

Application of SAN DIEGO GAS & ELECTRIC)
COMPANY for authority to update its gas and)
electric revenue requirement and base rates)
effective January 1, 2019 (U 902-M))

Application No. 17-10-____

Exhibit No.: (SDG&E-21-WP-S)

REDACTED
SUPPLEMENTAL WORKPAPERS TO
PREPARED DIRECT TESTIMONY
OF CARMEN HERRERA
ON BEHALF OF SAN DIEGO GAS & ELECTRIC COMPANY

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

OCTOBER 2017



SDG&E-21-SMFS-CLH-1FS001 AFV Premiums (CONFIDENTIAL)

Confidential and Protected Materials Pursuant to PUC Section 583, GO 66-C/D, and D.16-08-024

Vehicle Class	Technology	Premium per Vehicle
Passenger Vehicle	ELECTRIC	
Passenger Vehicle	HYBRID	
Full Size Truck and Van	CNG	
Full Size Truck and Van	HYBRID	
Medium/Heavy Duty Truck	CNG-HYBRID	
Medium/Heavy Duty Truck	CNG	
Medium/Heavy Duty Truck	CNG	
E-PTO Trouble Truck	IMS/E-PTO	
E-PTO Aerial Lift	IMS/E-PTO	

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

**DECLARATION OF CARMEN L. HERRERA
REGARDING CONFIDENTIALITY OF CERTAIN DATA/DOCUMENTS
PURSUANT TO D.16-08-024**

I, Carmen L. Herrera, do declare as follows:

1. I am Director of Support Services for Southern California Gas Company (SoCalGas) and San Diego Gas & Electric Company (SDG&E). I have been delegated authority to sign this declaration by Michael M. Schneider. I have reviewed the workpapers titled “SDG&E-21-SMFS-CLH-1FS001 AFV Premiums,” submitted concurrently herewith (the “Fleet Services Workpapers”). I am personally familiar with the facts 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.) 16-08-024 to demonstrate that the confidential information (Protected Information) provided in the Fleet Services Workpapers is within the scope of data protected as confidential under applicable law.

3. In accordance with the legal citations and narrative justification described in Attachment A, 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 3rd day of October, 2017, at Louisville, Kentucky.



Carmen Herrera
Director of Support Services

ATTACHMENT A

SDG&E Request for Confidentiality on the following information in response to Fleet Services Workpapers

Location of Protected Information	Legal Citations	Narrative Justification
<p>The information that is shaded in gray in workpaper “SDG&E-21-SMFS-CLH-1FS001 AFV Premiums” is confidential.</p>	<p>CPRA Exemption, Gov’t Code § 6254.7(d) (Trade Secrets)¹</p> <p>CPRA Exemption, Gov’t Code § 6254.15 (disclosure not required for “corporate financial records, corporate proprietary information including ROI, and information relating to siting within the state furnished to a government agency by a private company for the purpose of permitting the agency to work with the company in retaining, locating, or expanding a facility within California”).</p> <p>CPRA Exemption, Gov’t Code § 6254(k) (“Records, the disclosure of which is exempted or prohibited pursuant to federal or state law”)</p> <ul style="list-style-type: none"> • Evid. Code § 1060 	<p>The Alternate Fuel Vehicle (AFV) premium data that is shaded in gray in workpaper “SDG&E-21-SMFS-CLH-1FS001 AFV Premiums” cannot be disclosed as this data is proprietary represents and contains proprietary, commercially sensitive, trade secrets, and content not intended for public disclosure. SDGE derives economic value from it not being generally known to the public and uses reasonable efforts to maintain the secrecy of this information. Such trade secrets may not be used or disclosed except under appropriate precautions to maintain the confidentiality hereof, and may not be used in any way not expressly authorized by SDG&E as it could cause substantial harm to SDG&E and ultimately to ratepayers.</p> <p>Further, SDG&E’s vendors engage in efforts which involve communications and work product which is intended only for access by designated members. Public disclosure would pose potential negative impacts and/or harm to SDG&E, its vendors and the ratepayers.</p>

¹ “Trade secrets . . . may include, but are not limited to, any formula, plan, pattern, process, tool, mechanism, compound, procedure, production data, or compilation of information which is not patented, which is known only to certain individuals within a commercial concern who are using it to fabricate, produce, or compound an article of trade or a service having commercial value and which gives its user an opportunity to obtain a business advantage over competitors who do not know or use it.”

	<ul style="list-style-type: none">• Civil Code § 3426 <i>et seq.</i> (relating to trade secrets)² <p>Gov't Code § 6254(k) ("Records, the disclosure of which is exempted or prohibited pursuant to federal or state law")</p> <ul style="list-style-type: none">• <i>See, e.g.,</i> D.11-01-036, 2011 WL 660568 (2011) (agreeing that confidential prices and contract terms specifically negotiated with a program vendor is proprietary and commercially sensitive and should remain confidential).	

² Civil Code Section 3426.1 defines "trade secret" as "information, including a formula, pattern, compilation, program, device, method, technique, or process, that:

- (1) Derives independent economic value, actual or potential, from not being generally known to the public or to other persons who can obtain economic value from its disclosure or use; and
- (2) Is the subject of efforts that are reasonable under the circumstances to maintain its secrecy."