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 of the documents that are responsive to “SoCalGas Response - CalAdvocates-TB-SCG-2021-03, Q9b, 10a and Q10c” and provided guidance on how to mark the documents for confidentiality purpose.” 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 (“Protected Information”) provided in the Response submitted concurrently herewith and as described in specificity in Attachment A 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(k) 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 31st day of March 2021, at Glendale, California.

Respectfully submitted on behalf of SOUTHERN CALIFORNIA GAS COMPANY

By: ____________________

ANDY CARRASCO
Vice President for Communications, Local Government & Community Affairs
### 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>
</tr>
</thead>
<tbody>
<tr>
<td>Highlighted information in “Response 9b Confidential”</td>
<td>Consultant invoice/pricing information.</td>
<td>CPRA Exemption, Gov’t Code § 6254(k) (“Records, the disclosure of which is exempted or prohibited pursuant to federal or state law”)</td>
<td>The produced documents are proprietary and represent and contain proprietary, commercially sensitive, trade secrets, and content not intended for public disclosure. The Commission has repeatedly held that pricing information received by a regulated utility from a third-party vendor is entitled to confidential treatment. Further, it is industry custom among regulated utilities to treat as confidential pricing terms entered into with third-party vendors. Moreover, public disclosure of the commercially sensitive information contained in the referenced documents would put SoCalGas at a competitive disadvantage because it would give other vendors/service providers insight into SoCalGas’ negotiating positions. SoCalGas conducts efforts which involve communications and work product intended for only access by designated employees.</td>
</tr>
<tr>
<td>Highlighted information in response</td>
<td>Compensation and benefits information</td>
<td>CPRA Exemption, Gov’t Code § 6254(c) (exempting</td>
<td></td>
</tr>
</tbody>
</table>
The documents contain, among other things, information on compensation and benefits conferred to individual employees. The public disclosure of such information implicates those employees’ right to privacy and cannot be disclosed absent “compelling need.” The privacy risks are heightened where, as here, there is a history of information produced in this investigation being shared with the media and/or the public at large.
reversed on other grounds, 2010 WL 3719081 (S.D. Cal. Sept. 17, 2010) (denying motion to compel production of information seeking employees “annual salary, assets, liabilities, and net worth” on grounds that plaintiff’s need for the financial information did not outweigh employees’ privacy rights under the California Constitution).

CPRA Exemption, Gov’t Code § 6254(k) (exempting from disclosure “[r]ecords, the disclosure of which is exempted or prohibited pursuant to federal or state law); see Cal. Code of Civ. P. § 1985.6 (a party seeking disclosure of employment records must first provide notice to the individual whose records are sought and allow an opportunity to object).

CPUC General Order 77M.

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