Attachment A

Twitter publications

Matt Vespa @missionvespa · Aug 1

"If you're willing to lie about little things, why wouldn't you mislead about the big things." @ORA_California on @socalgas. @californiapuc - a reckoning is overdue.

SoCalGas Admits Funding 'Front' Group in Fight for Its Future

The battle for California's carbon-free future might one day come to your kitchen stove, but right now it's at the state Public Utilities Commission, w...

kqed.org

2 10 21

Matt Vespa @missionvespa · Jul 8

Want a step-by-step guide to forming fossil fuel front group? Check out @socalgas contract with consulting firm to establish @CA4BES (which then intervened in @californiapuc proceeding with no disclosure of @socalgas relationship).

@ORA_California filing efile.cpuc.ca.gov/FPSS/000013641...

The tasks outlined below shall connect with these goals:

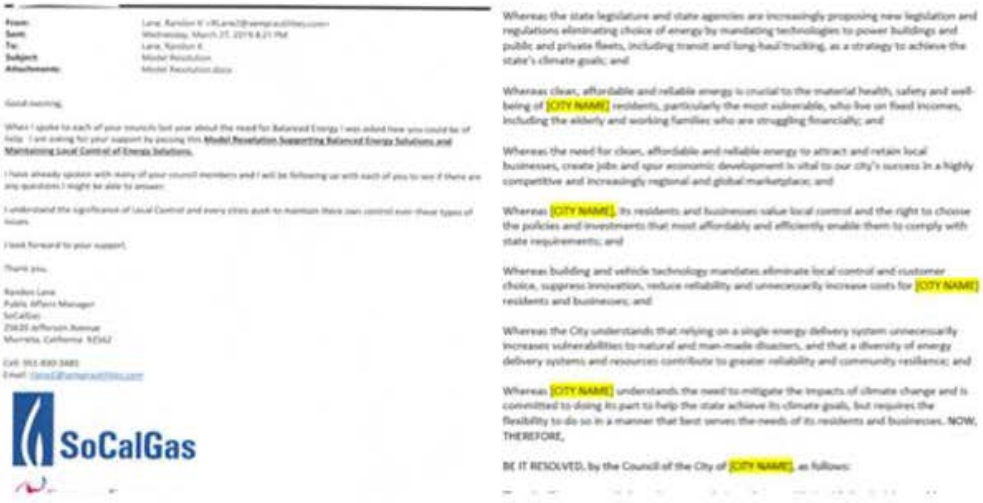
- Identifying the legal and administrative steps required to establish the organization.
- Reviewing available public opinion research and developing the organization's messages and themes.
- Developing a website, related social media, and other collateral materials highlighting those messages and providing a portal for recruitment of supporters.
- Identifying and confirming participation from an inaugural board of directors numbering at least twelve (12).
- Developing the rollout strategy to introduce the organization to the public and media.
- Developing and executing the initial organizational announcement (e.g. press conference).
- Identifying resources needed for ongoing management of the organization.

2 5 19

Matt Vespa
@missionvespa

Follow

Stall tactics from the loser of the clean energy transition. @socalgas lobbying cities to oppose state efforts to move away from fossil fuels in name of "local control." All-electric homes benefit health, climate and the economy. Gas homes benefit . . . SoCalGas.



Whereas the state legislature and state agencies are increasingly proposing new legislation and regulations eliminating choice of energy by mandating technologies to power buildings and public and private fleets, including transit and long-haul trucking, as a strategy to achieve the state's climate goals; and

Whereas clean, affordable and reliable energy is crucial to the material health, safety and well-being of [CITY NAME] residents, particularly the most vulnerable, who live on fixed incomes, including the elderly and working families who are struggling financially; and

Whereas the need for clean, affordable and reliable energy to attract and retain local businesses, create jobs and spur economic development is vital to our city's success in a highly competitive and increasingly regional and global marketplace; and

Whereas [CITY NAME], its residents and businesses value local control and the right to choose the policies and investments that most affordably and efficiently enable them to comply with state requirements; and

Whereas building and vehicle technology mandates eliminate local control and customer choice, suppress innovation, reduce reliability and unnecessarily increase costs for [CITY NAME] residents and businesses; and

Whereas the City understands that relying on a single energy delivery system unnecessarily increases vulnerabilities to natural and man-made disasters, and that a diversity of energy delivery systems and resources contribute to greater reliability and community resilience; and

Whereas [CITY NAME] understands the need to mitigate the impacts of climate change and is committed to doing its part to help the state achieve its climate goals, but requires the flexibility to do so in a manner that best serves the needs of its residents and businesses. NOW, THEREFORE,

BE IT RESOLVED, by the Council of the City of [CITY NAME], as follows:

3:44 PM - 13 Jun 2019

5 Retweets **13** Likes

1 5 13

Matt Vespa @missionvespa · Jun 13

@californiapuc - you know they try to pass these lobbying costs to customers right?

1 1

Attachment B

SoCalGas Amended Response to CALPA-SCG-051719

Dated August 13, 2019 (amended response originally submitted July 12, 2019)

QUESTIONS ON C4BES

SOUTHERN CALIFORNIA GAS COMPANY

(DATA REQUEST CALPA-SCG-051719)
Date Received: May 23, 2019
Date Submitted: June 14, 2019
Date of Amended Submission: July 12, 2019
Date of Modified Submission: August 13, 2019

QUESTION 1:

Did SoCalGas use any ratepayer funding to support the founding and launch of Californians for Balanced Energy Solutions (C4BES)? If yes,
a. Please give a full accounting of all ratepayer funding sources.
b. Please give a full accounting of how any ratepayer funds were used.

RESPONSE 1:

Ratepayer funds have not been used to support the founding or launch of Californians for Balanced Energy Solutions (C4BES).

QUESTIONS ON C4BES

SOUTHERN CALIFORNIA GAS COMPANY

(DATA REQUEST CALPA-SCG-051719)
Date Received: May 23, 2019
Date Submitted: June 14, 2019
Date of Amended Submission: July 12, 2019
Date of Modified Submission: August 13, 2019

QUESTION 2:

Does SoCalGas continue to use any ratepayer funding to support C4BES? If yes,
a. Please give a full accounting of all ratepayer funding sources.
b. Please give a full accounting of how any ratepayer funds were used.

RESPONSE 2:

Ratepayer funds are not used to support C4BES.

QUESTIONS ON C4BES

SOUTHERN CALIFORNIA GAS COMPANY

(DATA REQUEST CALPA-SCG-051719)
Date Received: May 23, 2019
Date Submitted: June 14, 2019
Date of Amended Submission: July 12, 2019
Date of Modified Submission: August 13, 2019

QUESTION 3:

Please provide accounting of all SoCalGas staff who spent work hours on the founding, launch, and continued activities of C4BES.
a. List all names of SoCalGas staff who spent work hours on C4BES activities.
b. Provide an estimate of the number of hours spent on C4BES activities by each staff member listed in Question 3b.
c. Provide the funding source(s) for all staff time, including specification of ratepayer or shareholder funding and the account the time was booked to (balancing account, shareholder account, GRC line item, etc.).

RESPONSE 3:

a. George Minter, Regional Vice President, External Affairs and Environmental Strategy; Ken Chawkins, Public Policy Manager.

b. See response to 3.c below.

c. SoCalGas determined that, in order to prevent further distraction from the important issues in R. 19-01-011, *Order Instituting Rulemaking Regarding Building Decarbonization*, that all of George Minter's and Ken Chawkins's time from May 1, 2018 through the present would be shareholder funded (i.e., this time is booked to a distinct invoice/order (I/O) that is not ratepayer funded).

QUESTIONS ON C4BES
SOUTHERN CALIFORNIA GAS COMPANY
(DATA REQUEST CALPA-SCG-051719)
Date Received: May 23, 2019
Date Submitted: June 14, 2019
Date of Amended Submission: July 12, 2019
Date of Modified Submission: August 13, 2019

QUESTION 4:

Please provide all invoices and contracts to which SoCal Gas is a party for work which relates to the creation or support of C4BES. These include, but are not limited to contracts and invoices related to:
a. Retention of Imprenta Communications in developing C4BES objectives and talking points.
b. Compensation provided to C4BES board member Matt Rahn.

RESPONSE 4:

The attachments include Confidential and Protected Material pursuant to PUC Section 583, GO 66-D, D.17-09-023, and the accompanying declaration.

a. SoCalGas does not have a direct contractual relationship with Imprenta Communications pertaining to C4BES. SoCalGas has a contractual relationship with Marathon Communications Incorporated, who contracts with Imprenta Communications. See the folder "Response 4A_Confidential Information" for responsive invoices through May 31, 2019 and underlying contract, as amended from time to time. Marathon Communications Incorporated has performed and continues to perform routine services for SoCalGas outside of those performed with respect to C4BES. Work for C4BES was never intended to be ratepayer funded; thus, the invoices had previously been allocated between ratepayer and shareholder funding. SoCalGas recently determined that, in order to prevent further distraction from the important issues in R. 19-01-011, *Order Instituting Rulemaking Regarding Building Decarbonization*, none of these invoices would be subject to ratepayer funding. For sake of clarity, all work done pursuant to the contracts provided herein is paid for by shareholders.

b. Matt Rahn volunteers his time as C4BES' Chair. Neither Rahn nor the organizations with which he is affiliated have received any funding from SoCalGas as compensation for his work with C4BES.

QUESTIONS ON C4BES
SOUTHERN CALIFORNIA GAS COMPANY
(DATA REQUEST CALPA-SCG-051719)
Date Received: May 23, 2019
Date Submitted: June 14, 2019
Date of Amended Submission: July 12, 2019
Date of Modified Submission: August 13, 2019

QUESTION 5:

For each invoice and contract provided in response to Question 5, identify:
a. Whether ratepayer or shareholder funded (and proportions if necessary)
b. The funding source used (e.g. GRC funds, specific balancing accounts, etc.).

RESPONSE 5:

SoCalGas interprets the question to refer to the documents and responses provided in response to Question 4 (rather than Question 5). With the following understanding, SoCalGas responds as follows:

a. SoCalGas recently determined that, in order to prevent further distraction from the important issues in R. 19-01-011, *Order Instituting Rulemaking Regarding Building Decarbonization*, none of these invoices or other work performed under the contracts provided in response to Question 4 would be subject to ratepayer funding. For sake of clarity, all work done pursuant to the contracts provided in response to Question 4 is paid for by shareholders.

b. The funding source is the distinct shareholder-funded I/O described in response to Question 3.c.

Attachment C

Email dated July 16, 2019

From: [redacted]
To: [redacted]
Cc: [redacted]
Subject: [EXTERNAL] Data Request - No. CalAdvocates-SC-SCG-2019-03 - Due JULY 18
Date: Tuesday, July 16, 2019 1:30:09 PM
Attachments: Data Request - CalAdvocates-SC-SCG-2019-03.pdf

Hi [redacted]

Please find the attached data request No. CalAdvocates-SC-SCG-2019-03. Please note the expedited response date July 18, 2019.
If you have any questions, please contact me by email or at the phone number below.

Best,
[redacted]

[redacted] Regulatory Analyst
Public Advocates Office
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102
[redacted]

Attachment D

Email dated August 9, 2019

[redacted]

From: [redacted]
Sent: Friday, August 9, 2019 9:16 AM
To: [redacted]
Subject: RE: Meet and Confer Request Re Confidentiality Designation and Declaration Re Data Requests

Hi [redacted]

I hadn't realized you'd intended this meeting to include others -- I only provided my availability in response to your first message yesterday. Can you please let me know who you expect to join us and I will see if I can get the appropriate people available at 9 am also? Thanks.

[redacted] | Senior Counsel
Southern California Gas Company
Tel [redacted]

-----Original Message-----
From: [redacted]
Sent: Friday, August 9, 2019 9:13 AM
To: [redacted]
Subject: [EXTERNAL] Re: Meet and Confer Request Re Confidentiality Designation and Declaration Re Data Requests

H[redacted]

I am scheduling the conference call for Monday at 9:00 am - 10 am.

Please confirm that this time still works for you and I will be sending you a conference line shortly.

Thanks,

[redacted]

> On Aug 8, 2019, at 9:36 PM, [redacted] wrote:
>
> Sorry[redacted]
>
> I just realized you provided a time. I will check with my clients and get back to you.
>
>[redacted]
>
>
>> On Aug 8, 2019, at 5:29 PM, [redacted] wrote:
>>

>> I can be available tomorrow (Friday) between 12:15 and 1; or on Monday, right now I can do any time before 10 and after 11:15.

Attachment E

Email dated August 13, 2019

[redacted]

From: [redacted]
Sent: Tuesday, August 13, 2019 3:42 PM
To: [redacted]
Cc: [redacted]
Subject: RE: Meet and Confer Conference Call Re SoCalGas DR Responses and Confidentiality Designations
Attachments: Cal PA-04 Modified.zip; Cal PA-01 Modified.zip; Cal PA-02 Modified.zip; Cal PA-03 Modified.zip

Good Afternoon,
Per the e-mail below and the meet and confer held yesterday, please find attached the modified responses to our previous four data requests regarding the building decarbonization proceeding. Note if nothing was modified we did not re-send. Let me know if you have any questions.
Sincerely,

[redacted]
Regulatory Affairs
[redacted]

From [redacted]
Sent: Tuesday, August 13, 2019 11:33 AM
To: [redacted]
Cc: [redacted]
Subject: RE: Meet and Confer Conference Call Re SoCalGas DR Responses and Confidentiality Designations

Good Morning,

This email follows our meet-and-confer yesterday, wherein we agreed to provide updated data request responses (and corollary attachments and confidentiality declarations) to remove certain confidentiality designations (of vendor names) and redactions (employee names would be highlighted instead of redacted). We further agreed to provide a privilege log (although, as I noted during the call, the email string was removed because it was not responsive to the question posed). These items are still being prepared. Although we do not anticipate meeting your noon deadline, we are working diligently on these items and expect to send them over to you today via FTP.

We did not reach agreement on a couple of items.

(1) You requested that we remove confidentiality designations from the contract pricing that was provided in response to your data requests. You cited D.06-06-066 as support that contract pricing is no longer confidential once a contract is signed. I reviewed D.06-06-066, *Interim Opinion Implementing Senate Bill No. 1488, Relating to Confidentiality of Electric Procurement Data Submitted to the Commission*, and find it inapplicable to SoCalGas: "This is the first of two decisions we anticipate in this proceeding. In this first phase, we have examined our approach to confidentiality ***in the context of electricity procurement by investor-owned utilities (IOUs) and energy service providers (ESPs).***" (D.06-06-066 at 3 (emphasis added.) Rather, D.17-09-023, the Decision adopting General

Order (GO) 66-D, is the controlling decision that applies to SoCalGas: "'***Modified D.06-06-06***' is a citation to Decision 06-06-066, as modified by D.07-05-032, which addresses confidentiality ***in the context of energy procurement information***." (D.17-09-023, Appendix A at 2 (emphasis added); *see also id.* at 4 ("There are limited circumstances when the requirements of this Section do not apply. First, information subject to the requirements of Modified D.06-06-066 is exempted from the requirements of this Section and may continue to be submitted consistent with the requirements of that decision.")) When we spoke you had not yet had an opportunity to review the decision we cited in our confidentiality declarations (the first of which was submitted June 14, 2019) to support our confidential designation of negotiated third-party vendor pricing information: D.11-01-036. I encourage you to review that decision as it supports designating as confidential contract prices and terms specifically negotiated with a vendor, and does not support that negotiated pricing becomes public once the contract is signed.

(2) You also requested that we provide the redacted dollar amounts on the Work Order Authorization (WOA) submitted in response to DR-04 on the grounds that (a) the WOA was initially funded with ratepayer funds and (b) the CPUC's Rule 10 relevance requirement does not apply to inquiries by the Public Advocates Office. I indicated that we had redacted that information because the WOA was ***not*** funded with ratepayer funds but rather shareholder funds (although you declined to discuss this further) and, furthermore, the information was not responsive to the question posed. I suggested that if the intent was to determine whether the WOA was sufficiently funded to cover the contract and labor costs referenced in the prior data request responses, you might ask that question; however, since the WOA is funded by shareholders, not ratepayers, we do not believe ascertaining the actual amounts stated on the WOA to be within the scope of Public Advocates Office's authority under Pub. Util. Code section 309.5, as disclosing shareholder activity is not necessary for Public Advocates Office to perform its duties. While the grant of authority under Section 309.5 is, indeed, broad ("The goal of the office shall be to obtain the lowest possible rate for service consistent with reliable and safe service levels. For revenue allocation and rate design matters, the office shall primarily consider the interests of residential and small commercial customers."), we do not see how the amount of shareholder funding allocated to a fully shareholder funded account dedicated to supporting balanced energy for, *inter alia*, affordability and customer choice reasons falls within the scope of that authority. *See, e.g.*, D.06-03-003.

[redacted] | Senior Counsel
Southern California Gas Company
[redacted]

From: [redacted]
Sent: Monday, August 12, 2019 8:50 AM
To: [redacted]
Cc: [redacted]
Subject: [EXTERNAL] Re: Meet and Confer Conference Call Re SoCalGas DR Responses and Confidentiality Designations

Thanks for accommodating [redacted]. And yes, I don't think this will take more than 10-15 minutes.

Best,
[redacted]

From [redacted]
Sent: Monday, August 12, 2019 8:16:50 AM
To: [redacted]

[redacted]
Cc: [redacted]
Subject: RE: Meet and Confer Conference Call Re SoCalGas DR Responses and Confidentiality Designations

Good Morning,

No problem, we [redacted] and me) will call in at 9:30. Please note that I have a hard stop at 9:55 so I can get to my other commitment. I think that should still be enough time.

[redacted] | Senior Counsel
Southern California Gas Company
Tel [redacted]

From [redacted]
Sent: Sunday, August 11, 2019 12:21 PM
To: [redacted]
Subject: [EXTERNAL] RE: Meet and Confer Conference Call Re SoCalGas DR Responses and Confidentiality Designations

Hi all,

Apologies for the late notice, but I need to push the start of this meeting to 9:30 due to an unavoidable conflict. Thanks in advance for your understanding and looking forward to our discussion tomorrow at 9:30.

Best,
[redacted]

-----Original Appointment-----
From: [redacted]
Sent: Friday, August 09, 2019 11:04 AM
To: [redacted]
Subject: Meet and Confer Conference Call Re SoCalGas DR Responses and Confidentiality Designations
When: Monday, August 12, 2019 9:00 AM-10:00 AM (UTC-08:00) Pacific Time (US & Canada).
Where:

This meet and confer conference call will be to discuss the following:

1. Redacted documents provided in response to DR 4.
2. Making various DR responses public which were previously marked as confidential by SoCalGas.

The call-in details are provided below.

Call-in Number: 866-715-4776

Participant Code: 2504776

Thank you,

[redacted]
Counsel for the Public Advocates Office
[redacted]

This email originated outside of Sempra Energy. Be cautious of attachments, web links, or requests for information.

From: [redacted]
Sent: Thursday, June 13, 2019 2:42 PM
To: [redacted]
Cc: [redacted]
Subject: RE: Accounting- JE Summary

Regarding the Marathon invoices, 50% from August 1, 2018 – present (so September 1, 2018 invoice through July 1, 2019 invoices)

[redacted]
Southern California Gas Company
Tel. [redacted]

From: [redacted]
Sent: Thursday, June 13, 2019 2:35 PM
To: [redacted]
Cc: [redacted]
Subject: RE: Accounting- JE Summary

[redacted]

Thanks for the quick chat and clarification on the JE We re pulling the labor for Ken and George (per distribution below) plus add Ken s expenses that was sent to me Please send me the date parameter for Marathon so we can finalize the 50% portion to JE as well

- August 2018 – December 2018: 2% of Minter time; 10% of Chawkins time
- January 2019 – June 14, 2019: 3 hours of Minter time; 10% of Chawkins time

Follow-up questions:
- The 50% of the Marathon Invoices that are ratepayer funded – what is the funding source? (GRC-_____) See context below:
- August 2018-January 2019 Marathon Invoices – please provide

Thanks,
[redacted]

Truncated due to applicability of attorney-client privilege

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

DECLARATION OF GEORGE MINTER REGARDING CONFIDENTIALITY OF CERTAIN DATA

I, George Minter, do declare as follows:

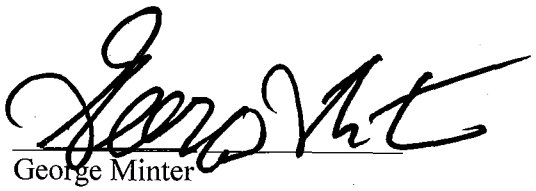
1. I am George Minter, Regional Vice President for External Affairs and Environmental Policy for Southern California Gas Company ("SoCalGas"). I have reviewed the "Accounting-JE Summary Email Confidential." In addition, I am personally familiar with the facts and representations in this Declaration and, 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 ("D.") 17-09-023 and General Order ("GO") 66-D to demonstrate that the confidential information ("Protected Information") provided in the Response submitted concurrently herewith and as described in specificity in Attachment A is within the scope of data protected as confidential under applicable statutory provisions including, but not limited to, Public Utilities Code ("PUC") § 583, Govt. Code § 6254(k) 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.

Executed this August 13, 2019, at Los Angeles, California.



George Minter
Regional Vice President
External Affairs and Environmental
Policy

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 portions of "Building Decarb – Privilege Log" and "Accounting- JE Summary Email Confidential"	Employee information (i.e. name, signature, contact information).	CPRA Exemption, Gov't Code § 6254(c) (disclosure of which would constitute an unwarranted invasion of personal privacy)	Disclosing staff names in conjunction with other identifying information such as e-mail addresses, home addresses and telephone numbers could pose a risk to staff safety. Additionally, disclosure of such information increases the risks of cyber attacks, incessant robo-calls, and malicious emails.

Date / Time	Author	Addressee(s)	Description of Document	Privilege / Protection Asserted
June 10, 2019 11:20 AM	[redacted]	To: [redacted]	Email communication concerning data request response	Attorney-client communication
June 10, 2019 2:51 PM	[redacted]	To: [redacted] cc: [redacted]	Email communication concerning data request response	Attorney-client communication; attorney work product (at direction of counsel)
June 10, 2019 3:12 PM	[redacted]	To: [redacted] cc: [redacted]	Email communication concerning data request response	Attorney-client communication; attorney work product (at the direction of counsel)
June 11, 2019 11:52 AM	[redacted]	To: [redacted] cc: [redacted]	Email communication concerning data request response	Attorney-client communication; attorney work product (at the direction of counsel)
June 11, 2019 12:02 PM	[redacted]	To: [redacted] cc: [redacted]	Email communication concerning data request response	Attorney-client communication
June 11, 2019 12:10 PM	[redacted]	To: [redacted] cc: [redacted]	Email communication concerning data request response	Attorney-client communication
June 11, 2019 12:23 PM	[redacted]	To: [redacted] cc: [redacted]	Email communication concerning data request response	Attorney-client communication

June 12, 2019 10:11 AM	[redacted]	To: [redacted] cc: [redacted]	Email communication concerning data request response	Attorney-client communication; attorney work product (at the direction of counsel)
June 12, 2019 10:21 AM	[redacted]	To: [redacted] cc: [redacted]	Email communication concerning data request response	Attorney-client communication
June 13, 2019 11:22 AM	[redacted]	To: [redacted] cc: [redacted]	Email communication concerning data request response	Attorney-client communication

Attachment F

Email dated August 13, 2019

From: [redacted]
To: [redacted]
Subject: [EXTERNAL] RE: Checking on Receipt?
Date: Tuesday, August 13, 2019 3:47:36 PM

Hi [redacted]

I see the email on my end and I will check all the files now. I see 4 attachments (.zip files). I will let you know if there are any issues, but looks like everything came through just fine. Thanks for confirming. Have a good evening!

Best,
[redacted]

From: [redacted]
Sent: Tuesday, August 13, 2019 3:44 PM
To: [redacted]
Subject: Checking on Receipt?

Hi [redacted]
I just sent an e-mail with the requested information today. Can you let me know that you did indeed receive it. I want to double check because of the attachments size.
Thank you,

[redacted]
Regulatory Affairs
[redacted]
[redacted]

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

DECLARATION OF JASON W. EGAN REGARDING CONFIDENTIALITY OF CERTAIN DATA

I, Jason W. Egan, do declare as follows:

1. I am Jason W. Egan, Director of Regulatory Affairs Special Projects for Southern California Gas Company ("SoCalGas"). I have reviewed the e-mail attachments C, D, E and F as part of SoCalGas' response to the Public Advocates Office Motion to Compel. 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 ("D.") 17-09-023 and General Order ("GO") 66-D to demonstrate that the confidential information ("Protected Information") provided in the Response submitted concurrently herewith and as described in specificity in Attachment A is within the scope of data protected as confidential under applicable statutory provisions including, but not limited to, Public Utilities Code ("PUC") § 583, Govt. Code § 6254(k) 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.

Executed this August 26, 2019, at Los Angeles, California.

Jason W. Egan
Director
Regulatory Affairs Special Projects

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 gray portions of e-mail attachments C, D, E and F.	Employee information (i.e. name, signature, contact information).	CPRA Exemption, Gov't Code § 6254(c) (disclosure of which would constitute an unwarranted invasion of personal privacy)	Disclosing staff names in conjunction with other identifying information such as e-mail addresses, home addresses and telephone numbers could pose a risk to staff safety. Additionally, disclosure of such information increases the risks of cyber attacks, incessant robo-calls, and malicious emails.