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6 Attorneys for Cross-Defendant  
 7 **SOUTHERN CALIFORNIA EDISON COMPANY**

8 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
 9 **FOR THE COUNTY OF LOS ANGELES, COMPLEX CIVIL DIVISION**

11 SANTA BARBARA CHANNELKEEPER, a  
 12 California non-profit corporation,

13 Petitioner,

14 v.

15 STATE WATER RESOURCES CONTROL  
 BOARD, a California State Agency;  
 16 CITY OF SAN BUENAVENTURA, a California  
 municipal corporation, incorrectly named as  
 17 CITY OF BUENAVENTURA,

18 Respondents.

19 CITY OF SAN BUENAVENTURA, a California  
 municipal corporation,

20 Cross-Complainant,

21 v.

22 DUNCAN ABBOTT, an individual, et al.,

23 Cross-Defendants.  
 24

Case No. 19STCP01176

[Transferred to Los Angeles Superior Court,  
 Complex Civil Division, and assigned for all  
 purposes to Hon. William F. Highberger per  
 Minute Order dated May 15, 2019]

**CROSS-DEFENDANT SOUTHERN  
 CALIFORNIA EDISON COMPANY'S  
 INITIAL DISCLOSURES (CCP § 842)**

Complaint Filed: September 19, 2014

Trial Date: Not Set

1 **INTRODUCTION**

2 Cross-Defendant Southern California Edison Company (“SCE”), pursuant to Code of Civil  
3 Procedure Code of Civil Procedure section 842(a), and the Court’s February 19, 2021 Order, hereby  
4 submits its initial disclosures. SCE reserves the right to supplement this disclosure, where appropriate,  
5 at a future date. (Code of Civ. Proc. §842(d)(1-3).)

6  
7 **DISLCOSURES**

8 **(1) The name, address, telephone number, and email address of the party and, if**  
9 **applicable, the party’s attorney.**

10 Response:

11 Party Information: Southern California Edison  
12 c/o Bridget Johnsen, Senior Attorney  
13 2244 Walnut Grove Avenue  
14 Rosemead, CA 91770  
15 Telephone: 626-302-8537  
16 Email: [bridget.johnsen@sce.com](mailto:bridget.johnsen@sce.com)

17  
18 Party Attorney Information: ALSTON & BIRD LLP  
19 Edward J. Casey and Gina Angiolillo  
20 333 South Hope St., 16th Floor, Los Angeles, CA 90071-1410  
21 Telephone: 213-576-1000  
22 Emails: [ed.casey@alston.com](mailto:ed.casey@alston.com); [gina.angiolillo@alston.com](mailto:gina.angiolillo@alston.com)

23  
24 **(2) The quantity of any groundwater extracted from the basin by the party and the**  
25 **method of measurement used by the party or the party’s predecessor in interest for each of the**  
26 **previous 10 years preceding the filing of the complaint.**

27 Response: SCE and its predecessors have title to, or an interest in, a number of parcels within  
28 the geographic area defined within the Complaint as the Ventura River Watershed. SCE reserves the

1 right to offer substantiating evidence later in this proceeding regarding SCE's possessory interests  
2 within the Ventura River Watershed. SCE has not extracted groundwater on its properties during the  
3 ten (10)- year period preceding the commencement of this adjudication. (Code of Civ. Proc. § 842,  
4 Subd. (a)(2).)

5  
6 **(3) The type of water right or rights claimed by the party for the extraction of**  
7 **groundwater.**

8 Response: SCE asserts overlying water rights for the extraction of groundwater, including but  
9 not limited to, unexercised rights. SCE also asserts a right to use groundwater under the self-help  
10 doctrine, in the event that prescriptive rights to extract water from the basins are determined.

11  
12 **(4) A general description of the purpose to which the groundwater has been put.**

13 Response: SCE has not historically extracted groundwater from its properties within the  
14 Ventura River Watershed, but reserves the right to do so in the future.

15  
16 **(5) The location of each well or other source through which groundwater has been**  
17 **extracted.**

18 Response: SCE is not aware of any wells through which groundwater has been extracted.

19  
20 **(6) The area in which the groundwater has been used.**

21 Response: SCE has not historically extracted groundwater from the properties within the  
22 Ventura River Watershed for which it has an ownership interest, but reserves the right to do so in the  
23 future.

24  
25 **(7) Any claims for increased or future use of groundwater.**

26 Response: SCE has no planned future water use at this time but reserves the right to extract,  
27 sell, or transfer water pursuant to its existing rights, for uses including but not limited to operation and  
28 maintenance of substations, transmission lines, and related electrical systems.

1           **(8) The quantity of any beneficial use of any alternative water use that the party**  
2 **claims as its use of groundwater under any applicable law, including, but not limited to, Section**  
3 **1005.1, 1005.2, or 1005.4 of the Water Code.**

4           Response: SCE reserves the right to additional water use pursuant to Water Code Sections  
5 1005.1, 1005.2 and 1005.4 as a result of any groundwater conservation practices, including but not  
6 limited to, the purchasing of water, the use of surface water, and the reduction of groundwater  
7 pumping.

8  
9           **(9) Identification of all surface water rights and contracts that the party claims**  
10 **provides the basis for its water right claims in the comprehensive adjudication.**

11           Response: SCE is not aware of any rights to surface water on or appurtenant to its properties  
12 within Ventura River Watershed at this time. SCE reserves the right to supplement this disclosure in  
13 the future should it determine it has any surface water rights.

14  
15           **(10) The quantity of any replenishment of water to the basin that augmented the**  
16 **basin's native water supply, resulting from the intentional storage of imported or non-native**  
17 **water in the basin, managed recharge of surface water, or return flows resulting from the use of**  
18 **imported water or non-native water on lands overlying the basin by the party, or the party's**  
19 **representative or agent, during each of the 10 calendar years immediately preceding the filing**  
20 **of the complaint.**

21           Response: SCE currently asserts no replenishment of water to the basin during the 10 calendar  
22 years immediately preceding the filing of the Complaint in this action. SCE reserves the right to  
23 supplement this disclosure in the future should it determine that its water conservation practices have  
24 resulted in replenishment to the basin.

25  
26           **(11) The names, addresses, telephone numbers, and email addresses of all persons**  
27 **possessing information that supports the party's disclosures.**

28           Response: SCE may be contacted through its attorneys of record, Edward J. Casey and Gina

1 Angiolillo, of Alston & Bird LLP:

2 333 South Hope St., 16th Floor, Los Angeles, CA 90071-1410

3 Telephone: 213-576-1000

4 Emails: [ed.casey@alston.com](mailto:ed.casey@alston.com); [gina.angiollilo@alston.com](mailto:gina.angiollilo@alston.com)

5  
6 **(12) Any other facts that tend to prove the party's claimed water right.**

7 Response: SCE reserves the right to supplement this disclosure, where appropriate, at a future  
8 date. (Code of Civ. Proc. § 842, subd. (d)(1)-(3).)

9  
10  
11 DATED: June 1, 2021

EDWARD J. CASEY  
GINA ANGIOLILLO  
**ALSTON & BIRD LLP**

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Gina Angiolillo  
Attorneys for Cross-Defendant  
**SOUTHERN CALIFORNIA EDISON**

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**VERIFICATION**

STATE OF CALIFORNIA

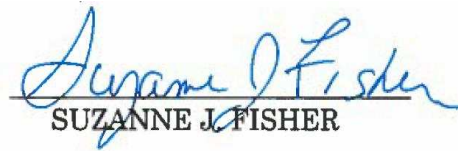
COUNTY OF LOS ANGELES

I, Suzanne J. Fisher, declare:

That I am an agent of Southern California Edison Company, a corporation organized and existing under the laws of the State of California, which is the Cross-Defendant in the above-entitled action, and I am authorized to make this verification on its behalf.

Based on information supplied by responding party's agents, and employees, I declare under penalty of perjury that **CROSS-DEFENDANT SOUTHERN CALIFORNIA EDISON'S INITIAL DISCLOSURES (CCP § 842)** are true and correct.

Executed on June 1, 2021, at Rosemead, California.

  
SUZANNE J. FISHER