**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, 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. 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	PG&E_2023_Q3_CONF.zip	File geodatabase
B	PG&E_2023_Q3_Risk Event Photos - Ignitions_CONF.zip	Photos of ignition events
C1	PGE_2023_Q3_Initiative Photo Log - Asset Inspections_1_CONF.zip	Photos of PG&E's asset inspections
C2	PGE_2023_Q3_Initiative Photo Log - Asset Inspections_2_CONF.zip	Photos of PG&E's asset inspections
C3	PGE_2023_Q3_Initiative Photo Log - Asset Inspections_3_CONF.zip	Photos of PG&E's asset inspections
C4	PGE_2023_Q3_Initiative Photo Log - Asset Inspections_4_CONF.zip	Photos of PG&E's asset inspections
C5	PGE_2023_Q3_Initiative Photo Log - Asset Inspections_5_CONF.zip	Photos of PG&E's asset inspections
C6	PGE_2023_Q3_Initiative Photo Log - Asset Inspections_6_CONF.zip	Photos of PG&E's asset inspections
D	PG&E_2023_Q3_PSPS_Event_Damage_Photo_Log_CONF.zip	Photos of PG&E's PSPS event damages

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

☒ Customer-specific data, which may include demand, loads, names, addresses, and billing data.

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 *et seq*.; Government Code ("Govt. Code") §§ 6254 and 6255(a); and the California Constitution ("Cal. Const."), Article I, Section 1.

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.

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.

Customer-specific data contained in Attachments A, B, C1-C6, 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.

☐ 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.

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).

All critical infrastructure information contained in Attachments A, B, C1-C6, 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.

☐ 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.

☐
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
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.

Employee information contained in Attachments A, B, C1-C6, 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.

Can this information be disclosed if the confidential portions
are masked?
☐ Yes.
☒ No.

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 Concord, California.

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