](mailto:Kate.Turner@cpuc.ca.gov)>; June Bote <[June.Bote@sce.com](mailto:June.Bote@sce.com)>; Cucu, Mihail <[Mihail.Cucu@cpuc.ca.gov](mailto:Mihail.Cucu@cpuc.ca.gov)>; Singh, Devla <[devla.singh@cpuc.ca.gov](mailto:devla.singh@cpuc.ca.gov)>; Patricia Cirucci <[Patricia.Cirucci@sce.com](mailto:Patricia.Cirucci@sce.com)>; Michelle L Cortez <[michelle.cortez@sce.com](mailto:michelle.cortez@sce.com)>  
**Subject:** RE: (External):RE: [EXTERNAL] RE: (External):Data Request SED-SCE-001 Fairview Fire

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Hi Aneiko,

SED approves the request for extension for responses to SED-SCE-001 Fairview Fire per your table below.

For the meet and confer re: Question 8, tomorrow 3/30 at 1:00 works great, please go ahead and set up the invite. (I was just reminded that Friday 3/31 is Cesar Chavez Day and the CPUC is closed!) Mihail Cucu will be joining the call as well--he can address more technical aspects of what SED is seeking with the question if needed.

Thanks,

Emily

**Emily Fisher**  
*Staff Counsel*

California Public Utilities Commission  
**Phone:** (415) 703-1327

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---

**From:** Aneiko L Hickerson <[aneiko.hickerson@sce.com](mailto:aneiko.hickerson@sce.com)>  
**Sent:** Wednesday, March 29, 2023 10:28 AM  
**To:** Fisher, Emily <[Emily.Fisher@cpuc.ca.gov](mailto:Emily.Fisher@cpuc.ca.gov)>  
**Cc:** Perez, Martha <[Martha.Perez@cpuc.ca.gov](mailto:Martha.Perez@cpuc.ca.gov)>; Labagh, Layla <[Layla.Labagh@cpuc.ca.gov](mailto:Layla.Labagh@cpuc.ca.gov)>; Yip-Kikugawa, Amy C. <[amy.yip-kikugawa@cpuc.ca.gov](mailto:amy.yip-kikugawa@cpuc.ca.gov)>; Turner, Kate <[Kate.Turner@cpuc.ca.gov](mailto:Kate.Turner@cpuc.ca.gov)>; June Bote <[June.Bote@sce.com](mailto:June.Bote@sce.com)>; Cucu, Mihail <[Mihail.Cucu@cpuc.ca.gov](mailto:Mihail.Cucu@cpuc.ca.gov)>; Singh, Devla <[devla.singh@cpuc.ca.gov](mailto:devla.singh@cpuc.ca.gov)>; Patricia Cirucci <[Patricia.Cirucci@sce.com](mailto:Patricia.Cirucci@sce.com)>; Michelle L Cortez <[michelle.cortez@sce.com](mailto:michelle.cortez@sce.com)>  
**Subject:** RE: (External):RE: [EXTERNAL] RE: (External):Data Request SED-SCE-001 Fairview Fire

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Thank you, Emily.

How about tomorrow, Thursday 3/30 at 1:00?

**Ms. Aneiko L. Hickerson**

Senior Attorney

**Law Department | Claims Litigation**

2244 Walnut Grove Avenue | Post Office Box 800 | Rosemead, CA 91770

T. 626-302-2812 | PAX 22812



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**From:** Fisher, Emily <[Emily.Fisher@cpuc.ca.gov](mailto:Emily.Fisher@cpuc.ca.gov)>  
**Sent:** Tuesday, March 28, 2023 5:04 PM  
**To:** Aneiko L Hickerson <[aneiko.hickerson@sce.com](mailto:aneiko.hickerson@sce.com)>  
**Cc:** Perez, Martha <[Martha.Perez@cpuc.ca.gov](mailto:Martha.Perez@cpuc.ca.gov)>; Labagh, Layla <[Layla.Labagh@cpuc.ca.gov](mailto:Layla.Labagh@cpuc.ca.gov)>; Yip-Kikugawa, Amy C. <[amy.yip-kikugawa@cpuc.ca.gov](mailto:amy.yip-kikugawa@cpuc.ca.gov)>; Turner, Kate <[Kate.Turner@cpuc.ca.gov](mailto:Kate.Turner@cpuc.ca.gov)>; June Bote <[June.Bote@sce.com](mailto:June.Bote@sce.com)>; Cucu, Mihail <[Mihail.Cucu@cpuc.ca.gov](mailto:Mihail.Cucu@cpuc.ca.gov)>; Singh, Devla <[devla.singh@cpuc.ca.gov](mailto:devla.singh@cpuc.ca.gov)>; Patricia Cirucci



<[Patricia.Cirucci@sce.com](mailto:Patricia.Cirucci@sce.com)>; Michelle L Cortez <[michelle.cortez@sce.com](mailto:michelle.cortez@sce.com)>

**Subject:** RE: (External):RE: [EXTERNAL] RE: (External):Data Request SED-SCE-001 Fairview Fire

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Hi Aneiko,

Thanks for sending this request – I’ll check in with our team regarding your updated proposed timeline and respond to you as soon as possible.

Meanwhile, it looks like your proposal to meet and confer regarding Question 8 somehow slipped by me – I am very sorry about that! I’m available this Thursday 3/30 between 1:00pm and 2:30 pm, or any time on Friday 3/31, if any of those time ranges would work for you. Let me know.

Thank you,

Emily

**Emily Fisher**  
*Staff Counsel*

California Public Utilities Commission  
**Phone:** (415) 703-1327

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---

**From:** Aneiko L Hickerson <[aneiko.hickerson@sce.com](mailto:aneiko.hickerson@sce.com)>

**Sent:** Tuesday, March 28, 2023 4:37 PM

**To:** Fisher, Emily <[Emily.Fisher@cpuc.ca.gov](mailto:Emily.Fisher@cpuc.ca.gov)>; Singh, Devla <[devla.singh@cpuc.ca.gov](mailto:devla.singh@cpuc.ca.gov)>

**Cc:** Perez, Martha <[Martha.Perez@cpuc.ca.gov](mailto:Martha.Perez@cpuc.ca.gov)>; Labagh, Layla <[Layla.Labagh@cpuc.ca.gov](mailto:Layla.Labagh@cpuc.ca.gov)>; Yip-Kikugawa, Amy C. <[amy.yip-kikugawa@cpuc.ca.gov](mailto:amy.yip-kikugawa@cpuc.ca.gov)>; Turner, Kate <[Kate.Turner@cpuc.ca.gov](mailto:Kate.Turner@cpuc.ca.gov)>; June Bote <[June.Bote@sce.com](mailto:June.Bote@sce.com)>; Cucu, Mihail <[Mihail.Cucu@cpuc.ca.gov](mailto:Mihail.Cucu@cpuc.ca.gov)>; Patricia Cirucci <[Patricia.Cirucci@sce.com](mailto:Patricia.Cirucci@sce.com)>; Michelle L Cortez <[michelle.cortez@sce.com](mailto:michelle.cortez@sce.com)>

**Subject:** RE: (External):RE: [EXTERNAL] RE: (External):Data Request SED-SCE-001 Fairview Fire

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Hi Emily.

I am emailing this afternoon to request for an extension of time for SCE to provide responses to Data Request SED-SCE-001 Fairview Fire, in accordance with the **revised** dates set forth below:

Question Nos.	Expected Production Date	Reason
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5, 6, 9, 28, 29, 31, 34-38, 40, 42, 44, 45, 50, 54 (17 total)	3/30/23	Final review in process
9, 26, 32, 33, 41, 43, 47 (7 total)	4/04/23	Confirming accuracy/completeness of information/documents; review process
4, 7, 11, 13, 30, 49, 51-53, 55 (9 total)	4/11/23	Confirming complete information/documents; review process
27, 39, 46 (3 total)	4/21/23	Confirming complete/accurate information; <i>SME is currently out through mid-April</i> ; review process
8	TBD	Need to meet & confer w/ SED re: request (See 2/10/23 A. Hickerson email to E. Fisher)

The above dates reflect when we expect to provide SED with the initial responses without Bates stamping. In accordance with the new process requested by SED, documents will be sent to SCE’s vendor for Bates stamping and overlays after all responses to data requests in this set have been provided, and then the complete set of Bates stamped responses will be sent.

Please let me know if you are amenable to this request. If you have any questions or wish to discuss, please do not hesitate to reach out.

Thank you!

**Ms. Aneiko L. Hickerson**

Senior Attorney

**Law Department | Claims Litigation**

2244 Walnut Grove Avenue | Post Office Box 800 | Rosemead, CA 91770

T. 626-302-2812 | PAX 22812



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**From:** Fisher, Emily <[Emily.Fisher@cpuc.ca.gov](mailto:Emily.Fisher@cpuc.ca.gov)>

**Sent:** Friday, March 24, 2023 4:29 PM

**To:** Singh, Devla <[devla.singh@cpuc.ca.gov](mailto:devla.singh@cpuc.ca.gov)>; Aneiko L Hickerson <[aneiko.hickerson@sce.com](mailto:aneiko.hickerson@sce.com)>

**Cc:** Perez, Martha <[Martha.Perez@cpuc.ca.gov](mailto:Martha.Perez@cpuc.ca.gov)>; Labagh, Layla <[Layla.Labagh@cpuc.ca.gov](mailto:Layla.Labagh@cpuc.ca.gov)>; Yip-Kikugawa, Amy C. <[amy.yip-kikugawa@cpuc.ca.gov](mailto:amy.yip-kikugawa@cpuc.ca.gov)>; Turner, Kate <[Kate.Turner@cpuc.ca.gov](mailto:Kate.Turner@cpuc.ca.gov)>; June Bote <[June.Bote@sce.com](mailto:June.Bote@sce.com)>; Cucu, Mihail <[Mihail.Cucu@cpuc.ca.gov](mailto:Mihail.Cucu@cpuc.ca.gov)>; Patricia Cirucci <[Patricia.Cirucci@sce.com](mailto:Patricia.Cirucci@sce.com)>

**Subject:** RE: (External):RE: [EXTERNAL] RE: (External):Data Request SED-SCE-001 Fairview Fire

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Hi Aneiko,

Sorry about the delayed response from me today! Thank you [@Singh, Devla](#) for jumping in.

Have a good weekend!

Thank you,

**Emily Fisher**  
*Staff Counsel*

California Public Utilities Commission

**Phone:** (415) 703-1327

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---

**From:** Singh, Devla <[devla.singh@cpuc.ca.gov](mailto:devla.singh@cpuc.ca.gov)>

**Sent:** Friday, March 24, 2023 4:13 PM

**To:** Aneiko L Hickerson <[aneiko.hickerson@sce.com](mailto:aneiko.hickerson@sce.com)>

**Cc:** Perez, Martha <[Martha.Perez@cpuc.ca.gov](mailto:Martha.Perez@cpuc.ca.gov)>; Labagh, Layla <[Layla.Labagh@cpuc.ca.gov](mailto:Layla.Labagh@cpuc.ca.gov)>; Yip-Kikugawa, Amy C. <[amy.yip-kikugawa@cpuc.ca.gov](mailto:amy.yip-kikugawa@cpuc.ca.gov)>; Turner, Kate <[Kate.Turner@cpuc.ca.gov](mailto:Kate.Turner@cpuc.ca.gov)>; June Bote <[June.Bote@sce.com](mailto:June.Bote@sce.com)>; Cucu, Mihail <[Mihail.Cucu@cpuc.ca.gov](mailto:Mihail.Cucu@cpuc.ca.gov)>; Patricia Cirucci <[Patricia.Cirucci@sce.com](mailto:Patricia.Cirucci@sce.com)>; Fisher, Emily <[Emily.Fisher@cpuc.ca.gov](mailto:Emily.Fisher@cpuc.ca.gov)>

**Subject:** RE: (External):RE: [EXTERNAL] RE: (External):Data Request SED-SCE-001 Fairview Fire

Dear Ms. Hickerson:

Thank you for your email. SCE's request for an extension as noted below is granted.

Thank you for your professional cooperation and courtesies.

**Devla Singh**

Program and Project Supervisor – Safety Enforcement Division  
 Wildfire Safety Enforcement Branch  
 California Public Utilities Commission  
 (Cell) 415-264-8699  
[devla.singh@cpuc.ca.gov](mailto:devla.singh@cpuc.ca.gov)

**From:** Aneiko L Hickerson <[aneiko.hickerson@sce.com](mailto:aneiko.hickerson@sce.com)>  
**Sent:** Thursday, March 23, 2023 5:03 PM  
**To:** Fisher, Emily <[Emily.Fisher@cpuc.ca.gov](mailto:Emily.Fisher@cpuc.ca.gov)>  
**Cc:** Perez, Martha <[Martha.Perez@cpuc.ca.gov](mailto:Martha.Perez@cpuc.ca.gov)>; Labagh, Layla <[Layla.Labagh@cpuc.ca.gov](mailto:Layla.Labagh@cpuc.ca.gov)>; Singh, Devla <[devla.singh@cpuc.ca.gov](mailto:devla.singh@cpuc.ca.gov)>; Yip-Kikugawa, Amy C. <[amy.yip-kikugawa@cpuc.ca.gov](mailto:amy.yip-kikugawa@cpuc.ca.gov)>; Turner, Kate <[Kate.Turner@cpuc.ca.gov](mailto:Kate.Turner@cpuc.ca.gov)>; June Bote <[June.Bote@sce.com](mailto:June.Bote@sce.com)>; Cucu, Mihail <[Mihail.Cucu@cpuc.ca.gov](mailto:Mihail.Cucu@cpuc.ca.gov)>; Patricia Cirucci <[Patricia.Cirucci@sce.com](mailto:Patricia.Cirucci@sce.com)>  
**Subject:** RE: (External):RE: [EXTERNAL] RE: (External):Data Request SED-SCE-001 Fairview Fire

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Good afternoon, Emily.

In follow-up to this afternoon’s call and pursuant to SED’s request thereon, please accept this email as SCE’s request for an extension of time to provide responses to Data Request SED-SCE-001 Fairview Fire, in accordance with the dates set forth below:

Question Nos.	Expected Production Date	Reason
<b>1, 10, 12, 15, 18, 19, 21, 22 &amp; 25</b> <i>(9 total)</i>	<b>3/24/23</b>	Pending execution of confidentiality declaration
<b>5, 6, 9, 26-29, 31-38, 40-45, 47, 48, 50, 54</b> <i>(25 total)</i>	<b>3/30/23</b>	Final review in process
<b>4, 7, 11, 13, 30, 39, 46, 49, 51-53, 55</b> <i>(12 total)</i>	<b>4/05/23</b>	Confirming complete information/documents; review process
<b>8</b>	<b>TBD</b>	<i>Need to meet &amp; confer w/ SED re: request (See 2/10/23 A. Hickerson email to E. Fisher)</i>

In order to get these responses out to you as quickly as possible, the above dates reflect when we expect to provide SED with the initial responses without Bates stamping. Bates stamping and adding overlays takes an additional 3 to 4 business days as it involves sending documents to an outside vendor to complete. Bates stamped responses will be sent under separate cover once stamping is completed.

Please let me know if you have any questions or wish to discuss further. Please also let me know your availability for a brief call regarding Question 8, as noted above.

Thank you!

**Ms. Aneiko L. Hickerson**

Senior Attorney

**Law Department | Claims Litigation**

2244 Walnut Grove Avenue | Post Office Box 800 | Rosemead, CA 91770

T. 626-302-2812 | PAX 22812



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**From:** Fisher, Emily <[Emily.Fisher@cpuc.ca.gov](mailto:Emily.Fisher@cpuc.ca.gov)>  
**Sent:** Wednesday, March 22, 2023 6:33 PM  
**To:** Aneiko L Hickerson <[aneiko.hickerson@sce.com](mailto:aneiko.hickerson@sce.com)>  
**Cc:** Perez, Martha <[Martha.Perez@cpuc.ca.gov](mailto:Martha.Perez@cpuc.ca.gov)>; Labagh, Layla <[Layla.Labagh@cpuc.ca.gov](mailto:Layla.Labagh@cpuc.ca.gov)>; Singh, Devla <[devla.singh@cpuc.ca.gov](mailto:devla.singh@cpuc.ca.gov)>; Yip-Kikugawa, Amy C. <[amy.yip-kikugawa@cpuc.ca.gov](mailto:amy.yip-kikugawa@cpuc.ca.gov)>; Turner, Kate <[Kate.Turner@cpuc.ca.gov](mailto:Kate.Turner@cpuc.ca.gov)>; June Bote <[June.Bote@sce.com](mailto:June.Bote@sce.com)>  
**Subject:** RE: (External):RE: [EXTERNAL] RE: (External):Data Request SED-SCE-001 Fairview Fire

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Hi Aneiko,

Thanks, I'm glad Rita will be able to join!

I meant to send this earlier today and got sidetracked – SED put together a spreadsheet charting what responses are still outstanding for reference on the call. Let me know if you have any questions before then – otherwise, looking forward to talking with you tomorrow.

Thanks,  
Emily

**Emily Fisher**  
*Staff Counsel*

California Public Utilities Commission  
**Phone:** (415) 703-1327

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---

**From:** Aneiko L Hickerson <[aneiko.hickerson@sce.com](mailto:aneiko.hickerson@sce.com)>  
**Sent:** Wednesday, March 22, 2023 4:04 PM  
**To:** Fisher, Emily <[Emily.Fisher@cpuc.ca.gov](mailto:Emily.Fisher@cpuc.ca.gov)>  
**Cc:** Perez, Martha <[Martha.Perez@cpuc.ca.gov](mailto:Martha.Perez@cpuc.ca.gov)>; Labagh, Layla <[Layla.Labagh@cpuc.ca.gov](mailto:Layla.Labagh@cpuc.ca.gov)>; Singh, Devla <[devla.singh@cpuc.ca.gov](mailto:devla.singh@cpuc.ca.gov)>; Yip-Kikugawa, Amy C. <[amy.yip-kikugawa@cpuc.ca.gov](mailto:amy.yip-kikugawa@cpuc.ca.gov)>; Turner, Kate <[Kate.Turner@cpuc.ca.gov](mailto:Kate.Turner@cpuc.ca.gov)>; June Bote <[June.Bote@sce.com](mailto:June.Bote@sce.com)>  
**Subject:** RE: (External):RE: [EXTERNAL] RE: (External):Data Request SED-SCE-001 Fairview Fire

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Hi Emily.

Just FYI, I anticipate Margarita (Rita) Gevondyan will join tomorrow's call as well. I have forwarded the calendar invitation to her.

Thank you.

**Ms. Aneiko L. Hickerson**

Senior Attorney

**Law Department | Claims Litigation**

2244 Walnut Grove Avenue | Post Office Box 800 | Rosemead, CA 91770

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**From:** Aneiko L Hickerson  
**Sent:** Friday, March 10, 2023 5:26 PM  
**To:** Fisher, Emily <[Emily.Fisher@cpuc.ca.gov](mailto:Emily.Fisher@cpuc.ca.gov)>  
**Cc:** Perez, Martha <[Martha.Perez@cpuc.ca.gov](mailto:Martha.Perez@cpuc.ca.gov)>; Labagh, Layla <[Layla.Labagh@cpuc.ca.gov](mailto:Layla.Labagh@cpuc.ca.gov)>; Singh, Devla <[devla.singh@cpuc.ca.gov](mailto:devla.singh@cpuc.ca.gov)>; Yip-Kikugawa, Amy C. <[amy.yip-kikugawa@cpuc.ca.gov](mailto:amy.yip-kikugawa@cpuc.ca.gov)>; Turner, Kate <[Kate.Turner@cpuc.ca.gov](mailto:Kate.Turner@cpuc.ca.gov)>; June Bote <[June.Bote@sce.com](mailto:June.Bote@sce.com)>  
**Subject:** RE: (External):RE: [EXTERNAL] RE: (External):Data Request SED-SCE-001 Fairview Fire

Hi Emily.

Regarding the 3/23 call, please also include/invite:

Patricia A. Cirucci (Trish)  
Director and Managing Attorney  
Claims and General Litigation  
[Patricia.Cirucci@sce.com](mailto:Patricia.Cirucci@sce.com)

Thank you!

**Ms. Aneiko L. Hickerson**

Senior Attorney

**Law Department | Claims & General Litigation**

2244 Walnut Grove Avenue | Post Office Box 800 | Rosemead, CA 91770

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**From:** Aneiko L Hickerson

**Sent:** Thursday, March 9, 2023 8:29 PM

**To:** Fisher, Emily <[Emily.Fisher@cpuc.ca.gov](mailto:Emily.Fisher@cpuc.ca.gov)>

**Cc:** Perez, Martha <[Martha.Perez@cpuc.ca.gov](mailto:Martha.Perez@cpuc.ca.gov)>; Labagh, Layla <[Layla.Labagh@cpuc.ca.gov](mailto:Layla.Labagh@cpuc.ca.gov)>; Singh, Devla <[devla.singh@cpuc.ca.gov](mailto:devla.singh@cpuc.ca.gov)>; Yip-Kikugawa, Amy C. <[amy.yip-kikugawa@cpuc.ca.gov](mailto:amy.yip-kikugawa@cpuc.ca.gov)>; Turner, Kate <[Kate.Turner@cpuc.ca.gov](mailto:Kate.Turner@cpuc.ca.gov)>; June Bote <[June.Bote@sce.com](mailto:June.Bote@sce.com)>

**Subject:** RE: (External):RE: [EXTERNAL] RE: (External):Data Request SED-SCE-001 Fairview Fire

Thank you, Emily!

For now, please just include June Bote (in case she's able to join) and me. I will let you know in advance of 3/23 if anyone else should be added.

If we aren't in touch again sooner, please have a wonderful weekend.

**Ms. Aneiko L. Hickerson**

Senior Attorney

**Law Department | Claims & General Litigation**

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**From:** Fisher, Emily <[Emily.Fisher@cpuc.ca.gov](mailto:Emily.Fisher@cpuc.ca.gov)>

**Sent:** Thursday, March 9, 2023 10:18 AM

**To:** Aneiko L Hickerson <[aneiko.hickerson@sce.com](mailto:aneiko.hickerson@sce.com)>

**Cc:** Perez, Martha <[Martha.Perez@cpuc.ca.gov](mailto:Martha.Perez@cpuc.ca.gov)>; Labagh, Layla <[Layla.Labagh@cpuc.ca.gov](mailto:Layla.Labagh@cpuc.ca.gov)>; Singh, Devla <[devla.singh@cpuc.ca.gov](mailto:devla.singh@cpuc.ca.gov)>; Yip-Kikugawa, Amy C. <[amy.yip-kikugawa@cpuc.ca.gov](mailto:amy.yip-kikugawa@cpuc.ca.gov)>; Turner, Kate

<[Kate.Turner@cpuc.ca.gov](mailto:Kate.Turner@cpuc.ca.gov)>; June Bote <[June.Bote@sce.com](mailto:June.Bote@sce.com)>

**Subject:** RE: (External):RE: [EXTERNAL] RE: (External):Data Request SED-SCE-001 Fairview Fire

**\*\*\* EXTERNAL EMAIL - Use caution when opening links or attachments \*\*\***

Hi Aneiko,

It sounds like Thursday March 23 at 2:00pm would work well on our end. I can send out an invite – anyone else on your team I should include?

**Emily Fisher**  
*Staff Counsel*

California Public Utilities Commission  
**Phone:** (415) 703-1327

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---

**From:** Aneiko L Hickerson <[aneiko.hickerson@sce.com](mailto:aneiko.hickerson@sce.com)>

**Sent:** Wednesday, March 8, 2023 10:43 AM

**To:** Fisher, Emily <[Emily.Fisher@cpuc.ca.gov](mailto:Emily.Fisher@cpuc.ca.gov)>

**Cc:** Perez, Martha <[Martha.Perez@cpuc.ca.gov](mailto:Martha.Perez@cpuc.ca.gov)>; Labagh, Layla <[Layla.Labagh@cpuc.ca.gov](mailto:Layla.Labagh@cpuc.ca.gov)>; Singh, Devla <[devla.singh@cpuc.ca.gov](mailto:devla.singh@cpuc.ca.gov)>; Yip-Kikugawa, Amy C. <[amy.yip-kikugawa@cpuc.ca.gov](mailto:amy.yip-kikugawa@cpuc.ca.gov)>; Turner, Kate <[Kate.Turner@cpuc.ca.gov](mailto:Kate.Turner@cpuc.ca.gov)>; June Bote <[June.Bote@sce.com](mailto:June.Bote@sce.com)>

**Subject:** RE: (External):RE: [EXTERNAL] RE: (External):Data Request SED-SCE-001 Fairview Fire

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Dear Emily,

Thank you so very much for your kind and thoughtful sentiments. I truly appreciate it. Please continue to communicate with June and me and we will of course let you know if there is any change to that.

Regarding the week of 3/20, as of right now, the following would work best for me:

- Wednesday, 3/22 – anytime between 9:30 a.m. and 1:30 p.m.
- Thursday, 3/23 – anytime between 9:00 a.m. and 3:00 p.m.

Please let me know if either day works on your end. Thank you again.

Sincerely,

Aneiko

**Ms. Aneiko L. Hickerson**  
Senior Attorney



**Law Department | Claims & General Litigation**

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**From:** Fisher, Emily <[Emily.Fisher@cpuc.ca.gov](mailto:Emily.Fisher@cpuc.ca.gov)>

**Sent:** Tuesday, March 7, 2023 4:00 PM

**To:** Aneiko L Hickerson <[aneiko.hickerson@sce.com](mailto:aneiko.hickerson@sce.com)>

**Cc:** Perez, Martha <[Martha.Perez@cpuc.ca.gov](mailto:Martha.Perez@cpuc.ca.gov)>; Labagh, Layla <[Layla.Labagh@cpuc.ca.gov](mailto:Layla.Labagh@cpuc.ca.gov)>; Singh, Devla <[devla.singh@cpuc.ca.gov](mailto:devla.singh@cpuc.ca.gov)>; Yip-Kikugawa, Amy C. <[amy.yip-kikugawa@cpuc.ca.gov](mailto:amy.yip-kikugawa@cpuc.ca.gov)>; Turner, Kate <[Kate.Turner@cpuc.ca.gov](mailto:Kate.Turner@cpuc.ca.gov)>; June Bote <[June.Bote@sce.com](mailto:June.Bote@sce.com)>

**Subject:** RE: (External):RE: [EXTERNAL] RE: (External):Data Request SED-SCE-001 Fairview Fire

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Hi Aneiko,

We are so sorry to hear about your loss. It sounds like it's been a really, really difficult time over the past few weeks – with that in mind, please let us know if you prefer that we communicate with one of your colleagues regarding data request responses for the time being, or if there is anything else we can do to be supportive.

Looking ahead a bit, we would like to schedule a meet and confer call with SCE to go over what responses are still needed at that point and address some past concerns SED has had with response timing/communication of need for extensions, etc. We'd like to propose scheduling the call for some time during the week of March 20 if that is feasible. Could you or June let me know if that would work, and if so, what days/times would be preferable?

Thanks – again, our condolences for your loss, and best wishes for ongoing recovery.

Emily

**Emily Fisher**

*Staff Counsel*

California Public Utilities Commission

**Phone:** (415) 703-1327

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---

**From:** Singh, Devla <[devla.singh@cpuc.ca.gov](mailto:devla.singh@cpuc.ca.gov)>

**Sent:** Friday, February 24, 2023 11:38 AM

**To:** June Bote <[June.Bote@sce.com](mailto:June.Bote@sce.com)>; Aneiko L Hickerson <[aneiko.hickerson@sce.com](mailto:aneiko.hickerson@sce.com)>  
**Cc:** Cucu, Mihail <[Mihail.Cucu@cpuc.ca.gov](mailto:Mihail.Cucu@cpuc.ca.gov)>; Dundon, Will <[Will.Dundon@cpuc.ca.gov](mailto:Will.Dundon@cpuc.ca.gov)>; Chase, Shelby <[Shelby.Chase@cpuc.ca.gov](mailto:Shelby.Chase@cpuc.ca.gov)>; Perez, Martha <[Martha.Perez@cpuc.ca.gov](mailto:Martha.Perez@cpuc.ca.gov)>; Labagh, Layla <[Layla.Labagh@cpuc.ca.gov](mailto:Layla.Labagh@cpuc.ca.gov)>; Paul Pimentel <[Paul.Pimentel@sce.com](mailto:Paul.Pimentel@sce.com)>; Bernice Cordero <[Bernice.Cordero@sce.com](mailto:Bernice.Cordero@sce.com)>; Robert Ramos <[Robert.Ramos@sce.com](mailto:Robert.Ramos@sce.com)>; Fisher, Emily <[Emily.Fisher@cpuc.ca.gov](mailto:Emily.Fisher@cpuc.ca.gov)>  
**Subject:** RE: (External):RE: [EXTERNAL] RE: (External):Data Request SED-SCE-001 Fairview Fire

Hi June and Aneiko,

SCE should provide an official request for extension to CPUC with the reasons for the delay and expected dates of data request responses. It is unacceptable for SCE to just give SED prolonged timings for Data Request questions to be answered in the future. We have addressed a similar matter with Aneiko in the past for another SCE Wildfire.

Please provide all responses to SED Data Request questions by March 1<sup>st</sup>, 2023, or we should schedule a meet and confer on the continued issues with SCE's non-response and delayed timing on DR responses.

***Devla Singh***

Program and Project Supervisor – Safety Enforcement Division  
Wildfire Safety Enforcement Branch  
California Public Utilities Commission  
(Cell) 415-264-8699  
[devla.singh@cpuc.ca.gov](mailto:devla.singh@cpuc.ca.gov)

---

**From:** June Bote <[June.Bote@sce.com](mailto:June.Bote@sce.com)>  
**Sent:** Friday, February 24, 2023 11:02 AM  
**To:** Aneiko L Hickerson <[aneiko.hickerson@sce.com](mailto:aneiko.hickerson@sce.com)>; Fisher, Emily <[Emily.Fisher@cpuc.ca.gov](mailto:Emily.Fisher@cpuc.ca.gov)>  
**Cc:** Cucu, Mihail <[Mihail.Cucu@cpuc.ca.gov](mailto:Mihail.Cucu@cpuc.ca.gov)>; Dundon, Will <[Will.Dundon@cpuc.ca.gov](mailto:Will.Dundon@cpuc.ca.gov)>; Chase, Shelby <[Shelby.Chase@cpuc.ca.gov](mailto:Shelby.Chase@cpuc.ca.gov)>; Singh, Devla <[devla.singh@cpuc.ca.gov](mailto:devla.singh@cpuc.ca.gov)>; Perez, Martha <[Martha.Perez@cpuc.ca.gov](mailto:Martha.Perez@cpuc.ca.gov)>; Labagh, Layla <[Layla.Labagh@cpuc.ca.gov](mailto:Layla.Labagh@cpuc.ca.gov)>; Paul Pimentel <[Paul.Pimentel@sce.com](mailto:Paul.Pimentel@sce.com)>; Bernice Cordero <[Bernice.Cordero@sce.com](mailto:Bernice.Cordero@sce.com)>; Robert Ramos <[Robert.Ramos@sce.com](mailto:Robert.Ramos@sce.com)>  
**Subject:** RE: (External):RE: [EXTERNAL] RE: (External):Data Request SED-SCE-001 Fairview Fire

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Hi Ms. Fisher,

Wanted to send over a note in regards to our estimates below and acknowledge that we still have some responses due for Fairview. Our team encountered an unexpected delay and will provide a timing update towards the end of next week. Thank you for your understanding.

Please let me know if you have any questions.

Thank you.

June

**From:** Aneiko L Hickerson <[aneiko.hickerson@sce.com](mailto:aneiko.hickerson@sce.com)>

**Sent:** Friday, February 10, 2023 5:14 PM

**To:** Fisher, Emily <[Emily.Fisher@cpuc.ca.gov](mailto:Emily.Fisher@cpuc.ca.gov)>

**Cc:** Cucu, Mihail <[Mihail.Cucu@cpuc.ca.gov](mailto:Mihail.Cucu@cpuc.ca.gov)>; Dundon, Will <[Will.Dundon@cpuc.ca.gov](mailto:Will.Dundon@cpuc.ca.gov)>; Chase, Shelby <[Shelby.Chase@cpuc.ca.gov](mailto:Shelby.Chase@cpuc.ca.gov)>; Singh, Devla <[devla.singh@cpuc.ca.gov](mailto:devla.singh@cpuc.ca.gov)>; Perez, Martha <[Martha.Perez@cpuc.ca.gov](mailto:Martha.Perez@cpuc.ca.gov)>; Labagh, Layla <[Layla.Labagh@cpuc.ca.gov](mailto:Layla.Labagh@cpuc.ca.gov)>; June Bote <[June.Bote@sce.com](mailto:June.Bote@sce.com)>; Paul Pimentel <[Paul.Pimentel@sce.com](mailto:Paul.Pimentel@sce.com)>; Bernice Cordero <[Bernice.Cordero@sce.com](mailto:Bernice.Cordero@sce.com)>; Robert Ramos <[Robert.Ramos@sce.com](mailto:Robert.Ramos@sce.com)>

**Subject:** RE: (External):RE: [EXTERNAL] RE: (External):Data Request SED-SCE-001 Fairview Fire

Dear Ms. Fisher:

Please accept this email as further/revised update on the status of the responses to this data request set that are currently outstanding.

As of this afternoon, below is our estimated timeline for providing the remaining responses:

Question Nos.	Estimated Date
10-12, 14, 15, 18, 19, 21, 22, 25	2/17/23
5, 6, 9, 13, 20, 23, 26-29, 31-45, 47, 48, 50, 54	2/24/23
4, 7, 30, 49, 51, 55	2/28/23
8	<i>See below</i>

As is always the case, we are working to gather responsive data and provide these responses as quickly as possible. Please understand, however, we are experiencing limited resources due to the current number of open sets of Data Requests from SED and the fact that SCE personnel involved in gathering the responsive data/information and preparing responses to the requests are all doing so in addition to our regular job duties. Your patience and understanding is truly appreciated.

Regarding **Question No. 8**, we are unable to respond to the question as phrased, and I would like to further discuss this with you. Please let me know if you have any availability for a call Tuesday, 2/14, Thursday, 2/16 or Friday, 2/17, anytime between 9:30 a.m. and 2 p.m.

Thank you and have a wonderful weekend!

Aneiko

**Ms. Aneiko L. Hickerson**

Senior Attorney

Law Department | Claims & General Litigation

2244 Walnut Grove Avenue | Post Office Box 800 | Rosemead, CA 91770

T. 626-302-2812 | PAX 22812



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**From:** Aneiko L Hickerson  
**Sent:** Friday, January 20, 2023 5:31 PM  
**To:** Fisher, Emily <[Emily.Fisher@cpuc.ca.gov](mailto:Emily.Fisher@cpuc.ca.gov)>  
**Cc:** Cucu, Mihail <[Mihail.Cucu@cpuc.ca.gov](mailto:Mihail.Cucu@cpuc.ca.gov)>; Dundon, Will <[Will.Dundon@cpuc.ca.gov](mailto:Will.Dundon@cpuc.ca.gov)>; Chase, Shelby <[Shelby.Chase@cpuc.ca.gov](mailto:Shelby.Chase@cpuc.ca.gov)>; Singh, Devla <[devla.singh@cpuc.ca.gov](mailto:devla.singh@cpuc.ca.gov)>; Perez, Martha <[Martha.Perez@cpuc.ca.gov](mailto:Martha.Perez@cpuc.ca.gov)>; Labagh, Layla <[Layla.Labagh@cpuc.ca.gov](mailto:Layla.Labagh@cpuc.ca.gov)>; June Bote <[June.Bote@sce.com](mailto:June.Bote@sce.com)>; Paul Pimentel <[Paul.Pimentel@sce.com](mailto:Paul.Pimentel@sce.com)>; Bernice Cordero <[Bernice.Cordero@sce.com](mailto:Bernice.Cordero@sce.com)>; Robert Ramos <[Robert.Ramos@sce.com](mailto:Robert.Ramos@sce.com)>  
**Subject:** RE: (External):RE: [EXTERNAL] RE: (External):Data Request SED-SCE-001 Fairview Fire

Dear Ms. Fisher:

Please allow this email to serve as an update on the status of providing responses for Fairview Fire Data Request Set-001.

As of our most recent assessment of the status of gathering responsive data and documents, the following list provides our anticipated data request response dates, as of this afternoon:

Question Nos.	Date
1-3, 12, 16-17, 20, 22-24	1/30/23
18, 21, 25-29, 36-37, 40-42, 44-45	2/6/23

In order to get these responses out to you as quickly as possible, they will initially be provided without Bates stamping. Bates stamping and adding overlays takes an additional 3 to 4 business days as it involves sending documents to an outside vendor to complete.

You have my assurance that we are diligently working to gather relevant data and process the same as quickly as possible. However, in the event we are not able to provide the above-referenced responses as indicated, we intend to provide SED with a further update accordingly. As for the remaining responses not identified above, I intend to provide you with a further update no later than Thursday, 1/26.

We truly appreciate SED's continued patience in this process. As you know, SCE takes its obligation to respond to these requests very seriously and, again, I can assure you we are working diligently to provide SED with complete and accurate information as quickly as possible. Please let me know if you have any questions or concerns.

Thank you and have a wonderful weekend!

Aneiko

**Ms. Aneiko L. Hickerson**  
Senior Attorney  
Law Department | Claims & General Litigation



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**From:** Fisher, Emily <[Emily.Fisher@cpuc.ca.gov](mailto:Emily.Fisher@cpuc.ca.gov)>  
**Sent:** Friday, December 23, 2022 11:23 AM  
**To:** Aneiko L Hickerson <[aneiko.hickerson@sce.com](mailto:aneiko.hickerson@sce.com)>  
**Cc:** Cucu, Mihail <[Mihail.Cucu@cpuc.ca.gov](mailto:Mihail.Cucu@cpuc.ca.gov)>; Dundon, Will <[Will.Dundon@cpuc.ca.gov](mailto:Will.Dundon@cpuc.ca.gov)>; Chase, Shelby <[Shelby.Chase@cpuc.ca.gov](mailto:Shelby.Chase@cpuc.ca.gov)>; Singh, Devla <[devla.singh@cpuc.ca.gov](mailto:devla.singh@cpuc.ca.gov)>; Perez, Martha <[Martha.Perez@cpuc.ca.gov](mailto:Martha.Perez@cpuc.ca.gov)>; Labagh, Layla <[Layla.Labagh@cpuc.ca.gov](mailto:Layla.Labagh@cpuc.ca.gov)>; June Bote <[June.Bote@sce.com](mailto:June.Bote@sce.com)>; Paul Pimentel <[Paul.Pimentel@sce.com](mailto:Paul.Pimentel@sce.com)>; Bernice Cordero <[Bernice.Cordero@sce.com](mailto:Bernice.Cordero@sce.com)>; Robert Ramos <[Robert.Ramos@sce.com](mailto:Robert.Ramos@sce.com)>  
**Subject:** (External):RE: [EXTERNAL] RE: (External):Data Request SED-SCE-001 Fairview Fire

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Thanks Aneiko – we'll make a note of that going forward.

Thank you,

**Emily Fisher**  
*Staff Counsel*

California Public Utilities Commission  
**Phone:** (415) 703-1327

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---

**From:** Aneiko L Hickerson <[aneiko.hickerson@sce.com](mailto:aneiko.hickerson@sce.com)>  
**Sent:** Thursday, December 22, 2022 5:01 PM  
**To:** Fisher, Emily <[Emily.Fisher@cpuc.ca.gov](mailto:Emily.Fisher@cpuc.ca.gov)>  
**Cc:** Cucu, Mihail <[Mihail.Cucu@cpuc.ca.gov](mailto:Mihail.Cucu@cpuc.ca.gov)>; Dundon, Will <[Will.Dundon@cpuc.ca.gov](mailto:Will.Dundon@cpuc.ca.gov)>; Chase, Shelby <[Shelby.Chase@cpuc.ca.gov](mailto:Shelby.Chase@cpuc.ca.gov)>; Singh, Devla <[devla.singh@cpuc.ca.gov](mailto:devla.singh@cpuc.ca.gov)>; Perez, Martha <[Martha.Perez@cpuc.ca.gov](mailto:Martha.Perez@cpuc.ca.gov)>; Labagh, Layla <[Layla.Labagh@cpuc.ca.gov](mailto:Layla.Labagh@cpuc.ca.gov)>; June Bote <[June.Bote@sce.com](mailto:June.Bote@sce.com)>; Paul Pimentel <[Paul.Pimentel@sce.com](mailto:Paul.Pimentel@sce.com)>; Bernice Cordero <[Bernice.Cordero@sce.com](mailto:Bernice.Cordero@sce.com)>; Robert Ramos <[Robert.Ramos@sce.com](mailto:Robert.Ramos@sce.com)>  
**Subject:** [EXTERNAL] RE: (External):Data Request SED-SCE-001 Fairview Fire

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Hi again, Ms. Fisher and All.

As a quick note, going forward, in addition to myself, please copy the following SCE personnel on wildfire related data request communications:

Paul Pimentel [Paul.Pimentel@sce.com](mailto:Paul.Pimentel@sce.com)  
Bernice Cordero [Bernice.Cordero@sce.com](mailto:Bernice.Cordero@sce.com)  
Robert Ramos [Robert.Ramos@sce.com](mailto:Robert.Ramos@sce.com)  
June Bote [June.Bote@sce.com](mailto:June.Bote@sce.com)

Please remove Scott Hayashi.

Thank you!

A handwritten signature in black ink that reads "Aneiko L. Hickerson". The signature is fluid and cursive. To the right of the signature, the letters "H.A.F." are printed in a small, sans-serif font.

**Ms. Aneiko L. Hickerson**

Senior Attorney

**Law Department | Claims & General Litigation**

2244 Walnut Grove Avenue | Post Office Box 800 | Rosemead, CA 91770  
T. 626-302-2812 | PAX 22812

**Upcoming Out of Office Dates: 12/26/2022 – 01/02/2023**



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---

**From:** Aneiko L Hickerson

**Sent:** Thursday, December 22, 2022 4:38 PM

**To:** Fisher, Emily <[Emily.Fisher@cpuc.ca.gov](mailto:Emily.Fisher@cpuc.ca.gov)>

**Cc:** Cucu, Mihail <[Mihail.Cucu@cpuc.ca.gov](mailto:Mihail.Cucu@cpuc.ca.gov)>; Dundon, Will <[Will.Dundon@cpuc.ca.gov](mailto:Will.Dundon@cpuc.ca.gov)>; Chase, Shelby <[Shelby.Chase@cpuc.ca.gov](mailto:Shelby.Chase@cpuc.ca.gov)>; Singh, Devla <[devla.singh@cpuc.ca.gov](mailto:devla.singh@cpuc.ca.gov)>; Perez, Martha <[Martha.Perez@cpuc.ca.gov](mailto:Martha.Perez@cpuc.ca.gov)>; Labagh, Layla <[Layla.Labagh@cpuc.ca.gov](mailto:Layla.Labagh@cpuc.ca.gov)>; Scott Hayashi <[Scott.Hayashi@sce.com](mailto:Scott.Hayashi@sce.com)>; June Bote <[June.Bote@sce.com](mailto:June.Bote@sce.com)>; Paul Pimentel <[Paul.Pimentel@sce.com](mailto:Paul.Pimentel@sce.com)>

**Subject:** FW: (External):Data Request SED-SCE-001 Fairview Fire

Hello, Ms. Fisher.

This email is to acknowledge receipt of this Data Request set – SED-001-Fairview Fire.

We will be handling these requests in similar fashion to how we have handled other Data Request sets (e.g., Coastal Fire, Ridge Fire). The process will begin with us contacting all of our subject matter experts to get an idea of when we will be able to obtain the information sought. As soon as we have more information regarding proposed dates, we will let you know. Please be aware that we are currently experiencing delays as many people are out of the office/on vacation due to the holidays.

I presume that SEC would like a rolling production, which will involve producing the Data Request responses as soon as we are able to (in groups), as opposed to waiting for a complete set of responses. If this is not correct, please let me know. I am also presuming that SED would like us to Bates stamp our responses and provide an index, similar to what we have done in the past. Again, if this is not the case please let me know.

As for information/documents to be produced and any applicable objections SCE may have, we intend on providing similar types of responses and objections as we've done for our prior responses such as for the Coastal and Bobcat fires.

If you have any questions or concerns, please do not hesitate to contact me. Otherwise, I will follow-up with you as soon as I have more information and am able to provide you with a further update about timing.

Thank you!

Aneiko



**Ms. Aneiko L. Hickerson**

Senior Attorney

**Law Department | Claims & General Litigation**

2244 Walnut Grove Avenue | Post Office Box 800 | Rosemead, CA 91770

T. 626-302-2812 | PAX 22812

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---

**From:** Fisher, Emily <[Emily.Fisher@cpuc.ca.gov](mailto:Emily.Fisher@cpuc.ca.gov)>

**Sent:** Thursday, December 22, 2022 4:30 PM

**To:** Aneiko L Hickerson <[aneiko.hickerson@sce.com](mailto:aneiko.hickerson@sce.com)>

**Cc:** Cucu, Mihail <[Mihail.Cucu@cpuc.ca.gov](mailto:Mihail.Cucu@cpuc.ca.gov)>; Dundon, Will <[Will.Dundon@cpuc.ca.gov](mailto:Will.Dundon@cpuc.ca.gov)>; Chase, Shelby <[Shelby.Chase@cpuc.ca.gov](mailto:Shelby.Chase@cpuc.ca.gov)>; Singh, Devla <[devla.singh@cpuc.ca.gov](mailto:devla.singh@cpuc.ca.gov)>; Perez, Martha <[Martha.Perez@cpuc.ca.gov](mailto:Martha.Perez@cpuc.ca.gov)>; Labagh, Layla <[Layla.Labagh@cpuc.ca.gov](mailto:Layla.Labagh@cpuc.ca.gov)>; Scott Hayashi <[Scott.Hayashi@sce.com](mailto:Scott.Hayashi@sce.com)>; June Bote <[June.Bote@sce.com](mailto:June.Bote@sce.com)>; Paul Pimentel <[Paul.Pimentel@sce.com](mailto:Paul.Pimentel@sce.com)>

**Subject:** (External):Data Request SED-SCE-001 Fairview Fire

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**\*\*\* EXTERNAL EMAIL WITH ATTACHMENT - BE CAREFUL NOT TO OPEN IF THIS DOCUMENT IS NOT EXPECTED OR TRUSTED \*\*\***

Dear Mr. Pimentel and Ms. Hickerson:

Please reference the attached Data Request SED-SCE-001 Fairview Fire. The CPUC requires the attached information to further investigate the Fairview Fire Incident, and asks that SCE provide the requested information and documents **on or before January 26, 2023**.

Please let us know if you have any questions or concerns.

Thank you,

**Emily Fisher**  
*Staff Counsel*

California Public Utilities Commission  
**Phone:** (415) 703-1327

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# EXHIBIT D

## Aneiko L Hickerson

---

**From:** Yip-Kikugawa, Amy C. <amy.yip-kikugawa@cpuc.ca.gov>  
**Sent:** Friday, March 24, 2023 4:48 PM  
**To:** Aneiko L Hickerson  
**Cc:** Fisher, Emily; Labagh, Layla; Perez, Martha; Turner, Kate; Singh, Devla; Patricia Cirucci; June Bote  
**Subject:** (External):Bates Stamping of Data Responses

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Hi Aneiko,

SED has discussed the Bates stamping of SCE's data responses. Instead of Bates stamping each set of data responses as they are submitted to SED, we propose that the following process be adopted for all data requests:

1. SCE will provide initial responses to questions, without Bates stamping, as soon as they are completed. For the Fairview, Middle, Silverado, Emerald and Ridge Fires, these initial responses will be in accordance with the schedule you provided to SED yesterday.
2. Once SCE has responded to all questions in the data request, SCE will Bates stamp its responses in question order, not in the order the responses were provided to SED, and submit to SED. Please confirm that Bates stamping all the responses to the data request at one time (as opposed to on a rolling basis) could still be completed within 3-4 business days.

Please let me know if you have any questions regarding the proposed procedure.

Thanks,  
Amy

**Amy C. Yip-Kikugawa**

*Assistant General Counsel – Legal Division*

California Public Utilities Commission  
505 Van Ness Avenue, San Francisco CA 94102

Phone: 415-703-5256 Mobile: 415-308-7388

Email: [amy.yip-kikugawa@cpuc.ca.gov](mailto:amy.yip-kikugawa@cpuc.ca.gov)