

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



**FILED**

12/29/25

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A2505016

In the Matter of the Joint Application of  
Platinum Equity Capital Partners IV, L.P. and  
SCRS Intermediate Holding Corporation,  
Requesting Expedited Approval of Indirect  
Transfer of Control of Securus Technologies,  
LLC (U-6888-C) Pursuant to California  
Public Utilities Code Section 854(a).

Application 25-05-016  
(Filed May 23, 2025)

**MOTION OF THE UTILITY REFORM NETWORK TO DE-DESIGNATE AS  
CONFIDENTIAL THE EVIDENTIARY HEARING TRANSCRIPT**

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December 29, 2025

## I. INTRODUCTION

Pursuant to Rule 11.1 of the California Public Utilities Commission’s (Commission) Rules of Practice and Procedure (“Rules”), the non-disclosure agreements (“NDAs”) executed between parties,<sup>1</sup> and the ALJ Clark’s December 23, 2025 email ruling (“December 23, 2025 Ruling”),<sup>2</sup> The Utility Reform Network (“TURN”) submits this motion to de-designate as confidential most of the evidentiary hearing transcript.<sup>3</sup> This motion follows TURN’s December 22, 2025 motion to de-designate as confidential Applicants’ response to TURN Data Request (“DR”) 4-4 (“TURN December 22, 2025 Motion”), and the December 23, 2025 Ruling, which requires TURN to identify references to DR 4-4 in the evidentiary transcript. TURN’s instant motion incorporates by reference the arguments pertaining to DR 4-4, to avoid repeating its argument.

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<sup>1</sup> TURN has an NDA with each Applicant in this proceeding: Securus Technologies, LLC (“Securus”); Platinum Equity Capital Partners IV, L.P. (“PECP”); and SCRS Intermediate Holding Corporation (“SCRS Intermediate HC”). To enable efficient discovery, TURN issued data requests to Applicants jointly, and Applicants provided joint responses. All three NDA’s contain the following provision: “. . . [I]f one Party objects to the claim of the other Party that particular information is lawfully entitled to proprietary or confidential status, counsel may request a ruling from the Commission or assigned administrative law judge (‘ALJ’).”

<sup>2</sup> See Email Ruling Regarding Motions to De-Designate Confidential Information and Responses (issued Dec. 23, 2025) (seeking clarity on whether TURN intended to “also request to de-designate portions of the December 16, 2025 hearing transcript which has not yet been issued” and required TURN to “file a request specifying any confidential portions of the December 16, 2025 evidentiary hearing transcript to be re-designated if Intervenor’s December 23, 2025 motion is granted.”) (“December 23, 2025 Ruling”).

<sup>3</sup> At the December 16, 2025 evidentiary hearing, ALJ Clark issued a ruling requiring “the parties to file any motions to de-designate an exhibit as confidential no later than five days after the issuance of the transcript for the evidentiary hearing” and “that any party filing such a motion shall also specify any confidential portions of the transcript referring to that exhibit that they are requesting to be de-designated as confidential.” The evidentiary hearing transcript was issued on December 23, 2025. Moreover, the December 23, 2025 Ruling required that TURN’s “request shall be filed no later than December 29, 2025.” Therefore, TURN’s motion is timely.

## II. LEGAL STANDARD

As TURN noted in its December 22, 2025 Motion, the Commission has repeatedly underscored,<sup>4</sup> “[t]he public’s right to access to most, though not all, government records, including those developed in Commission proceedings, is enshrined in California Constitution, Article I, § 3(b)(1).”<sup>5</sup> General Order (“G.O.”) 66-D, Section 3, sets forth the requirements for submission of information to the Commission under a claim of confidentiality. Pursuant to G.O. 66-D Section 3.2, the party submitting the information bears the burden of proof and must provide the reasons the Commission should withhold information from the public. Among other requirements, the request for confidential treatment must state a specific legal basis for the claim and provide a declaration in support of the claim.<sup>6</sup>

Finally, G.O. 66-D, Section 3.2(b) further states that if the information submitter cites California Government Code Section 7922.000 (“public interest balancing test”)

as the legal authority for the Commission to withhold the document from public release, then the information submitter must demonstrate with granular specificity on the facts of the particular information why the public interest served by not disclosing the record clearly outweighs the public interest served by disclosure of the record. A private economic interest is an inadequate interest to claim in lieu of a public interest.

As TURN notes in Table 1 below, Applicants’ confidentiality declarations offer general assertions and an insufficient factual basis to support their assertion that the information should be confidential. Moreover, much of the information is already publicly available and in the record of the proceeding.

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<sup>4</sup> See e.g., D.20-12-021 at 9-12; D.20-03-014 at 10-13; D.17-09-023 at 2-3, 9-12.

<sup>5</sup> Administrative Law Judge’s Ruling on AT&T’s Motion to Correct and De-Designate as Confidential Evidentiary Hearing Transcript, *Application of Pacific Bell Telephone Company d/b/a AT&T California (U 1001 C) To Relinquish Its Eligible Telecommunications Carrier Designation* (A.23-03-002) at 2 (issued Aug. 29, 2024).

<sup>6</sup> See G.O. 66-D 3.2(b), (c).

### III. DISCUSSION

TURN moves to disclose most of the transcript of the December 16, 2025 evidentiary hearing. TURN submits that the confidential portions of the transcript should be limited and that most of the information discussed in the confidential sessions referred to by TURN was done so out of an abundance of caution to avoid inadvertent references to confidential material. In Table 1 below, TURN compares the reasons the Applicants provided for marking certain information as confidential with TURN's position on those reasons. However, many of the issues raised in the confidential sessions relate to matters publicly raised by both parties in the opening and rebuttal testimonies or are readily available to the public, and thus, this information should be de-designated as confidential.

*Table 1. Proposed De-Designation of Confidential Redactions*

<b>Transcript Citation</b>	<b>Applicant's Position<sup>7</sup></b>	<b>TURN's Position</b>
Tr. 49:23-50:16 (general questions regarding Mr. Lozich's opening testimony)	N/A	This information is publicly available and already in the record of this proceeding. <sup>8</sup>
Tr. 50:17-51:9 (questions regarding Applicants' response to TURN DR 4-4)	N/A	This information is publicly available and already in the record of this proceeding. <sup>9</sup>
Tr. 51:10-52:17 (identity of one of the entities and its percentage ownership listed)	The Applicants cite Gov. Code § 7927.705; Evid. Code § 1060; Civ. Code 3426.1(d); Gov. Code § 7922.000 in support the designation.	TURN incorporates the arguments raised in regard to December 22, 2025 Motion, the Commission should de-designate as confidential Applicants' response to TURN DR 4-

<sup>7</sup> Based on Applicants' confidentiality declarations provided in data request responses and testimonies, where available.

<sup>8</sup> Opening Testimony of Michael S. J. Lozich on behalf of Applicants and Securus Technologies, LLC (U-6888-C) at 6 (filed Oct. 10, 2025) (Lozich Opening Testimony).

<sup>9</sup> TURN submitted a public version of Applicants' response to TURN DR 4-4 as Exhibit TRN-27X.

<b>Transcript Citation</b>	<b>Applicant's Position<sup>7</sup></b>	<b>TURN's Position</b>
in Applicants' response to TURN DR 4-4)		4, which includes the identities all First and Second Lien Lenders, including the entity identified here. TURN argues that the Applicants have not sufficiently met their burden under G.O. 66-D to demonstrate that the information is a trade secret or that the public interest balancing test falls on the side of non-disclosure.
Tr. 52:18-53:2 (questions regarding Mr. Lozich's opening testimony)	N/A	This information is publicly available and already in the record of this proceeding. <sup>10</sup>
Tr. 53:3-20 (general questions related to Applicants' response to TURN DR 4-2)	N/A	This information is publicly available and already in the record of this proceeding. <sup>11</sup>
Tr. 53:21-54:16 (specific questions related to Applicants' response to TURN DR 4-2)	Applicants characterize "future project information" as warranting confidentiality as a trade secret.  The Applicants cite Gov. Code § 7927.705; Evid. Code § 1060; Civ. Code 3426.1(d); Gov. Code § 7922.000 in support of its designation.	While TURN takes no position on the designation of this information at this time, TURN does <i>not</i> seek to de-designate the confidentiality of this information at this time.
Tr. 54:17-65:17 (questions regarding Securus' AI Model)	N/A	This information is publicly available and already in the record of this proceeding. <sup>12</sup> As discussed in the MIT Technology Review article entitled "An AI Model Trained on Prison Phone Calls Now Looks for Planned Crimes in Those Calls," Securus' Artificial Intelligence ("AI") tool is public knowledge.

<sup>10</sup> Lozich Opening Testimony at 8.

<sup>11</sup> TURN submitted a public version of Applicants' response to TURN DR 4-2 as Exhibit TRN-28X.

<sup>12</sup> See Exhibit TRN-29X.

Transcript Citation	Applicant's Position <sup>7</sup>	TURN's Position
		Moreover, Mr. Lozich's rebuttal testimony, the entirety of which is public, makes claims about data sharing and privacy issues, which TURN sought to further understand. <sup>13</sup>
Tr. 126:18-130:19 (Redirect of Mr. Raher).	N/A	This information is publicly available and already in the record of this proceeding. <sup>14</sup> Both Mr. Raher and Mr. Lozich discuss this matter publicly.

#### IV. CONCLUSION

For the foregoing reasons. TURN respectfully requests that the Commission de-designate as confidential the aforementioned portions of the evidentiary hearing transcript.

Respectfully submitted,

By: /s/ Leo Fitzpatrick

Leo Fitzpatrick,  
Telecom. Policy Analyst  
**THE UTILITY REFORM NETWORK**

Dated: December 29, 2025

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<sup>13</sup> See Rebuttal Testimony of Michael S. J. Lozich on behalf of Applicants and Securus Technologies, LLC (U-6888-C) at 8-9 (filed Nov. 7, 2025) (Lozich Rebuttal Testimony).

<sup>14</sup> See Opening Testimony of Stephen Raher on behalf of Intervenors at 12-13, 20 (filed Oct. 10, 2025); Lozich Rebuttal Testimony 9-10.