

**BEFORE THE PUBLIC UTILITIES
COMMISSION OF THE STATE OF CALIFORNIA
DECLARATION OF ANDY CARRASCO
REGARDING CONFIDENTIALITY OF CERTAIN DATA**

I, Andy Carrasco, do declare as follows:

1. I am Andy Carrasco, Vice President for Strategy and Engagement and Chief Environmental Officer for Southern California Gas Company (“SoCalGas”). I have directed the review of SoCalGas’s response to Data Request CALADVOCATES-TB-SCG-2020-4 (“DR-15”) Question 18 and provided guidance on how to mark the documents for confidentiality. 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 provided in the Response submitted concurrently herewith and as described in specificity in Attachment A (“Protected Information”) 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(c), -(k), & 6255(a), 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 July 10, 2020, at Los Angeles, California.



Andy Carrasco
Vice President
Strategy and Engagement

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 information marked as Confidential in response to DR-15 Question 18 (July 10, 2020)</p>	<p>Personnel, personal or private employee information</p>	<p>CPRA Exemption, Gov't Code § 6254(c) (public disclosure would constitute an unwarranted invasion of personal privacy); CAL. CONST., Art. I, § 1 (California constitutional right to privacy); Civil Code §§ 1798.3, 1798.24 (the California Information Practices Act); <i>Pioneer Elecs. (USA), Inc. v. Superior Court</i>, 40 Cal. 4th 360, 366 (2007) (“protecting disclosure of an individual's name and other identifying information is a matter embraced within the state Constitution's privacy provision (Cal. Const., art. I, § 1)”); <i>Britt v. Superior Court</i>, 20 Cal. 3d 844, 855-856 (1978) (even highly relevant information may be shielded from discovery if its disclosure would impair a person's inalienable right of privacy provided by the California Constitution); <i>City of San Jose v. Superior Court</i>, 74 Cal. App. 4th 1008, 1016–</p>	<p>The produced document contains sensitive employee information not intended for public disclosure. Public disclosure would disclose the employee's private or personal employee information protected by the employee's right to privacy. Further, disclosing employee names in conjunction with other identifying information such as e-mail addresses, home addresses and telephone numbers could pose a risk to employee safety. Additionally, disclosure of such information increases the risks of cyber-attacks, incessant robo-calls, targeted calls, and malicious emails.</p>

		<p>1017 (1999) (because “[p]ublic records can include ‘personal details about private citizens,’” the public disclosure under the CPRA of personally identifying information “may infringe upon privacy interests”).</p> <p>CPRA Exemption, Gov’t Code § 6255(a) (Balancing Test)</p>	
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