BEFORE THE PUBLIC UTILITIES
COMMISSION OF THE STATE OF CALIFORNIA

DECLARATION OF ANDY CARRASCO
REGARDING CONFIDENTIALITY OF CERTAIN DATA

I, Andy Carrasco, do declare as follows:

1.   I am Andy Carrasco, Vice President for Strategy and Engagement for Southern California Gas Company ("SoCalGas"). I have directed the review SoCalGas's response to Question 12(b) of Data Request CalAdvocates-AW- 2020-08 ("DR 20") and provided guidance on how to mark them for confidentiality. In addition, I am personally familiar with the facts and representations 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 in accordance with Decision 17-09-023 and General Order ("GO") 66-D to demonstrate that the confidential information provided in the Response submitted concurrently herewith and as described in specificity in Attachment A ("Protected Information") is within the scope of data protected as confidential under applicable statutory provisions including, but not limited to, Public Utilities Code § 583, Government Code §§ 6254(c), -(k), & 6255(a), and/or GO 66-D.

3.   In accordance with the statutory provisions described herein, the Protected Information should be protected from public disclosure.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct to the best of my knowledge.

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Executed this January 31, 2021, at __Glendale_____, California.

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Andy Carrasco
Vice President
Strategy and Engagement

ATTACHMENT A

Confidentiality Justification for Protected Information as
Provided in the Response

(Confidential Protected Information provided in the documents in response to this data request have been highlighted)

Location of Data	Description of Data	Legal Citations	Narrative Justification
Highlighted information in the following: (1) name referred to in Question 12(b)	Names of SoCalGas employees	CPRA Exemption, Gov't Code § 6254(c) ("disclosure of which would constitute an unwarranted invasion of personal privacy"); CPRA Exemption, Gov't Code § 6254(k) ("Records, the disclosure of which is exempted or prohibited pursuant to federal or state law") Cal. Civil Code § 1798.21 (requiring agencies to "ensure the security and confidentiality of" personal data); Cal. Civil Code § 1798.24 (limiting disclosure of personal information); Cal. Civil Code § 1985.3, 1985.6 (identifying types of protected records (including employment records), the process for subpoenaing employee records and requiring notice and opportunity to object);	Disclosing employee names is an unwarranted invasion of personal privacy and could pose a risk to employee safety. Additionally, disclosure of such information increases the risks of cyber-attacks, phishing attempts, incessant robocalls, targeted calls, identity theft and malicious emails. These risks are further increased where there is a history of employee names and contact information being shared with the public and/or media. Public disclosure would also constitute an "unwarranted invasion of personal privacy."

		Britt v. Superior Court (1978) 20 Cal. 3d 844, 855-856 (even highly relevant information may be shielded from discovery if its disclosure would impair a person's inalienable right of privacy provided by the California Constitution);	
		Alch v. Superior Court, 165 Cal. App. 4th 1412, 1428 (2008) (recognizing that name and work history information can implicate privacy interests;	
		Pioneer Elecs. (USA), Inc. v. Superior Court (2007) 40 Cal. 4th 360, 366 ("protecting disclosure of an individual's name and other identifying information is a matter embraced within the state Constitution's privacy provision (Cal. Const., art. I, § 1)");	
		Sehlmeyer v. Dept. of General Services, 17 Cal. App. 4th 1072, 1079-1080 (1993) (applying civil litigation privacy protections to administrative proceedings).	
		CPRA Exemption, Gov't Code § 6255(a) (Balancing Test)	