

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

**DECLARATION OF JOHN D. JENKINS
REGARDING CONFIDENTIALITY OF CERTAIN DATA/DOCUMENTS
PURSUANT TO CALIFORNIA CODE OF REGULATIONS § 29200**

I, John D. Jenkins, do declare as follows:

1. I am the Vice President of Electric System Operations for San Diego Gas & Electric Company (SDG&E). I have reviewed SDG&E's Wildfire Mitigation Plan Quarterly Data Report dated February 1, 2022 (QDR), submitted concurrently herewith. I am personally familiar with the facts 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 of Regulations Section 29200 to demonstrate that the confidential information (Protected Information) provided in the QDR 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 been publicly published in this form.

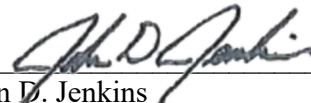
4. In accordance with the narrative justification described in Attachment A, the Protected Information should be protected from public disclosure indefinitely, because the neither the Protected Information, nor its sensitive nature are projected to change at any time.

5. I have been authorized to make this application on behalf of SDG&E.

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

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 1st day of February, 2022, at San Diego, California.



John D. Jenkins
Vice President – Electric System Operations
SDG&E

ATTACHMENT A

SDG&E Request for Confidentiality on the following information in its Wildfire Mitigation Plan Quarterly Data Report

Location of Protected Information	Legal Citations	Narrative Justification
<p>SDG&E's Wildfire Mitigation Plan Quarterly Data Report</p> <ul style="list-style-type: none"> • Critical customers/facilities names and addresses • Substation infrastructure 230 kV and greater, including voltage detail • Transmission infrastructure 230 kV and greater, including voltage detail 	<p>There are several laws, regulations, and guides that seek to protect critical infrastructure information and sensitive security information from public disclosure, for national security reasons. These include, but are not limited to: (i) Homeland Security's regulations related to Protected Critical Infrastructure Information ("PCII") Program (6 C.F.R. Part 29) and Sensitive Security Information (49 C.F.R. Part 1520), and (ii) Federal Energy Regulatory Commission ("FERC") Order No. 630 - Critical Energy Infrastructure Information ("CEII") regulations.</p> <p>Privacy: Gov't Code § 6254(c); Gov't Code § 6254(k); Civil Code §§ 1798.3 & 1798.24 (the California Information Practices Act); Cal. Const., Art. I, § 1 (California constitutional right to privacy); (20 Calif. Code of Regulations – Section 2505).</p> <p>For commercial customers: Non-Public Company Financial Information: Gov't Code §§6254(k), 6254.7(d); Evid. Code §1060; Civil Code §3426 et seq.; Competitive Data: Gov't Code §§ 6254(k), 6254.7(d); Evid. Code §1060; Civil Code §3426 et seq.</p>	<p>The confidential GIS data contains Protected Information that provides Transmission Substation and Transmission Line connectivity, construction details, and operating limitations that are considered by SDG&E and the North American Electric Reliability Corporation ("NERC") to be sensitive information and requires protection from disclosure to non-operations personnel and the public. At the level of detail provided, this information is not customarily in the public domain and could reveal vulnerabilities of critical utility service.</p> <p>The document has been assigned and published by SDG&E at a security level of INTERNAL and treated as CONFIDENTIAL under NERC's Rules of Procedure, Section 1500 et seq. SDG&E has not provided this information to the Office of Emergency Services.</p> <p>No level of masking or aggregation of the Protected Information justifies disclosure of the Protected Information due to the specificity of the information contained therein.</p> <p>For customer information: Public disclosure of this information could compromise privacy to the potential harm of customers. In addition, public disclosure of this information could identify the company, customer, or the location/site or other private information that could be advantageous to a competitor.</p>