



FILED

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

Application of San Diego Gas & Electric
Company (U 902 E) for Authority to Update
Marginal Costs, Cost Allocation, and Electric
Rate Design

Application 23-01-008

**MOTION OF SMALL BUSINESS UTILITY ADVOCATES FOR LEAVE TO FILE
UNDER SEAL DOCUMENTS IN SUPPORT OF INTERVENOR COMPENSATION CLAIM**

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November 21, 2025

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Small Business Utility Advocates (SBUA) respectfully submits this Motion to File Under Seal, requesting confidential treatment for an attachment to its concurrently filed Intervenor Compensation Claim. This request is made pursuant to Rule 11.4 of the California Public Utilities Commission Rules of Practice and Procedure, General Order 66-D, and other applicable Commission decisions and State laws governing the confidentiality of sensitive information.

The Claim contains an attorney-client agreement between SBUA and E&E Law Corp., which constitutes confidential attorney-client communications and/or attorney work-product. Under established statutory and case law, such contracts between clients and attorneys are protected. *See, e.g.*, Bus. & Prof. Code § 6149 (attorney fee contract shall be deemed to be a confidential communication); *Dietz v. Meisenheimer & Herron* (2009), 177 Cal. App. 4th 771, 786 (a retainer agreement is confidential attorney-client communication under Business & Professions Code section 6149).

General Order 66-D, section 3.3 requires that parties file a motion under Rule 11.4 to request confidential treatment when submitting information in formal proceedings.

SBUA is concurrently filing a public, redacted version of the attorney-client agreement, which omits all confidential information.

For the foregoing reasons, SBUA respectfully requests that the Commission grant this motion and maintain the confidentiality of the attorney-client agreement under seal. A proposed ruling is attached to this Motion.

Respectfully Submitted,

By: /s/ Jennifer Weberski
Jennifer L. Weberski
Litigation Supervisor

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Dated: November 21, 2025

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[PROPOSED] RULING

In accordance with its Rules of Practice and Procedure, the California Public Utilities Commission (Commission) has considered the November 21, 2025 Motion of Small Business Utility Advocates (SBUA) for Leave to File Under Seal Documents in Support of Intervenor Compensation Claim.

IT IS HEREBY RULED that: SBUA's motion is granted and SBUA may file the confidential version of its Intervenor Compensation Claim under seal.

Dated: _____,

[Administrative Law Judge Name]