

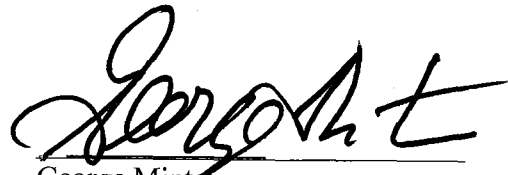
**BEFORE THE PUBLIC UTILITIES
COMMISSION OF THE STATE OF CALIFORNIA
DECLARATION OF GEORGE MINTER
REGARDING CONFIDENTIALITY OF CERTAIN DATA**

I, George Minter, do declare as follows:

1. I am George Minter, Regional Vice President for External Affairs and Environmental Policy for Southern California Gas Company (“SoCalGas”). I have reviewed the document “SoCalGas Response_Cal PA-02-Modified” and the folder “Response 1_Confidential Information”, submitted concurrently herewith (the “Response”). In addition, I am personally familiar with the facts and representations in this Declaration and, if called upon to testify, I could and would testify to the following based upon my personal knowledge and/or information and belief.
2. I hereby provide this Declaration in accordance with Decision (“D.”) 17-09-023 and General Order (“GO”) 66-D to demonstrate that the confidential information (“Protected Information”) provided in the Response submitted concurrently herewith and as described in specificity in Attachment A is within the scope of data protected as confidential under applicable statutory provisions including, but not limited to, Public Utilities Code (“PUC”) § 583, Govt. Code § 6254(k) and/or GO 66-D.
3. In accordance with the statutory provisions described herein, the Protected Information should be protected from public disclosure.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct to the best of my knowledge.

Executed this August 13, 2019, at Los Angeles, California.

A handwritten signature in black ink, appearing to read "George Minter". The signature is written in a cursive style with a horizontal line underneath the name.

George Minter
Regional Vice President
External Affairs and Environmental
Policy

ATTACHMENT A

Confidentiality Justification for Protected Information as Provided in the Response

(Confidential Protected Information provided in the documents in response to this data request have been highlighted)

Location of Data	Description of Data	Legal Citations	Narrative Justification
<p>Highlighted portions of document "SoCalGas Response_Cal PA-02 Modified" and various highlighted portions of invoices in folder "Response 1_Confidential Information," including files: "Marathon April 2018," "Marathon May 2018," "Marathon June 2018," "Marathon July 2018," Marathon August 2018" & "Marathon September 2018."</p>	<p>Consultant invoices.</p>	<p>CPRA Exemption, Gov't Code § 6254(k) ("Records, the disclosure of which is exempted or prohibited pursuant to federal or state law") · See, e.g., D.11-01-036, 2011 WL 660568 (2011) (agreeing that confidential prices and contract terms specifically negotiated with a program vendor is proprietary and commercially sensitive and should remain confidential) · Valley Bank of Nev. v. Superior Court, 15 Cal.3d 652, 658 (1975) (financial information is protected – especially of non-parties)</p>	<p>Based on input received by third party, and based on SoCalGas's concurring position, the produced documents are proprietary and represent and contain proprietary, commercially sensitive, trade secrets, and content not intended for public disclosure. Third party conducts efforts which involve communications and work product which is intended only for access by designated members. Public disclosure would pose potential negative impacts and/or harm to third party and SoCalGas.</p>