

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

Application of SAN DIEGO GAS & ELECTRIC
COMPANY (U 902-E) for Approval of its 2019 Electric
Procurement Revenue Requirement Forecasts and GHG-
Related Forecasts

Application 18-04-004
(Filed April 13, 2018)

**MOTION OF SAN DIEGO GAS & ELECTRIC COMPANY (U 902 E) FOR
LEAVE TO FILE CONFIDENTIAL MATERIALS UNDER SEAL; CONFIDENTIAL
MATERIALS ATTACHED AND FILED UNDER SEAL**

Christopher M. Lyons
8330 Century Park Court, CP 32D
San Diego, CA 92123-1530
Telephone: (858) 654-1559
Facsimile: (619) 699-5027
Email: clyons@semprautilities.com

Attorney for:
SAN DIEGO GAS & ELECTRIC COMPANY

November 7, 2018

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Pursuant to Rule 11.4 of the Commission’s Rules of Practice and Procedure and Decisions (“D”) 06-06-066 and D.14-10-033, San Diego Gas & Electric Company (“SDG&E”) hereby files this Motion to File Under Seal, and Proposed Ruling, regarding the confidential information in Attachment G to the November Update to the Application of San Diego Gas & Electric Company (U-902-E) for Approval of its 2019 Electric Procurement Revenue Requirement Forecasts and GHG-Related Forecasts (“Application”). Specifically, as described in the Declarations of Ryan A. Miller and Hillary Hebert, SDG&E is seeking confidential treatment of limited greenhouse gas (“GHG”)-related information in Templates D-2 (Annual GHG Emissions and Associated Costs) and D-5 (History of Revenue, Costs, and Emissions Intensity) to Attachment G – the GHG Revenue and Reconciliation Form – to the November Update. As Mr. Miller and Ms. Hebert indicate, disclosure of this information would be inappropriate because disclosure of forecasts of GHG emissions and recorded and forecast GHG costs would allow market participants to gain insight SDG&E’s GHG obligations and procurement strategies, which would comprise SDG&E’s contractual bargaining power and cause customer costs to rise.

In sum, the material for which SDG&E seeks confidential treatment is confidential according to D.06-06-066 and D.14-10-033. The confidential information should be protected as follows:

- The confidential information constitutes a particular type of data listed in the IOU Matrix;
- The confidential information is confidential in accordance with D.14-10-033;
- SDG&E is complying with the limitations on confidentiality specified in the IOU Matrix for each type of data;
- The Protected Information is not already public; and
- The data cannot be aggregated, redacted, summarized, masked or otherwise protected in a way that allows partial disclosure.

For good cause shown and because no party will be prejudiced by the redacted material set forth in the above-referenced Templates D-2 and D-5 to Attachment G to the Application, SDG&E respectfully requests that this Motion be granted. SDG&E has attached a Proposed Ruling for the Commission's use in granting this Motion.

DATED this 7th day of November 2018, at San Diego, California.

Respectfully submitted,

By: /s/ Christopher M. Lyons
Christopher M. Lyons
8330 Century Park Court, CP 32D
San Diego, CA 92123-1530
Telephone: (858) 654-1559
Facsimile: (619) 699-5027
Email: clyons@semprautilities.com

Attorney for:
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PROPOSED ORDER

Pursuant to Rule 11.4 of the Rules of Practice and Procedure of the California Public Utilities Commission (the “Commission”) and D.06-06-066, D.08-04-023 and D.14-10-033, San Diego Gas & Electric Company (“SDG&E”) filed a motion on November 7, 2018, requesting authority to file and maintain confidential, commercially sensitive and proprietary information under seal (the “Motion”). The Motion sought confidential treatment of certain limited greenhouse gas (“GHG”)-related information appearing in in Templates D-2 (Annual GHG Emissions and Associated Costs) and D-5 (History of Revenue, Costs, and Emissions Intensity) to Attachment G – the GHG Revenue and Reconciliation Form – to the November Update to Application of San Diego Gas & Electric Company (U-902-E) for Approval of its 2019 Electric Procurement Revenue Requirement Forecasts and GHG-Related Forecasts (“Application”). .

The information for which confidential treatment is sought is protected under the IOU Matrix adopted in D.06-06-066 (the “IOU Matrix”) or under D.14-10-033. In addition, the information complies with the limitations on confidentiality specified in the IOU Matrix for that type of data (as applicable) and has not been made public. SDG&E has not publicly disclosed this information. The data cannot be aggregated, redacted, summarized, masked or otherwise protected in a way that allows partial disclosure.

Therefore, it is ordered that:

1. The confidential information contained in Templates D-2 and D-5 to Attachment G to the Application, shall remain sealed and is not to be disclosed to anyone other than Commission staff, the Assigned Commissioner, the assigned Administrative Law Judges (“ALJs”) or an ALJ designated to decide this motion;
2. Further proceedings, if any, held with respect to matters contained in the confidential

information shall be conducted in a manner the assigned ALJs deem reasonably necessary to protect the confidentiality of the materials described herein;

3. SDG&E has the right to consider and reject requests for access to this material by means of a non-disclosure agreement or other method; and
4. All additional documentary evidence in this proceeding that addresses or relates to the subject matter of the confidential information must be treated in the confidential manner described in paragraphs 1 and 2, above.

Administrative Law Judge

Dated: _____