

**BEFORE THE OFFICE OF ENERGY INFRASTRUCTURE SAFETY OF THE
CALIFORNIA NATURAL RESOURCES AGENCY**

**DECLARATION SUPPORTING THE DESIGNATION OF
CONFIDENTIAL INFORMATION ON BEHALF OF
PACIFIC GAS AND ELECTRIC COMPANY**

1. I, Heidi Ramos, am the Data Response Unit Quality Control (“DRU QC”) Compliance and Risk Consultant, Senior, of Pacific Gas and Electric Company (“PG&E”), a California corporation. Joe Bentley, Senior Vice President, Electric Engineering at PG&E, delegated authority to me to sign this declaration. My business office is located at:

Pacific Gas and Electric Company
300 Lakeside Drive
Oakland, CA 94612

2. PG&E will produce the information identified in Paragraph 3 of this Declaration to the Office of Energy Infrastructure Safety (“Energy Safety”) or departments within or contractors retained by Energy Safety in response to an audit, data request, proceeding, or other request by Energy Safety.

Name of Energy Safety Proceeding (if applicable): N/A

3. Title and description of document(s):

Attachment	File Name	Description
A	Attachment 06_5.3.5.7_3a_Total Detection Buffer 04 foot PI 111221 2020_CONF.xlsx	Field Inspection Sample
B	Attachment 07_5.3.5.13_4a_TD 7104P-1 VM QA Distribution Audit Procedure_CONF.pdf	VM QA Distribution and Local Transmission Audit Procedure
C	Attachment 09_5.3.5.13_4c_2020_QV_EVM Audit_CONF.pdf	VEG QV for EVM Work Verification Audit
D	Attachment 10_5.3.5.13_4c_QVVM-RISK-6301P-10 Quality Verification VM Audit Procedure_CONF.pdf	Quality Verification Procedure
E	Attachment 11_5.3.5.15_6b_Targeted Tree Species Study FINAL REPORT_CONF.pdf	Targeted Tree Species Study Final Report
F	Attachment 13_5.3.5.19_7b_One VM POC Evaluation_CONF.xlsx	One VM Proof-of-Concepts Evaluation
G	Attachment 14_Multiple_SAFE-4300S_MOC Standard_CONF.pdf	Management of Change Standard
H	Attachment 15_Multiple_PPSOT-GUID-000018330_CONF.pdf	Management of Change Process for VM

4. These documents contain confidential information that, based on my information and belief, has not been publicly disclosed. Portions of these documents have been marked as confidential, and the basis for confidential treatment and where the confidential information is located on the documents is identified below.

Check	Basis for Confidential Treatment	Where Confidential Information is Located on the Documents
<input type="checkbox"/>	<p>Customer-specific data, which may include demand, loads, names, addresses, and billing data.</p> <p>This information is protected under Public Utilities Code (“P.U.C.”) §§ 8380 and 15475(c); PG&E Electric and Gas Rules 9 and 27, Civil Code (“Civ. Code”) §§ 1798 <i>et seq.</i>; Government Code (“Govt. Code”) §§ 6254 and 6255(a); and the California Constitution (“Cal. Const.”), Article I, Section 1.</p> <p>In order to meet its statutory obligations, PG&E consistently maintains this information as confidential, protects it from public disclosure, and marks it as confidential when legally required to disclose this information.</p> <p>Length of time for confidential treatment:</p> <p><input type="checkbox"/> Indefinite. There is no reasonably foreseeable point in time at which this information will no longer be confidential.</p> <p><input type="checkbox"/> Other: _____.</p> <p>Can this information be disclosed if aggregated?</p> <p><input type="checkbox"/> Yes.</p> <p><input type="checkbox"/> No.</p> <p>Can this information be disclosed if the confidential portions are masked?</p> <p><input type="checkbox"/> Yes.</p> <p><input type="checkbox"/> No.</p>	
<input type="checkbox"/>	<p>Personal information that identifies or describes an individual (including employees), which may include home address or phone number; SSN, driver’s license, or passport numbers; education; financial matters;</p>	

medical or employment history (not including PG&E job titles); and statements attributed to the individual.

In order to meet its legal obligations, PG&E consistently maintains this information as confidential, protects it from public disclosure, and marks it as confidential when legally required to disclose the information.

This information is protected under P.U.C. § 15475(c); Civ. Code §§ 1798 *et seq.*; Govt. Code §§ 6254 and 6255(a); and the Cal. Const., Article I, Section 1.

Length of time for confidential treatment:

☐ Indefinite. There is no reasonably foreseeable point in time at which this information will no longer be confidential.

☐ Other: _____.

Can this information be disclosed if aggregated?

☐ Yes.

☐ No.

Can this information be disclosed if the confidential portions are masked?

☐ Yes.

☐ No.

☐

Physical facility, cyber-security sensitive, or critical infrastructure data, including without limitation critical energy infrastructure information (CEII) as defined by the regulations of the Federal Energy Regulatory Commission at 18 C.F.R. § 388.113 and/or General Order 66-D (“The subject information: (1) is not customarily in the public domain by providing a declaration in compliance with Section 3.2(c) stating that the subject information is not related to the location of a physical structure that is visible with the naked eye or is available publicly online or in print; **and** (2) the subject information either: could allow a bad actor to attack, compromise or incapacitate physically or electronically a facility providing critical utility service; or discusses vulnerabilities of a facility providing critical utility service”).

This information is protected under P.U.C. § 15475(c); Govt. Code §§ 6254(k), (ab) and 6255(a); 6 U.S.C.

§ 131; and 6 Code of Federal Regulations (“CFR”) § 29.2.

In order to meet its statutory obligations, PG&E consistently maintains this information as confidential, protects it from public disclosure, and marks it as confidential when legally required to disclose the information.

This physical facility, cyber-security sensitive, or critical infrastructure data meets the following criteria:

- ☐ This information is customarily in the public domain, such as the location of visible equipment.
- ☐ This information discusses vulnerabilities of a facility providing critical utility service.
- ☐ This information has been voluntarily submitted to the Office of Emergency services as set forth in Government Code section 6254(ab).
- ☐ This information, or substantially similar Information, was classified as protected critical infrastructure information by the Department of Homeland Security or Department of Energy.

Length of time for confidential treatment:

- ☐ 3 years.
- ☐ 5 years.
- ☐ Indefinite. There is no reasonably foreseeable point in time at which this information will no longer be confidential.
- ☐ Other: _____.

Can this information be disclosed if aggregated?

- ☐ Yes.
- ☐ No.

Can this information be disclosed if the confidential portions are masked?

- ☐ Yes.
- ☐ No.

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- ☐ Proprietary and trade secret information or other intellectual property and protected market sensitive/competitive data.
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This information is protected under P.U.C. § 15475(c); Civ. Code §§ 3426 *et seq.*; Govt. Code §§ 6254, *et seq.*, (e.g., 6254(e), 6254(k), 6254.15), 6276.44; and Evidence (“Evid.”) Code § 1060.

Since this information derives independent economic value from not being generally known, PG&E consistently maintains this information as secret, protects it from public disclosure, and marks it as confidential when legally required to disclose the information.

This document contains the following proprietary and trade secret information:

- ☐ Invoices—Public disclosure of this information, which contains trade secret pricing information, would be destabilizing to California energy markets and could be used in a tactical manner to obtain an improper competitive advantage. If publicly disclosed, this information could be leveraged to make calculated financial decisions to the detriment of California energy consumers. PG&E holds this information as confidential and would suffer harm if disclosed.
- ☐ Contract work authorizations—Public disclosure of this information, which contains trade secret pricing information, would be destabilizing to California energy markets and could be used in a tactical manner to obtain an improper competitive advantage. If publicly disclosed, this information could be leveraged to make calculated financial decisions to the detriment of California energy consumers. PG&E holds this information as confidential and would suffer harm if disclosed.
- ☐ Journal entry templates—Public disclosure of this information, which contains trade secret pricing information, would be destabilizing to California energy markets and could be used in a tactical manner to obtain an improper competitive advantage. If publicly disclosed, this information could be leveraged to make calculated financial decisions to the detriment of California energy consumers. PG&E holds this information as confidential and would suffer harm if disclosed.
- ☐ Purchase order agreements—Public disclosure of this information, which contains trade secret pricing information, would be

destabilizing to California energy markets and could be used in a tactical manner to obtain an improper competitive advantage. If publicly disclosed, this information could be leveraged to make calculated financial decisions to the detriment of California energy consumers. PG&E holds this information as confidential and would suffer harm if disclosed.

☐ Other: _____.

Length of time for confidential treatment:

☐ 3 years.

☐ 5 years.

☐ Indefinite. There is no reasonably foreseeable point in time at which this information will no longer be confidential.

☐ Other: _____.

Can this information be disclosed if aggregated?

☐ Yes.

☐ No.

Can this information be disclosed if the confidential portions are masked?

☐ Yes.

☐ No.

☐ Corporate financial records.

This information is protected under P.U.C. § 15475(c); and Govt. Code §§ 6254(k) and 6254.15, 6255(a).

Since this information includes closely-held corporate financial records, PG&E consistently maintains this information as confidential, protects it from public disclosure, and marks it as confidential when legally required to disclose the information.

Length of time for confidential treatment:

☐ 3 years.

☐ 5 years.

☐ Indefinite. There is no reasonably foreseeable point

in time at which this information will no longer
be
confidential.
☐ Other: _____.

Can this information be disclosed if aggregated?

- ☐ Yes.
☐ No.

Can this information be disclosed if the confidential
portions are masked?

- ☐ Yes.
☐ No.
-

- ☐ Third-Party information subject to non-disclosure or
confidentiality agreements or obligations.

This information is protected under P.U.C. § 15475(c);
and Govt. Code §6255(a).

In order to meet its contractual obligations, PG&E
consistently maintains this information as confidential,
protects it from public disclosure, and marks it as
confidential when legally required to disclose the
information.

Length of time for confidential treatment:

- ☐ Indefinite. There is no reasonably foreseeable
point
in time at which this information will no longer
be
confidential.
☐ Other: _____.

Can this information be disclosed if aggregated?

- ☐ Yes.
☐ No.

Can this information be disclosed if the confidential
portions are masked?

- ☐ Yes.
☐ No.
-



Other categories where disclosure would be against the public interest (Govt. Code § 6255(a)): In light of risks to employee safety and privacy, the public interest in maintaining the confidentiality of the employee information outweighs the public interest in disclosure.

Length of time for confidential treatment:

☒ Indefinite. There is no reasonably foreseeable point in time at which this information will no longer be confidential.

☐ Other: _____.

Can this information be disclosed if aggregated?

☐ Yes.

☒ No.

Can this information be disclosed if the confidential portions are masked?

☒ Yes.

☐ No.

Confidential information is highlighted in grey:

Atch. A, Sheet
“Field_Inspection_Sample”
Columns H, K

Atch. F, Sheets:
“Evaluation” Column I,
“ESRI” Columns I-T,
“Unearth” Columns I-T,
“Salesforce” Columns I-T,
“SAP” Columns I-T

Confidential information is outlined green on:

Atch. B, Pages 24-25
Atch. C, Pages 3, 16, 48-49
Atch. D, Page 6
Atch. E, Pages 1, 150, 184,
186
Atch. G, Page 9
Atch. H, Page 10

5. The importance of maintaining the confidentiality of this information outweighs any public interest in disclosure of this information. This information should be exempt from the public disclosure requirements under the California Public Records Act and should be withheld from disclosure.
6. If this information has been disclosed to a person outside of PG&E, it has been protected through the use of confidentiality or non-disclosure agreements. At this time, PG&E does not have internal processes in place that would allow it to determine whether specific information has been disclosed to independent contractors, third parties, or through the regulatory or litigation process. However, to the extent this information was ever disclosed to a person other than an employee, it has been

consistently marked confidential and its disclosure contractually protected through the use of confidentiality and non-disclosure agreements.

7. I am authorized to make this application on behalf of PG&E and 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.
8. Executed on the date indicated in the signature block below at Richmond, California.

Heidi Ramos
DRU QC Compliance and Risk Consultant, Senior
Data Response Unit
Pacific Gas and Electric Company