

Southern California Edison
SONGS OII I.12-10-013

DATA REQUEST SET CDSO/CITIZENS' OVERSIGHT, INC.
Dated: 11/28/17

GENERAL OBJECTIONS

Southern California Edison (“SCE”) objects to the data requests propounded by the Coalition to Decommission San Onofre/Citizens’ Oversight, Inc. (CDSO) on November 28, 2017 (the “Data Requests”), to the extent that they seek information regarding matters not within the scope of the pending proceeding. SCE further objects to the Data Requests to the extent that they seek information that is proprietary, market sensitive, or otherwise protected from public disclosure. SCE will produce such information only pursuant to the Non-Disclosure Agreement (“NDA”) in this proceeding. SCE further objects to the Data Requests to the extent that they seek information that is covered by attorney-client privilege or work product protections. SCE further objects to the Data Requests to the extent that they are vague, ambiguous, and use phrases that are not defined. SCE further objects to the Data Requests to the extent that they seek information that is confidential under the arbitration agreement in International Chamber of Commerce Arbitration Case No. 19784/AFG/RD or under the Purchase Order with Mitsubishi Heavy Industries Ltd. (“Mitsubishi”).

SCE incorporates each of these General Objections into each of its responses below.

RESPONSES AND OBJECTIONS

1. *Question:* Exh. JX-813 AR (Performance Analysis Report) 28 October 2008

Response: Pursuant to instructions from Mitsubishi, SCE designates this document confidential under the NDA and is not permitted to disclose it to parties who have not signed the NDA.

2. Question: Memorial

Response: Pursuant to instructions from Mitsubishi, SCE designates this document confidential under the NDA and is not permitted to disclose it to parties who have not signed the NDA.

3. Question: Exh. JX-271 Revision D of Edison's CDS (Contractual Design Specifications), dated 11 August 2003

Response: On December 12, 2017, Mitsubishi informed SCE that it does not believe that this document contains MHI confidential information. SCE will therefore review this document for confidentiality and privilege and supplement its response promptly.

4. Question: Exh. JX-411

Response: Pursuant to instructions from Mitsubishi, SCE designates this document confidential under the NDA and is not permitted to disclose it to parties who have not signed the NDA.

5. Question: Exh. JX-412

Response: Pursuant to instructions from Mitsubishi, SCE designates this document confidential under the NDA and is not permitted to disclose it to parties who have not signed the NDA.

6. Question: Exh. JX-424

Response: SCE responds that the letter in JX-424 has been previously made publicly available, including at this link:

http://www.songscommunity.com/docs/Nunn_June_2005_letter.pdf

7. Question: Exh. JX-433

Response: Pursuant to instructions from Mitsubishi, SCE designates this document confidential under the NDA and is not permitted to disclose it to parties who have not signed the NDA.

8. Question: Exh. JX-439

Response: Pursuant to instructions from Mitsubishi, SCE designates this document confidential under the NDA and is not permitted to disclose it to parties who have not signed the NDA.

9. Question: Exh. JX-453 29 July 2005 email, Mr. Wilson followed up

Response: Pursuant to instructions from Mitsubishi, SCE designates this document confidential under the NDA and is not permitted to disclose it to parties who have not signed the NDA.

10. Question: Exh. JX-455 See above

Response: Pursuant to instructions from Mitsubishi, SCE designates this document confidential under the NDA and is not permitted to disclose it to parties who have not signed the NDA.

11. Question: Exh. JX-456 The joint presentation

Response: Pursuant to instructions from Mitsubishi, SCE designates this document confidential under the NDA and is not permitted to disclose it to parties who have not signed the NDA.

12. Question: Exh. JX-467

Response: Pursuant to instructions from Mitsubishi, SCE designates this document confidential under the NDA and is not permitted to disclose it to parties who have not signed the NDA.

13. Question: Exh. JX-468 17-20 August 2005 design and technical meeting

Response: Pursuant to instructions from Mitsubishi, SCE designates this document confidential under the NDA and is not permitted to disclose it to parties who have not signed the NDA.

14. Question: Exh. JX-469

Response: Pursuant to instructions from Mitsubishi, SCE designates this document confidential under the NDA and is not permitted to disclose it to parties who have not signed the NDA.

15. Question: Exh. JX-500 15 October 2005, Mr. Langford communicated to MHI

Response: Pursuant to instructions from Mitsubishi, SCE designates this document confidential under the NDA and is not permitted to disclose it to parties who have not signed the NDA.

16. Question: Exh. JX-514

Response: Pursuant to instructions from Mitsubishi, SCE designates this document confidential under the NDA and is not permitted to disclose it to parties who have not signed the NDA.

17. Question: Exh. JX-542

Response: Pursuant to instructions from Mitsubishi, SCE designates this document confidential under the NDA and is not permitted to disclose it to parties who have not signed the NDA.

18. Question: Exh. JX-561

Response: Pursuant to instructions from Mitsubishi, SCE designates this document confidential under the NDA and is not permitted to disclose it to parties who have not signed the NDA.

19. Question: Exh. JX-567 24 February 2006 email from MHI's consultants Mr. Wilson to Mr. Langford and MHI

Response: Pursuant to instructions from Mitsubishi, SCE designates this document confidential under the NDA and is not permitted to disclose it to parties who have not signed the NDA.

20. Question: Exh. JX-575

Response: Pursuant to instructions from Mitsubishi, SCE designates this document confidential under the NDA and is not permitted to disclose it to parties who have not signed the NDA.

21. Question: Exh. JX-577 "Chronology of Resolution of Mr. Langford's Comments on FIT-III Gap Velocity," dated 24 March 2006 (Including attachments)

Response: Pursuant to instructions from Mitsubishi, SCE designates this document confidential under the NDA and is not permitted to disclose it to parties who have not signed the NDA.

22. Question: Exh. JX-760 Revisions 4 and 5 to the Design of AVBs report were issued on 21 March 2008 and 3 July 2008

Response: Pursuant to instructions from Mitsubishi, SCE designates this document confidential under the NDA and is not permitted to disclose it to parties who have not signed the NDA.

23. Question: Exh. JX-782 See above

Response: Pursuant to instructions from Mitsubishi, SCE designates this document confidential under the NDA and is not permitted to disclose it to parties who have not signed the NDA.