

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

FILED

Robin Mattern, Simki Kuznick, and Asmara Marek,

C.26-03-007

05/06/26

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C2603007

Complainants,

v.

PACIFIC GAS AND ELECTRIC COMPANY (U 39 E),

Defendant.

**COMPLAINANTS' OPPOSITION TO MOTION FOR LEAVE TO FILE
UNDER SEAL; ALTERNATIVE MOTION TO REDACT SPECIFIC
PRIVACY INFORMATION**

I. INTRODUCTION

Complainants respectfully submit this response to Pacific Gas and Electric Company's (PG&E) Motion for Leave to File Under Seal, served April 27, 2026. While Complainants recognize the importance of protecting sensitive Personal Identifiable Information (PII), PG&E's request to seal Exhibits 1 and 3 through 6 in their entirety is overly broad and unnecessarily impedes the public's right to an open and transparent proceeding.

II. ARGUMENT

1. Preference for Public Records: Under Commission Rule 11.4 and **D.06-06-066**, there is a strong presumption that all filings in Commission proceedings should be open to the public. The Commission has established that an Investor-Owned Utility (IOU) must establish that data "cannot be aggregated, redacted, summarized, masked or otherwise protected in a way that allows partial disclosure" before sealing is granted.

2. Redaction is the Superior Alternative: PG&E’s Motion specifies that the confidential material consists of employee names, phone numbers, ID numbers, Complainants' non-public contact info, and third-party emails. Complainants do not contest the sensitivity of this specific PII. However, the substantive technical content of these exhibits—including assessments of the pole's condition, wildfire risk mapping, and Rule 20C communications—is central to the dispute and must remain part of the public record. Sealing the documents entirely, rather than redacting the PII, exceeds the scope of protection required by the **D.06-06-066 Matrix**.


3. Compliance with D.06-06-066: While PG&E cites **Public Utilities Code Section 583** and **D.06-06-066** to justify its claim, these authorities do not mandate the sealing of entire documents when targeted redaction is a viable option. Removing specific identifiers fulfills the privacy mandate without obscuring the material facts of Case C.26-03-007.

III. CONCLUSION AND PROPOSED ORDER

Complainants request that the Commission **deny** PG&E’s Motion for Leave to File Under Seal. In its place, Complainants move the Commission to order PG&E to:

- File **public, redacted versions** of Exhibits 1, 3, 4, 5, and 6.
- Limit all redactions strictly to **names, employee IDs, personal phone numbers, and personal email addresses**.
- Ensure that all **technical data, maps, policy interpretations, and official correspondence** regarding the Stoetz Lane project remain visible to the public.

Respectfully submitted,

By:  _____

Dated: May 6, 2026

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Lead Complainant (on behalf of Marek, Mattern, and Kuznick)