

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

**DECLARATION SUPPORTING CONFIDENTIAL DESIGNATION  
ON BEHALF OF  
PACIFIC GAS AND ELECTRIC COMPANY (U 39 E)**

1. I, Richard Knoeber, am the Data Response Unit Quality Control (“DRU QC”) Compliance and Risk Consultant, Expert, of Pacific Gas and Electric Company (“PG&E”), a California corporation. Joe Bentley, Senior Vice President, Electric Engineering at PG&E, delegated authority to me to sign this declaration. My business office is located at:

Pacific Gas and Electric Company  
300 Lakeside Drive  
Oakland, CA 94612

2. PG&E will produce the information identified in paragraph 3 of this Declaration to the California Public Utilities Commission (“CPUC”) or departments within or contractors retained by the CPUC in response to a CPUC audit, data request, proceeding, or other CPUC request.

Name or Docket No. of CPUC Proceeding (if applicable): N/A

3. Title and description of document(s):

Attachment	Title	Description
A	WMP-Discovery2023 DR CalAdvocates 016-Q001Atch01CONF.pdf	Guidance Document
B	WMP-Discovery2023 DR CalAdvocates 016-Q001Atch02CONF.pdf	Guidance Document

4. These documents contain confidential information that, based on my information and belief, has not been publicly disclosed. These documents have been marked as confidential in red font on the header of the relevant portions of the document. Please note that starting in the second half of 2022, PG&E implemented an internal automated data classification tool which mandates the labeling of all documents and emails with one of four increasing security

classifications: public, internal, confidential, and restricted. These classifications serve a purpose separate and apart from advising the CPUC that certain information is confidential; these classifications are for PG&E data security. For purposes of confidentiality designation, we ask that you please disregard the internal black font labeling at the footer of all documents which is distinguished from the CPUC confidentiality markings in red font at the header of relevant pages of the documents. The basis for CPUC confidential treatment and where the CPUC confidential information is located on the documents are identified on the following chart:

Check	Basis for Confidential Treatment	Where Confidential Information is located on the documents
<input type="checkbox"/>	Customer-specific data, which may include demand, loads, names, addresses, and billing data  (Protected under PUC § 8380; Civ. Code §§ 1798 et seq.; Govt. Code § 6254; Public Util. Code § 8380; Decisions (D.) 14-05-016, 04-08-055, 06-12-029)	
<input type="checkbox"/>	Personal information that identifies or describes an individual (including employees), which may include home address or phone number; SSN, driver's license, or passport numbers; education; financial matters; medical or employment history (not including PG&E job titles); and statements attributed to the individual.  (Protected under Civ. Code §§ 1798 et seq.; Govt. Code § 6254; 42 U.S.C. § 1320d-6; and General Order (G.O.) 77-M)	
<input checked="" type="checkbox"/>	Physical facility, cyber-security sensitive, or critical infrastructure data, including without limitation critical energy infrastructure information (CEII) as defined by the regulations of the Federal Energy Regulatory Commission at 18 C.F.R. § 388.113 and/or General Order 66-D ("The subject information: (1) is not customarily in the public domain by providing a declaration in compliance with Section 3.2(c) stating that the subject information is not related to the location of a physical structure that is visible	Confidential information is outlined red on:  Atch. B, Page 54

---

with the naked eye or is available publicly online or in print; and (2) the subject information either: could allow a bad actor to attack, compromise or incapacitate physically or electronically a facility providing critical utility service; or discusses vulnerabilities of a facility providing critical utility service”).

(Protected under Govt. Code § 6254(k), (ab); 6 U.S.C. § 131; 6 CFR § 29.2)

---

- ☐ Proprietary and trade secret information or other intellectual property and protected market sensitive/competitive data

(Protected under Civ. Code §§3426 *et seq.*; Govt. Code §§ 6254, *et seq.*, e.g., 6254(e), 6254(k), 6254.15; Govt. Code § 6276.44; Evid. Code §1060; D.11-01-036)

---

- ☐ Corporate financial records

(Protected under Govt. Code §§ 6254(k), 6254.15)

---

- ☐ Third-Party information subject to non-disclosure or confidentiality agreements or obligations

(Protected under Govt. Code § 6254(k); see, e.g., CPUC D.11-01-036))

---

- ☒ Other categories where disclosure would be against the public interest (Govt. Code § 6255(a): In light of risks to employee safety and privacy, the public interest in maintaining the confidentiality of the employee information outweighs the public interest in disclosure.

---

Confidential  
information is outlined  
red on:

Atch. A, Page 30  
Atch. B, Pages 11-14,  
18-19, 21, 48

---

5. The importance of maintaining the confidentiality of this information outweighs any public interest in disclosure of this information. This information should be exempt from the public disclosure requirements under the Public Records Act and should be withheld from disclosure.
6. I declare under penalty of perjury that the foregoing is true, correct, and complete to the best of my knowledge.
7. Executed on the date indicated below at Concord, California.

---

Richard Knoeber  
Compliance and Risk Consultant, Expert  
Data Response Unit  
Pacific Gas and Electric Company