



February 23, 2022

**Via Electronic Filing**

Melissa Semcer, Deputy Director  
Office of Energy Infrastructure Safety  
California Natural Resources Agency  
715 P Street, 20th Floor  
Sacramento, CA 95814  
melissa.semcer@energysafety.ca.gov

**Subject: Application for Confidential Designation for  
CONFIDENTIAL Comments of the Public Advocates  
Office on Pacific Gas and Electric Company's Quarter  
Four (Q4) Quarterly Data Report, Docket #2021-SCs**

Dear Deputy Director Semcer,

Pursuant to 14 CCR section 29200, the Public Advocates Office at the California Public Utilities Commission (Cal Advocates) respectfully submits this application for confidential designation of portions of its **Confidential Comments of the Public Advocates Office on Pacific Gas and Electric Company's Quarter Four (Q4) Quarterly Data Report, Docket #2021-SCs (Comments)**, submitted February 15, 2022.

Cal Advocates requests confidential treatment of the portions of the Comments with confidential designation, "[BEGIN CONFIDENTIAL]" and "[END CONFIDENTIAL]," per the California Public Records Act at Government Code section 6250 *et seq.* (CPRA), Public Utilities Code section 583, and California Public Utilities Commission (CPUC) General Order 66-D (GO 66-D).

**Portions Designated as Confidential (14 CCR section 29200(a)(2)):**

- Table 1 – page 3
- Figure 1 – page 4

**Basis and Parameters for Confidential Treatment of Portions Designated as Confidential (14 CCR section 29200(a)(3), (4), (7)-(10)):**

Both Table 1 and Figure 1 include information provided as part of the geographic information system (GIS) data submitted as part of the quarterly data reports. The data includes location aspects and conditions of Pacific Gas and Electric Company (PG&E) utility infrastructure in its quarterly data submissions to Office of Energy Infrastructure Safety (Energy Safety) in quarters one through four.<sup>1</sup> Cal Advocates obtained this GIS data as a copied recipient of PG&E's quarterly data reports submitted to Energy Safety. Cal Advocates maintains confidential treatment of the data while in its possession and has not disclosed the data to anyone other than employees at Cal Advocates.

When submitting copies of its quarterly reports, PG&E provided declarations to Cal Advocates, asserting the bases of confidential treatment by Cal Advocates.<sup>2</sup> PG&E claimed in its declarations that the GIS information at issue pertain to “[p]hysical 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”).”<sup>3</sup>

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<sup>1</sup> Office of Energy Infrastructure Safety PG&E 2021 Quarterly Data Reports submitted on May 3, 2021 (Q.1), August 2, 2021 (Q.2), November 1, 2021 (Q.3), and February 1, 2022 (Q.4).

<sup>2</sup> Attachment A - Edlyn Louie Declaration Supporting the Designation of Confidential Information on Behalf of Pacific Gas And Electric Company, April 30, 2021 (Attachment A - Louie Declaration, Q.1); Attachment B - Anna Hettig Declaration Supporting the Designation of Confidential Information on Behalf of Pacific Gas And Electric Company, July 29, 2021 (Attachment B - Hettig Declaration, Q.2); Attachment C - Edlyn Louie Declaration Supporting the Designation of Confidential Information on Behalf of Pacific Gas And Electric Company, November 1, 2021 (Attachment C - Louie Declaration, Q.3); Attachment D - Richard Knoeber Declaration Supporting the Designation of Confidential Information on Behalf of Pacific Gas And Electric Company, February 8, 2022 (Attachment D - Knoeber Declaration, Q.4).

<sup>3</sup> See Attachment A - Louie Declaration, Q.1; Attachment B - Hettig Declaration, Q.2; Attachment C - Louie Declaration, Q.3; Attachment D - Knoeber Declaration, Q.4.

In addition, PG&E claimed confidentiality of its GIS data for quarters 1 through 4 based on Government Code § 6254(k) and (ab), 6 U.S.C. § 131, and 6 CFR § 29.2.<sup>4</sup> PG&E also asserted confidential treatment for its quarter 3 data, under Government section 6255(a) and “P.U.C. § 15475(c),” and that the physical facility, cyber-security sensitive, or critical infrastructure data in its quarter 3 submissions meets the following criteria: it discusses vulnerabilities of a facility providing critical utility service; there is no reasonably foreseeable point in time at which this information will no longer be confidential; and this confidential information cannot be disclosed if the confidential portions are masked.<sup>5</sup>

Cal Advocates requests confidential treatment of Table 1 and Figure 1 containing the GIS data at issue, in the manner requested by PG&E in its declarations, based on P.U. Code section 583, GO 66-D, and the CPRA. Cal Advocates has not independently verified that the information that PG&E marked as confidential qualifies as confidential. Cal Advocates’ representations about the truth, correctness, and completeness of the information that provides the basis for Cal Advocates’ application for confidential treatment, are based on PG&E’s representations to Cal Advocates and Cal Advocates’ obligations pursuant to P. U. Code section 583.<sup>6</sup> Under P.U. Code section 583, “No information furnished to the commission<sup>7</sup> by a public utility, . . . except those matters specifically required to be open to public inspection by this part, shall be open to public inspection or made public except on order of the commission, or by the commission or a commissioner in the course of a hearing or proceeding.” In the absence of an order by the CPUC, Cal Advocates requests that Energy Safety maintain as confidential the GIS information in the Comments, as identified in this application, which PG&E provided pursuant to GO 66-D and relevant provisions of the CPRA, *e.g.*, Government Code sections 6254(k), (ab), and which PG&E stated is confidential and not open to public inspection.

Cal Advocates respectfully requests that Energy Safety grant this application for confidential designation. For any questions relating to this application, please contact Carolyn Chen (Carolyn.Chen@cpuc.ca.gov).

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<sup>4</sup> See Attachment A - Louie Declaration, Q.1; Attachment B - Hettig Declaration, Q.2; Attachment C - Louie Declaration, Q.3; Attachment D - Knoeber Declaration, Q.4.

<sup>5</sup> See Attachment C - Louie Declaration, Q.3.

<sup>6</sup> Pursuant to Rule 1.1 of the CPUC’s Rules of Practice and Procedure, PG&E has an obligation never to mislead the CPUC or its staff by a false statement of law or fact.

<sup>7</sup> In Public Utilities Code section 583, “commission” refers to the CPUC, and “commissioner” refers to a commissioner of the CPUC.

Melissa Semcer, Deputy Director  
Office of Energy Infrastructure Safety  
February 23, 2022  
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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, and I am authorized to make this application and certification on behalf of Cal Advocates.

Sincerely,

/s/ CAROLYN CHEN  
Carolyn Chen  
Attorney

Public Advocates Office  
California Public Utilities Commission  
505 Van Ness Avenue  
San Francisco, CA 94102  
Telephone: (415) 703-1980  
E-mail: [Carolyn.Chen@cpuc.ca.gov](mailto:Carolyn.Chen@cpuc.ca.gov)

# **ATTACHMENT A**

Edlyn Louie Declaration Supporting the Designation of Confidential Information  
on Behalf of Pacific Gas And Electric Company  
April 30, 2021

**BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF CALIFORNIA**

**DECLARATION SUPPORTING CONFIDENTIAL DESIGNATION  
ON BEHALF OF  
PACIFIC GAS AND ELECTRIC COMPANY (U 39 E)**

1. I, Edlyn Louie, am the Data Response Unit Quality Control (“DRU QC”) Supervisor, of Pacific Gas and Electric Company (“PG&E”), a California corporation. Debbie Powell, Interim Head of Electric Operations at PG&E, delegated authority to me to sign this declaration. My business office is located at:

Pacific Gas and Electric Company  
77 Beale Street  
San Francisco, CA 94105

2. PG&E will produce the information identified in paragraph 3 of this Declaration to the California Public Utilities Commission (“CPUC”) or departments within or contractors retained by the CPUC in response to a CPUC audit, data request, proceeding, or other CPUC request.

Name or Docket No. of CPUC Proceeding (if applicable): N/A

3. Title and description of document(s):

<b>Attachment</b>	<b>Title</b>	<b>Description</b>
A	PGE_Q1_20210501_CONF.zip	GIS Files
B	PG&E_3.3.6.6 PSPS Event Damage Photo Log_20210501_CONF.zip	PSPS Event Damage Photos
C	PG&E_3.4.9 Risk Event Photo Log_20210501_CONF.zip	Risk Event Photos
D	PG&E_3.5.6 Initiative Photo Log_20210501_CONF.zip	Initiative Photos – Asset Inspections
E	Appendix Files_Q1_20210501_CONF.zip	Appendix Files

4. These documents contain confidential information that, based on my information and belief, has not been publicly disclosed. These documents have been marked as confidential, and the

basis for confidential treatment and where the confidential information is located on the documents are identified on the following chart:

Check	Basis for Confidential Treatment	Where Confidential Information is located on the documents
☒	<p>Customer-specific data, which may include demand, loads, names, addresses, and billing data</p> <p>(Protected under PUC § 8380; Civ. Code §§ 1798 et seq.; Govt. Code § 6254; Public Util. Code § 8380; Decisions (D.) 14-05-016, 04-08-055, 06-12-029)</p>	<p>To the extent there is customer information contained in Attachments A, D, this is considered confidential.</p>
☐	<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; medical or employment history (not including PG&amp;E job titles); and statements attributed to the individual.</p> <p>(Protected under Civ. Code §§ 1798 et seq.; Govt. Code § 6254; 42 U.S.C. § 1320d-6; and General Order (G.O.) 77-M)</p>	
☒	<p>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”).</p>	<p>To the extent there is critical infrastructure information contained in Attachments A-E, this is considered confidential</p>

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(Protected under Govt. Code § 6254(k), (ab);  
6 U.S.C. § 131; 6 CFR § 29.2)

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- Proprietary and trade secret information or other intellectual property and protected market sensitive/competitive data  
(Protected under Civ. Code §§3426 *et seq.*; Govt. Code §§ 6254, *et seq.*, e.g., 6254(e), 6254(k), 6254.15; Govt. Code § 6276.44; Evid. Code §1060; D.11-01-036)
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- Corporate financial records  
(Protected under Govt. Code §§ 6254(k), 6254.15)
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- Third-Party information subject to non-disclosure or confidentiality agreements or obligations  
(Protected under Govt. Code § 6254(k); see, e.g., CPUC D.11-01-036))
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- Other categories where disclosure would be against the public interest (Govt. Code § 6255(a): Due to sensitivity around names, LAN IDs and phone numbers for individual employees, the public interest in maintaining the confidentiality of this information outweighs the public interest in disclosure.
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To the extent there is employee information contained in Attachments A, D, this is considered confidential

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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 Public Records Act and should be withheld from disclosure.

6. I declare under penalty of perjury that the foregoing is true, correct, and complete to the best of my knowledge.

7. Executed on the date indicated below at San Francisco, California.

Edlyn Louie Digitally signed by Edlyn Louie Date: 2021.04.30 14:34:18 -07'00'

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Edlyn Louie  
DRU QC Supervisor  
Data Response Unit  
Pacific Gas and Electric Company



# **ATTACHMENT B**

Anna Hettig Declaration Supporting the Designation of Confidential Information  
on Behalf of Pacific Gas And Electric Company  
July 29, 2021

**BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF CALIFORNIA**

**DECLARATION SUPPORTING CONFIDENTIAL DESIGNATION  
ON BEHALF OF  
PACIFIC GAS AND ELECTRIC COMPANY (U 39 E)**

1. I, Anna Hettig, am the Data Response Unit Quality Control (“DRU QC”) Compliance and Risk Consultant, Expert, of Pacific Gas and Electric Company (“PG&E”), a California corporation. Debbie Powell, Vice President, Asset and Risk Management at PG&E, delegated authority to me to sign this declaration. My business office is located at:

Pacific Gas and Electric Company  
77 Beale Street  
San Francisco, CA 94105

2. PG&E will produce the information identified in paragraph 3 of this Declaration to the California Public Utilities Commission (“CPUC”) or departments within or contractors retained by the CPUC in response to a CPUC audit, data request, proceeding, or other CPUC request.

Name or Docket No. of CPUC Proceeding (if applicable): N/A

3. Title and description of document(s):

<b>Attachment</b>	<b>Title</b>	<b>Description</b>
A	PGE_Q2_20210801_CONF.zip	GIS Files
B	PGE_3.4.9 Risk Event Photo Log_20210801_CONF.zip	Risk Event Photos

4. These documents contain confidential information that, based on my information and belief, has not been publicly disclosed. These documents have been marked as confidential, and the basis for confidential treatment and where the confidential information is located on the documents are identified on the following chart:

**Basis for Confidential Treatment**

**Check**

**Where Confidential Information is located on the documents**

- Customer-specific data, which may include demand, loads, names, addresses, and billing data  
  
(Protected under PUC § 8380; Civ. Code §§ 1798 et seq.; Govt. Code § 6254; Public Util. Code § 8380; Decisions (D.) 14-05-016, 04-08-055, 06-12-029)

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- 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; medical or employment history (not including PG&E job titles); and statements attributed to the individual.  
  
(Protected under Civ. Code §§ 1798 et seq.; Govt. Code § 6254; 42 U.S.C. § 1320d-6; and General Order (G.O.) 77-M)

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- 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”).  
  
(Protected under Govt. Code § 6254(k), (ab); 6 U.S.C. § 131; 6 CFR § 29.2)

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- Proprietary and trade secret information or other intellectual property and protected market sensitive/competitive data

To the extent there is customer information contained in Attachment A, this is considered confidential.

To the extent there is critical infrastructure information contained in Attachments A-B, this is considered confidential

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(Protected under Civ. Code §§3426 *et seq.*; Govt. Code §§ 6254, *et seq.*, e.g., 6254(e), 6254(k), 6254.15; Govt. Code § 6276.44; Evid. Code §1060; D.11-01-036)

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Corporate financial records

(Protected under Govt. Code §§ 6254(k), 6254.15)

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

(Protected under Govt. Code § 6254(k); see, e.g., CPUC D.11-01-036))

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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.

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To the extent there is employee information contained in Attachment A, this is considered confidential.

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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 Public Records Act and should be withheld from disclosure.
6. I declare under penalty of perjury that the foregoing is true, correct, and complete to the best of my knowledge.
7. Executed on the date indicated below at South San Francisco, California.

**Anna** Digitally signed  
by Anna Hettig  
Date:  
**Hettig** 2021.07.29  
11:48:28 -07'00'

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Anna Hettig  
Compliance and Risk Consultant, Expert  
Data Response Unit  
Pacific Gas and Electric Company

# **ATTACHMENT C**

Edlyn Louie Declaration Supporting the Designation of Confidential Information  
on Behalf of Pacific Gas And Electric Company  
November 1, 2021

**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, Edlyn Louie am the Data Response Unit Quality Control (“DRU QC”) Manager, of Pacific Gas and Electric Company (“PG&E”), a California corporation. Wade Smith, Senior Vice President, Electric Operations of PG&E, delegated authority to me to sign this declaration. My business office is located at:

Pacific Gas and Electric Company  
77 Beale Street  
San Francisco, CA 94105

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): 2021-QIU

3. Title and description of document(s):

<b>Attachment</b>	<b>File Name</b>	<b>Description</b>
A	PG&E_Q3_20211101_CONF.zip	GIS files
B	PG&E_3.5.6 Initiative Photo Log_20211101_CONF.zip	Photos of PG&E assets
C	PG&E_3.3.6.6 PSPS Event Damage Photo Log_20211101_CONF.zip	Photos from PSPS events
D	PG&E_3.4.9 Risk Event Photo Log_20211101_CONF.zip	Photos from Risk events

4. These documents contain confidential information that, based on my information and belief, has not been publicly disclosed. These files have been marked confidential at the record level, as requested. However, given that there are millions of records<sup>1</sup> in this quarterly submission, it is not possible for PG&E to specifically mark individual portions of each record as confidential and, therefore, the

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<sup>1</sup>PG&E’s 1<sup>st</sup> Quarter 2021 submission produced over 13 million records, and its 2<sup>nd</sup> Quarter 2021 submission produced over 15 million records.

entire file is being marked as confidential if it contains confidential information or if it is interconnected with another confidential file, causing both records to be confidential. The basis for confidential treatment for these files is identified below:

Check	Basis for Confidential Treatment	Where Confidential Information is Located on the Documents
<input checked="" 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&amp;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&amp;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 checked="" 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 checked="" 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 checked="" type="checkbox"/> No.</p>	<p>Customer-specific data contained in Attachments A, B, C, and D is considered confidential. As described above, it is not possible to specifically identify the location of this information in the millions of records provided. Thus, confidentiality is marked at the file level.</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; medical or</p>	

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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.

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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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

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All critical infrastructure information contained in Attachments A, B, C, and D is considered confidential. As described above, it is not possible to specifically identify the location of this information in the millions of records provided. Thus, confidentiality is marked at the file level.

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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.

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

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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: \_\_\_\_\_.

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Length of time for confidential treatment:

- 3 years.
- 5 years.
- Indefinite.
- 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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- 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.
- 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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- 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.  
 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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- 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.

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Employee information contained in Attachments A, B, C, and D is considered confidential. As described above, it is not possible to specifically identify the location of this information in the millions of records provided. Thus, confidentiality is marked at the file level.

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

Yes.

No.

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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 San Francisco, California.

**Edlyn**  
**Louie**

Digitally signed  
by Edlyn Louie  
Date:  
2021.11.01  
08:33:30 -07'00'

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Edlyn Louie  
DRU QC Manager  
Data Response Unit  
Pacific Gas and Electric Company

# **ATTACHMENT D**

Richard Knoeber Declaration Supporting the Designation of Confidential Information  
on Behalf of Pacific Gas And Electric Company  
February 8, 2022

**BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF CALIFORNIA**

**DECLARATION SUPPORTING CONFIDENTIAL DESIGNATION  
ON BEHALF OF  
PACIFIC GAS AND ELECTRIC COMPANY (U 39 E)**

1. I, Richard Knoeber, am the Data Response Unit Quality Control (“DRU QC”) Compliance and Risk Consultant, Expert, of Pacific Gas and Electric Company (“PG&E”), a California corporation. Christine Cowsert, Vice President, Asset & Regulatory at PG&E, delegated authority to me to sign this declaration. My business office is located at:

Pacific Gas and Electric Company  
77 Beale Street  
San Francisco, CA 94105

2. PG&E will produce the information identified in paragraph 3 of this Declaration to the California Public Utilities Commission (“CPUC”) or departments within or contractors retained by the CPUC in response to a CPUC audit, data request, proceeding, or other CPUC request.

Name or Docket No. of CPUC Proceeding (if applicable): N/A

3. Title and description of document(s):

<b>Attachment</b>	<b>Title</b>	<b>Description</b>
A	PG&E_2021_Q4_Rev1_CONF.zip	GIS Files

4. These documents contain confidential information that, based on my information and belief, has not been publicly disclosed. These files have been marked confidential at the record level, as requested. However, given that there are millions of records in this quarterly submission, it is not possible for PG&E to specifically mark individual portions of each record as confidential and, therefore, the entire file is being marked as confidential if it contains confidential information or if it is interconnected with another confidential file,

causing both records to be confidential. The basis for confidential treatment for these files is identified below:

Check	Basis for Confidential Treatment	Where Confidential Information is located on the documents
<input checked="" type="checkbox"/>	<p>Customer-specific data, which may include demand, loads, names, addresses, and billing data</p> <p>(Protected under PUC § 8380; Civ. Code §§ 1798 et seq.; Govt. Code § 6254; Public Util. Code § 8380; Decisions (D.) 14-05-016, 04-08-055, 06-12-029)</p>	<p>Customer-specific data contained in Attachment A is considered confidential. As described above, it is not possible to specifically identify the location of this information in the millions of records provided. Thus, confidentiality is marked at the file level</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; medical or employment history (not including PG&amp;E job titles); and statements attributed to the individual.</p> <p>(Protected under Civ. Code §§ 1798 et seq.; Govt. Code § 6254; 42 U.S.C. § 1320d-6; and General Order (G.O.) 77-M)</p>	
<input checked="" type="checkbox"/>	<p>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</p>	<p>All critical infrastructure information contained in Attachment A is considered confidential. As described above, it is not possible to</p>



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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”).

(Protected under Govt. Code § 6254(k), (ab); 6 U.S.C. § 131; 6 CFR § 29.2)

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specifically identify the location of this information in the millions of records

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- Proprietary and trade secret information or other intellectual property and protected market sensitive/competitive data

(Protected under Civ. Code §§3426 *et seq.*; Govt. Code §§ 6254, *et seq.*, e.g., 6254(e), 6254(k), 6254.15; Govt. Code § 6276.44; Evid. Code §1060; D.11-01-036)

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- Corporate financial records

(Protected under Govt. Code §§ 6254(k), 6254.15)

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

(Protected under Govt. Code § 6254(k); see, e.g., CPUC D.11-01-036))

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- 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.

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Employee information contained in Attachment A is considered confidential. As described above, it is not possible to specifically identify the location of this information in the millions of records provided. Thus, confidentiality is marked at the file level.

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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 Public Records Act and should be withheld from disclosure.

6. I declare under penalty of perjury that the foregoing is true, correct, and complete to the best of my knowledge.

7. Executed on the date indicated below at Concord, California.

**Richard  
Knoeber** Digitally signed by  
Richard Knoeber  
Date: 2022.02.08  
10:20:27 -08'00'

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Richard Knoeber  
Compliance and Risk Consultant, Expert  
Data Response Unit  
Pacific Gas and Electric Company