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, Anna Hettig, am the Compliance Excellence Quality Control ("Compliance Excellence QC") Compliance and Risk Consultant, Expert, of Pacific Gas and Electric Company ("PG&E"), a California corporation. Shay Bahramirad, Vice President, Electric T&D 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): 10-Year Electrical Undergrounding Plan (EUP)

3. Title and description of document(s):

Attachment	File Name	Description
A	EUP-PhI_DR_CalAdvocates_002-Q001Atch01_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 in red font on the header of the relevant portions of the document. Please note that starting in the second half of 2022, PG&E implemented an internal automated data classification tool which mandates the labeling of all documents and emails with one of four increasing security classifications: public, internal, confidential, and restricted. These classifications serve a purpose separate and apart from advising Energy Safety that certain information is confidential; these classifications are for PG&E data security. For purposes of confidentiality designation, we ask that you please disregard the internal black font labeling at the footer of all documents which is distinguished from the Energy Safety confidentiality markings in red font at the header of relevant pages of the documents. The basis

for Energy Safety confidential treatment and where the ENERGY SAFETY confidential information is located on the documents are identified on the following chart:

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.	
☐	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). ☐ This information, or substantially similar Information, was classified as protected critical	CEII-specific data contained in Attachment A is confidential. As described above, it is not possible to specifically identify the location and confidentiality is marked at the file level.

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 § 7922): 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.

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.

Anna Hettig

Digitally signed by Anna Hettig
Date: 2026.10.23 11:30:43 -07'00'

Anna Hettig
Compliance and Risk Consultant, Expert
Compliance Excellence
Pacific Gas and Electric Company