

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

**DECLARATION OF BRIAN D'AGOSTINO
REGARDING CONFIDENTIALITY OF CERTAIN DATA/DOCUMENTS
PURSUANT TO CALIFORNIA CODE OF REGULATIONS § 29200**

I, Brian D'Agostino, do declare as follows:

1. I am the Vice President of Wildfire & Climate Science for San Diego Gas & Electric Company (SDG&E). I have reviewed SDG&E's 2023-2025 Wildfire Mitigation Plan (WMP) (Clean Updated) and 2023-2025 Wildfire Mitigation Plan (WMP) (Redlined Updated), submitted concurrently herewith as part of SDG&E's non-substantive errata submittal of its 2025 Wildfire Mitigation Plan Update. 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 WMP 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 made public in this form. SDG&E is simultaneously providing a copy of the information with the Protected Information redacted as part of its non-confidential WMP submission.

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

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. 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 14th day of May, 2024, at San Diego, California.

A handwritten signature in black ink, appearing to read "B. D'Agostino", is written over a horizontal line.

Brian D'Agostino
Vice President – Wildfire & Climate Science
SDG&E

ATTACHMENT A

**SDG&E Request for Confidentiality
on the following information in its 2023-2025
Wildfire Mitigation Plan (Clean Updated)
and 2023-2025 Wildfire Mitigation Plan
(WMP) (Redlined Updated)**

Location of Protected Information	Legal Citations	Narrative Justification
<p>Names, e-mail addresses, and telephone numbers in Appendix F of SDG&E’s 2023-2025 Wildfire Mitigation Plan (WMP) (Clean Updated) and 2023-2025 Wildfire Mitigation Plan (WMP) (Redlined Updated), specifically Table 8-44 “State and Local Agency Collaboration” OEIS Table 8-46 “High Level Communication Protocols, Procedures and Systems with Public Safety Partners”</p>	<p>CPRA Exemption, Gov’t Code § 6254(c) (“disclosure of which would constitute an unwarranted invasion of personal privacy”); CPRA Exemption, Gov’t Code § 6255(a) (Balancing Test).</p>	<p>Energy Safety requires SDG&E to provide the names, email addresses, and phone numbers of third-party Public Safety Partners as a component of its WMP submission. The information contained in Appendix F of SDG&E’s 2023-2025 WMP (Clean Updated) constitutes personally identifying information that, if shared, could pose a risk to the affected third parties, including both safety and cybersecurity risks. Additionally, the individuals listed in Appendix F are private citizens not otherwise affiliated with SDG&E, thus it would be inappropriate for SDG&E to share this information publicly.</p> <p>As these individuals have limited to no role in designing or implementing SDG&E’s Wildfire Mitigation Plan and they are not otherwise subject to regulation by Energy Safety, the public interest in non-disclosure of their personally identifying information vastly exceeds any public interest in its disclosure.</p>