

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



FILED

06/25/26

04:47 PM

A2508008

Application of Southern California Gas Company
(U904G) to Recover Costs Recorded in the
Distribution Integrity Management Program
Balancing Account from January 1, 2019, to
December 31, 2023.

Application 25-08-008
(Filed August 15, 2025)

**MOTION OF SOUTHERN CALIFORNIA GAS COMPANY FOR
LEAVE TO FILE A CONFIDENTIAL EXHIBIT UNDER SEAL;
[PROPOSED] ORDER**

DINAH TOUNY

Attorney for:

SOUTHERN CALIFORNIA GAS COMPANY

555 West Fifth Street, Suite 1700

Los Angeles, California 90013

Telephone: (213) 244-2927

Facsimile: (213) 629-9620

E-Mail: dtouny@socalgas.com

Date: June 25, 2026

DECLARATION

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

**DECLARATION OF TRAVIS T. SERA
REGARDING CONFIDENTIALITY OF CERTAIN DOCUMENTS
PURSUANT TO D.25-01-005**

I, Travis T. Sera, do declare as follows:

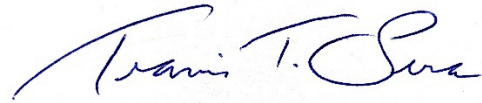
1. I am the Director of Integrity Management for Southern California Gas Company (SoCalGas). I have been delegated authority to sign this declaration by Amy Kitson, Vice President of Gas Engineering and System Integrity for SoCalGas. I have reviewed the confidential information included within Exhibit SCG-02-WP-R, Revised Workpapers Supporting the Prepared Direct Testimony of Mark Forster and Shaena Walker (Technical – Programs/Projects and Activities to Address Risk) (“DIMP Chapter 2 Revised Workpapers”). I am personally familiar with the facts and representations in this Declaration and, if called upon to testify, I could and would testify to the following based upon my personal knowledge and/or belief.

2. I hereby provide this Declaration in accordance with Decision (“D.”) 25-01-005 and General Order (“GO”) 66-D Revision 3 to demonstrate that the confidential information (“Protected Information”) provided in the DIMP Chapter 2 Revised Workpapers is within the scope of data protected as confidential under applicable law.

3. In accordance with the legal authority described in Appendix A, the Protected Information should be protected from public disclosure.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct to the best of my knowledge.

Executed this 17th day of June, 2026 at Los Angeles, California.

A handwritten signature in blue ink that reads "Travis T. Sera". The signature is written in a cursive style with a horizontal line underneath it.

Travis T. Sera
Director of Integrity Management
Southern California Gas Company

APPENDIX A

SoCalGas Request for Confidentiality on the following Protected Information in its Distribution Integrity Management Program (DIMP) Workpapers, Supporting the Prepared Direct Testimony of Mark Forster and Shaena Walker

Location of Data	Applicable Confidentiality Provisions	Basis for Confidentiality
<p>SCG-02-WP-R Workpapers (“DIMP Chapter 2 Revised Workpapers”) supporting the Prepared Direct Testimony of Mark Forster and Shaena Walker (Execution of Programs/Projects and Activities to Address Risk) have been marked/highlighted as confidential pursuant to PUC Section 583, GO 66-D, and D. 21-09-020:</p> <p>Confidential Information: Trade Secrets (Business Process Flows and Standard Operating Procedures)</p>	<p>California Public Records Act (CPRA) Exemption, Gov’t Code § 7924.510(f) (Trade Secrets)</p> <p>CPRA Exemption, Gov’t Code § 7927.705 (“Records, the disclosure of which is exempted or prohibited pursuant to federal or state law”)</p> <ul style="list-style-type: none"> • Cal. Civil Code §§ 3426 et seq. (Uniform Trade Secrets Act) • D.13-11-025, 2013 WL 6202871 (2013) (“The contracting IOU should not be required to allow use or provide access to data or test results if such use or disclosure could compromise the safe operation or confidential operating details of any IOUs’ infrastructure.”) • O2 Micro Int’l Ltd. v. Monolithic Power Sys., Inc., 420 F. Supp. 2d 1070, 1089–1090 (N.D. Cal. 2006) (“It does not matter if a portion of the trade secret is generally known, or even that every individual portion of the trade secret is generally known, so long as the combination of all such information is not generally known.”) • Cal. Int’l Chem. Co. v. Sister H. Corp., 168 F.3d 498, at *3-4 (9th Cir. 1999) (unpub.) (affirming the finding of confidentiality where a company’s pool treatment system, the use of which was licensed per non-disclosure agreements, and training manuals, which contained valuable information that was developed over the years) 	<p>It is SoCalGas’s practice to designate portions of their Standard Operating Procedures (SOP) (i.e., Gas Standards) as confidential because this data is considered proprietary, not currently published by PHMSA, and, if made publicly available, could potentially present a risk to public and pipeline safety, as well as a potential financial loss of future revenue as these documents could be monetized.</p> <p>The functions of these SOPs are not common knowledge, especially when they are associated with specific utility equipment and facilities. Such documents could potentially serve as a roadmap to nefarious activities if misused. Additionally, SOPs and training curricula documents are a collection of knowledge that have evolved over time. They may contain descriptions of unique systems of processes, technology, innovations, and procedures that the utilities have developed and improved upon over several decades. They may have evolved and been compiled from countless hours of ratepayer-funded activities, including field experience and laboratory testing, evaluating industry best practices, development of technical knowledge, and integration of manufacturer information. They have been finely tuned, over time, by knowledge gained and lessons learned. As such, they have intrinsic commercial value to an operator of a natural gas utility or someone who wants to know how to work on or operate portions of a gas utility system.</p> <p>Contractors, other utilities, or companies in the natural gas industry could use these documents for their own training or operational programs</p>

	<ul style="list-style-type: none"> • Joshua David Mellberg LLC v. Will, 96 F. Supp. 3d 953, 965 (D. Ariz. 2015) (under the Uniform Trade Secrets Act, training materials and business plans may qualify as trade secrets). • By-Buk Co. v. Printed Cellophane Tape Co., 163 Cal. App. 2d 157, 166–67 (1958) (finding plaintiff’s manufacturing methods were trade secrets and stating, “It is undoubtedly true that if [defendant] had used the same thought, labor and ingenuity which were used by plaintiff it might have been able to secure the same results that plaintiff did. But this fact does not destroy plaintiff’s right not to have its processes wrongfully disclosed to others and used to its detriment.”) • Navarro v. Eskanos & Adler, No. C-06-02231, 2007 WL 902550, at *6 (N.D. Cal. Mar. 22, 2007) (holding the “best practices” section and other portions of a debt collection agency’s Training and Procedures Guide were confidential trade secrets). 	<p>and could be willing to purchase them. This information is subject to reasonable efforts to maintain its confidentiality by the use of non-disclosure agreements with contractors and vendors. Disclosure of this information could place the utilities at an unfair competitive advantage by creating a lost opportunity for reducing costs for utility ratepayers because these procedures were paid for by ratepayers and now they will be “free” to anyone that wants to use them for their own economic gain instead of potential revenues to offset the cost of training and procedure development for the utility.</p>
--	--	--

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

Application of Southern California Gas Company (U904G) to Recover Costs Recorded in the Distribution Integrity Management Program Balancing Account from January 1, 2019, to December 31, 2023.

Application 25-08-008
(Filed August 15, 2025)

[PROPOSED] ORDER

In accordance with the California Public Utilities Commission’s (Commission) Rules of Practice and Procedure, the Commission has considered Southern California Gas Company's (SoCalGas) Motion for Leave to File a Confidential Exhibit Under Seal.

THEREFORE, for good cause appearing, IT IS HEREBY ORDERED that:

1. The Motion is GRANTED. The protected information identified in Table 1 is described in the Motion. The Declaration of Travis T. Sera supports the request.

TABLE 1: CONFIDENTIAL EXHIBIT

EXHIBIT NUMBER	TITLE
SCG-02-WP-C-R	Workpapers Supporting the Prepared Direct Testimony of Mark Forster and Shaena Walker (Execution of Programs/Projects and Activities to Address Risk; Confidential Version)

2. The confidential exhibit identified in Table 1 shall remain under seal and shall not be made accessible or disclosed to anyone other than the Commission staff except on the further order or ruling of the Commission, the Assigned Commissioner, the Assigned Administrative Law Judge (ALJ), or the ALJ then designated as Law and Motion Judge.

Dated: _____, 2026, at San Francisco, California.

Brandon Gerstle
Administrative Law Judge