The following document contains Southern California Edison Company's additional responses to questions in the "Year 2000 Program Assessment Checklist & Survey For Jurisdictional Companies" which require more than a "yes" or "no" answer. This document was submitted to the CPUC on March 15, 1999.

California Public Utilities Commission
Year 2000 Program Assessment Checklist & Survey for Jurisdictional Companies (1)

Company Name: Southern California Edison Company

Address: 2244 Walnut Grove Ave., Rosemead, CA 91770

Type of Utility: Electric

Utility No.   U-338-E

Name of individual with primary responsibility for addressing the Year 2000 problem in your company: Eric G. Trapp

Title: Manager, IT Risk Management

Address: 2244 Walnut Grove Ave., Rosemead, CA 91770

Telephone No.: (626) 302-7107

Fax No.:   (626) 302-7113

Email address: trappeg@sce.com

PLEASE DIRECT YOUR RESPONSES TO THE APPROPRIATE INDUSTRY DIVISION AT THE CPUC, ATTENTION Y2K COORDINATOR

Preliminary Questions

☐   If the company's ONLY computerized systems are related to billing or other administrative tasks, please check this box , STOP HERE and return this page.

☑   If the company has computerized service delivery systems under its control, please complete the remainder of this survey. For the purposes of this question, include embedded systems necessary to delivery of the utility services you provide. If you do not know whether you have embedded systems necessary to

delivery of the utility services you provide, please complete the remainder of this survey.

I certify that the responses provided to this survey are true and correct, and that I have the authority to represent the company on these issues.

By: _____

Title: _____

Company: _____

(1) Modeled primarily on the U.S. GAO's Year 2000 Program Assessment Checklist

For each question below which requires a "yes" or "no" answer, please check the corresponding box if your answer is "yes". For questions which require an additional response, please provide your responses on separate sheets of paper.

Awareness

☑ Has the company defined and documented the potential impact of the Year 2000 problem? Please provide a summary of these efforts to the CPUC.

Please refer to copies of the letters sent to Mr. Paul Clanon, dated July 20, 1998, and to Mr. Mahendra Jhala, dated November 30, 1998. (Section II, Tab #1)

☑ Has the company conducted a Year 2000 awareness campaign with respect to:
   ☑ Employees?
   ☑ Customers?
   ☑ Vendors?
Please summarize your efforts and provide the CPUC with copies of sample documentation relating to any such awareness campaign which could be helpful to an evaluation of your effort.

Please reference Section III, Tab #1 - #8 for information about SCE's Year 2000 awareness campaign and copies of sample documentation.

☑ Has the company developed and documented a Year 2000 strategy? Please summarize your strategy.

Please refer to Section IV, Tab #1 for information about SCE's Year 2000 strategy.

☑ Has a program manager been appointed and a Year 2000 program office been established and staffed? Who is the manager and what is his/her title and level in the company? How many employees and contractors are dedicated to this effort?

The Year 2000 Program manager is Mr. Eric Trapp, Manager, IT Risk Management. Mr. Trapp reports directly to the Company's Chief Information

Officer. For a detailed program office organizational chart, please refer to Section IV, Tab #1. For staffing information, please refer to the staffing matrix in Section IV, Tab # 2.

☑ When did you begin your effort to become Year 2000 compliant and what is your estimated completion date for your compliance plan?

Southern California Edison first began addressing the Year 2000 issue in 1995. The Company has a comprehensive program in place to have 75% of mission critical assets Year 2000 Ready by December 31, 1998 and 100% of mission critical assets Year 2000 Ready by July 1, 1999. As of December 31, 1998, 80% of mission critical assets were Year 2000 Ready. Please see Section IV, Tab #1 for a definition of mission critical assets, and the document "Y2K Readiness Certification Process" (Section IV, Tab #4) for a definition of Year 2000 Ready. Also, please reference the "Overall Project Schedule and Major Milestones" chart, located in Section IV, Tab #1.

☑ Summarize the resources you anticipate will be necessary for your company to remedy your Year 2000 issues.

As noted in SCE's 3ʳᵈ Quarter 1998 10Q filing with the Securities and Exchange Commission (Section II, Tab #2) the estimate of the costs to complete Year 2000 modifications was $80 million. The current estimate of costs to complete Year 2000 modifications is $72 million. For personnel resources, please refer to the staffing matrix noted above (Section IV, Tab # 2).

☑ Does your particular industry have an organization that is providing Y2K guidance and information? If so, please identify the organization.

The following organizations provide Year 2000 guidance and information for the electric utility industry:
- *The North American Electric Reliability Council (NERC)*
- *The Western Systems Coordinating Council (WSCC)*
- *The Nuclear Regulatory Commission (NRC)*
- *The Electric Power Research Institute (EPRI)*
- *The Nuclear Energy Institute (NEI)*

Assessment

☑ Has the company defined Year 2000 compliance? Please provide your definition. Describe what tests or standards your company uses to determine "Y2K compliant" status.

Please refer to the document "Y2K Readiness Certification Process" (Section IV, Tab #4) for SCE's definition of "Year 2000 Compliant." SCE's Year 2000 program is designed to have the company "Year 2000 Ready."

☑ Has the company defined Year 2000 readiness? Please provide your definition. Describe what tests or standards your company uses to determine "Y2K ready" status.

Please refer to the document "Y2K Readiness Certification Process" (Section IV, Tab #4) for SCE's definition of "Year 2000 Ready." Please refer to the following documents for information related to the tests and standards used to determine "Year 2000 Ready" status:
- *Overall Flow of Y2K Testing (<u>Section IV, Tab #6</u>)*
- *IT Application Test Strategy (<u>Section IV, Tab #7</u>)*
- *Physical Assets Test Guidelines (<u>Section IV, Tab #9</u>)*
- *Year 2000 Metrics Calculation Overview (<u>Section IV, Tab #5</u>)*

☑ Do you (or does your parent company) have a Year 2000 Compliance statement? If so, please attach. If not, do you plan to have one in the future? When?

In addition to certain regulatory responses (see Section II, Tabs 1,2, and 3), please generally refer to the document "Letter of Response to Year 2000 Inquiries" (Section III, Tab #3). As noted above, SCE's Year 2000 program is designed to have the company "Year 2000 Ready."

☑ What is the date at which you expect to be fully Year 2000 ready?

As noted above, SCE's goal was to have 75% of mission critical assets "Year 2000 Ready" by December 31, 1998 (80% readiness was achieved) and 100% of mission critical assets "Year 2000 Ready" by July 1, 1999.

☑ What is the date at which you expect to be fully Year 2000 compliant?

As noted above, SCE's Year 2000 program is designed to have the company "Year 2000 Ready."

☑ Has the company assessed the severity of potential impact of Year 2000-induced failures for core business areas and processes? Please describe such potential impacts and the respective severity of each.

Please refer to copies of the letters sent to Mr. Paul Clanon, dated July 20, 1998, and to Mr. Mahendra Jhala, dated November 30, 1998 (<u>Section II, Tab #1</u>). In addition, please refer to the document "Risk Management & Contingency Plan Guidelines" (<u>Section IV, Tab #10</u>).

☑ Has the company developed a Year 2000 program plan? If so, please provide the CPUC with a copy of the plan.

The company's program plan includes
        ☑ schedules for all tasks and phases
        ☑ master conversion and replacement schedule
        ☑ assessment and selection of outsourcing options
        ☑ assignment of conversion or replacement projects to project teams
        ☑ risk assessment
        ☑ contingency plans for all systems

Please refer to the following:
- *Year 2000 Program Strategy (Section IV, Tab #1)*
- *Risk Management and Contingency Plan Guidelines (Section IV, Tab #10)*
- *Corporate Event Plan - Year 2000 Contingency Plan (Section IV, Tab #11)*
- *Risk Assessment and Contingency Planning Methodology: Business Processes/Facilities (Section IV, Tab #11)*

☑ Has the company identified and mobilized required resources and capabilities? Please describe.

As noted above, SCE's 3rd Quarter 1998 10Q filing with the Securities and Exchange Commission (Section II, Tab #2) states the estimate of the costs to complete Year 2000 modifications was $80 million. The current estimate of costs to complete Year 2000 modifications is $72 million. For personnel resources, please refer to the staffing matrix noted above (Section IV, Tab #2).

☑ In priority order identify the top twenty hardware and the top twenty software systems for whose operation your company is responsible that directly and immediately support the utility services you offer.

Please refer to the "NERC Y2K Electric System Readiness Assessment" report for a list of the top hardware and software systems for whose operation SCE is responsible that directly and immediately support the utility services the Company offers (Section II, Tab #4). Included are generation, energy management (SCADA), telecommunications, substation control, system protection, distribution, and IT business information systems.

☑ For each of the systems identified in response to the prior question, provide your company's assessment of its Year 2000 compliance, identify components of the systems that are internally produced and those that are not internally produced.

Please refer to the "NERC Y2K Electric System Readiness Assessment" report for the Year 2000 Ready status of the systems identified in the prior question (Section II, Tab #4).

☑ For each of the systems identified in response to the prior question that are not assessed as Year 2000 compliant, set forth your schedule for (a) initiating remediation or replacement; (b) unit testing of compliance; (c) internal system integration testing for compliance; and (d) where appropriate, testing with interconnecting utilities. Explain the transactions that will be used in conducting those tests. Identify any systems which you intend to make Year 2000 ready but do not intend to make Year 2000 compliant, and explain why. Of these systems, identify the systems which are currently year 2000 ready, and set forth your schedule for making the remaining systems year 2000 ready.

As noted above, SCE has a comprehensive program in place to have 75% of mission critical assets Year 2000 Ready by December 31, 1998 (80% readiness was achieved) and 100% of mission critical assets Year 2000 Ready by July 1, 1999. Please see Section IV, Tab #1 for a definition of mission critical assets, and the document "Y2K Readiness Certification Process" (Section IV, Tab #4) for a definition of Year 2000 Ready. Also, please reference the "Year 2000 Project Milestone Chart", located in Section IV, Tab #1. Please refer to the "NERC Y2K Electric System Readiness Assessment" report for the Year 2000 Ready status of the systems identified in the prior question (Section II, Tab #4).

SCE plans to participate in the nationwide NERC/WSCC-coordinated Year 2000 readiness drills scheduled for April and September, 1999. Planning for those events is currently in progress. For additional information about SCE's Year 2000 contingency planning activities, please refer to the following documents:

- *Risk Management & Contingency Plan Guidelines (Section IV, Tab # 10)*
- *Corporate Event Plan - Year 2000 Contingency Plan (Section IV, Tab #11)*
- *Risk Assessment and Contingency Planning Methodology: Business Processes/Facilities (Section IV, Tab #11)*

For additional information about SCE's Year 2000 testing process, please refer to the following documents:

- *Overall Flow of Y2K Testing (Section IV, Tab #6)*
- *IT Application Test Strategy (Section IV, Tab #7)*
- *Year 2000 Test & Configuration Management Environment (Section IV, Tab #7)*
- *Physical Assets Test Guidelines (Section IV, Tab #9)*
- *Year 2000 Metrics Calculation Overview (Section IV, Tab #5)*

☑ For each of the systems identified in response to the prior question that are not assessed as Year 2000 compliant or Year 2000 ready, set forth your schedule for (a) developing contingency plans in case remediation plans are delayed or fail, including failure just before or after the change in date to the year 2000, and including the leap year date of February 29, 2000; and (b) testing of those contingency plans.

As noted below, SCE's contingency plan is currently under development., The draft of such plan is expected to be completed in March, 1999, with management approval thereof scheduled for May 1, 1999.

☑ What is your plan for monitoring for potential problems after January 1, 2000?

As noted below, SCE's contingency plan is currently under development. The draft of such plan is expected to be completed in March, 1999, with management approval thereof scheduled for May 1, 1999.

☑ Has the company initiated the development of contingency plans for critical systems? Please provide a copy of your contingency plan.

SCE's contingency plan is currently under development. The draft of such plan is expected to be completed in March, 1999, with management approval thereof scheduled for May 1, 1999. Please refer to the following documents for information about SCE's contingency planning efforts:

- *Risk Management & Contingency Plan Guidelines (Section IV, Tab # 10)*
- *Corporate Event Plan - Year 2000 Contingency Plan (Section IV, Tab #11)*
- *Risk Assessment and Contingency Planning Methodology: Business Processes/Facilities (Section IV, Tab #11)*

☑ Does the impact assessment document identify Year 2000 vulnerable systems and processes outside the traditional information resource management area that may affect the company's operations? Please provide the CPUC with documentation of such identified impacts.

The assessment document addresses the impact of potential Year 2000 induced failure of
    ☑ telecommunication systems, including telephone and data networks switching equipment
    ☑ building infrastructure

SCE's Year 2000 program covers three distinct areas: mainframe computing, distributed computing, and physical assets. For additional information about

Year 2000 activities in each of these areas, please refer to the following documents:

- *Copies of the letters sent to Mr. Paul Clanon, dated July 20, 1998, and to Mr. Mahendra Jhala, dated November 30, 1998. (Section II, Tab #1)*
- *SCE's 3rd Quarter 1998 10Q filing with the Securities and Exchange Commission (Section II, Tab #2)*
- *Response to NRC Generic Letter 98-01: "Year 2000 Readiness of Computer Systems at Nuclear Power Plants" (Section II, Tab #3)*
- *Physical Asset Inventory, Assessment, and Remediation Process (Section IV, Tab #8)*

Renovation

☑ What actions remain to be taken for your computer hardware to be fully Year 2000 compliant?

Please refer to Section IV, Tab #12 for the "Year 2000 Ready" status of SCE's computer hardware.

☑ What actions remain to be taken in order for your infrastructure to be fully Year 2000 compliant?

Please refer to Section IV, Tab #12 for the "Year 2000 Ready" status of SCE's infrastructure.

☑ What actions have you taken to identify and test embedded chips within your infrastructure?

Please refer to the following documents for information about SCE's Year 2000 activities related to embedded chips, which are classified by SCE as "Physical Assets":
- *Physical Asset Inventory, Assessment, and Remediation Process (Section IV, Tab #8)*
- *Physical Assets Test Guidelines (Section IV, Tab #9)*

To date, Year 2000 issues related to Physical Assets have been minor in that while there have been instances where a device has a problem with the date tracking function, the device itself does not fail. The device continues to perform its primary function regardless of the accuracy of the date.

☑ What specific embedded chip Year 2000 problems have you found and in what way could they affect the services you provide?

To date, Year 2000 issues related to Physical Assets have been minor. Although there have been instances where a device has a problem with the date tracking function, the device itself does not fail. The device continues to perform its primary function regardless of the date tracking issue.

Program and Project Management

☑ Have you determined if your suppliers and vendors are Year 2000 compliant and/or year 2000 ready? If no, why not? If yes and your suppliers and vendors are not Year 2000 compliant, what negative impact can this have on your provision of utility service?

SCE has a program in place to contact vendors and business partners to determine their Year 2000 status. SCE has implemented testing guidelines which require that all vendor-supplied critical assets be tested, regardless of the vendor's claims related to the Year 2000 readiness of the asset. Also, as noted above, contingency plans are under development for all critical systems.

☑ What facilities and equipment have vendors certified as Year 2000 compliant?

Please reference Section IV, Tab # 13.

☑ What facilities and equipment have vendors certified as Year 2000 ready?

Please reference Section IV, Tab # 13.

In addition to the documents referenced in the answers above, the following document provides information about SCE's Year 2000 program:
- *Clean Management Process Guidelines (Section IV, Tab #14)*
- *Clean Management Content Guidelines*
- *Clean Management Template*
- *Clean Management Reporting Metrics*

Industry-Based Y2K Efforts

SCE participates in the following regional and industry-based Y2K efforts:

- NRC
- NEI/NUSMG
- NERC/WSCC
- EPRI Year 2000 Embedded Systems Project

SCE has submitted the following responses related to regional and industry-based Y2K efforts:

- Response to NRC Generic Letter 98-01, "Year 2000 Readiness of Computer Systems at Nuclear Power Plants" (*Section II, Tab #3*)
- NERC Y2K Electric System Readiness Assessment (*Section II, Tab #4*)
- NEI Nuclear Utility Year 2000 Readiness Survey (*Section II, Tab #5)*

Y2K Information Provided to the SEC (*Section II, Tab #2*)

- 1997 Form 10-K
- 1st Quarter 1998 Form 10-Q
- 2nd Quarter 1998 Form 10-Q
- 3rd Quarter 1998 Form 10-Q
- Transfer Agent Form TA-Y2K
- Letter to SEC - Dated February 6, 1998