

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



FILED

08/06/26

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A2508009

Application of Southern California Gas
Company (U 904 G) and Lakeside Pipeline
LLC to Initiate Reasonableness Review and
Recovery of Lakeside Maas Energy Works
Dairy Biomethane Pilot Project Costs.

A.25-08-009
(Filed August 15, 2025)

**JOINT MOTION OF SOUTHERN CALIFORNIA GAS COMPANY AND LAKESIDE
PIPELINE LLC FOR LEAVE TO FILE UNDER SEAL; [PROPOSED] ORDER**

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August 6, 2026

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

Application of Southern California Gas
Company (U 904 G) and Lakeside Pipeline
LLC to Initiate Reasonableness Review and
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**JOINT MOTION OF SOUTHERN CALIFORNIA GAS COMPANY AND LAKESIDE
PIPELINE LLC FOR LEAVE TO FILE UNDER SEAL; [PROPOSED] ORDER**

In accordance with Rule 11.1 and 11.4 of the California Public Utilities Commission's (Commission) Rules of Practice and Procedure, Southern California Gas Company (SoCalGas) and Lakeside Pipeline LLC (Lakeside) (collectively, the Applicants) respectfully file this joint motion for leave to file under seal SoCalGas's confidential exhibits identified in Table 1, below (Joint Motion to File Under Seal).¹ No party opposes this Joint Motion to File Under Seal.²

Concurrently filed with this Motion to File Under Seal, the Applicants filed a Joint Motion to Admit Testimony and Exhibits into Evidence which requests that the Commission admit the confidential exhibits included in this Motion into evidence. As detailed in the Declaration of Rene Garcia in support of the Motion to File Under Seal (Garcia Declaration), exhibits contain information that is confidential pursuant to California Government Code §§7927.705, 7929.205, Federal Energy Regulatory Commission (FERC) regulations and orders, and laws protecting trade secret, proprietary, commercially sensitive, and personal information.

Specifically, the confidential exhibits contain data similar to data protected as critical infrastructure and/or critical energy infrastructure, vendor information and employee personal information. The Applicants respectfully request that the Commission grant this Motion

¹ Pursuant to Rule 1.8(d) of the Commission's Rules of Practice and Procedure, counsel for Lakeside has authorized counsel for SoCalGas to file and serve this Joint Motion to File Under Seal on the Parties' behalf.

² Public Advocates Office confirmed by email dated August 5, 2026 that they do not intend to oppose the Joint Motion to File Under Seal. Southern California Generation Coalition (SCGC) is not an active party in the proceeding.

designating the redacted portions of the confidential exhibits in Table 1 as confidential and protect the material under seal.

TABLE 1
CONFIDENTIAL EXHIBITS

EXHIBIT	TITLE
SCG-03-WP-R	Revised Workpapers Supporting the Prepared Direct Testimony of Maritza Pacheco [Confidential Version]
SCG/Lakeside-05	Supplemental Testimony of Maritza Pacheco on Behalf of Southern California Gas Company (Project Execution Cost) [Confidential Version]
SCG/Lakeside-07	Prepared Rebuttal Testimony of Maritza Pacheco on Behalf of Southern California Gas Company [Confidential Version]

Respectfully submitted,

By: /s/ Johnny Q. Tran
Johnny Q. Tran

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August 6, 2026

DECLARATION

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

**DECLARATION OF RENE GARCIA
REGARDING CONFIDENTIALITY OF CERTAIN DOCUMENTS
PURSUANT TO D.25-01-005**

I, Rene Garcia, do declare as follows:

1. I am the Project Delivery Strategy and Controls Director in the Infrastructure Project Delivery organization for Southern California Gas Company (SoCalGas). I have been delegated authority to sign this declaration by Devin Zornizer, Vice President of Infrastructure Project Delivery for SoCalGas. I have reviewed the confidential information included within Attachment A to attachments that SoCalGas provides for Joint Motion to File Under Seal.

2. I am personally familiar with the facts in this Declaration and, if called upon to testify, I could and would testify to the following based upon my personal knowledge and/or information and belief.

3. I hereby provide this Declaration in accordance with Public Utilities Code Section 583, Decision (D.) 25-01-005 and its subsequent decisions, and General Order (GO) 66-D, Revision 3 to demonstrate that the confidential information (Protected Information) provided in SoCalGas's Response is within the scope of data protected as confidential under applicable law.

4. In accordance with the legal authority and narrative described herein and in Attachment 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 6th day of August 2026, at Los Angeles, California.

E-SIGNED by Rene Garcia
on 2026-08-06 08:02:45 PDT

Rene Garcia
Infrastructure Project Delivery
SoCalGas

ATTACHMENT A

SCG Request for Confidentiality on the following information in the attachments to the Joint Motion to File Under Seal

Location of Protected Information	Legal Citations	Narrative Justification
All information highlighted in grey in the following attachments: • SC-03-WP-R • SCG/Lakeside-05	California Public Records Act (CPRA) Exemption, Gov't Code §7929.205 ("Critical infrastructure information, as defined in Section 131(3) of Title 6 of the United States Code, that is voluntarily submitted to the Office of Emergency Services for use by that office") CPRA Exemption, Gov't Code §7927.705 ("Records, the disclosure of which is exempted or prohibited pursuant to federal or state law") • 6 U.S.C. §§ 131(3) (defining CII) & 133(a)(1)(E) (CII is protected) • 6 CFR §§29.2(b) & 29.8 (defining CII and restricting its disclosure) • 42 U.S.C. §5195c (defining critical infrastructure) • Cal. Pub. Util. Code §364(d) ("The commission may, consistent with other provisions of law, withhold from the public information generated or obtained pursuant to this section that it deems would pose a security threat to the public if disclosed.") D.20-08-031 (providing protection for CII under G.O. 66-D when the CII is not customarily in the public domain by (1) stating that the subject information is not related to the location of a physical structure that is visible with the naked eye or is available publicly online or in print; and (2) the subject information either: could allow a bad actor to attack, compromise or incapacitate physically or electronically a facility providing critical utility service; or discusses vulnerabilities of a facility providing critical utility service.) CPRA Exemption, Gov't Code §7922.000 (Balancing Test)	It is SoCalGas's practice to designate certain data as confidential because this data is similar to data protected by CII regulations and, if made publicly available, could potentially present a risk to public and pipeline safety. The designated CII is (1) is not customarily in the public domain, is not related to the location of a physical structure that is visible with the naked eye or is available publicly online or in print; and (2) the subject information either: could allow a bad actor to attack, compromise or incapacitate physically or electronically a facility providing critical utility service; or discusses vulnerabilities of a facility providing critical utility service. These engineering design values of a proposed or existing critical infrastructure could potentially be used to determine the criticality of a gas facility and identify vulnerabilities of the gas delivery network. The value can be used to identify the volume of gas present in an area and ascertain the relative potential consequences of intentional acts against the gas transportation and distribution network.

Location of Protected Information	Legal Citations	Narrative Justification
All information highlighted in grey in the following attachments: • SC-03-WP-R • SCG/Lakeside-05	CPRA Exemption, Gov't Code §7927.705 ("Records, the disclosure of which is exempted or prohibited pursuant to federal or state law") • 18 CFR §388.113(c) (defining CEII) • FERC Order Nos. 630, 643, 649, 662, 683, and 702 (defining CEII) • FAST Act - Critical Electric Infrastructure Security, Pub. L. 114-94, amended December 4, 2015 (protecting electric infrastructure) • FERC Order 833 (including amendments to the CEII regulations, required by The FAST Act) • Critical Energy Infrastructure Information, 68 Fed. Reg. 9857, 9862 (Dep't of Energy Mar. 3, 2003) (final rule) (listing what gas information qualifies as CEII) • FERC's Guidelines for Filing Critical Energy/Electric Infrastructure Information, (Feb. 21, 2017), <i>available at</i> https://www.ferc.gov/sites/default/files/2020-04/CEII-Filing-guidelines.pdf ○ Exhibits G, G-1, G-II of pipeline certificate applications. 18 CFR §157.14 ○ Exhibit V of abandonment applications. 18 CFR §157.18 ○ FERC Form 567. 18 CFR §260.8 • CPUC Res. L-436, at 8 (stating CPUC will "refrain from making available to the public detailed maps and schematic diagrams showing the location of specific utility regulator stations, valves, and similar facilities") • Cal. Pub. Util. Code §364(d) ("The commission may, consistent with other provisions of law, withhold from the public information generated or obtained pursuant to this section that it deems would pose a security threat to the public if disclosed.")	It is SoCalGas's practice to designate certain data as confidential because this data is similar to data protected by CEII regulations and, if made publicly available, could potentially present a risk to public and pipeline safety

Location of Protected Information	Legal Citations	Narrative Justification
	CPRA Exemption, Gov't Code §7922.000 (Balancing Test)	
All information highlighted in grey in the following attachments: - SC-03-WP-R - SCG/Lakeside - 07	CPRA Exemption, Gov't Code §7927.705 ("Records, the disclosure of which is exempted or prohibited pursuant to federal or state law") <i>See, e.g.</i>, D.11-01-036, 2011 WL 660568 (2011) (agreeing that confidential prices and contract terms specifically negotiated with a program vendor is proprietary and commercially sensitive and should remain confidential) <i>Valley Bank of Nev. v. Superior Court</i>, 15 Cal.3d 652,658 (1975) (financial information is protected - especially of nonparties). - D.20-03-021, (2020) (allowing for confidential treatment of applicants' agreements and financial information) - D.20-02-054, (2020) (agreeing that non-public proprietary financial information should remain confidential) CPRA Exemption, Gov't Code §7922.000 (Balancing Test)	This data is provided pursuant to a negotiated contract between the utility and a third-party vendor. The contract states that this data is considered by the third-party vendor as trade secret, proprietary and commercially sensitive. The contract also contains a confidentiality provision that governs this data and requires that the information be treated as and remain confidential. Vendor contracting efforts involve communications and work product which is intended only for access by designated parties. Public disclosure would pose potential negative impacts and/or harm to the vendors, and/or inhibit SoCalGas/SDG&E's efforts to reduce costs for customers by obtaining competitive pricing from vendors. Given the reasons stated above, the public interest in preventing disclosure of this information outweighs any potential public interest in disclosure.
All employee information (i.e. SoCalGas employee names, email, and contact information) highlighted in grey in the following attachments: - SCG/Lakeside-05 - SCG/Lakeside-07	CPRA Exemption, Gov't Code §7927.700 ("disclosure of which would constitute an unwarranted invasion of personal privacy"). CPRA Exemption, Gov't Code §7927.705 ("Records, the disclosure of which is exempted or prohibited pursuant to federal or state law") Cal. Civil Code §1798.21 (requiring agencies to "ensure the security and confidentiality of" personal data);	Disclosing employee names and contact information is an unwarranted invasion of personal privacy and could pose a risk to employee safety. Additionally, disclosure of such information increases the risks of cyber-attacks, phishing attempts, incessant robo-calls, targeted calls, identity theft and malicious emails.

Location of Protected Information	Legal Citations	Narrative Justification
	• Cal. Civil Code §1798.24 (limiting disclosure of personal information); • Cal. Civ. Proc. Code §1985.3, 1985.6 (identifying types of protected records (including employment records, the process for subpoenaing employee records and requiring notice and opportunity to object); • <i>Britt v. Superior Court</i>, 20 Cal. 3d 844, 855-856 (1978) (even highly relevant information may be shielded from discovery if its disclosure would impair a person's inalienable right of privacy provided by the California Constitution); • <i>Alch v. Superior Court</i>, 165 Cal. App. 4th 1412, 1428 (2008) (recognizing that name and work history information can implicate privacy interests); • <i>Pioneer Elecs. (USA), Inc. v. Superior Court</i>, 40 Cal. 4th 360, 366 (2007) ("protecting disclosure of an individual's name and other identifying information is a matter embraced within the state Constitution's privacy provision (Cal. Const., art. I, § 1)"); • <i>Sehlmeyer v. Dept. of General Services</i>, 17 Cal. App. 4th 1072, 1079-1080 (1993) (applying civil litigation privacy protections to administrative proceedings). CPRA Exemption, Gov't Code §7922.000 (Balancing Test)	

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A.25-08-009
(Filed August 15, 2025)

[PROPOSED] ORDER

In accordance with the Rules of Practice and Procedure, the California Public Utilities Commission (Commission) has considered Southern California Gas Company (SoCalGas) and Lakeside Pipeline LLC (Lakeside) (collectively, the Applicants) Joint Motion to File Under Seal the Confidential Exhibits.

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

1. The Motion is GRANTED. The protected information in Table 1 is described in the Motion. The request is supported by the Declaration of Rene Garcia.

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CONFIDENTIAL EXHIBITS**

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2. The confidential exhibits 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.

Administrative Law Judge
Margery Melvin