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**Exhibit HYM-6**

*Southern California Edison*  
2007 Malibu Canyon Fire OII 1.09-01-018

**DATA REQUEST SET Malibu Fire CPSD-01**

To: CPSD  
Prepared by: Jeff Billingsley  
Title: Manager of Transmission Asset Management  
Dated: 06/04/2009

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**Question 03:**

Provide each and all wind load safety calculations done between January 1, 1990 to October 30, 2007 for any of the three poles that broke in October 2007, and identify clearly when the calculation provided was made. Provide such calculations regardless of whether SCE or agents, or whether another entity, made the calculations.

**Response to Question 03:**

SCE previously provided CPSD with materials responsive to this question. Please refer to the document pages bearing Bates numbers SCE 000778 - 000787. Approximate date of calculation, August/September 2003.

*Southern California Edison*  
2007 Malibu Canyon Fire OII I.09-01-018

**DATA REQUEST SET Malibu Fire CPSD-01**

**To: CPSD**  
**Prepared by: Jeff Billingsley**  
**Title: Manager of Transmission Asset Management**  
**Dated: 06/04/2009**

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**Question 35:**

Provide all wind load calculations or analyses done by anyone from January 1, 1990 through October 23, 2007 that relate any of the three subject poles and planned reconstruction or installation associated with the poles.

**Response to Question 35:**

SCE incorporates by reference documents previously produced. Please refer to documents bearing Bates numbers SCE 000778-000797.



Brian A. Cardoza  
Senior Attorney  
brian.cardoza@sce.com

June 15, 2009

VIA ELECTRONIC MAIL & U.S. MAIL

Mr. Robert C. Cagen  
California Public Utilities Commission  
505 Van Ness Avenue  
San Francisco, CA 94102-3298  
rcc@cpuc.ca.gov

Re: Malibu Fire OIL L09-01-018  
CPSD Date Request No. 1 to SCE, Dated  
June 4, 2009

Dear Bob:

I appreciated the opportunity to speak with you last Friday regarding CPSD's Data Request No. 1 ("CPSD DR 1"), which had been served electronically after close of business, June 4, 2009. On June 5, 2009, I took a vacation day and was not in cellular telephone range to review the document. In the future, please copy my colleague, Robert LeMoine of SCE's Law Department, on discovery requests to ensure prompt delivery.

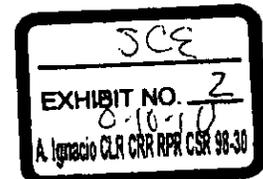
As we discussed, it will not be possible for SCE to provide complete responses to all of the questions in CPSD DR 1 by June 19, 2009. As I explained, several of the questions would require SCE to review all work orders dated within a 17-year period filed in regional and district offices throughout our 50,000 square mile service territory. Even if the information sought in those data requests were relevant to these proceedings (a point we dispute) and not otherwise objectionable, a production of this magnitude would be exceedingly labor-intensive and would take months to complete, assuming the appropriate personnel could be taken off other duties and assigned full-time to work on those data requests.

The purpose of this letter is to both list presently known objections to CPSD DR 1 and request clarification where appropriate. The objections expressed herein are not meant to list all objections SCE may have to CPSD DR 1 as our search for responsive materials is ongoing. With its production, SCE anticipates augmenting the objections set forth below and may set forth general objections to the entire production. Notwithstanding this, SCE identifies the following objections:

Question No. 1

This question seeks wind loading calculations covering a 17-year period for all wood poles in SCE's service territory. SCE objects to this request on the grounds that it is unduly burdensome and seeks

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irrelevant information not reasonably calculated to lead to the discovery of admissible evidence. This question requires pulling all work orders in regional and district offices in our 50,000 square mile territory in search of wind loading calculations. It is estimated that compliance would require thousands of man hours and take months to complete.

**Question Nos. 5 & 6**

These questions seek "retrospective" wind loading calculations regarding the subject poles from January 1, 1990 to October 21, 2007. SCE objects to these requests on the grounds that they are unduly burdensome, prematurely seek expert evaluations which have not been completed, and seek privileged information which is protected from disclosure under the attorney work product doctrine. The CPSD has the burden of proof in this matter and is free to perform such studies as it believes are necessary to meet its evidentiary burden; however, SCE cannot be compelled to perform analytical work for the CPSD. To the extent SCE has retained consultants to perform such studies, the results of those studies will be provided at the appropriate time through SCE's evidentiary showing.

**Question No. 9 (A) - (D)**

This question is similar to No.1 and seeks wind load calculation documentation which may exist throughout SCE's service territory covering the years 2003 - 2007. SCE objects to this request on the same grounds as stated in response to No. 1. In its present form, this question would likewise require the retrieval, review and analysis of all work orders in the service territory. Besides being an unduly burdensome exercise, it would be exceedingly resource-intensive. It is estimated that such an assignment would involve thousands of man hours and take months to complete.

**Question No. 19**

This question seeks materials related to the construction and maintenance of wooden poles in areas of "stronger than average winds than surrounding areas." SCE objects to this question on the ground that it is vague and ambiguous.

**Question No. 23**

This question asks SCE to interpret wind speed data retrieved from the National Weather Service recorded on the date of the incident. SCE objects to this question on the grounds that it prematurely seeks expert evaluations which have not been completed and it seeks privileged information which is protected from disclosure under the attorney work product doctrine.

**Question No. 24**

This question seeks expert analyses regarding wind speeds in Malibu Canyon on October 20, 2007. SCE objects to this question on the grounds that it prematurely seeks expert evaluations which have not been completed and it seeks privileged information which is protected from disclosure under the attorney work product doctrine.

Question No. 25

This question seeks all communications between SCE and its experts. SCE objects to this question on the same grounds as stated in response to No. 24.

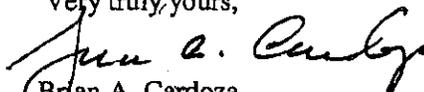
Question No. 28

This question seeks all communications between SCE and other utilities for the 17-year period between January 1, 1990 and October 20, 2007 regarding wind load calculations within our entire service territory. SCE objects to this question on the same grounds as stated in response to No. 1. above. SCE does not maintain a central file in which such general "communications with utilities" are stored. In order to respond to this question, it would be necessary for SCE to review each work order dated within the 17 year period on file in the regional and district offices throughout our 50,000 square mile service territory.

Bob, if CPSD will consider clarifying, refining and narrowing the above questions, I would be willing to work with you to ensure that SCE provides responsive and relevant information which meets CPSD's needs. In the meantime, I believe substantive responses to question nos. 3,4,7,8,10,11,12,13,14,15,16,17,21,22, 26,27,31,32,33 and 35 can be provided by June 19, 2009. Given their broad scope, SCE requests a 30-day extension of time, to July 20, 2009, to respond to the other questions. Such an extension is not unreasonable given the fact that there currently is no scheduling order in place. A thorough review for responsive materials necessarily takes time.

Thank you for your anticipated cooperation in agreeing to SCE's request for an extension and otherwise addressing the points noted above. Please let me know if you have any questions.

Very truly yours,

  
Brian A. Cardoza

## PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298



June 22, 2009

**VIA ELECTRONIC MAIL AND HARD COPY**

Brian A. Cardoza  
Senior Attorney  
2244 Walnut Grove Avenue  
Rosemead, CA 91770

EXCEPTION MAIL

JUN 25 2009

Re: Malibu Fire OII, I.09-01-018,  
CPSD Data Request No. 1 to SCE  
Dated June 4, 2009

CASE ADMINISTRATION  
SCE LAW DEPARTMENT

Dear Brian:

This letter is CPSD's response to your June 15, 2009 letter addressed to me. Your letter makes certain proposals about CPSD's first data request directed to SCE, and also discusses those data requests that SCE agrees to answer as is. We appreciate your letter and proposals, which I will discuss here individually.

First, we cannot accept SCE's apparent proposal to provide additional or augmented objections at a later time, in particular that SCE "may set forth general objections to the entire production". CPSD's June 4 communication requests objections no later than June 15. We don't have the time in the schedule all parties agreed to for multiple sets of discovery objections. CPSD considers the objections that you have stated already as the only ones we will address at this point or later. Therefore to the extent that SCE's June 19 communication raises new objections we are not addressing them here.

CPSD cannot agree to your June 15 request for an extension to July 20 for SCE to respond to certain data requests you identify in your letter. We need to work within the already tight schedule the parties agreed on. We need all responses no later than July 3. If I correctly understand your June 19 communication then SCE and CPSD are in accord about a response date of July 3.

Below CPSD will reproduce SCE's objections and comments to particular data request questions. Our responses will address these matters and where appropriate will offer compromises that CPSD believes should fit both the legitimate interests of CPSD and of SCE.

Question No.1 (SCE discussion)

This question seeks wind loading calculations covering a 17-year period for all wood poles in SCE's service territory. SCE objects to this request on the grounds that it is unduly burdensome and seeks irrelevant information not reasonably calculated to lead to the discovery of admissible evidence. This question requires pulling all work orders in regional and district offices in our 50,000 square mile territory in search of wind loading calculations.

Mr. Brian A. Cardoza  
June 22, 2009  
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It is estimated that compliance would require thousands of man hours and take months to complete.

Question No. 1 (CPSD response)

CPSD requested all wind loading calculations for wood poles in SCE's service territory done from 1990 through 2007. This material is clearly calculated both to lead to admissible evidence and to lead to the discovery of admissible evidence. The time period is the same one we are concerned with in this proceeding. Respondents' practices of wind loading calculation for construction and installation during that period is critical to this case. Particularly because we have very few wind load calculations available for the 3 poles from 1990-2007, despite considerable construction and installation, we need to understand whether this lack of documentation is limited to these poles or is a system characteristic.

Your letter claims a review of 17 years of data is burdensome. Although the information you have provided is insufficient to determine the validity of that claim, we are willing as part of an overall agreement to accept a production of two years of data, for 2003 and for 2007 prior to the incident. If later we find that CPSD needs data for other years, we will request it then.

Question Nos. 5 & 6 (SCE discussion)

These questions seek "retrospective" wind loading calculations regarding the subject poles from January 1, 1990 to October 21, 2007. SCE objects to these requests on the grounds that they are unduly burdensome, prematurely seek expert evaluations which have not been completed, and seek privileged information which is protected from disclosure under the attorney work product doctrine. The CPSD has the burden of proof in this matter and is free to perform such studies as it believes are necessary to meet its evidentiary burden; however, SCE cannot be compelled to perform analytical work for the CPSD. To the extent SCE has retained consultants to perform such studies, the results of those studies will be provided at the appropriate time through SCE's evidentiary showing.

Questions 5 and 6 (CPSD's response)

Question 5 seeks information that is both relevant and unprivileged. A central issue in this proceeding is whether the proper wind load calculations were done at the appropriate times and whether they showed that the poles complied with legal engineering requirements. To date SCE has provided virtually no information to demonstrate that the calculations were made or considered at any time from 1990 to 2007 before construction or reinstallation on the three poles occurred. Using data that should be available or accessible to SCE now, SCE should also be able to reconstruct wind loading calculations to retrospectively demonstrate compliance with the wind loading standards of GO 95. If SCE lacks the information to do so, number 6 requires SCE to state the information that would be needed to make that calculation but is unavailable.

Mr. Brian A. Cardoza  
June 22, 2009  
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Question No. 25 (SCE discussion)

This question seeks all communications between SCE and its experts. SCE objects to this question on the same grounds as stated in response to No. 24.

Question No. 25 (SCE discussion)

CPSD agrees to forego this data request for now, for the same reasons as CPSD agreed to do so for Question No. 24.

Question No. 28 (SCE discussion)

This question seeks all communications between SCE and other utilities for the 17-year period between January 1, 1990 and October 20, 2007 regarding wind load calculations within our entire service territory. SCE objects to this question on the same grounds as stated in response to No. 1 above. SCE does not maintain a central file in which such general "communications with utilities" are stored. In order to respond to this question, it would be necessary for SCE to review each work order dated within the 17 year period on file in the regional and district offices throughout our 50,000 square mile service territory.

Question No. 28 (CPSD response)

Compromising this data request poses a problem. Much of this proceeding rests on the frequency and nature of wind loading communications between and among joint pole owners during the period from 1990 through 2007. This is true both for the three poles at issue and for the system in general.

However, if SCE commits to identifying and producing a knowledgeable Edison employee to testify at a deposition about the nature of written and verbal inter-utility communications about wind loading, CPSD is willing to consider limiting this data request to a search for large projects between 1990 and 2007, and a small and agreed upon sample of other projects. I don't have an idea in mind of "large projects" and am open to your suggestions on this matter.

Brian, please give me a call or e-mail me if you have any questions. Thank you for the opportunity to work this out informally rather than by motion.

Sincerely,



Robert Cagen  
Staff Counsel  
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(415) 703-2197

Cc: James Lehrer, SCE  
Robert F. Lemoine, SCE