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 Communications, Local Government & Community Affairs for Southern California Gas Company (“SoCalGas”). I have directed the review SoCalGas’s response to Question 2, 7 and 9 of Data Request CalAdvocates-TB-2021-01 (“DR 21”) and provided guidance on how to mark them 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 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 § 583, Government 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.

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Executed this February 11, 2021, at Glendale, California.

[Signature]

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)

<table>
<thead>
<tr>
<th>Location of Data</th>
<th>Description of Data</th>
<th>Legal Citations</th>
<th>Narrative Justification</th>
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<tbody>
<tr>
<td>Highlighted information in the following:</td>
<td></td>
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<tr>
<td>(1) name referred to in Questions 2 &amp; 9(b)</td>
<td>Names of SoCalGas employees Private email address and cell phone number of a former employee</td>
<td>CPRA Exemption, Gov’t Code § 6254(c) (&quot;disclosure of which would constitute an unwarranted invasion of personal privacy&quot;); CPRA Exemption, Gov’t Code § 6254(k) (&quot;Records, the disclosure of which is exempted or prohibited pursuant to federal or state law&quot;); Cal. Civil Code § 1798.21 (requiring agencies to “ensure the security and confidentiality of” personal data); Cal. Civil Code § 1798.24 (limiting disclosure of personal information); Cal. Civil Code § 1985.3, 1985.6 (identifying types of protected records (including employment records), the process for subpoenaing employee records and requiring notice and opportunity to object);</td>
<td>Disclosing employee names, the private email of a former employee and the cell phone number of a former employee is an unwarranted invasion of personal privacy and could pose a risk to employee’s safety and the former employee’s safety. Additionally, disclosure of such information increases the risks of cyber-attacks, phishing attempts, incessant robocalls, targeted calls, identity theft and malicious emails. These risks are further increased where there is a history of employee names and contact information being shared with the public and/or media. Public disclosure would also constitute an “unwarranted invasion of personal privacy.”</td>
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Britt v. Superior Court (1978) 20 Cal. 3d 844, 855-856 (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);

Alch v. Superior Court, 165 Cal. App. 4th 1412, 1428 (2008) (recognizing that name and work history information can implicate privacy interests;

Pioneer Elecs. (USA), Inc. v. Superior Court (2007) 40 Cal. 4th 360, 366 (“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”);


CPRA Exemption, Gov’t Code § 6255(a) (Balancing Test)