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

**FILED**  
05/18/26  
04:59 PM  
A2603025

Application of Gateway Cities Council of  
Governments for a Certificate of Public  
Convenience and Necessity to Provide Facilities-  
Based and Resold Local Exchange Services.

A.26-03-025  
(Filed March 20, 2026)

**MOTION OF  
GATEWAY CITIES COUNCIL OF GOVERNMENTS  
FOR LEAVE TO FILE CONFIDENTIAL INFORMATION UNDER SEAL**

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Attorneys for Gateway Cities Council of  
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May 18, 2026

1 **I. INTRODUCTION.**

2 Pursuant to Rule 11.4 of the California Public Utilities Commission’s (“Commission”)  
3 Rules of Practice and Procedure, Gateway Cities Council of Governments (“Gateway Cities”)  
4 hereby move for leave to file under seal the confidential version of their contemporaneously-  
5 filed Response to April 24, 2026 and May 6, 2026 Administrative Law Judge Rulings, dated  
6 May 18, 2026. The confidential data contained within the Response includes the home addresses  
7 of Gateway Cities’ Board of Directors. These data is subject to protection under applicable law  
8 and should be held under seal. In compliance with Rule 11.4, a proposed ruling is attached with  
9 this motion.

10 **II. HOME ADDRESSES FOR BOARD MEMBERS OF GATEWAY CITIES MERITS**  
11 **CONFIDENTIAL TREATMENT UNDER THE CALIFORNIA PUBLIC**  
12 **RECORDS ACT.**

13 As part of the April 24, 2025 Ruling, Gateway Cities was asked to provide street  
14 addresses for Gateway Cities’ Executive Director and the Board of Directors to aid the  
15 Commission in its efforts to conduct background checks pursuant to D.13-05-035.<sup>1</sup> Gateway  
16 Cities provided these home addresses as part of its Response, as **Attachment B**  
17 **[CONFIDENTIAL]**.

18 This information qualifies for confidential treatment under Public Utilities Code Section  
19 583, General Order 66-D, and the California Public Records Act (“CPRA”) public interest  
20 “balancing test” set forth in Government Code Section 7922.000, *et seq.*, which protects  
21 documents where “on the facts of the particular case the public interest served by not disclosing  
22 the record clearly outweighs the public interest served by the disclosure of the record.”<sup>2</sup>  
23 Gateway Cities’ Executive Director and the members of the Board of Directors include elected  
24 officials, representing municipalities throughout Los Angeles County. Disclosing the home  
25 addresses of elected officials to the public enables potentially improper uses of this information,  
26 such as harassment, threats, identity theft, or acts of political violence. As such, the disclosure  
27 poses serious safety concerns, and no countervailing public benefit would accrue from revealing

28 <sup>1</sup> RT, Vol. 1 at 12:16-13:4.

<sup>2</sup> Gov. Code § 7922.000.

1 the data. Moreover, the California constitution guarantees an “inalienable” right to privacy, and  
2 Gateway Cities is not aware of any compelling reason to infringe or dilute this important  
3 constitutional right by making this information public.<sup>3</sup> As such, balance of equities strongly  
4 favors maintaining these home addresses as confidential, and these data qualify for protection  
5 under the CPRA balancing test.

6 **III. CONCLUSION.**

7 For the aforementioned reasons, the confidential information in the Response has been  
8 appropriately marked and presented subject to the protections of Public Utilities Code Section  
9 583, and the other provisions of law identified herein. The confidential materials are limited in  
10 scope, and the non-public elements are narrowly tailored to protect only what is confidential.

11 Respectfully submitted on May 18, 2026, at Oakland, California.

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19 By: /s/ Chan Q. Vu  
20 Chan Q. Vu

21 Attorneys for Gateway Cities Council of  
22 Governments

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<sup>3</sup> Cal. Const. art. I, § 1.

# ATTACHMENT A

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**[PROPOSED] ORDER**

Pursuant to Rule 11.4 of the California Public Utilities Commission’s Rules of Practice and Procedure, on May 18, 2026, Gateway Cities Council of Governments (“Gateway Cities”) submitted a confidential version of their Response, which contains confidential information reflecting the home addresses of key personnel, many of which are elected officials. For good cause shown in Gateway Cities’ Motion to Seal and based on Public Utilities Code Section 583, General Order 66-D, and applicable provisions of the California Public Records Act (Gov. Code § 7920.000, *et seq.*), the data are appropriate for confidential treatment.

It is **THEREFORE ORDERED** that Gateway Cities’ Motion to Seal is granted, and the confidential version of its Response shall be held under seal. All pleadings and correspondence in this proceeding shall be made in a manner that protects the confidential information from unauthorized disclosure.

**SO ORDERED.**

Dated: \_\_\_\_\_, 2026

\_\_\_\_\_  
Administrative Law Judge