

BEFORE THE PUBLIC UTILITIES COMMISSION OF
THE STATE OF CALIFORNIA



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Joint Application of Southern California Edison
Company (U 338-E) and San Diego Gas & Electric
Company (U 902-E) For the 2024 Nuclear
Decommissioning Cost Triennial Proceeding.

Application 24-12-003

THE UTILITY REFORM NETWORK'S
MOTION FOR LEAVE TO FILE UNDER SEAL



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I. INTRODUCTION

Pursuant to Rule 11.4 of the California Public Utilities Commission's Rules of Practice and Procedure, The Utility Reform Network (TURN) respectfully submits this Motion for Leave to File Under Seal ("Motion") regarding the confidential version of TURN's Opening Brief in the above-referenced docket, filed concurrently with this Motion.

II. DISCUSSION

TURN executed non-disclosure agreements (NDAs) with Southern California Edison and San Diego Gas & Electric ("Joint Applicants") to obtain and rely on confidential information in connection with the review of Joint Applicants' testimony and workpapers in this proceeding. TURN included confidential materials covered by these NDAs in its evidentiary exhibits. On December 16, 2025, the Joint Applicants and other parties (including TURN) filed a joint motion to seal a portion of the evidentiary record with respect to the confidential exhibits.¹ As noted in the January 13, 2026 ruling of ALJ McGary, this motion remains under submission.²

TURN's Opening Brief contain a limited amount of material deemed confidential by the Joint Applicants. In light of these assertions of confidentiality by the Joint Applicants, TURN requests that the Commission allow its Opening Brief be submitted under seal. TURN believes it is necessary to include this information in its Opening Brief to fully represent its position on contested factual issues that are central to the resolution of the Application. TURN urges the Commission to find that, due to the limited amount of material that will be redacted from the public version, no party to the proceeding will be prejudiced, and the public will not be harmed.

¹ Joint Notice of Southern California Edison Company and Other Parties of Filing Final Exhibit List and Joint Motion to Seal a Portion of the Evidentiary Record, A.24-12-003, December 16, 2025.

² Administrative Law Judge's Ruling Entering Stipulated Exhibits Into the Evidentiary Record, A.24-12-003, January 13, 2026, page 3.

In the December 16, 2025 Joint Motion, the Joint Applicants provided confidentiality declarations supporting the designation of certain exhibits as confidential. Those confidentiality declarations cover the confidential materials included in TURN's Opening Brief. TURN takes no position on whether the designations are appropriate and reserves the right, generally, to challenge any confidentiality declarations as necessary.

TURN attaches a Proposed Order to this Motion to effectuate the request to file this brief under seal.

III. CONCLUSION

To comply with the terms of its NDAs with the Joint Applicants, TURN respectfully requests leave to file the confidential version of its Opening Brief under seal.

Respectfully submitted,

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_____/S/_____
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Dated: January 15, 2026

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[PROPOSED] ORDER

In accordance with the Rules of Practice and Procedure, the assigned Administrative Law Judge has considered The Utility Reform Network's Motion for Leave to File Under Seal,

IT IS HEREBY ORDERED that the Motion is granted and the material covered by this Order shall remain under seal and shall not be made accessible or disclosed to anyone other than Commission staff except on the further order/ruling of the Commission, the Assigned Commissioner, the assigned Administrative Law Judges (ALJs), or the ALJ then designated as Law and Motion Judge.

Dated: _____, 2026 at San Francisco, California.

Administrative Law Judge