

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

**DECLARATION SUPPORTING CONFIDENTIAL DESIGNATION
ON BEHALF OF
PACIFIC GAS AND ELECTRIC COMPANY (U 39 E)**

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. Christine Cowsert, Vice President, Asset & Regulatory at PG&E, delegated authority to me to sign this declaration. My business office is located at:

Pacific Gas and Electric Company
77 Beale Street
San Francisco, CA 94105

2. PG&E will produce the information identified in paragraph 3 of this Declaration to the California Public Utilities Commission (“CPUC”) or departments within or contractors retained by the CPUC in response to a CPUC audit, data request, proceeding, or other CPUC request.

Name or Docket No. of CPUC Proceeding (if applicable): N/A

3. Title and description of document(s):

Attachment	Title	Description
A	WMP-Discovery2022_DR_CalAdvocates_007-Q02Atch01_CONF.zip	GIS Data

4. These documents contain confidential information that, based on my information and belief, has not been publicly disclosed. These documents have been marked as confidential, and the basis for confidential treatment and where the confidential information is located on the documents are identified on the following chart:

Basis for Confidential Treatment

Check

Where Confidential Information is located on the documents

- ☐ Customer-specific data, which may include demand, loads, names, addresses, and billing data
(Protected under PUC § 8380; Civ. Code §§ 1798 et seq.; Govt. Code § 6254; Public Util. Code § 8380; Decisions (D.) 14-05-016, 04-08-055, 06-12-029)
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- ☐ 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.
(Protected under Civ. Code §§ 1798 et seq.; Govt. Code § 6254; 42 U.S.C. § 1320d-6; and General Order (G.O.) 77-M)
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- ☒ 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").
(Protected under Govt. Code § 6254(k), (ab); 6 U.S.C. § 131; 6 CFR § 29.2)
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- ☐ Proprietary and trade secret information or other intellectual property and protected market sensitive/competitive data
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Confidential
information is outlined
red on:

Atch A. Entire file is
confidential

(Protected under Civ. Code §§3426 *et seq.*; Govt. Code §§ 6254, *et seq.*, e.g., 6254(e), 6254(k), 6254.15; Govt. Code § 6276.44; Evid. Code §1060; D.11-01-036)

- ☐ Corporate financial records
(Protected under Govt. Code §§ 6254(k), 6254.15)
 - ☐ Third-Party information subject to non-disclosure or confidentiality agreements or obligations
(Protected under Govt. Code § 6254(k); see, e.g., CPUC D.11-01-036))
 - ☐ 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.
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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 Public Records Act and should be withheld from disclosure.
6. I declare under penalty of perjury that the foregoing is true, correct, and complete to the best of my knowledge.
7. Executed on the date indicated below at Concord, California.

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