



FILED

02-11-11

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Exhibit EDM-3

Southern California Edison
Malibu Fire I.09-01-018

DATA REQUEST SET Malibu Fire CPSD-03 November 29, 2010

Prepared by: SCE Counsel
Witness: Not applicable

Data Request 2-1: Please provide the location of any and all physical or factual evidence under your or your agent's physical control, custody, or possession related to the incident. Identify with particularity each piece of evidence. Provide all measurements and technical specifications of said evidence. Identify with specificity the height/location that said evidence had previously been affixed to the subject poles.

Objection:

Incorporating all general objections, SCE objects to this Request.

SCE objects to this Request because it is vague or ambiguous, or both, and, as such, would require SCE to speculate as to the meaning of the Request.

SCE objects to this Request because it asks questions duplicative of and/or seeks to obtain information, documents or other materials previously provided, requested or otherwise available to the CPSD, and/or are within the possession, custody, or control of the CPSD, and/or are publicly available.

SCE objects to this Request because it calls for excessive time and resources of Respondents to complete, compared to the value of the information sought; compared to alternative, more defined requests; and/or compared to other sources of information available to CPSD.

SCE objects to this Request because it fails to include appropriate limitations as to time, location, or subject matter, and as such, is overbroad. Without such limitations, this Request is unduly burdensome and seek irrelevant information.

Response to Data Request 2-1:

Subject to all objections, SCE responds as follows:

SCE responds that all of the "physical evidence" associated with the failed poles was removed from Malibu Canyon and retained is located in a SCE facility in Westminster, California. The CPSD has already observed this "evidence" during its visit to the Westminster facility and has had continuous access thereto.

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Prepared by: SCE Counsel
Witness: Not applicable

Data Request 2-5: Please provide the name and contact information of any person or entity that has taken possession of any physical evidence removed from the site of the incident. This data request includes persons who came in contact (in any capacity) with the evidence after the incident. Identify all facts, information, documents, evidence, and/or other witnesses that were perceived by the witness, related to this incident, the facilities involved in this incident, the repairs of the facilities related to the incident, and any pole loading calculations/analysis conducted.

Objection:

Incorporating all general objections, SCE objects to this Request.

SCE objects to this Request because it is vague or ambiguous, or both, and, as such, would require SCE to speculate as to the meaning of the Request.

SCE objects to this Request because it asks questions duplicative of and/or seeks to obtain information, documents or other materials previously provided, requested or otherwise available to the CPSD, and/or are within the possession, custody, or control of the CPSD, and/or are publicly available.

SCE objects to this Request because it calls for excessive time and resources of Respondents to complete, compared to the value of the information sought; compared to alternative, more defined requests; and/or compared to other sources of information available to CPSD.

SCE objects to this Request because it fails to include appropriate limitations as to time, location, or subject matter, and as such, is overbroad. Without such limitations, this Request is unduly burdensome and seek irrelevant information.

Response to Data Request 2-5:

Subject to all objections, SCE responds as follows:

SCE responds that all of the “physical evidence” associated with the failed poles removed from Malibu Canyon and retained is located in a SCE facility in Westminster, California. The CPSD has already observed this “evidence” during its visit to the Westminster facility. The evidence was taken into custody under the supervision of Fredrick McCollum.