

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

**DECLARATION OF KELLY CONTRATTO IN SUPPORT OF SOUTHERN
CALIFORNIA GAS COMPANY'S RESPONSE TO PUBLIC ADVOCATES OFFICE'S
MOTION TO FIND SOUTHERN CALIFORNIA GAS COMPANY IN CONTEMPT OF
THIS COMMISSION IN VIOLATION OF COMMISSION RULE 1.1 FOR FAILURE TO
COMPLY WITH A COMMISSION SUBPOENA ISSUED MAY 5, 2020, AND FINED
FOR THOSE VIOLATIONS FROM THE EFFECTIVE DATE OF THE SUBPOENA
(NOT IN A PROCEEDING)**

DECLARATION OF KELLY CONTRATTO

I, Kelly Contratto, 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 employed by San Diego Gas & Electric Company (SDG&E) as its IT Software Development Manager in the Utility Operations and Financial Applications organization. I am a shared employee with Southern California Gas Company (SoCalGas), an affiliate of SDG&E. As such, I provide support to both SoCalGas and SDG&E. I have been employed by Sempra Energy (the parent company of SoCalGas and SDG&E) or one of its companies since 1991. In my current role, I, along with my team, are responsible for, amongst other things, supporting SoCalGas's accounting system, which utilize the SAP enterprise software. I also oversee a team of security professionals relating to developing and granting access roles to users in SAP.
3. I am submitting this Declaration in Support of Southern California Gas Company's (SoCalGas) Opposition to the Public Advocates Office Motion to Find Southern California Gas Company in Contempt of this Commission in Violation of Commission Rule 1.1 for Failure to Comply with a Commission Subpoena Issued May 5, 2020, and Fined for those Violations from the Effective Date of the Subpoena.
4. On May 17, 2020 I was asked to create a custom software solution in connection with a subpoena issued by the Public Advocates Office to access SoCalGas's SAP financial system. SoCalGas's SAP system is a vast financial system which I understand includes nearly all financial transactions made by the company. It captures a wide variety of transactions, including payments to contractors and other third parties, worker compensation payments, and individual employee reimbursements. In that connection, it also references or contains payees' names, social security numbers and bank information. The purpose of the software solution is to filter and exclude the ability to access and view transactions related to certain 100% shareholder-funded vendors of SoCalGas and outside law firms retained by SoCalGas.
5. For this project I assigned a team consisting of myself, two technical leads, and one programmer. We worked with a team of at least two individuals from the Environmental Policy business unit team ("Business Unit") to identify the relevant transactions. We additionally

worked with three members of the Financial Systems team in Accounting to customize the solution and test the software.

6. This team (comprising of at least 9 people) compiled a list of relevant vendor identification numbers based on the names (and variations thereof) of certain 100% shareholder-funded vendors and outside law firms identified by the Business Unit. We then built, developed and programmed a custom software solution to exclude the ability to access or view the transactions of these identified vendors and law firms, based on their corresponding Vendor Identification Number, which is a field in the SAP database. This solution also excluded the ability to access or view certain records, attachments, and documents associated with these vendor and law firm transactions. The Business Unit manually identified additional transactions to exclude by reviewing thousands of journal entries to exclude transactions containing protected information.. Each of these particular records, attachments and documents was excluded by its unique SAP Reference Document Number, which is also a field in the SAP system.

7. In addition to compiling relevant Vendor ID Numbers and SAP Reference Document Numbers, and building, developing and programming the custom software, this team also conducted multiple tests of the software to identify and redress any deficiencies or vulnerabilities.

8. The above-described process required the dedicated efforts of all members of the team, from approximately May 18, 2020 to May 28, 2020, when the custom software was completed. Speaking strictly for my technical team, comprised of two technical leads, one programmer and myself, I estimate that we spent a total of approximately 200 hours during the May 18, 2020 to May 28, 2020 time frame, to design, build, test and implement the solution. During that time, my technical team members dedicated all or substantially all of their workday hours on this project, and I spent approximately 20% to 25% of my work day hours managing them.

9. The SAP system contains millions of accounting records. For example, the SAP system contains millions of records called "accounting documents." An accounting document reflects postings of financial transactions in the SAP system, and the document contains fields or includes hyperlinks to other fields including but not limited to those which reveal sensitive information such as social security numbers, banking accounting numbers and information, pricing information, amongst others. Further, through the accounting document a user can access

or link through to underlying records such as invoices, which itself may contain additional sensitive information. For the period January 1, 2015 to April 30, 2020, SoCalGas's SAP system contains approximately 13 million accounting documents.

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

Executed on July 1, 2020 at Escondido, California.



KELLY CONTRATTO