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12 **Liaison Counsel for Individual Plaintiffs**

13 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
14 **FOR THE COUNTY OF LOS ANGELES**

15 JEREMY GURSEY, an individual,  
16  
17 Plaintiffs,

18 v.

19 SOUTHERN CALIFORNIA EDISON  
COMPANY, a California Corporation;  
20 EDISON INTERNATIONAL, a California  
Corporation; and DOES 1-200, inclusive,  
21  
22 Defendants.

Lead Case No. 25STCV00731  
and Related Cases

**PLAINTIFFS' SEPARATE STATEMENT  
IN SUPPORT OF MOTION TO COMPEL  
FURTHER RESPONSES TO REQUEST  
FOR PRODUCTION NOS. 268-281**

Date: December 22, 2025  
Time: 9:00 a.m.  
Dept: 17

Assigned for all purposes to:  
Judge: Hon. Laura A. Seigle  
Dept.: 17

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**Liaison Counsel for Public Entity Plaintiffs**

1           **TO THE COURT, ALL PARTIES, AND THEIR ATTORNEYS:**

2           Individual Plaintiffs and Public Entity Plaintiffs (“Plaintiffs”) file this Separate Statement  
3 of Items in Dispute re: Request for Production of Documents, Set Three, propounded by Plaintiffs  
4 on Defendant Southern California Edison (hereinafter “Defendant SCE” or “Defendant”) as  
5 follows:

6   **I.       DEFENDANTS RESPONSES TO THE FOLLOWING REQUESTS FOR**  
7   **PRODUCTION, SET THREE ARE DEFICIENT AND IMPROPERLY REFUSE TO**  
8   **PRODUCE RESPONSIVE DOCUMENTS AS FOLLOWS**

9           The following are certain of the Requests for Production of Documents-Set Three verbatim,  
10 the response received verbatim, and the reasons why further responses to said Requests for  
11 Production of Documents-Set Three should be compelled.

12   **REQUEST FOR PRODUCTION NO. 268:**

13           ALL DOCUMENTS RELATING TO any annual incentive awards paid under YOUR  
14 Executive Incentive Compensation (EIC) Plan to any person in SCE director-level or higher  
15 executive positions from January 1, 2019 to the present, including but not limited to, all  
16 DOCUMENTS RELATING TO how all annual incentive awards were calculated, how any “point  
17 deductions” reflected in YOUR annual Safety Performance Metric Reports equated to actual dollar  
18 reductions, and/or how much executive compensation declined in dollars, if at all, because of  
19 missed safety goals.

20   **RESPONSE TO REQUEST FOR PRODUCTION NO. 268:**

21           SCE restates its Preliminary Statement and General Objections, and further objects to the  
22 extent the information requested is protected by the attorney-client privilege and work product  
23 privilege doctrines or any other privilege or immunity available under the United States  
24 Constitution, the Constitution of the State of California, any federal or state statute or common  
25 law.

26           SCE further objects to this Request as overbroad (including but not limited to with respect  
27 to time period), vague and ambiguous, unduly burdensome, not reasonably particularized, seeking  
28 irrelevant information and/or not reasonably calculated to lead to the discovery of admissible  
evidence.

1 SCE further objects to “incentive awards”, “director-level or higher executive positions”,  
2 “actual dollar reductions,” “executive compensation”, and “missed safety goals” as vague and  
3 ambiguous.

4 SCE further objects to this Request to the extent it assumes facts not in existence or the  
5 occurrence of events that did not take place.

6 **REASON WHY FURTHER RESPONSES SHOULD BE ORDERED:**

7 The propounded discovery is relevant to the subject matter of this action, and reasonably  
8 calculated to lead to the discovery of admissible evidence, the responses provided by Defendant  
9 SCE are deficient and are not full and complete responses as required by the California Code of  
10 Civil Procedure, and the objections interposed by Defendant SCE are meritless and evasive.  
11 Defendant SCE’s refusal to provide full and satisfactory responses, as well as its refusal to either  
12 produce all responsive documents and information and/or state in Defendant SCE’s verified  
13 responses that there are no responsive documents as required, is in blatant disregard for Plaintiffs’  
14 right to engage in the discovery process and is without substantial justification.

15 SCE claims it cannot understand what the term “incentive awards” means even though this  
16 term is used annually by SCE in its Safety Performance Metric Reports” filed with the CPUC.  
17 Remarkably, SCE makes the objection that Plaintiffs’ requests “assume facts not in evidence” even  
18 though SCE’s annual incentive awards are not only discussed in its Safety Performance Metric  
19 Reports, but also were the subject of an extensive news article in the LA times. SCE also claims  
20 that the requested discovery is not relevant to Plaintiffs’ claims. However, discovery related to  
21 SCE and Edison International’s Annual Incentive Awards is undoubtedly relevant to Plaintiffs’  
22 claims for negligence and punitive damages. Likewise, there is no basis to claim that such  
23 documents are somehow privileged. As such, SCE should produce all responsive documents.

24 **REQUEST FOR PRODUCTION NO. 269:**

25 ALL DOCUMENTS RELATING TO any annual incentive awards paid to any person  
26 employed by Co-Defendant EDISON INTERNATIONAL in director-level or higher executive  
27 positions from January 1, 2019 to the present including but not limited to, all DOCUMENTS  
28 RELATING TO how all annual incentive awards were calculated, how any “point deductions”

1 reflected in YOUR annual Safety Performance Metric Reports equated to actual dollar reductions,  
2 and/or how much executive compensation declined in dollars, if at all, because of missed safety  
3 goals.

4 **RESPONSE TO REQUEST FOR PRODUCTION NO. 269:**

5 SCE restates its Preliminary Statement and General Objections, and further objects to the  
6 extent the information requested is protected by the attorney-client privilege and work product  
7 privilege doctrines or any other privilege or immunity available under the United States  
8 Constitution, the Constitution of the State of California, any federal or state statute or common  
9 law.

10 SCE further objects to this Request as overbroad (including but not limited to with respect  
11 to time period), vague and ambiguous, unduly burdensome, not reasonably particularized, seeking  
12 irrelevant information and/or not reasonably calculated to lead to the discovery of admissible  
13 evidence.

14 SCE further objects to “incentive awards”, “director-level or higher executive positions”,  
15 “actual dollar reductions,” “executive compensation”, and “missed safety goals” as vague and  
16 ambiguous.

17 SCE further objects to this Request to the extent it assumes facts not in existence or the  
18 occurrence of events that did not take place.

19 **REASON WHY FURTHER RESPONSES SHOULD BE ORDERED:**

20 The propounded discovery is relevant to the subject matter of this action, and reasonably  
21 calculated to lead to the discovery of admissible evidence, the responses provided by Defendant  
22 SCE are deficient and are not full and complete responses as required by the California Code of  
23 Civil Procedure, and the objections interposed by Defendant SCE are meritless and evasive.  
24 Defendant SCE’s refusal to provide full and satisfactory responses, as well as its refusal to either  
25 produce all responsive documents and information and/or state in Defendant SCE’s verified  
26 responses that there are no responsive documents as required, is in blatant disregard for Plaintiffs’  
27 right to engage in the discovery process and is without substantial justification.

1 SCE claims it cannot understand what the term “incentive awards” means even though this  
2 term is used annually by SCE in its Safety Performance Metric Reports” filed with the CPUC.  
3 Remarkably, SCE makes the objection that Plaintiffs’ requests “assume facts not in evidence” even  
4 though SCE’s annual incentive awards are not only discussed in its Safety Performance Metric  
5 Reports, but also were the subject of an extensive news article in the LA times. SCE also claims  
6 that the requested discovery is not relevant to Plaintiffs’ claims. However, discovery related to  
7 SCE and Edison International’s Annual Incentive Awards is undoubtedly relevant to Plaintiffs’  
8 claims for negligence and punitive damages. Likewise, there is no basis to claim that such  
9 documents are somehow privileged. As such, SCE should produce all responsive documents.

10 **REQUEST FOR PRODUCTION NO. 270:**

11 ALL DOCUMENTS RELATING TO how any calculation of annual incentive award  
12 deductions for safety performance were applied to executive compensation for SCE senior  
13 executive officers (senior vice-presidents or above) from 2019 to 2024 as reflected in Table I-3 of  
14 YOUR (U-338-E) 2024 Safety Performance Metrics Report including but not limited to, all  
15 DOCUMENTS RELATING TO how all annual incentive awards were calculated, how any “point  
16 deductions” reflected in YOUR annual Safety Performance Metric Reports equated to actual dollar  
17 reductions, and/or how much executive compensation declined in dollars, if at all, because of  
18 missed safety goals.

19 **RESPONSE TO REQUEST FOR PRODUCTION NO. 270:**

20 SCE restates its Preliminary Statement and General Objections, and further objects to the  
21 extent the information requested is protected by the attorney-client privilege and work product  
22 privilege doctrines or any other privilege or immunity available under the United States  
23 Constitution, the Constitution of the State of California, any federal or state statute or common  
24 law.

25 SCE further objects to this Request as overbroad (including but not limited to with respect  
26 to time period), vague and ambiguous, unduly burdensome, not reasonably particularized, seeking  
27 irrelevant information and/or not reasonably calculated to lead to the discovery of admissible  
28 evidence.

1 SCE further objects to “incentive awards”, “director-level or higher executive positions”,  
2 “actual dollar reductions,” “executive compensation”, and “missed safety goals” as vague and  
3 ambiguous.

4 SCE further objects to this Request to the extent it assumes facts not in existence or the  
5 occurrence of events that did not take place.

6 **REASON WHY FURTHER RESPONSES SHOULD BE ORDERED:**

7 The propounded discovery is relevant to the subject matter of this action, and reasonably  
8 calculated to lead to the discovery of admissible evidence, the responses provided by Defendant  
9 SCE are deficient and are not full and complete responses as required by the California Code of  
10 Civil Procedure, and the objections interposed by Defendant SCE are meritless and evasive.  
11 Defendant SCE’s refusal to provide full and satisfactory responses, as well as its refusal to either  
12 produce all responsive documents and information and/or state in Defendant SCE’s verified  
13 responses that there are no responsive documents as required, is in blatant disregard for Plaintiffs’  
14 right to engage in the discovery process and is without substantial justification.

15 SCE claims it cannot understand what the term “incentive awards” means even though this  
16 term is used annually by SCE in its Safety Performance Metric Reports filed with the CPUC.  
17 Remarkably, SCE makes the objection that Plaintiffs’ requests “assume facts not in evidence” even  
18 though SCE’s annual incentive awards are not only discussed in its Safety Performance Metric  
19 Reports, but also were the subject of an extensive news article in the LA times. SCE also claims  
20 that the requested discovery is not relevant to Plaintiffs’ claims. However, discovery related to  
21 SCE and Edison International’s Annual Incentive Awards is undoubtedly relevant to Plaintiffs’  
22 claims for negligence and punitive damages. Likewise, there is no basis to claim that such  
23 documents are somehow privileged. As such, SCE should produce all responsive documents.

24 **REQUEST FOR PRODUCTION NO. 271:**

25 ALL DOCUMENTS RELATING TO how any calculation of annual incentive award  
26 deductions for safety performance (as reflected in Table I-3 of YOUR (U-338-E) 2024 Safety  
27 Performance Metrics Report) were applied to executive compensation for co-DEFENDANT  
28 EDISON INTERNATIONAL senior executive officers (senior vice-presidents or above) from

1 2019 to 2024 including but not limited to, all DOCUMENTS RELATING TO how all annual  
2 incentive awards were calculated, how any “point deductions” reflected in YOUR annual Safety  
3 Performance Metric Reports equated to actual dollar reductions, and/or how much executive  
4 compensation declined in dollars, if at all, because of missed safety goals.

5 **RESPONSE TO REQUEST FOR PRODUCTION NO. 271:**

6 SCE restates its Preliminary Statement and General Objections, and further objects to the  
7 extent the information requested is protected by the attorney-client privilege and work product  
8 privilege doctrines or any other privilege or immunity available under the United States  
9 Constitution, the Constitution of the State of California, any federal or state statute or common  
10 law.

11 SCE further objects to this Request as overbroad (including but not limited to with respect  
12 to time period), vague and ambiguous, unduly burdensome, not reasonably particularized, seeking  
13 irrelevant information and/or not reasonably calculated to lead to the discovery of admissible  
14 evidence.

15 SCE further objects to “incentive awards”, “director-level or higher executive positions”,  
16 “actual dollar reductions,” “executive compensation”, and “missed safety goals” as vague and  
17 ambiguous.

18 SCE further objects to this Request to the extent it assumes facts not in existence or the  
19 occurrence of events that did not take place.

20 **REASON WHY FURTHER RESPONSES SHOULD BE ORDERED:**

21 The propounded discovery is relevant to the subject matter of this action, and reasonably  
22 calculated to lead to the discovery of admissible evidence, the responses provided by Defendant  
23 SCE are deficient and are not full and complete responses as required by the California Code of  
24 Civil Procedure, and the objections interposed by Defendant SCE are meritless and evasive.  
25 Defendant SCE’s refusal to provide full and satisfactory responses, as well as its refusal to either  
26 produce all responsive documents and information and/or state in Defendant SCE’s verified  
27 responses that there are no responsive documents as required, is in blatant disregard for Plaintiffs’  
28 right to engage in the discovery process and is without substantial justification.

1 SCE claims it cannot understand what the term “incentive awards” means even though this  
2 term is used annually by SCE in its Safety Performance Metric Reports filed with the CPUC.  
3 Remarkably, SCE makes the objection that Plaintiffs’ requests “assume facts not in evidence” even  
4 though SCE’s annual incentive awards are not only discussed in its Safety Performance Metric  
5 Reports, but also were the subject of an extensive news article in the LA times. SCE also claims  
6 that the requested discovery is not relevant to Plaintiffs’ claims. However, discovery related to  
7 SCE and Edison International’s Annual Incentive Awards is undoubtedly relevant to Plaintiffs’  
8 claims for negligence and punitive damages. Likewise, there is no basis to claim that such  
9 documents are somehow privileged. As such, SCE should produce all responsive documents.

10 **REQUEST FOR PRODUCTION NO. 272:**

11 ALL DOCUMENTS prepared by and/or reviewed by YOUR Compensation and Executive  
12 Personal Committee RELATING TO any annual incentive awards paid under YOUR Executive  
13 Incentive Compensation (EIC) Plan to any person in SCE director-level or higher executive  
14 positions from January 1, 2019 to the present.

15 **RESPONSE TO REQUEST FOR PRODUCTION NO. 272:**

16 SCE restates its Preliminary Statement and General Objections, and further objects to the  
17 extent the information requested is protected by the attorney-client privilege and work product  
18 privilege doctrines or any other privilege or immunity available under the United States  
19 Constitution, the Constitution of the State of California, any federal or state statute or common  
20 law.

21 SCE further objects to this Request as overbroad (including but not limited to with respect  
22 to time period), vague and ambiguous, unduly burdensome, not reasonably particularized, seeking  
23 irrelevant information and/or not reasonably calculated to lead to the discovery of admissible  
24 evidence.

25 SCE further objects to “reviewed”, “incentive awards”, “director-level or higher executive  
26 positions,” as vague and ambiguous.

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1 **REASON WHY FURTHER RESPONSES SHOULD BE ORDERED:**

2 The propounded discovery is relevant to the subject matter of this action, and reasonably  
3 calculated to lead to the discovery of admissible evidence, the responses provided by Defendant  
4 SCE are deficient and are not full and complete responses as required by the California Code of  
5 Civil Procedure, and the objections interposed by Defendant SCE are meritless and evasive.  
6 Defendant SCE's refusal to provide full and satisfactory responses, as well as its refusal to either  
7 produce all responsive documents and information and/or state in Defendant SCE's verified  
8 responses that there are no responsive documents as required, is in blatant disregard for Plaintiffs'  
9 right to engage in the discovery process and is without substantial justification.

10 SCE claims it cannot understand what the term "incentive awards" means even though this  
11 term is used annually by SCE in its Safety Performance Metric Reports filed with the CPUC. SCE  
12 also claims that the requested discovery is not relevant to Plaintiffs' claims. However, discovery  
13 related to SCE and Edison International's Annual Incentive Awards is undoubtedly relevant to  
14 Plaintiffs' claims for negligence and punitive damages. Likewise, there is no basis to claim that  
15 such documents are somehow privileged. As such, SCE should produce all responsive documents.

16 **REQUEST FOR PRODUCTION NO. 273:**

17 ALL DOCUMENTS prepared by and/or reviewed by YOUR Compensation and Executive  
18 Personal Committee RELATING TO any annual incentive awards paid under YOUR Executive  
19 Incentive Compensation (EIC) Plan to any person employed by Co-Defendant EDISON  
20 INTERNATIONAL in director-level or higher executive positions from January 1, 2019 to the  
21 present.

22 **RESPONSE TO REQUEST FOR PRODUCTION NO. 273:**

23 SCE restates its Preliminary Statement and General Objections, and further objects to the  
24 extent the information requested is protected by the attorney-client privilege and work product  
25 privilege doctrines or any other privilege or immunity available under the United States  
26 Constitution, the Constitution of the State of California, any federal or state statute or common  
27 law.

1 SCE further objects to this Request as overbroad (including but not limited to with respect  
2 to time period), vague and ambiguous, unduly burdensome, not reasonably particularized, seeking  
3 irrelevant information and/or not reasonably calculated to lead to the discovery of admissible  
4 evidence.

5 SCE further objects to “reviewed”, “incentive awards”, “director-level or higher executive  
6 positions,” as vague and ambiguous.

7 **REASON WHY FURTHER RESPONSES SHOULD BE ORDERED:**

8 The propounded discovery is relevant to the subject matter of this action, and reasonably  
9 calculated to lead to the discovery of admissible evidence, the responses provided by Defendant  
10 SCE are deficient and are not full and complete responses as required by the California Code of  
11 Civil Procedure, and the objections interposed by Defendant SCE are meritless and evasive.  
12 Defendant SCE’s refusal to provide full and satisfactory responses, as well as its refusal to either  
13 produce all responsive documents and information and/or state in Defendant SCE’s verified  
14 responses that there are no responsive documents as required, is in blatant disregard for Plaintiffs’  
15 right to engage in the discovery process and is without substantial justification.

16 SCE claims it cannot understand what the term “incentive awards” means even though this  
17 term is used annually by SCE in its Safety Performance Metric Reports filed with the CPUC. SCE  
18 also claims that the requested discovery is not relevant to Plaintiffs’ claims. However, discovery  
19 related to SCE and Edison International’s Annual Incentive Awards is undoubtedly relevant to  
20 Plaintiffs’ claims for negligence and punitive damages. Likewise, there is no basis to claim that  
21 such documents are somehow privileged. As such, SCE should produce all responsive documents.

22 **REQUEST FOR PRODUCTION NO. 274:**

23 ALL DOCUMENTS prepared by and/or reviewed by YOUR Safety and Operations  
24 Committee RELATING TO any annual incentive awards paid under YOUR Executive Incentive  
25 Compensation (EIC) Plan to any person in SCE director-level or higher executive positions from  
26 January 1, 2019 to the present.

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1 **RESPONSE TO REQUEST FOR PRODUCTION NO. 274:**

2 SCE restates its Preliminary Statement and General Objections, and further objects to the  
3 extent the information requested is protected by the attorney-client privilege and work product  
4 privilege doctrines or any other privilege or immunity available under the United States  
5 Constitution, the Constitution of the State of California, any federal or state statute or common  
6 law.

7 SCE further objects to this Request as overbroad (including but not limited to with respect  
8 to time period), vague and ambiguous, unduly burdensome, not reasonably particularized, seeking  
9 irrelevant information and/or not reasonably calculated to lead to the discovery of admissible  
10 evidence.

11 SCE further objects to “reviewed”, “incentive awards”, “director-level or higher executive  
12 positions,” as vague and ambiguous.

13 **REASON WHY FURTHER RESPONSES SHOULD BE ORDERED:**

14 The propounded discovery is relevant to the subject matter of this action, and reasonably  
15 calculated to lead to the discovery of admissible evidence, the responses provided by Defendant  
16 SCE are deficient and are not full and complete responses as required by the California Code of  
17 Civil Procedure, and the objections interposed by Defendant SCE are meritless and evasive.  
18 Defendant SCE’s refusal to provide full and satisfactory responses, as well as its refusal to either  
19 produce all responsive documents and information and/or state in Defendant SCE’s verified  
20 responses that there are no responsive documents as required, is in blatant disregard for Plaintiffs’  
21 right to engage in the discovery process and is without substantial justification.

22 SCE claims it cannot understand what the term “incentive awards” means even though this  
23 term is used annually by SCE in its Safety Performance Metric Reports filed with the CPUC. SCE  
24 also claims that the requested discovery is not relevant to Plaintiffs’ claims. However, discovery  
25 related to SCE and Edison International’s Annual Incentive Awards is undoubtedly relevant to  
26 Plaintiffs’ claims for negligence and punitive damages. Likewise, there is no basis to claim that  
27 such documents are somehow privileged. As such, SCE should produce all responsive documents.  
28

1 **REQUEST FOR PRODUCTION NO. 275:**

2 ALL DOCUMENTS prepared by and/or reviewed by YOUR Safety and Operations  
3 Committee RELATING TO any annual incentive awards paid under YOUR Executive Incentive  
4 Compensation (EIC) Plan to any person employed by Co-Defendant EDISON INTERNATIONAL  
5 in director-level or higher executive positions from January 1, 2019 to the present.

6 **RESPONSE TO REQUEST FOR PRODUCTION NO. 275:**

7 SCE restates its Preliminary Statement and General Objections, and further objects to the  
8 extent the information requested is protected by the attorney-client privilege and work product  
9 privilege doctrines or any other privilege or immunity available under the United States  
10 Constitution, the Constitution of the State of California, any federal or state statute or common  
11 law.

12 SCE further objects to this Request as overbroad (including but not limited to with respect  
13 to time period), vague and ambiguous, unduly burdensome, not reasonably particularized, seeking  
14 irrelevant information and/or not reasonably calculated to lead to the discovery of admissible  
15 evidence.

16 SCE further objects to “reviewed”, “incentive awards”, “director-level or higher executive  
17 positions,” as vague and ambiguous.

18 **REASON WHY FURTHER RESPONSES SHOULD BE ORDERED:**

19 The propounded discovery is relevant to the subject matter of this action, and reasonably  
20 calculated to lead to the discovery of admissible evidence, the responses provided by Defendant  
21 SCE are deficient and are not full and complete responses as required by the California Code of  
22 Civil Procedure, and the objections interposed by Defendant SCE are meritless and evasive.  
23 Defendant SCE’s refusal to provide full and satisfactory responses, as well as its refusal to either  
24 produce all responsive documents and information and/or state in Defendant SCE’s verified  
25 responses that there are no responsive documents as required, is in blatant disregard for Plaintiffs’  
26 right to engage in the discovery process and is without substantial justification.

27 SCE claims it cannot understand what the term “incentive awards” means even though this  
28 term is used annually by SCE in its Safety Performance Metric Reports filed with the CPUC. SCE

1 also claims that the requested discovery is not relevant to Plaintiffs' claims. However, discovery  
2 related to SCE and Edison International's Annual Incentive Awards is undoubtedly relevant to  
3 Plaintiffs' claims for negligence and punitive damages. Likewise, there is no basis to claim that  
4 such documents are somehow privileged. As such, SCE should produce all responsive documents.

5 **REQUEST FOR PRODUCTION NO. 276:**

6 ALL DOCUMENTS RELATED TO your calculation of SCE'S AUTHORIZED CPUC  
7 RATE BASE for 2024.

8 **RESPONSE TO REQUEST FOR PRODUCTION NO. 276:**

9 SCE restates its Preliminary Statement and General Objections, and further objects to the  
10 extent the information requested is protected by the attorney-client privilege and work product  
11 privilege doctrines or any other privilege or immunity available under the United States  
12 Constitution, the Constitution of the State of California, any federal or state statute or common  
13 law.

14 SCE further objects to this Request as overbroad (including but not limited to with respect  
15 to time period), vague and ambiguous, unduly burdensome, not reasonably particularized, seeking  
16 irrelevant information and/or not reasonably calculated to lead to the discovery of admissible  
17 evidence.

18 SCE further objects to "calculation" as vague and ambiguous.

19 **REASON WHY FURTHER RESPONSES SHOULD BE ORDERED:**

20 The propounded discovery is relevant to the subject matter of this action, and reasonably  
21 calculated to lead to the discovery of admissible evidence, the responses provided by Defendant  
22 SCE are deficient and are not full and complete responses as required by the California Code of  
23 Civil Procedure, and the objections interposed by Defendant SCE are meritless and evasive.  
24 Defendant SCE's refusal to provide full and satisfactory responses, as well as its refusal to either  
25 produce all responsive documents and information and/or state in Defendant SCE's verified  
26 responses that there are no responsive documents as required, is in blatant disregard for Plaintiffs'  
27 right to engage in the discovery process and is without substantial justification.

28

1 SCE claims it cannot understand what it means for it to calculate SCE'S AUTHORIZED  
2 CPUC RATE BASE for 2024 even though it filed a general rate case application in May 2023 and  
3 requested an authorized base revenue requirement of \$10.27 billion to become effective January 1,  
4 2025. The term "AUTHORIZED CPUC RATE BASE" was also used by SCE in its Annual  
5 Report as well as other documents filed by it with the CPUC. SCE also claims that the requested  
6 discovery is not relevant to Plaintiffs' claims. However, discovery related to SCE'S  
7 AUTHORIZED CPUC RATE BASE for 2024 is undoubtedly relevant to Plaintiffs' claims for  
8 negligence and punitive damages. Likewise, there is no basis to claim that such documents are  
9 somehow privileged. As such, SCE should produce all responsive documents.

10 **REQUEST FOR PRODUCTION NO. 277:**

11 ALL DOCUMENTS RELATED TO the methodology used to calculate the SCE'S  
12 AUTHORIZED CPUC RATE BASE for 2024.

13 **RESPONSE TO REQUEST FOR PRODUCTION NO. 277:**

14 SCE restates its Preliminary Statement and General Objections, and further objects to the  
15 extent the information requested is protected by the attorney-client privilege and work product  
16 privilege doctrines or any other privilege or immunity available under the United States  
17 Constitution, the Constitution of the State of California, any federal or state statute or common  
18 law.

19 SCE further objects to this Request as overbroad (including but not limited to with respect  
20 to time period), vague and ambiguous, unduly burdensome, not reasonably particularized, seeking  
21 irrelevant information and/or not reasonably calculated to lead to the discovery of admissible  
22 evidence.

23 SCE further objects to "methodology" and "calculate" as vague and ambiguous.

24 **REASON WHY FURTHER RESPONSES SHOULD BE ORDERED:**

25 The propounded discovery is relevant to the subject matter of this action, and reasonably  
26 calculated to lead to the discovery of admissible evidence, the responses provided by Defendant  
27 SCE are deficient and are not full and complete responses as required by the California Code of  
28 Civil Procedure, and the objections interposed by Defendant SCE are meritless and evasive.

1 Defendant SCE’s refusal to provide full and satisfactory responses, as well as its refusal to either  
2 produce all responsive documents and information and/or state in Defendant SCE’s verified  
3 responses that there are no responsive documents as required, is in blatant disregard for Plaintiffs’  
4 right to engage in the discovery process and is without substantial justification.

5 SCE claims it cannot understand what it means for it to calculate SCE’S AUTHORIZED  
6 CPUC RATE BASE for 2024 even though it filed a general rate case application in May 2023 and  
7 requested an authorized base revenue requirement of \$10.27 billion to become effective January 1,  
8 2025. The term “AUTHORIZED CPUC RATE BASE” was also used by SCE in its Annual  
9 Report as well as other documents filed by it with the CPUC. SCE also claims that the requested  
10 discovery is not relevant to Plaintiffs’ claims. However, discovery related to SCE’S  
11 AUTHORIZED CPUC RATE BASE for 2024 is undoubtedly relevant to Plaintiffs’ claims for  
12 negligence and punitive damages. Likewise, there is no basis to claim that such documents are  
13 somehow privileged. As such, SCE should produce all responsive documents.

14 **REQUEST FOR PRODUCTION NO. 278:**

15 ALL DOCUMENTS identifying the assets included in the calculation of the SCE’S  
16 AUTHORIZED CPUC RATE BASE for 2024.

17 **RESPONSE TO REQUEST FOR PRODUCTION NO. 278:**

18 SCE restates its Preliminary Statement and General Objections, and further objects to the  
19 extent the information requested is protected by the attorney-client privilege and work product  
20 privilege doctrines or any other privilege or immunity available under the United States  
21 Constitution, the Constitution of the State of California, any federal or state statute or common  
22 law.

23 SCE further objects to this Request as overbroad (including but not limited to with respect  
24 to time period), vague and ambiguous, unduly burdensome, not reasonably particularized, seeking  
25 irrelevant information and/or not reasonably calculated to lead to the discovery of admissible  
26 evidence.

27 SCE further objects to “assets” and “calculation” as vague and ambiguous.  
28

1 **REASON WHY FURTHER RESPONSES SHOULD BE ORDERED:**

2 The propounded discovery is relevant to the subject matter of this action, and reasonably  
3 calculated to lead to the discovery of admissible evidence, the responses provided by Defendant  
4 SCE are deficient and are not full and complete responses as required by the California Code of  
5 Civil Procedure, and the objections interposed by Defendant SCE are meritless and evasive.  
6 Defendant SCE's refusal to provide full and satisfactory responses, as well as its refusal to either  
7 produce all responsive documents and information and/or state in Defendant SCE's verified  
8 responses that there are no responsive documents as required, is in blatant disregard for Plaintiffs'  
9 right to engage in the discovery process and is without substantial justification.

10 SCE claims it cannot understand what it means for it to calculate SCE'S AUTHORIZED  
11 CPUC RATE BASE for 2024 even though it filed a general rate case application in May 2023 and  
12 requested an authorized base revenue requirement of \$10.27 billion to become effective January 1,  
13 2025. The term "AUTHORIZED CPUC RATE BASE" was also used by SCE in its Annual  
14 Report as well as other documents filed by it with the CPUC. SCE also claims that the requested  
15 discovery is not relevant to Plaintiffs' claims. However, discovery related to SCE'S  
16 AUTHORIZED CPUC RATE BASE for 2024 is undoubtedly relevant to Plaintiffs' claims for  
17 negligence and punitive damages. Likewise, there is no basis to claim that such documents are  
18 somehow privileged. As such, SCE should produce all responsive documents.

19 **REQUEST FOR PRODUCTION NO. 279:**

20 ALL DOCUMENTS RELATED TO your calculation of YOUR YEAR-END RATE BASE  
21 for 2024.

22 **RESPONSE TO REQUEST FOR PRODUCTION NO. 279:**

23 SCE restates its Preliminary Statement and General Objections, and further objects to the  
24 extent the information requested is protected by the attorney-client privilege and work product  
25 privilege doctrines or any other privilege or immunity available under the United States  
26 Constitution, the Constitution of the State of California, any federal or state statute or common  
27 law.

1 SCE further objects to this Request as overbroad (including but not limited to with respect  
2 to time period), vague and ambiguous, unduly burdensome, not reasonably particularized, seeking  
3 irrelevant information and/or not reasonably calculated to lead to the discovery of admissible  
4 evidence.

5 SCE further objects to “calculation” and “YEAR-END BASE RATE” as vague and  
6 ambiguous.

7 **REASON WHY FURTHER RESPONSES SHOULD BE ORDERED:**

8 The propounded discovery is relevant to the subject matter of this action, and reasonably  
9 calculated to lead to the discovery of admissible evidence, the responses provided by Defendant  
10 SCE are deficient and are not full and complete responses as required by the California Code of  
11 Civil Procedure, and the objections interposed by Defendant SCE are meritless and evasive.  
12 Defendant SCE’s refusal to provide full and satisfactory responses, as well as its refusal to either  
13 produce all responsive documents and information and/or state in Defendant SCE’s verified  
14 responses that there are no responsive documents as required, is in blatant disregard for Plaintiffs’  
15 right to engage in the discovery process and is without substantial justification.

16 SCE claims it cannot understand what it means for it to calculate YEAR END RATE  
17 BASE for 2024 even though it filed a general rate case application in May 2023 and requested an  
18 authorized base revenue requirement of \$10.27 billion to become effective January 1, 2025. The  
19 term “YEAR END RATE BASE” was also used by SCE in its Annual Report as well as other  
20 documents filed by it with the CPUC. SCE also claims that the requested discovery is not relevant  
21 to Plaintiffs’ claims. However, discovery related to SCE’S YEAR END RATE BASE for 2024 is  
22 undoubtedly relevant to Plaintiffs’ claims for negligence and punitive damages. Likewise, there is  
23 no basis to claim that such documents are somehow privileged. As such, SCE should produce all  
24 responsive documents.

25 **REQUEST FOR PRODUCTION NO. 280:**

26 ALL DOCUMENTS RELATED TO the methodology used to calculate the YEAR-END  
27 RATE BASE for 2024.

28

1 **RESPONSE TO REQUEST FOR PRODUCTION NO. 280:**

2 SCE restates its Preliminary Statement and General Objections, and further objects to the  
3 extent the information requested is protected by the attorney-client privilege and work product  
4 privilege doctrines or any other privilege or immunity available under the United States  
5 Constitution, the Constitution of the State of California, any federal or state statute or common  
6 law.

7 SCE further objects to this Request as overbroad (including but not limited to with respect  
8 to time period), vague and ambiguous, unduly burdensome, not reasonably particularized, seeking  
9 irrelevant information and/or not reasonably calculated to lead to the discovery of admissible  
10 evidence.

11 SCE further objects to “methodology”, “calculate,” “YEAR-END RATE BASE” as vague  
12 and ambiguous.

13 **REASON WHY FURTHER RESPONSES SHOULD BE ORDERED:**

14 The propounded discovery is relevant to the subject matter of this action, and reasonably  
15 calculated to lead to the discovery of admissible evidence, the responses provided by Defendant  
16 SCE are deficient and are not full and complete responses as required by the California Code of  
17 Civil Procedure, and the objections interposed by Defendant SCE are meritless and evasive.  
18 Defendant SCE’s refusal to provide full and satisfactory responses, as well as its refusal to either  
19 produce all responsive documents and information and/or state in Defendant SCE’s verified  
20 responses that there are no responsive documents as required, is in blatant disregard for Plaintiffs’  
21 right to engage in the discovery process and is without substantial justification.

22 SCE claims it cannot understand what it means for it to calculate YEAR END RATE  
23 BASE for 2024 even though it filed a general rate case application in May 2023 and requested an  
24 authorized base revenue requirement of \$10.27 billion to become effective January 1, 2025. The  
25 term “YEAR END RATE BASE” was also used by SCE in its Annual Report as well as other  
26 documents filed by it with the CPUC. SCE also claims that the requested discovery is not relevant  
27 to Plaintiffs’ claims. However, discovery related to SCE’S YEAR END RATE BASE for 2024 is  
28 undoubtedly relevant to Plaintiffs’ claims for negligence and punitive damages. Likewise, there is

1 no basis to claim that such documents are somehow privileged. As such, SCE should produce all  
2 responsive documents.

3 **REQUEST FOR PRODUCTION NO. 281:**

4 ALL DOCUMENTS identifying the assets included in the calculation of the YEAR-END  
5 RATE BASE for 2024.

6 **RESPONSE TO REQUEST FOR PRODUCTION NO. 281:**

7 SCE restates its Preliminary Statement and General Objections, and further objects to the  
8 extent the information requested is protected by the attorney-client privilege and work product  
9 privilege doctrines or any other privilege or immunity available under the United States  
10 Constitution, the Constitution of the State of California, any federal or state statute or common  
11 law.

12 SCE further objects to this Request as overbroad (including but not limited to with respect  
13 to time period), vague and ambiguous, unduly burdensome, not reasonably particularized, seeking  
14 irrelevant information and/or not reasonably calculated to lead to the discovery of admissible  
15 evidence.

16 SCE further objects to “assets”, “calculation” and “YEAR-END RATE BASE” as vague  
17 and ambiguous.

18 **REASON WHY FURTHER RESPONSES SHOULD BE ORDERED:**

19 The propounded discovery is relevant to the subject matter of this action, and reasonably  
20 calculated to lead to the discovery of admissible evidence, the responses provided by Defendant  
21 SCE are deficient and are not full and complete responses as required by the California Code of  
22 Civil Procedure, and the objections interposed by Defendant SCE are meritless and evasive.  
23 Defendant SCE’s refusal to provide full and satisfactory responses, as well as its refusal to either  
24 produce all responsive documents and information and/or state in Defendant SCE’s verified  
25 responses that there are no responsive documents as required, is in blatant disregard for Plaintiffs’  
26 right to engage in the discovery process and is without substantial justification.

27 SCE claims it cannot understand what it means for it to calculate YEAR END RATE  
28 BASE for 2024 even though it filed a general rate case application in May 2023 and requested an

1 authorized base revenue requirement of \$10.27 billion to become effective January 1, 2025. The  
2 term “YEAR END RATE BASE” was also used by SCE in its Annual Report as well as other  
3 documents filed by it with the CPUC. SCE also claims that the requested discovery is not relevant  
4 to Plaintiffs’ claims. However, discovery related to SCE’S YEAR END RATE BASE for 2024 is  
5 undoubtedly relevant to Plaintiffs’ claims for negligence and punitive damages. Likewise, there is  
6 no basis to claim that such documents are somehow privileged. As such, SCE should produce all  
7 responsive documents.

8 **II. DEFINITIONS**

9 When Plaintiffs served SCE with Request for Production of Documents, Set Three,  
10 propounded by Plaintiffs on Defendant Southern California Edison, they provided the following  
11 definitions that are relevant to the instant motion.

12 1. “CONCERNING”, “REFERRING TO”, or “RELATING TO” as used herein shall  
13 be construed in the broadest possible sense, and shall mean without limitation and whether in  
14 whole or in part: referring to, constituting, bearing upon, commenting upon, reflecting, evidencing,  
15 pertaining to, describing, resulting from, depicting, consisting of, containing, comprising,  
16 embodying, identifying, stating, discussing, analyzing, studying, summarizing, dealing with,  
17 mentioning, relating to, or having any logical or factual connection whatsoever with the subject  
18 addressed, regardless whether the factual connection is favorable to or adverse to YOU.

19 2. “DOCUMENT” or “DOCUMENTS” shall mean all documents, electronically  
20 stored information, and tangible things, including without limitation all writings, as defined by  
21 section 250 of the California Evidence Code and all other means of recording information, whether  
22 written, transcribed, taped, filmed, microfilmed, or in any other way produced, reproduced, or  
23 recorded, and including but not limited to: originals, drafts, computer-sorted and computer-  
24 retrievable information, electronic data, technical data, copies and duplicates that are marked with  
25 any notation or annotation or otherwise differ in any way from the original, e-mails,  
26 correspondence, memoranda, reports, notes, minutes, contracts, agreements, books, records,  
27 checks, vouchers, invoices, purchase orders, ledgers, diaries, logs, calendars, computer printouts,  
28 computer disks, card files, lists of persons attending meetings or conferences, sketches, diagrams,

1 calculations, evaluations, analyses, directions, work papers, press clippings, sworn or unsworn  
2 statements, requisitions, manuals or guidelines, audit work papers, financial analyses, tables of  
3 organizations, charts, graphs, indices, advertisements and promotional materials, audited and  
4 unaudited financial statements, trade letters, trade publications, newspapers and newsletters,  
5 PHOTOGRAPHS, emails, electronic or mechanical records, facsimiles, videotapes, VIDEO files,  
6 audiotapes, audio files, voicemails, SMS, MMS or other text messages, or chat or instant message  
7 conversations. Each draft, annotated, or otherwise non-identical copy is a separate DOCUMENT  
8 within the meaning of this term. DOCUMENTS shall also include any removable sticky notes,  
9 flags, or other attachments affixed to any of the foregoing, as well as the files, folder tabs, and  
10 labels appended to or containing any documents.

11 3. “SCE’S AUTHORIZED CPUC RATE BASE” shall have the same meaning as the  
12 phrase is used on page 35 of YOUR 2024 Annual Report [“SCE's CPUC authorized return on  
13 investment is established by multiplying an authorized rate of return, determined by the CPUC in  
14 standalone cost of capital proceedings, by SCE's authorized CPUC rate base.”]

15 4. “YOU” or “YOUR” or “SCE” means and refers to Defendant Southern California  
16 Edison Company, including all of its officers, directors, employees, agents, attorneys (including  
17 outside counsel), representatives, contractors, staff and other persons working for or acting on,  
18 their subsidiaries, unincorporated divisions, operations, affiliates, successors and predecessors.

19 5. “YEAR-END RATE BASE” shall refer to the figures reflected in the 2024  
20 Financial & Statistical Report published by Edison International & Southern California Edison,  
21 which defines these values as “capital expenditures related to certain FERC-approved projects  
22 during the construction phase, and excludes rate base related to wildfire risk mitigation capital  
23 expenditures required by California Assembly Bill 1054.”

24 6. The words “and” and “or” shall be construed conjunctively or disjunctively as  
25 necessary to make the Requests inclusive rather than exclusive; the singular includes the plural and  
26 the plural includes the singular; the use of a verb in any tense shall be construed as the use of the  
27 verb in all other tenses whenever necessary to bring within the scope of the Request for Production  
28 any response that might otherwise be construed outside its scope.

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Dated: November 24, 2025

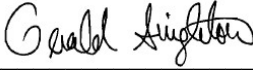
**PANISH | SHEA | RAVIPUDI, LLP**

By: 

Rahul Ravipudi  
*Liaison Counsel for Individual Plaintiffs*

Dated: November 24, 2025

**SINGLETON SCHREIBER, LLP**

By: 

Gerald Singleton  
Paul Starita  
*Liaison Counsel for Individual Plaintiffs*

Dated: November 24, 2025

**COREY, LUZAICH, DE GHETALDI & RIDDLE, LLP**

By: 

Amanda L. Riddle  
Sumble Manzoor  
*Liaison Counsel for Individual Plaintiffs*

Dated: November 24, 2025

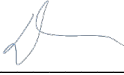
**BARON & BUDD, P.C.**

By: 

John P. Fiske  
Victoria E. Sherlin  
*Liaison Counsel for Public Entity Plaintiffs*

Dated: November 24, 2025

**DIAB CHAMBERS LLP**

By: 

Ed Diab  
Kristen Barton  
*Liaison Counsel for Public Entity Plaintiffs*