

**BEFORE THE OFFICE OF ENERGY INFRASTRUCTURE SAFETY OF
THE STATE OF CALIFORNIA**

**DECLARATION OF VALERIE BILLE REGARDING
CONFIDENTIALITY OF CERTAIN DATA PURSUANT TO CALIFORNIA
CODE OF REGULATIONS § 29200**

I, Valerie Bille, do declare as follows:

1. I am Senior Vice President and Chief Financial Officer (“CFO”) for San Diego Gas and Electric (“SDG&E”). I have reviewed the confidential information included within SDG&E’s response to the Office of Energy Infrastructure Safety’s data request regarding 2021-2024 Documentation of Compliance with Executive Compensation Provisions of Public Utilities Code § 8389(e) and the Office of Energy Infrastructure Safety Guidance (“Data Request”) submitted to the Office of Energy Infrastructure Safety on May 15, 2026. 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 pursuant to California Code or Regulations Section 29200 to demonstrate that the confidential information (“Protected Information”) provided in SDG&E’s response to the Executive Compensation Data Request is within the scope of data protected as confidential under applicable law. Attachment A to this Declaration discusses the relevant provisions of law that allow the Office of Energy Infrastructure Safety to maintain the confidentiality of the Protected Information. The Protected Information is also confidential pursuant to California Public Utilities Commission Decision (D.) 17-09-023 and General Order (GO) 66-D Revision 1¹.

3. Based on my knowledge, the Protected Information being provided has not

¹ GO 66-D was modified by D.19-01-028 to create GO 66-D Revision 1, which became effective February 1, 2019.

been publicly published in this form.

4. In accordance with the narrative justification described in Attachment A, the Protected Information should be protected from public disclosure indefinitely, because neither the Protected Information, nor its sensitive nature are projected to change at any time.

5. SDG&E is providing also providing Energy Safety with a nonconfidential version of the 2021, 2022, 2023, and 2024 Executive Compensation Submissions with the confidential information redacted.

6. I have been authorized to make this application on behalf of SDG&E. I certify under penalty of perjury that the information contained in this application for confidential designation is true, correct, and complete to the best of my knowledge.

Executed this May 15, 2026, at San Diego, California.



Valerie Bille
Senior Vice President & CFO

ATTACHMENT A

Confidentiality Justification for Protected Information as Provided in the SDG&E’s Response to the Data Request

Location of Data	Legal Citations	Narrative Justification
<p>Yellow highlighted fields in following files:</p> <ul style="list-style-type: none"> • CONFIDENTIAL_SDG E_2021_ECSS_Excel_Template_R0.xlsx • CONFIDENTIAL_SDG E_2022_ECSS_Excel_Template_R0.xlsx • CONFIDENTIAL_SDG E_2023_ECSS_Excel_Template_R0.xlsx • CONFIDENTIAL_SDG E_2024_ECSS_Excel_Template_R0.xlsx 	<p>CPRA Exemption, Gov’t Code § 6254(c) (exempting from disclosure “personnel, medical, or similar files, the disclosure of which would constitute an unwarranted invasion of personal privacy”); <i>see</i> Cal. Const., art. 1, § 1 (“All people . . . have inalienable rights. Among these are . . . privacy.”); <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>Bd. of Trustees v. Superior Court</i>, 119 Cal. App. 3d 516, 529 (1981) (affirming the right to privacy in employment records, and finding that such records are not discoverable absent a “compelling need”); <i>Garcia v. City of Imperial</i>, 270 F.R.D. 566, 572–73 (S.D. Cal. 2010), <i>reversed on other grounds</i>, 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).</p> <p>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); <i>see</i> 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).</p> <p>CPRA Exemption, Gov’t Code § 6255(a) (Balancing Test).</p>	<p>The public disclosure of salary information, including the structure of specific individual compensation packages, implicates employees’ right to privacy and cannot be disclosed absent “compelling need.” This information is not publicly available in any other forum, and the individuals listed herein are not specifically described in the proxy statements of SDG&E or its parent corporation, Sempra.</p> <p>SDG&E has provided a redacted version of the 2021, 2022, 2023, and 2024 Executive Compensation Submission that removes individual identifying information for public filing on Energy Safety’s docket system.</p>