DECLARATION OF SHARON TOMKINS IN SUPPORT OF MOTION OF SOUTHERN CALIFORNIA GAS COMPANY FOR LEAVE TO FILE UNDER SEAL CONFIDENTIAL VERSIONS OF DECLARATION NUMBERS 3, 4, 5 AND 6

- I, Sharon Tomkins, do declare as follows:
- 1. I am a resident of California over 18 years of age, and 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 am employed by Southern California Gas Company ("SoCalGas") as Vice President of Strategy, Engagement and Chief Environmental Officer. I have worked for SoCalGas since 2010.
- 3. I am submitting this declaration in support of the Motion to File Under Seal Declarations Confidential Versions of Declaration Numbers 3, 4, 5, and 6 in support of SoCalGas' Motion for Reconsideration/Appeal to the Full Commission of Administrative Law Judge's Ruling in the Discovery Dispute Between Public Advocates Office and Southern California Gas Company, October 2019 (Not in a Proceeding) issued on November 1, 2019 ("Motion for Reconsideration/Appeal").
- 4. Declarations 3, 4, 5 and 6 contain information that discloses the identities of the third parties that SoCalGas has engaged. Disclosing the name of the third party risks the disclosure of identifying information regarding the third party. Disclosure of the confidential information risks the third party's privacy, especially here where there is a history of names and contact information being shared with the public and/or media.
- 5. Declarations 3, 4, 5 and 6 contain confidential information that discloses SoCalGas' 100% shareholder-funded associational activities and speech, such as its scope of work, business plans and strategies with third parties made in furtherance of its political association and expression.
- 6. In accordance with the statutory provisions described herein, the confidential 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 2nd day of December 2019, at Los Angeles, California.

Respectfully submitted on behalf of SOUTHERN CALIFORNIA GAS COMPANY

By:

SHARON TOMKINS

Vice President of Strategy, Engagement and Chief Environmental Officer