

**DECLARATION OF
DENNIS ENRIQUE**

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I, Dennis Enrique, declare and state as follows:

1. I am a resident of California over 18 years of age, and my statements herein are based on personal knowledge.
2. I am currently employed by Southern California Gas Company (SoCalGas) as a Financial Systems and Client Support Manager. I have worked for Sempra Energy (SoCalGas's parent company) since 1999, and for SoCalGas since 2010. In my current position, my responsibilities include managing SoCalGas's financial accounting system, which utilizes the SAP enterprise software. I am familiar with the types of information and records which are accessible through the SAP financial accounting system.
3. I am submitting this Declaration in Support of Southern California Gas Company's (SoCalGas) (U 904 G) Motion to Quash Portion of the Subpoena to Produce Access to Certain Materials in Accounting Databases and to Stay Compliance Until Completion of Software Solution to Exclude Those Protected Materials in the Databases.
4. SoCalGas's SAP system is a vast financial database which includes nearly all financial transactions made by the company. It captures a wide variety of transactions, including payments made to contractors and other third parties, workers compensation payments, and individual employee reimbursements. To my understanding, the database references and contains information relating to over 2,000 unique payees (or "vendors") of SoCalGas.
5. SoCalGas's SAP financial accounting system does not merely record and disclose sums of payment. It contains a wide breadth of identifying and descriptive information and records. A few illustrative examples demonstrate this point. Specifically, the system contains a variety of information relating to the payments, including sensitive information such as payee bank account numbers. The system also contains fields which identify each vendor, both by name and assigned number, and discloses the addresses associated with them.
6. The database also has line item records attachments. This means a user can access a record of the corresponding invoice for a particular payment made. These invoices may include the vendor's description of the services provided and other narrative information about the work they performed for SoCalGas. With respect to an outside law firm, for example, its invoice containing descriptions of the legal work performed for SoCalGas can be viewed and accessed via the SAP database. Similarly, for a political consulting firm, an invoice that includes

a description of the sensitive lobbying or political work it performed for SoCalGas can be viewed and accessed via the SAP system.

7. The system additionally contains a "Line Item Text" field, wherein narrative descriptions can be entered when a transaction record is created. This field may contain information reflecting the name of the vendor as well as descriptive information about the nature of its relationship with SoCalGas or the services it provides. The system further contains journal entry line items. These are entered when adjustments or corrections need to be made in connection with financial transactions. Such line item entries sometimes contain descriptions that reflect or reveal the identity of a vendor to which the adjustment or correction pertains.

8. I understand that Cal Advocates has made a request to obtain exported data from, and gain live access to, the entirety of SoCalGas's SAP underlying accounting database. I have been assisting in preparing exports from SAP in order to provide responsive data to Cal Advocates. This work has been delayed in part because the accounting department must remotely download and upload data contained within SAP via SoCalGas's virtual private network while working from home, as mandated by relevant state and local safer-at-home guidelines during the current Covid-19 pandemic.

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

Executed on May 19, 2020 at Porter Ranch, California.



DENNIS ENRIQUE