



ALJ/JOR/sgu 12/3/2025

FILED

12/03/25

04:59 PM

A2205015

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Application of Southern California
Gas Company (U904G) for Authority,
Among Other Things, to Update its
Gas Revenue Requirement and Base
Rates Effective on January 1, 2024.

Application 22-05-015

And Related Matter.

Application 22-05-016

**EMAIL RULING DENYING PROTECT OUR COMMUNITIES FOUNDATION'S
MOTION TO UNREDACT EVIDENCE AND GRANTING MOTIONS TO
SUBMIT DOCUMENTS UNDER SEAL**

Dated December 3, 2025, at San Francisco, California.

/s/ JOHN H. LARSEN

John H. Larsen
Administrative Law Judge

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Subject: A.22-05-015 & 016 EMAIL RULING DENYING PCF'S MOTION TO UNREDACT EVIDENCE AND GRANTING MOTIONS TO SUBMIT DOCUMENTS UNDER SEAL

Parties to proceeding A.22-05-015 & 016:

On September 22, 2025, Protect Our Communities Foundation (PCF) filed a motion for an order to unredact testimony designated as confidential Protective

Material pursuant to the August 9, 2022 Protective Order adopted in Phase 1 of this proceeding. On October 1, 2025, Southern California Gas Company (SoCalGas) and San Diego Gas and Electric Company (SDG&E) (collectively Sempra) filed a response in opposition to the motion, and the parties were permitted to file replies.

In its October 20, 2025 reply, PCF clarified that it requests an order to unredact Sempra's current and historic specified minimum yield strength (SMYS), Maximum Allowable Operating Pressure (MAOP), and pipeline diameter in exhibits SDG&E-T3-PSEP-01-WP1 and SCG-T3-PSEP-01-WP1 Volumes I - IV. In support, PCF contends the following: 1) Sempra has not demonstrated that this information meets the three-part test in the protective order of this proceeding; 2) Sempra has already made publicly available some of this information, so under the terms of the Protective Order, it cannot be confidential; and 3) Sempra has not established that their information is protected critical infrastructure information (PCII) because Sempra has a historic practice of publishing the SMYS, MAOP, and pipeline diameter of their other pipelines.

In its October 27, 2025 sur-reply, Sempra opposes PCF's motion based on the following contentions: 1) the language cited by PCF in the protective order is not controlling on the confidentiality of all information shared in this proceeding, and regardless, the disclosure of the information sought meets the "test" that PCF interprets in the Protective Order; 2) the previous publishing of some of the redacted information over a decade ago, prior to more recent confidentiality regulations, does not mean that all such information should be disclosed; 3) the information is confidential under multiple federal standards; and 4) the information sought by PCF is of essentially no value to the general public but its disclosure increases the vulnerability of the gas system. Sempra further noted that PCF did obtain access to the confidential information by signing the Non-Disclosure Agreement (NDA) that was issued along with the Protective Order.

Section 3 of the Protective Order allows Participants (as defined by the Order) to designate materials as protected "that customarily are treated by that Participant as confidential, sensitive, or proprietary, which are not available to the public, and which, if disclosed freely, would subject that Participant or Participant's customers or clients, to risk of competitive disadvantage or other business injury." This is not the standard for determining if material temporarily protected by the Protective Order is confidential, as the Protective Order permits protection of material beyond what is confidential.

The framework of laws and regulations governing the confidentiality of evidence in this proceeding includes provisions regarding the public's interest in accessing information ensuring transparency, and the public's interest in safety. The latter provisions include material that meets the federal definition of critical infrastructure and California law governing the protection of confidential material generally. Under federal law, the parties dispute whether SMYS, MAOP, and pipeline diameter are not "engineering, vulnerability, or detailed design information" protected by federal law. The California Public Records Act, codified in Cal. Govt. Code Section 7922.000 states that information need not be publicly disclosed where "on the facts of the particular case the public interest served by not disclosing the record clearly outweighs the public interest served by disclosure of the record." See also G.O. 66-D. Material not eligible for protection as critical infrastructure information may still be protected under California law.

PCF does not address the operation of the provisions of the Protective Order adopted three years ago, the application of California law, and is not persuasive in other respects. Pursuant to federal law, large natural gas transmission pipes are part of California's critical energy infrastructure, and their strength, pressure, and diameter constitute "engineering, vulnerability, or detailed design information" that might be used to disrupt the delivery of gas to a large segment of the population in a dangerous manner. Such information is appropriately viewed by the parties under the terms of the protective order. PCF has not demonstrated how disclosure of the operating details of this pipe is more than de minimis public interest.

According to California law, Sempra has met its burden to demonstrate that the public's interest in safety is served by not disclosing characteristics of this critical infrastructure because it outweighs a general public interest in disclosing such information in the public record. Instead, such information is properly considered in this proceeding pursuant to the Protective Order.

Accordingly, PCF's motion is denied.

The following unopposed motions to submit PCF Ex-57, PCF's Opening Brief, and PCF's Reply Brief under seal are granted. PCF shall submit PCF Ex-57 confidentially forthwith.

It is so ruled.

The Docket Office shall formally file this ruling.

John H. Larsen

Administrative Law Judge

California Public Utilities Commission

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