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

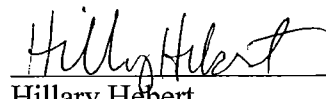I, **Hillary Hebert**, do declare as follows:

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 the SDGE ORA DR001 Data Request response, submitted concurrently herewith (the "ORA DR001"). 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 DR001 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 21st day of November 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 A.17-09-005 ORA DR001

FOR RESPONSES WITHOUT HIGHLIGHTS (PDFs): 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.

FOR RESPONSES WHERE SPECIFIC DATA IS HIGHLIGHTED IN YELLOW (XLS): Information highlighted in yellow in the attached response are to be treated as confidential Protected Information for the reason(s) provided. 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.

The **EXCEL** files provided in this response are entitled:
2016 Energy Consumption for Port Tidelands
Specialized Audit Results

The **PDF** files provided in this response are listed in the legend below:

Exhibit No.	Documents
01	Continental Maritime – Port of San Diego ASHRAE Level I Audit Report dtd. 8/18/2016
02	BAE Systems – Port of San Diego ASHRAE Level I Audit Report dtd. 8/18/2016
03	San Diego Convention Center SDG&E Comprehensive Category 2 Audit Report dtd. 3/11/2016
04	Harborside Refrigerated Services ASHRAE Level II Audit Report dtd. 1/26/2016
05	San Diego Cold Storage ASHRAE Level II Audit Report dtd. 1/26/2016
06	Energy Analysis Report High Pressure Air compressors and Natural Gas Boosters, Solar Turbines Harbor Drive Plant dtd. 12/1/2016

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
No	**Application ID**: 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.	**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). **Address**: Civil Code §1798.80, et seq.; Gov't Code § 6254(c); Gov't Code § 6255 **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).
No	**Account Info**: Account ID, Customer ID	**Exhibit 01** Sheets 1-72 **Exhibit 02** Sheets 1-51 **Exhibit 03** Sheet 1-47, 51, 83-115 **Exhibit 04** Sheet 1-48 **Exhibit 05** Sheet 1-39 **Exhibit 06** Sheets 1-55	Disclosure could allow the public to gain access to customer data such as address, customer name, usage, account number.	**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). **Address**: Civil Code §1798.80, et seq.; Gov't Code § 6254(c); Gov't Code § 6255 **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).
Yes	**Project Info**: Project Description	**Specialized Audit Results.xlsx column F**	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.	**Trade Secrets**: Gov't Code §§ 6254(k), §6254.7(d) ; Evid. Code §1060; Civil Code §3426 et seq. **Non-Public Company Financial Information**: Gov't Code §§6254(k), 6254.7(d); Evid. Code §1060; Civil Code §3426 et seq.; GO 66-C, Section 2.2(b); **Competitive Data**: Gov't Code §§ 6254(k), 6254.7(d); Evid. Code §1060; Civil Code §3426 et seq.; GO 66-C Section 2.2(b)

Yes	Personnel Info: 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)	**Exhibit 01** Sheets 2, 6-7 **Exhibit 02** Sheets 2, 5-6 **Exhibit 04** Sheet 2,7-8 **Exhibit 05** Sheet 2, 6-7 **Exhibit 06** Sheet 3	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	**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).
Yes	Contractor: Project Sponsor or Vendor Company, Contractor Name	**Exhibit 06** Sheet 29	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 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.	When the customer is also acting as project sponsor: **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). **Non-Public Company Financial Information**: Gov't Code §§6254(k), 6254.7(d); Evid. Code §1060; Civil Code §3426 et seq.; GO 66-C, Section 2.2(b); **Competitive Data**: 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: **Customer and vendor proprietary information**: See, e.g., D.09-08-018, 2011 WL 660568 (2011); GO 66-C Sections 2.2(b), 2.8
Yes	Location: Project Name, Address, City, Project Address, Site ID, Premise ID, Site Address, Site Unit Number, Blueprints, Photographs Facility Name, Facility First Name, Facility Last Name, Facility Street 1, Facility Street 2, Facility City, Facility State, Facility Zip, Facility Email	**Exhibit 01** Sheets 4, 8-22, 62-72 **Exhibit 02** Sheets 4, 7-21 **Exhibit 03** Sheets 3, 7-12, 47-51 **Exhibit 04** Sheets 8-9, 24-28 **Exhibit 05** Sheets 4,7, 22-25	For Residential Customers: Public disclosure of this information could compromise customer privacy to the potential harm of customers. 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.	**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). For commercial customers: **Non-Public Company Financial Information**: Gov't Code §§6254(k), 6254.7(d); Evid. Code §1060; Civil Code §3426 et seq.; GO 66-C, Section 2.2(b); **Competitive Data**: Gov't Code §§ 6254(k), 6254.7(d); Evid. Code §1060; Civil Code §3426 et seq.; GO 66-C Section 2.2(b)

		Exhibit 06 Sheets 4-5, 14-17, 24-29		
Yes	**Energy Usage and/or Savings:** kW, kWh, Therms	**2016 Energy Consumption for Port Tidelands.xlsx - tab "2016 Gas ", columns E, F, G & I, and tab "2016 Electric ", columns E, F, G & I** **Specialized Audit Results.xlsx columns G, H, J K, M & N** **Exhibit 01** Sheets 23-34 **Exhibit 02** Sheets 22-30 **Exhibit 03** Sheets 3-5,13-16 17-38,41-45, 53-82, 84-94, 96-113 **Exhibit 04** Sheets 10-23, 29-45 **Exhibit 05** Sheets 8-21, 26-36 **Exhibit 06** Sheets 5-7,9-13, 18-23, 30-45, 52-55	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).
Yes	**Incentives:** Total Incentive, Cost Estimates, ROI, Equipment Cost, Invoice	**Exhibit 01** Sheets 3, 36-61 **Exhibit 02** Sheets 32-51	Disclosure of information could indicate to the public change in the company's financial status or business	**Non-Public Company Financial Information:** Gov't Code §§6254(k), 6254.7(d); Evid. Code §1060; Civil Code §3426 et seq.; GO 66-C, Section 2.2(b); **Competitive Data:** Gov't Code §§ 6254(k), 6254.7(d); Evid. Code §1060; Civil Code §3426 et seq.; GO 66-C Section 2.2(b)

		Exhibit 03 Sheets 4-5, 17-38, 41-45 **Exhibit 04** Sheets 10,13-14 29, 31-44 **Exhibit 05** Sheets 8,12,27, 33-36 **Exhibit 06** Sheets 6-7, 13	opportunities potentially resulting in a competitive disadvantage.	
Yes	**Customer Contact Info:** Customer Name, Contact Name, site Contact Name, Applicant Full Name, App User Name, Primary Decision Maker Name, Phone Number, Phone Extension, Alternate Phone Number, Alternate Phone Extension, Email, Account Name	**2016 Energy Consumption for Port Tidelands.xlsx - tab "2016 Gas ", column H, and tab "2016 Electric ", columns H & J** **Specialized Audit Results.xlsx column B** **Exhibit 01** Sheet 6 **Exhibit 02** Sheet 5 **Exhibit 03** Sheet 47 **Exhibit 04** Sheets 2,7 **Exhibit 05** Sheets 2,6 **Exhibit 06** Sheet 3	These data elements identify customers by name and contain personal contact information provided as part of provision of services	**Privacy:** Gov't Code § 6254(c); Gov't Code 6255; Civil Code §§ 1798.3 & 1798.24 (the California Information Practices Act); **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). Address: Civil Code §1798.80, et seq.; Gov't Code § 6254(c); Gov't Code § 6255
No	**Meter:** Meter Number		Public disclosure of this information could compromise customer privacy to the potential harm of customers. These data elements identify	**Customer Energy Usage:** 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

				Public disclosure of this information	practices to protect a customer's unencrypted electrical or gas consumption data
				customer's account numbers and energy consumption.	from unauthorized access, destruction, use, modification, or disclosure") and associated CPUC Decisions (D.11-07-056 and D.11-08-045). .
Yes	**Specifications:** HVAC Serial Number, HVAC Make, HVAC Model, HVAC Unit Tons	**Exhibit 01** Sheets 62-72 **Exhibit 02** Sheet 9, 13 **Exhibit 03** Sheets 47-51, **Exhibit 04** Sheet 24 **Exhibit 05** Sheets 22, 24-25 **Exhibit 06** Sheets 14, 46-51		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.	**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).
No	**Tax ID**			Public disclosure of this information creates a risk of fraud, identify theft or other personal, commercial or financial damage.	**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).
No	**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.	**Trade Secrets:** Gov't Code §§ 6254(k), §6254.7(d) ; Evid. Code §1060; Civil Code §3426 et seq. Competitive Data: Gov't Code §§ 6254(k), 6254.7(d); Evid. Code§1060; Civil Code §3426 et seq.; GO 66-C Section 2.2(b)
No	**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 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.