

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

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

I, **Monica Wiggins**, do declare as follows:

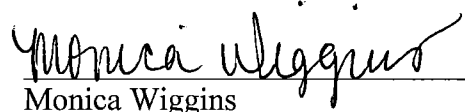
1. I am Customer Programs Compliance Supervisor in the Customers Services Division for San Diego Gas & Electric Company (“SDG&E”). I have been delegated authority to sign this declaration by Scott B. Crider, Vice President of Customer Services at SDG&E. I have reviewed Data Request ORA-A1701013-SDGE004, submitted concurrently herewith (the “Data Request ORA-A1701013-SDGE004”). 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 Data Request ORA-A1701013-SDGE004 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 9th day of August, 2017, at San Diego.

A handwritten signature in black ink that reads "Monica Wiggins". The signature is written in a cursive style and is positioned above a horizontal line.

Monica Wiggins  
Customer Programs Compliance  
Supervisor

# ATTACHMENT A

**SDG&E Request for Confidential Treatment of the following information in its response to Data Request ORA-A170101SDGE004**

**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.

**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	<b>Application ID:</b> Application Number, Project ID, Reference Number, Job ID, Claim ID		Coupled with other data elements being submitted in this file, public could potentially gain access to customer data such as address, customer name, usage, account number.	<b>Energy Usage:</b> 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). <b>Address:</b> Civil Code §1798.80, et seq.; Gov’t Code § 6254(c); Gov’t Code § 6255 <b>Privacy:</b> 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).
Y	<b>Account Info:</b> Account ID, Customer ID		Disclosure could allow the public to gain access to customer data such as address, customer name, usage, account number.	<b>Energy Usage:</b> 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). <b>Address:</b> Civil Code §1798.80, et seq.; Gov’t Code § 6254(c); Gov’t Code § 6255 <b>Privacy:</b> 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).
Y	<b>Project Info:</b> Project Description		This information could include discussion of building expansions and upgrades and other data that might disclose market sensitive information, providing a competitive advantage to other businesses. If this information was released it could pose negative financial impacts which could be detrimental to the customer.	<b>Trade Secrets:</b> Gov’t Code §§ 6254(k), §6254.7(d) ; Evid. Code §1060; Civil Code §3426 et seq. <b>Non-Public Company Financial Information:</b> Gov’t Code §§6254(k), 6254.7(d); Evid. Code §1060; Civil Code §3426 et seq.; GO 66-C, Section 2.2(b); <b>Competitive Data:</b> Gov’t Code §§ 6254(k), 6254.7(d); Evid. Code §1060; Civil Code §3426 et seq.; GO 66-C Section 2.2(b)
Y	<b>Personnel Info:</b> Employee Name in conjunction with other identifying information, like email address, phone number (i.e. PA Review Engineer Name or PA QC Review Engineer Name; PA Implementation Manager, or vendor name if coupled with other identifying information)		Disclosing staff names in conjunction with other identifying information like emails and telephone numbers could pose a risk to staff safety.  For Email Addresses: disclosure could result in information security concerns	<b>Privacy:</b> 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).
Y	<b>Contractor:</b> Project Sponsor or Vendor Company, Contractor Name		When the customer is also acting as project sponsor, disclosure of information could indicate to the public a change in the company's financial status or business opportunities potentially resulting in a competitive disadvantage.  When a 3rd party is acting as project sponsor, it is private customer business information about who the customer hired to do the work, which could indicate specialties of such firms	When the customer is also acting as project sponsor: <b>Privacy:</b> 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). <b>Non-Public Company Financial Information:</b> Gov’t Code §§6254(k), 6254.7(d); Evid. Code §1060; Civil Code §3426 et seq.; GO 66-C, Section 2.2(b); <b>Competitive Data:</b> Gov’t Code §§ 6254(k), 6254.7(d); Evid. Code §1060; Civil Code §3426 et seq.; GO 66-C Section 2.2(b)  When a 3rd party is acting as project sponsor: <b>Customer and vendor proprietary information:</b> See, e.g., D.09-08-018, 2011 WL 660568 (2011); GO 66-C Sections 2.2(b), 2.8

			that might disclose information about the customer that could lead to a competitive disadvantage. SDG&E also does not endorse project sponsors, and does not want to have such listings made public so as to be misconstrued as an endorsement.	
Y	<p><b>Location:</b> Project Name, Address, City, Project Address, Site ID, Premise ID, Site Address, Site Unit Number, Blueprints, Photographs</p> <p>Facility Name, Facility First Name, Facility Last Name, Facility Street 1, Facility Street 2, Facility City, Facility State, Facility Zip, Facility Email</p>		<p>For Residential Customers: Public disclosure of this information could compromise customer privacy to the potential harm of customers.</p> <p>For Commercial Customers: Public disclosure of this information could identify the company, customer, or the location/site or other private information that could be advantageous to a competitor.</p>	<p><b>Privacy:</b> Gov't Code § 6254(c); Gov't Code 6255; Civil Code §§ 1798.3 &amp; 1798.24 (the California Information Practices Act); Cal. Const., Art. I, § 1 (California constitutional right to privacy).</p> <p>For commercial customers: <b>Non-Public Company Financial Information:</b> Gov't Code §§6254(k), 6254.7(d); Evid. Code §1060; Civil Code §3426 et seq.; GO 66-C, Section 2.2(b); <b>Competitive Data:</b> Gov't Code §§ 6254(k), 6254.7(d); Evid. Code §1060; Civil Code §3426 et seq.; GO 66-C Section 2.2(b)</p>
Y	<b>Energy Usage and/or Savings:</b> kW, kWh, Therms		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.	<b>Customer Energy Usage:</b> 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	<b>Incentives:</b> Total Incentive, Cost Estimates, ROI, Equipment Cost, Invoice		Disclosure of information could indicate to the public change in the company's financial status or business opportunities potentially resulting in a competitive disadvantage.	<b>Non-Public Company Financial Information:</b> Gov't Code §§6254(k), 6254.7(d); Evid. Code §1060; Civil Code §3426 et seq.; GO 66-C, Section 2.2(b); <b>Competitive Data:</b> Gov't Code §§ 6254(k), 6254.7(d); Evid. Code §1060; Civil Code §3426 et seq.; GO 66-C Section 2.2(b)
Y	<b>Customer Contact Info:</b> Customer Name, Contact Name, site Contact Name, Applicant Full Name, App User Name, Primary Decision		These data elements identify customer's by name and contain personal contact information provided as part of provision of services	<b>Privacy:</b> Gov't Code § 6254(c); Gov't Code 6255; Civil Code §§ 1798.3 & 1798.24 (the California Information Practices Act); <b>Energy Usage:</b> 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

	Maker Name, Phone Number, Phone Extension, Alternate Phone Number, Alternate Phone Extension, Email, Account Name			unauthorized access, destruction, use, modification, or disclosure”) and associated CPUC Decisions (D.11-07-056 and D.11-08-045). Address: Civil Code §1798.80, et seq.; Gov’t Code § 6254(c); Gov’t Code § 6255
N	Meter: Meter Number		Public disclosure of this information could compromise customer privacy to the potential harm of customers. These data elements identify customer’s account numbers and energy consumption.	<b>Customer Energy Usage:</b> These data points are to be protected pursuant to 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	Specifications: HVAC Serial Number, HVAC Make, HVAC Model, HVAC Unit Tons		Public disclosure of this information could compromise customer privacy to the potential harm of customers. These data elements identify customer’s account numbers and energy consumption.	<b>Privacy:</b> 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).
N	Tax ID		Public disclosure of this information creates a risk of fraud, identify theft or other personal, commercial or financial damage	<b>Privacy:</b> 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).
Y	Intellectual Property: Software, Certificates		This information could include data that might disclose market sensitive information providing a competitive advantage to other businesses. If this information was released it could pose negative financial impacts which could be detrimental to the customer.	<b>Trade Secrets:</b> Gov’t Code §§ 6254(k), §6254.7(d) ; Evid. Code §1060; Civil Code §3426 et seq. <b>Competitive Data:</b> Gov’t Code §§ 6254(k), 6254.7(d); Evid. Code §1060; Civil Code §3426 et seq.; GO 66-C Section 2.2(b)
Y	Market Sensitive Business Practices: certain aspects of internal management reports/status reports		SDG&E’s business decision making processes and results of these processes are proprietary to SDG&E and could result in competitive disadvantage if disclosed publicly.	<b>Market Sensitive Information:</b> 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.