

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

**DECLARATION OF HILLARY HEBERT
REGARDING CONFIDENTIALITY OF CERTAIN DATA/DOCUMENTS
PURSUANT TO D.16-08-024**

I, **Hillary Hebert**, do declare as follows:

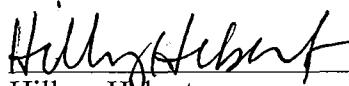
1. I am Manager of Customer Programs Policy and Strategy in the Customers Services Division for San Diego Gas & Electric Company (“SDG&E”). I have been delegated authority to sign this declaration by Scott B. Crider, Vice President of Customer Services at SDG&E. I have reviewed SDGE ORA-A1701013-SDGE002 Data Request, submitted concurrently herewith (the “ORA-A1701013-SDGE002”). 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 belief.

2. I hereby provide this Declaration in accordance with Decision (“D.”) 16-08-024 to demonstrate that the confidential information (“Protected Information”) provided in the ORA-A1701013-SDGE002 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 specific provisions of General Order (“GO”) 66-C.

3. In accordance with the legal authority 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 23rd day of June, 2017, at San Diego.



Hillary Hebert
Manager – Customer Programs
Policy and Strategy

ATTACHMENT A

SDG&E Request for Confidential Treatment of the following information in its response to ORA-A1701013-SDGE002

FOR VOLUMINOUS RESPONSES WHERE HIGHLIGHTING SPECIFIC DATA IS NOT POSSIBLE: The response is provided in multiple files, each of which contains various confidential data elements. The high volume of materials provided preclude SDG&E from marking each specific data element. The Master Confidentiality Matrix below indicates which confidential data elements are included in this response. The Location column indicates which folder(s) and/or file(s) contains the specified confidential data element. The folders and or files listed in the Location column below are to be treated as confidential Protected Information for the reason(s) provided below.

Master Confidentiality Matrix

Data Elements Included Y/N	Data Element(s)	Location (e.g.name of file; pg #, items shaded in yellow)	Justification (What harm could result if this data is disclosed to the public)	Legal Citation
Y- Q19	Certain employee salaries:	SDG&E has provided employee salary information in the folders labeled: 2014 ORA Data Request, 2015 ORA Data Request, 2016 ORA Data Request and 2017 ORA Data Request. For folders 2014-2016 ORA Data Request the employee salaries is located in file "Individual Workbooks", within the last 3 worksheets (e.g. Jan 14, Jan 14 Labor & SDGE SAP). For 2017, the employee salaries are located in folder "2017 WB" in the "Individual Workbooks" within the worksheets "Monthly Labor", "Monthly Labor %" and "Trend Labor %".	Employee Salary information is generally considered to be personal data relating to individual finances. Disclosing employee Salary information could also pose a risk to staff safety.	Gov't Code §6254(c) However, <i>see</i> GO 77-M (requiring e.g., the "names, titles and duties of all Executive Officers and any other employees who received compensation including a base salary of \$250,000 or more per annum, and the total compensation received, or awarded in the past year but not yet received"); General Order 77-L; D.04-08-055;

Y- Q19	Vendor bid and pricing information: (including rates invoices)	SDG&E has provided Vendor bid and pricing information in the folders labeled 2014 ORA Data Request, 2015 Data Request, 2016 ORA Data Request and 2017 ORA Data Request. For 2014-2016, within the files labeled "Individual Workbooks", the Vendor bid and pricing information is located in the worksheets SDGE SAP for each month. For 2017, located in the file "2017 WB" within the "Individual Workbooks", the Vendor bid and pricing information is located in the worksheets SDGE SAP for each month. The SDGE SAP worksheets include the same columns, titled, "Name", "Name of offsetting account", "Val/COArea Crcy" and "Total quantity" contain Vendor bid and pricing information and are to be treated as Protected Information.	Vendor Name, Pricing, units of quantities and copies of invoices, may provide a competitive disadvantage if disclosed publicly or provided to competitors.	D.09-08-018, 2011 WL 660568 (2011), GO 66-C Sections 2.2(b), 2.9
Y- Q1, Q2 & Q19	Personnel Info: Employee Name and Information (i.e. PA Review Engineer Name or PA QC Review Engineer Name; PA Implementation Manager, PA Implementation Manager Email Address, PA Customer Account Manager Name)	SDG&E has provided an Internal Audit document titled "2016 Energy Efficiency Direct Install" Report. Within the document the confidential information has been highlighted. SDG&E has provided employee names in the Presentation file name: Org Chart. June 2017b.pptx Within the folders 2014 ORA Data Request, 2015 ORA Data Request, 2016 Data Request, file name Expenditure Confirmations and within folder 2017 ORA	Names are generally considered to be personal data, being information relating to living identifiable individuals. Disclosing staff names and or emails could also pose a risk to staff safety.	Customer Privacy: Gov't Code § 6254(c); Gov't Code 6255; Civil Code §§ 1798.3 & 1798.24 (the California Information Practices Act); Cal. Const., Art. I, § 1 (California constitutional right to privacy).

		Data Request file name 2017 Confirmations employee signatures may be included in the email confirmation statement.		
Y- Q1	Energy Usage and/or Savings: kW, kWh, Therms	SDG&E has provided the Financial & Operational Metrics and Performance Measures Reports for Customer Programs and C&I services. Within the reports energy savings is provided. The file name is: ORA DR KPI Report and contains 70 worksheets.	Private customer data related to energy usage and its implications and savings. Public disclosure of this information could compromise customer privacy to the potential harm of customers.	Customer Energy Usage: Civil Code §§1798.98-1798.99 (relating to privacy of customer energy usage data made available to utility as part of an advanced metering infrastructure); Civil Code §1798.80, et seq. (process for protecting customer records); Pub. Util. Code § 8380(d) (a utility “shall use reasonable security procedures and practices to protect a customer’s unencrypted electrical or gas consumption data from unauthorized access, destruction, use, modification, or disclosure”) and associated CPUC Decisions (D.11-07-056 and D.11-08-045).
Y- Q1, Q10 & Q11	Market Sensitive Business Practices: certain aspects of internal management reports/status reports	Customer Programs Consolidated Status Reports File Names: 1_20_2017 1_27_2017 2.10.2017 2.17.2017 2-24-2017 3-10-2017 3-17-2017 3-24-2017 3-31-2017 3-3-2017 4-14-2017 4-21-2017	SDG&E’s business decision making processes and results of these processes are proprietary to SDG&E and could result in a competitive disadvantage if disclosed publicly.	Market Sensitive Information: GO 66-C Section 2.2(b) (“unfair business advantage”); Gov’t Code §§ 6254(k), 6254.7(d); Evid. Code §1060; Civil Code §3426 et seq.; Gov’t Code §§ 6254(k), 6254.7(d); Evid. Code §1060; Civil Code §3426 et seq.

		4-28-2017 4-7-2017 5-12-2017 5-19-2017 5-5-2017 6-2-2017 2-3-2017 SDG&E provided Market Reference Ranges (MRR) pay bands by position for 2014- 2017 in PDF files.		
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