

SOUTHERN CALIFORNIA GAS COMPANY  
SAN DIEGO GAS & ELECTRIC COMPANY

APPLICATION TO RECOVER COSTS RECORDED IN THE  
PIPELINE SAFETY AND RELIABILITY MEMORANDUM ACCOUNTS,  
THE SAFETY ENHANCEMENT EXPENSE BALANCING ACCOUNTS, AND  
THE SAFETY ENHANCEMENT CAPITAL COST BALANCING ACCOUNTS  
(A.16-09-005)

(DATA REQUEST TURN-SCGC-015)

Date Requested: August 9, 2017

Date Responded: August 30, 2017

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**QUESTION 15.1:**

**15.1. With respect to the Equipment Conditions described at WP-V-A33:**

- 15.1.1. Did the requirement to install a new line break cabinet with the associated changes in the wiring arrangement including new as-built drawing cause a delay in the construction schedule?

**RESPONSE 15.1.1:**

The change in line break cabinet caused a one-day delay to the schedule to accommodate scheduling with the Field Operations personnel for access to the jobsite, but the SCADA wiring arrangement did not cause a delay.

- 15.1.2. If the answer to the previous question is “yes,” please identify any cost increase that was associated with the delay in the construction schedule.

**RESPONSE 15.1.2:**

The increased cost for the Contractor was \$4,723 for the one-day delay. In addition to these direct costs, there may be additional costs for SoCalGas/SDG&E labor and non-construction costs for activities, such as project management and inspection services, that were not tracked and reported separately for this specific delay.

- 15.1.3. Please provide a copy of all Change Order materials or other notices or correspondence provided to SoCalGas’ PSEP management team by its contractor that are related to the delay or added cost created by the delay.

**RESPONSE 15.1.3:**

The attached supporting documents include Confidential and Protected Materials Pursuant to PUC Section 583, GO 66-C, and D.16-08-024. A copy of Requests for Information 3 is provided in the attachment folder.

- 15.1.4. Please provide a copy of all of SoCalGas’ PSEP management team’s responses to its contractor in regards to these change order materials, notices or correspondence.

**RESPONSE 15.1.4:**

See the response to TURN-SCGC Q.15.1.3.

**SOUTHERN CALIFORNIA GAS COMPANY  
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PIPELINE SAFETY AND RELIABILITY MEMORANDUM ACCOUNTS,  
THE SAFETY ENHANCEMENT EXPENSE BALANCING ACCOUNTS, AND  
THE SAFETY ENHANCEMENT CAPITAL COST BALANCING ACCOUNTS  
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- 15.1.5.** Why were the characteristics of the line break cabinet not identified during the Stage 4 process?

**RESPONSE 15.1.5:**

The characteristics of the line break cabinet were identified during Stage 4. SoCalGas ordered the line break panel based on the Stage 4 design. Once the cabinet was delivered to the field, onsite personnel identified potential enhancements to the design that were implemented in the field, prior to installation.

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**QUESTION 15.2:**

**15.2. With respect to the Constructability Issues identified at WP-V-A98, specifically “The existing mainline valve was not the manufacturer type expected, requiring construction of an adapter plate.” And “Due to the unavailability of the expected radio communications system, the electrical contractor had to install power and work with AT&T to provide 4-wire communications to ensure that valve control could be provided via a telecommunications system.”:**

**15.2.1.** Did the construction of the adapter plate cause a delay in the construction schedule for the project?

**RESPONSE 15.2.1:**

No.

**15.2.2.** If the answer to the previous question is “yes,” please identify any cost increase that was associated with the delay in the construction schedule.

**RESPONSE 15.2.2:**

Not applicable.

**15.2.3.** Please provide a copy of all Change Order materials or other notices or correspondence provided to SoCalGas’ PSEP management team by its contractor that are related to the delay or added cost created by the delay.

**RESPONSE 15.2.3:**

Not applicable.

**15.2.4.** Please provide a copy of all of SoCalGas’ PSEP management team’s responses to its contractor in regards to these change order materials, notices or correspondence.

**RESPONSE 15.2.4:**

Not applicable.

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THE SAFETY ENHANCEMENT CAPITAL COST BALANCING ACCOUNTS  
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**15.2.5.** Why were the characteristics of the existing mainline valve not identified during the Stage 4 process?

**RESPONSE 15.2.5:**

The model of the existing valve was not identified prior to excavation; excavation of the valve was needed to determine the valve model. Records for the valve indicated the orientation, rating and type but did not indicate the valve model.

**15.2.6.** Did the unavailability of the expected radio communications system cause a delay in the construction schedule?

**RESPONSE 15.2.6:**

No.

**15.2.7.** If the answer to the previous question is “yes,” please identify any cost increase that was associated with the delay in the construction schedule.

**RESPONSE 15.2.7:**

Not applicable.

**15.2.8.** Please provide a copy of all Change Order materials or other notices or correspondence provided to SoCalGas’ PSEP management team by its contractor that are related to the delay or added cost created by the delay.

**RESPONSE 15.2.8:**

Not applicable.

**15.2.9.** Please provide a copy of all of SoCalGas’ PSEP management team’s responses to its contractor in regards to these change order materials, notices or correspondence.

**RESPONSE 15.2.9:**

Not applicable

**15.2.10.** Why were the characteristics of the existing radio communications system not identified during the Stage 4 process?

**RESPONSE 15.2.10:**

The characteristics were identified in Stage 4.

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**QUESTION 15.3:**

**15.3. With respect to the delay in receipt of materials identified for L-235 W at WP-V-A199:**

**15.3.1.** Did the delay in the receipt of materials occur after construction was mobilized for the project?

**RESPONSE 15.3.1:**

Yes.

**15.3.2.** If the answer to the previous question is “yes,” did the delay in the receipt of materials cause a delay in the construction schedule for the project?

**RESPONSE 15.3.2:**

Yes.

**15.3.3.** If the answer to the previous question is “yes,” please identify any cost increase that was associated with the delay in the construction schedule.

**RESPONSE 15.3.3:**

There was no Construction Contractor cost incurred on the Line 235 West project for this delay. There may be SoCalGas/SDG&E labor and non-construction costs for activities, such as project management and inspection services, that were not tracked and reported separately for this specific delay.

**15.3.4.** Please provide a copy of all Change Order materials or other notices or correspondence provided to SoCalGas’ PSEP management team by its contractor that are related to the delay or added cost created by the delay.

**RESPONSE 15.3.4:**

The attached supporting documents include Confidential and Protected Materials Pursuant to PUC Section 583, GO 66-C, and D.16-08-024. Copies of Requests for Information 6 and 18 are provided in the attachment folder.

**15.3.5.** Please provide a copy of all of SoCalGas’ PSEP management team’s responses to its contractor in regards to these change order materials, notices or correspondence.

**RESPONSE 15.3.5:**

See the response to TURN-SCGC Q.15.3.4.

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**Date Requested: August 9, 2017**

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**QUESTION 15.4:**

**15.4. With respect to the delay in receipt of materials identified for L-44-654 at WP-V-A199:**

**15.4.1.** Did the delay in the receipt of materials occur after construction was mobilized for the project?

**RESPONSE 15.4.1:**

Yes.

**15.4.2.** If the answer to the previous question is “yes,” did the delay in the receipt of materials cause a delay in the construction schedule for the project?

**RESPONSE 15.4.2:**

Yes.

**15.4.3.** If the answer to the previous question is “yes,” please identify any cost increase that was associated with the delay in the construction schedule.

**RESPONSE 15.4.3:**

The increased Contractor’s cost was \$32,438 for the material delay, which represents an allocation of 25% of the costs set forth in RFIs 6 and 18. In addition to these direct costs, there may be additional costs for SoCalGas/SDG&E labor and non-construction costs for activities, such as project management and inspection services, that were not tracked and reported separately for this specific delay.

**15.4.4.** Please provide a copy of all Change Order materials or other notices or correspondence provided to SoCalGas’ PSEP management team by its contractor that are related to the delay or added cost created by the delay.

**RESPONSE 15.4.4:**

See the response to TURN-SCGC Q.15.3.4.

**15.4.5.** Please provide a copy of all of SoCalGas’ PSEP management team’s responses to its contractor in regards to these change order materials, notices or correspondence.

**RESPONSE 15.4.5:**

See the response to TURN-SCGC Q.15.3.4.

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**(DATA REQUEST TURN-SCGC-015)**

**Date Requested: August 9, 2017**

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**QUESTION 5:**

**15.5. With respect to the delay in receipt of materials identified for Palmdale Valves at WP-V-A200:**

**15.5.1.** Did the delay in the receipt of materials occur after construction was mobilized for the project?

**RESPONSE 15.5.1:**

Yes.

**15.5.2.** If the answer to the previous question is “yes,” did the delay in the receipt of materials cause a delay in the construction schedule for the project?

**RESPONSE 15.5.2:**

Yes.

**15.5.3.** If the answer to the previous question is “yes,” please identify any cost increase that was associated with the delay in the construction schedule.

**RESPONSE 15.5.3:**

The increased Contractor’s cost was \$97,314 for the material delay, which represents an allocation of 75% of the costs set forth in RFIs 6 and 18. In addition to these direct costs, there may be additional costs for SoCalGas/SDG&E labor and non-construction costs for activities, such as project management and inspection services, that were not tracked and reported separately for this specific delay.

**15.5.4.** Please provide a copy of all Change Order materials or other notices or correspondence provided to SoCalGas’ PSEP management team by its contractor that are related to the delay or added cost created by the delay.

**RESPONSE 15.5.4:**

See the response to TURN-SCGC Q.15.3.4.

**15.5.5.** Please provide a copy of all of SoCalGas’ PSEP management team’s responses to its contractor in regards to these change order materials, notices or correspondence.

**RESPONSE 15.5.5:**

See the response to TURN-SCGC Q.15.3.4.

**SOUTHERN CALIFORNIA GAS COMPANY  
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THE SAFETY ENHANCEMENT EXPENSE BALANCING ACCOUNTS, AND  
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(A.16-09-005)**

**(DATA REQUEST TURN-SCGC-015)**

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**QUESTION 15.6:**

**15.6. With respect to the lack of utility power and hard-wired communications at the Palmdale Valves site at WP-V-A200:**

- 15.6.1.** Did the lack of utility power and hard-wired communications at the site cause a delay in the construction schedule for the project?

**RESPONSE 15.6.1:**

Yes.

- 15.6.2.** If the answer to the previous question is “yes,” please identify any cost increase that was associated with the delay in the construction schedule.

**RESPONSE 15.6.2:**

The Contractor’s costs increased by \$57,719 for the radio communications and solar power. In addition to these direct costs, there may be additional costs for SoCalGas/SDG&E labor and non-construction costs for activities, such as project management and inspection services, that were not tracked and reported separately for this specific activity.

- 15.6.3.** Please provide a copy of all Change Order materials or other notices or correspondence provided to SoCalGas’ PSEP management team by its contractor that are related to the delay or added cost created by the delay.

**RESPONSE 15.6.3:**

The attached supporting documents include Confidential and Protected Materials Pursuant to PUC Section 583, GO 66-C, and D.16-08-024. Copies of Requests for Information 5, 7, and 15 are provided in the attachment folder.

- 15.6.4.** Please provide a copy of all of SoCalGas’ PSEP management team’s responses to its contractor in regards to these change order materials, notices or correspondence.

**RESPONSE 15.6.4:**

See the response to TURN-SCGC Q.15.6.3.



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- 15.6.5.** Why was the lack of utility power and hard-wired communications at the site not identified during the Stage 4 process?

**RESPONSE 15.6.5:**

Regarding the lack of utility power, SoCalGas negotiated with landowners to obtain additional easements for the local electric utility during Stage 4. The negotiations were unsuccessful, and therefore, SoCalGas was required to identify an alternative (solar) source of power.

Regarding the lack of hard-wired communications, the utility providing this service was not able to install the communications during the planned installation schedule. Radio communication was installed to enable timely completion of the project. The hard-wired communication was installed and utilized as a backup communication system.

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

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

I, Hugo Mejia, do declare as follows:

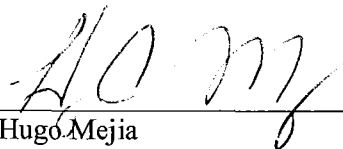
1. I am a Project and Execution Manager in the Major Projects, Regulatory Compliance and Controls for San Diego Gas & Electric Company (“SDG&E”) and Southern California Gas Company (“SoCalGas”) designated by Jimmie Cho, Senior Vice President, Gas Operations and System Integrity for SDG&E and SoCalGas. I have been delegated authority to sign this declaration by Mr. Cho. I have reviewed the Response of SoCalGas and SDG&E to the Fifteenth Data Request of The Utility Reform Network (TURN) and Southern California Generation Coalition (SCGC) in the Pipeline Safety and Enhancement Plan (PSEP) 2016 Reasonableness Review A.16-09-005 proceeding, submitted concurrently herewith (Response to TURN-SCGC’s Fifteenth Data Request). I personally am familiar with the facts and representations in this Declaration, except where stated as based upon my information and belief. 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 Response to TURN-SCGC’s Fifteenth Data Request is within the scope of data protected as confidential under applicable law and pursuant to Public Utilities Code (“PUC”) § 583 and General Order (“GO”) 66-C, as further described in Attachment A. The intervenors in this proceeding (The Utility Reform Network, the Office of Ratepayer Advocates, and Southern California Generation Coalition) have requested that SDG&E and SoCalGas provide their responses to all data requests to all other parties; since this necessarily includes the Office of Ratepayer Advocates, this Declaration has been necessitated.

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 30<sup>th</sup> day of August, 2017, at Los Angeles, California.

  
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Hugo Mejia  
Project and Execution Manager

## ATTACHMENT A

### **SoCalGas and SDG&E Request Confidential Treatment of the Following Information in Their Response to TURN-SCGC's Fifteenth Data Request in A.16-09-005, Application to Recover Costs Recorded in Pipeline Safety & Reliability Memorandum Accounts, Safety Enhancement Capital Costs Balancing Accounts, and Safety Enhancement Expense Balancing Accounts**

SDG&E and SoCalGas designated the combination of the pipeline diameter attribute and location data as confidential in their response to TURN-SCGC's Fifteenth Data Request in A.16-09-005, Application to Recover Costs Recorded in Pipeline Safety & Reliability Memorandum Accounts, the Safety Enhancement Expense Balancing Accounts, and the Safety Enhancement Capital Cost Balancing Accounts, because:

- (1) This data is sensitive critical energy infrastructure information that is not currently published by PHMSA and, if made publicly available, could present a risk to the security of California's critical energy infrastructure. SoCalGas' and SDG&E's assessment of the risks associated with critical energy infrastructure data will continue to evolve as the sophistication, frequency and volume of security threats increase. In light of certain events, such as the attack on Pacific Gas & Electric Company's Metcalf Substation in 2013, SoCalGas and SDG&E believe pipeline diameter data must be treated as confidential. SoCalGas and SDG&E designate this pipeline diameter data as confidential pursuant to several laws, regulations, and guides that seek to protect critical infrastructure information and sensitive security information from public disclosure for national security reasons. These include, but are not limited to: (i) the Protected Critical Infrastructure Information (PCII) Program; (ii) FERC Order 630 - Critical Energy Infrastructure Information (CEII); (iii) Sensitive Security Information Regulations; and (iv) the Transportation Security Administration's (TSA) Pipeline Security Guidelines. *See also* the Federal Register Notice on August 27, 2015 (Volume 80, Number 166) concerning PHMSA/OPS' proposed changes to the National Pipeline Mapping System (NPMS) data collection and the protection of pipeline information such as MAOP and pipe diameter. The yellow highlighted portions on the pages identified in the table below fall within the category of sensitive critical energy infrastructure.

SDG&E and SoCalGas designated the vendor bid and pricing information (including rates and invoices) as confidential in their response to TURN-SCGC's Fifteenth Data Request in A.16-09-005, Application to Recover Costs Recorded in Pipeline Safety & Reliability Memorandum Accounts, the Safety Enhancement Expense Balancing Accounts, and the Safety Enhancement Capital Cost Balancing Accounts because:

- (2) This data is market-sensitive information and is entitled to confidential treatment under D.11-01-36, 2011 WL 660568 (2011) GO 66-C Sections 2.2(b), 2.8. The disclosure of such information would trigger the protection of section 2.2(b) of G.O. 66-C, which protects "[r]eports, records and information requested or required by the Commission which, if revealed, would place the regulated company at an unfair business disadvantage." The yellow highlighted portions on the pages identified in the table below fall within the category of vendor identifying information.

SDG&E and SoCalGas designated their employee names as confidential because:

- (3) Disclosure of this information would constitute an unwarranted invasion of personal privacy. Releasing names could put employees at risk for identity theft, personal harm, harassment or other negative outcomes. This information is exempt from public disclosure, and constitutes confidential information pursuant to Government Code § 6254(c); Gov't Code 6255; Civil Code §§ 1798.3 & 1798.24 (the California Information Practices Act); and Cal. Const., Art. I, § 1 (California constitutional right to privacy) among other relevant provisions. The yellow highlighted portions

on the pages identified in the table below fall within the category of employee identifying information (e.g., names, signatures, other contact information).

DATA / INFORMATION	JUSTIFICATION FOR CONFIDENTIALITY	ATTACHMENTS
<p>Pipeline attribute (i.e. diameter, pressure, and location)</p>	<p>This information has been identified as confidential protected information as this data constitutes sensitive critical energy infrastructure information that is not currently published by the PHMSA and, if made publicly available, could present a risk to the security of the SoCalGas and SDG&amp;E pipeline system and California's critical energy infrastructure.</p> <p><u>CEII</u>: 18 CFR §388.113(c); FERC Orders 630, 643, 649, 662, 683, and 702 (defining CEII).</p> <p><u>Critical Infrastructure Information</u>: 6 U.S.C. §§131(3), 133(a)(1)(E); 6 CFR §§ 29.2(b), 29.8 (defining CII and restricting its disclosure).</p> <p>Gov't Code § 6254(e) ("Geological and geophysical data, plant production data, and similar information relating to utility systems development, or market or crop reports, that are obtained in confidence from any person.")</p> <p>Gov't Code § 6254 (ab) ("Critical infrastructure information, as defined in Section 131(3) of Title 6 of the United States Code, that is voluntarily submitted to the Office of Emergency Services for use by that office")</p>	<p>Q15.1.3 CONFIDENTIAL Valve Brea Station RFI 03.pdf: pp.1</p>
<p>Vendor information</p>	<p>Vendor names, bid and pricing information have been marked as confidential protected information as publicly disclosing this information could lead to a competitive disadvantage and potential loss of market share for those vendors.</p> <p><i>See, e.g.</i>, D.11-01-36, 2011 WL 660568 (2011)</p> <p>GO 66-C Sections 2.2(b), 2.8</p>	<p>Q15.1.3 CONFIDENTIAL Valve Brea Station RFI 03.pdf: pp.1-4  Q15.3.4 CONFIDENTIAL L44-654 RFI 018.pdf: pp.1-3  Q15.3.4 CONFIDENTIAL Valve 235-335 Palmdale CCO 08 RFI 006.pdf: pp.1-2  Q15.6.3 CONFIDENTIAL Valve 235-335 Palmdale RFI 005.pdf: pp.1  Q15.6.3 CONFIDENTIAL Valve 235-335 Palmdale RFI 007.pdf: pp.1  Q15.6.3 CONFIDENTIAL Valve 235-335 Palmdale RFI 015.pdf: pp.1</p>

	<p>Gov't Code § 6254.15 (disclosure not required for "corporate financial records, corporate proprietary information including trade secrets, 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>Gov't Code §6254.7(d) (relating to trade secrets)</p> <p>Gov't Code § 6254(k); Evid. Code §1060; Civil Code §3426</p>	
<p>Employee identifying information (e.i. names, signatures, other contact information)</p>	<p>Public disclosure of staff level employee names, signatures, and other contact information is being prevented to protect against privacy, employee security, identity theft, and cyber-security risks.</p> <p>Gov't Code § 6254(c); Gov't Code 6255;</p> <p>Civil Code §§ 1798.3 &amp; 1798.24 (the California Information Practices Act);</p> <p>Cal. Const., Art. I, § 1 (California constitutional right to privacy).</p>	<p>Q15.1.3 CONFIDENTIAL Valve Brea Station RFI 03.pdf: pp.1,3-4  Q15.3.4 CONFIDENTIAL L44-654 RFI 018.pdf: pp.1-3  Q15.3.4 CONFIDENTIAL Valve 235-335 Palmdale CCO 08 RFI 006.pdf: pp.2</p>