

BEFORE THE PUBLIC UTILITIES COMMISSION OF
THE STATE OF CALIFORNIA

Joint Application of Charter Communications, Inc., Charter Communications Holdings, LLC, and Cox Enterprises, Inc. for Approval Pursuant to Public Utilities Code Section 854 of the Indirect Transfer of Control of Cox California Telecom, LLC (U-5684-C).

Application 25-07-016
(Filed July 30, 2025)



FILED

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**MOTION OF THE UTILITY REFORM NETWORK
FOR LEAVE TO FILE OPENING BRIEF UNDER SEAL**



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May 22, 2026

**MOTION OF THE UTILITY REFORM NETWORK
FOR LEAVE TO FILE OPENING BRIEF UNDER SEAL**

Pursuant Rule 11.4 of the California Public Utilities Commission’s Rules of Practice and Procedure, The Utility Reform Network (TURN) hereby submits this Motion for Leave to File Opening Brief Under Seal (Motion) in the above-referenced docket.

Contemporaneous with this Motion, TURN has filed its opening brief in the above-referenced docket. TURN’s opening brief contains material that Charter Communications, Inc. and Charter Communications Holdings, LLC, (collectively, Charter) have designated as confidential or highly confidential. Pursuant to the non-disclosure agreement that Charter and TURN have entered for the specific purpose of participating in this proceeding, TURN is requesting that the Commission honor Charter’s confidentiality designations and allow TURN to submit its opening brief under seal. TURN take no position on whether the designations are appropriate and has not independently verified that the designations are appropriate. However, TURN believes it is necessary to include this information in its opening brief to properly develop the record and represent TURN’s position on the scoped issues.

Applicants provided this material to TURN in response to data requests from TURN, the Center for Accessible Technology, Public Advocates Office, and California Emerging Technology Fund, and as part of Applicants’ testimonies. When responding to the relevant data requests, Charter provided TURN with General Order (G.O.) 66-D Confidentiality Declarations. TURN included Charter’s California G.O. 66-D Confidentiality Declarations as attachments to TURN’s exhibits, as applicable.

The Applicants’ Confidentiality Declarations are intended to support the designation of the material produced to TURN as confidential. These Declarations provide individual

justifications for the confidentiality designation as it relates to each data request response. The Declarations cite to specific state statutes, administrative regulations, and Commission Rules and decisions for support of Charter's request for confidential treatment. As discussed above, TURN takes no position on Charter's assertion of harm from the release of this information. TURN reserves the right, generally, to challenge any confidentiality designation as necessary. TURN respectfully requests that the Commission grant this Motion designating TURN's opening brief as confidential and to protect the material under seal.

Dated: May 22, 2026

Respectfully submitted,

By: 

Alexandra Green

Alexandra Green,
Telecom. Regulatory Attorney
THE UTILITY REFORM NETWORK

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[PROPOSED] ORDER

Having reviewed the Motion of the TURN for Leave to File Opening Brief Under Seal, and good cause appearing there for,

IT IS HEREBY ORDERED that the Motion is granted and the above-referenced comments shall be filed under seal.

Dated: _____, 202__ at San Francisco, California.

Administrative Law Judge