



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

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Application of Southern California Gas
Company (U904G) for Authority, Among
Other Things, to Update its Gas Revenue
Requirement and Base Rates Effective on
January 1, 2028

A.26-06-014

And Related Matter.

A.26-06-015

***EXPEDITED* JOINT MOTION OF SAN DIEGO GAS & ELECTRIC COMPANY
(U 902 M) AND SOUTHERN CALIFORNIA GAS COMPANY (U 904 G)
FOR PROTECTIVE ORDER**

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August 6, 2026

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

Application of Southern California Gas Company (U904G) for Authority, Among Other Things, to Update its Gas Revenue Requirement and Base Rates Effective on January 1, 2028	A.26-06-014
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FOR PROTECTIVE ORDER**

Pursuant to Rule 11.1 of the California Public Utilities Commission’s (CPUC or Commission’s) Rules of Practice and Procedure and the authorities set forth herein, San Diego Gas & Electric Company (SDG&E) and Southern California Gas Company (SoCalGas) (collectively, the Applicants) respectfully move for a Protective Order in the above-captioned consolidated proceedings, also referred to herein as the Applicants’ Test Year (TY) 2028 General Rate Case (GRC).¹ The Applicants respectfully request that this Motion be granted on an *expedited* basis to allow parties to have access to confidential information as quickly as possible. The Applicants have already received discovery seeking the production of confidential information in this proceeding. An expedited ruling adopting the proposed Protective Order will minimize delay in the parties receiving confidential information.

I. OVERVIEW

The Protective Order would facilitate discovery and exchange of confidential materials by the parties by governing access to confidential, proprietary, or otherwise protected materials

¹ On July 7, 2026, SDG&E’s and SoCalGas’s motions to consolidate their GRC Applications was granted. *See Administrative Law Judge’s Ruling Consolidating Applications* (July 7, 2026).

produced by the Applicants, or other appearing parties to the proceedings, including, but not limited to, information constituting trade secrets, competitively sensitive documents, geographic information systems (GIS) data, and information constituting critical energy infrastructure information (CEII) (all collectively, the Protected Materials). Some Protected Materials have been concurrently submitted with the Applications on June 15, 2026 in confidential workpapers with accompanying declarations required by General Order (GO) 66-D (Revision 3) (hereinafter, GO 66-D).² Applicants request that the Commission expeditiously grant this motion so that those Protected Materials, as well as additional Protected Materials that may be produced during the course of this proceeding, are subject to this Protective Order.

Pursuant to Resolution ALJ-164 (September 16, 1992), the Applicants have attached: (1) a draft Protective Order (**Attachment A**), (2) a draft Non-Disclosure Certificate to be signed by a party receiving Protected Materials from a producing party (**Attachment B**), and a draft Administrative Law Judge Ruling Approving Protective Order (**Attachment C**). The attached Protective Order is intended to comply with GO 66-D's procedural requirements for submission of confidential information to the CPUC in a formal proceeding. Additionally, the draft Protective Order is intended to facilitate the exchange of confidential information during discovery, such as by governing access to the Applicants' Protected Materials by parties other than staff of the Commission. Those parties who wish to access Applicants' Protected Materials within the scope of this Protective Order must sign the Non-Disclosure Certificate.

II. GROUNDS FOR ADOPTING PROTECTIVE ORDER

The specific grounds justifying the confidential designations to be covered by the draft Protective Order are provided in the confidentiality declarations submitted in connection with

² GO 66-D Revision 3 adopted in Decision (D.) 25-01-005.

previously served documents (*i.e.*, testimony, workpapers and/or data request responses) and will be provided in any future declarations. Furthermore, the draft Protective Order is similar to the protective order granted in the TY 2024 GRC.³ Like the previous GRC, substantial discovery is expected and it is important to impose an orderly process on the discovery of confidential and proprietary documents to facilitate the Commission's and parties' full and timely review of an application.

III. CONCLUSION

For the reasons set forth herein, the Applicants respectfully request that the Commission grant this motion.

Respectfully submitted,

/s/ Roger A. Cerda

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August 6, 2026

³ See August 9, 2022, Administrative Law Judge's Ruling Approving the Utilities' Protective Order (A.22-05-018/016 (cons.)).

ATTACHMENT A
[DRAFT] PROTECTIVE ORDER

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

Application of Southern California Gas Company (U904G) for Authority, Among Other Things, to Update its Gas Revenue Requirement and Base Rates Effective on January 1, 2028	A.26-06-014
And Related Matter.	A.26-06-015

[DRAFT] PROTECTIVE ORDER

1. This Protective Order shall govern access to and the use of all Protected Materials in these proceedings as hereinafter defined. This Protective Order acknowledges the consolidation of the Test Year 2028 General Rate Case (GRC) Applications of Southern California Gas Company (SoCalGas) and San Diego Gas & Electric Company (SDG&E) (collectively, the Applicants) and shall govern the proceedings for both companies. Notwithstanding any order terminating this docket, this Protective Order shall remain in effect for two (2) years after a final and non-appealable order terminating these proceedings, or until, after notice and an opportunity to be heard, it is specifically modified or terminated by the Assigned Commissioner, the Assigned Administrative Law Judge(s) (ALJ), the Law and Motion ALJ, or the California Public Utilities Commission (Commission).
2. This Protective Order shall govern the access to the Applicants' revenue requirement computer models, including the Results of Operations (RO) computer model, including any changes, updates, or enhancements thereof, which were used to develop the revenue requirements for the Applicants in these proceedings. This Protective Order shall also govern the access to the corresponding User Reference Guide for the RO model of the Applicants. In addition, this Protective Order shall be available to and govern the use of all other Protected Materials produced by the Applicants, and other Participants to these proceedings.
3. A Participant, as hereinafter defined, may designate as protected those materials that customarily are treated by that Participant as confidential, sensitive, or proprietary, which

are not available to the public, and which, if disclosed freely, would subject that Participant or Participant's customers or clients, to risk of competitive disadvantage or other business injury.

4. Definitions:

(a) The term "Participant" shall mean those entities and/or individuals who have entered an appearance in these proceedings. Those who have appeared in these proceedings on an "Information Only" basis shall not be regarded as a Participant for the purposes of this Protective Order. "Applicants" shall mean SDG&E and SoCalGas and Applicants are also considered Participants under this Protective Order.

(b) "Protected Materials"

(1) The term "Protected Materials" means: (A) materials in either hardcopy or electronic form provided by a Participant in response to discovery requests and designated by such Participant as protected; (B) any information contained in or obtained from such designated materials; (C) any other hardcopy or electronic materials which are made subject to this Protective Order by the Commission, by the Assigned Commissioner, by the Assigned ALJ, by the Law and Motion ALJ, by any court or other body having appropriate authority, or by agreement of the Participants; (D) hardcopy or electronic notes of Protected Materials; and (E) hardcopy or electronic copies of Protected Materials. The Participant producing the Protected Materials shall physically mark on each page the term "PROTECTED MATERIALS," "CONFIDENTIAL," or words of similar import, such as "Confidential and Protected Materials Pursuant to Public Utilities Code Section 583 and GO 66-D (Rev. 3)," as long as the term "Protected Materials" or "Confidential" is included in that designation to indicate that they are Protected Materials. If the Protected Materials are produced in electronic form, the "PROTECTED MATERIALS" designation shall be inserted on each page as a header or footer. Protected Materials produced in electronic form may be downloaded onto a secure

computer network or onto secure computer hard drives for review and analysis purposes.

- (2) The term “Notes of Protected Materials” means memoranda, handwritten notes, or any other form of information (including electronic form) which copies or discloses materials described in Paragraph 4(b)(1). Protected Materials produced or converted into electronic form that are copied onto a computer network, computer hard drives, or any other non-hardcopy medium (including, without limitation, electronic, magnetic, and optical backup copies, CDs, DVDs, data sticks/cards, mini-discs, diskettes, zip drives, and other storage devices) shall be regarded as “Electronic Notes of Protected Materials.” Notes of Protected Materials and Electronic Notes of Protected Materials are subject to the same restrictions provided in this Order for Protected Materials.
 - (3) Protected Materials shall not include information that is public knowledge, or which becomes public knowledge, other than through disclosure in violation of this Protective Order or any other agreement or duty to keep the information confidential.
 - (4) The term “Redacted” refers to situations in which Protected Material in a document, whether the document is in paper or electronic form, have been covered, blocked out, or removed. That Protected Material in a document has been redacted and where that redaction has occurred shall be apparent in the document.
- (c) A Reviewing Representative shall not be permitted to inspect, participate in discussions regarding, or otherwise access Protected Materials pursuant to this Protective Order unless and until that Reviewing Representative has first executed and delivered to SoCalGas and SDG&E a Non-Disclosure Certificate in the form attached to this Protective Order (Non-Disclosure Certificate). Attorneys qualified as Reviewing Representatives are responsible for ensuring that all persons under their employment, instruction, supervision or control who require access to Protected Materials comply with this Protective Order and execute and deliver to SoCalGas and SDG&E a Non-Disclosure Certificate. By signing the Non-

Disclosure Certificate and by accessing Protected Materials, the Participant is deemed to have certified their understanding that such access to Protected Materials is provided pursuant to the terms and restrictions of this Protective Order, and that such Participants have read the Protective Order and agree to be bound by it.

- (d) The term “Reviewing Representative” shall mean a person who has signed a Non-Disclosure Certificate and who is:
- (1) an attorney who has made an appearance in these proceedings for a Participant;
 - (2) attorneys, paralegals, and other employees associated for purposes of this case with an attorney described in (1);
 - (3) an expert or an employee of an expert retained by a Participant for the purpose of advising, preparing for, or testifying in these proceedings;
 - (4) a person designated as a Reviewing Representative by order of the Assigned ALJ or the Commission; or
 - (5) employees or other representatives of Participants appearing in these proceedings with responsibility for this docket.

Notwithstanding 4(d)(1-4) above, a Participant has the right to refuse to provide a requesting Participant or Reviewing Representative access to Protected Materials if grounds exist such that the requesting Participant or the Reviewing Representative could use Protected Materials for commercial or improper usage. If a requesting Participant disagrees with the Participant’s refusal to provide Protected Materials, the requesting Participant may seek resolution under the procedures set forth in Paragraph 11.

5. Protected Materials shall be made available under the terms of Protective Order only to Participants and only through their Reviewing Representatives.
6. Protected Materials shall remain available to Participants until an order terminating these proceedings becomes no longer subject to judicial review. If requested to do so in writing after that date, the Participants shall, within fifteen (15) days of such request: (a) return the Protected Materials (excluding Notes of Protected Materials) to the Participant that produced them or destroy the Protected Materials; and (b) destroy Notes of Protected Materials and Electronic Notes of Protected Materials, except that copies of filings,

official transcripts and exhibits in these proceedings that contain Protected Materials, and Notes of Protected Materials may be retained, if they are maintained in accordance with Paragraph 7 below. Electronic Notes of Protected Materials shall be deemed to have been destroyed at the time they have been deleted from the computer network, hard drives, or any other non-hardcopy medium (including, without limitation, electronic, magnetic, and optical backup copies, CDs, DVDs, data sticks/cards, mini-discs, diskettes, zip drives, and other storage devices) on which they were maintained. Within such time period each Participant, if requested to do so, shall also submit to the producing Participant an affidavit stating that, to the best of its knowledge: (1) all Protected Materials other than copies of filings, official transcripts, and exhibits in these proceedings that contain Protected Materials have been returned or destroyed; (2) all copies of filings, official transcripts, and exhibits in these proceedings that contain Protected Materials either have been returned or will be maintained in accordance with Paragraph 7; and (3) all Notes of Protected Materials and Electronic Notes of Protected Materials have been destroyed. Until they are returned or destroyed, all Protected Materials and Notes of Protected Materials shall remain subject to the Protective Order.

7. All Protected Materials shall be maintained by the Participant in a secure manner. Access to those materials shall be limited to those Reviewing Representatives specifically authorized pursuant to this Protective Order.
8. Protected Materials, Notes of Protected Materials, and Electronic Notes of Protected Materials, shall be treated as confidential by each Participant and by the Reviewing Representative in accordance with the certificate executed pursuant to Paragraph 9. Participants and Reviewing Representatives shall adopt reasonable information security measures to maintain the confidentiality of Protected Materials and shall employ the higher of: (a) the standard of care that the Participant and Reviewing Representatives employ to preserve their own confidential information or (b) a reasonable standard of care to prevent unauthorized use or disclosure of Protected Materials. Protected Materials shall not be used except as necessary for the conduct of these proceedings, nor shall they be disclosed in any manner to any person except a Reviewing Representative who is engaged in the conduct of these proceedings and who needs to know the information in order to carry out that person's responsibilities in these proceedings. Participants and

their Reviewing Representatives may not use Protected Materials, Notes of Protected Materials, Electronic Notes of Protected Materials, and information contained therein for any other purpose or in any other regulatory or judicial proceeding. Reviewing Representatives may make copies of Protected Materials, but such copies become Protected Materials. Reviewing Representatives may make notes of Protected Materials, which shall become Notes of Protected Materials.

9. A Reviewing Representative shall not be permitted to inspect, participate in discussions regarding, or otherwise be permitted access to Protected Materials pursuant to this Protective Order unless that Reviewing Representative has first executed a Non-Disclosure Certificate. Participants shall serve executed Non-Disclosure Certificates on all Participants on the official service lists in these proceedings within seven (7) business days after they are signed.
10. A Reviewing Representative may exchange Protected Materials with any other Reviewing Representative for the same Participant as long as the disclosing Reviewing Representative and the receiving Reviewing Representative both have executed a Non-Disclosure Certificate. The foregoing does not preclude Reviewing Representatives for different Participants from discussing and/or sharing analyses of Protected Materials, analyses of Notes of Protected Materials, and information contained therein as long as each Reviewing Representative has executed a Non-Disclosure Certificate. Reviewing Representatives and Participants receiving such shared analyses shall treat them as Notes of Protected Materials. In the event that any Reviewing Representative to whom the Protected Materials are disclosed ceases to be engaged in these proceedings, or is employed or retained for a position whose occupant is not qualified to be a Reviewing Representative under Paragraph 4(d), access to Protected Materials by that person shall be terminated. Even if no longer engaged in these proceedings, every person who has executed a Non-Disclosure Certificate shall continue to be bound by the provisions of this Protective Order and their certification.
11. The Assigned ALJ or the Law and Motion ALJ may resolve any disputes arising under this Protective Order. Prior to presenting any dispute under this Protective Order to the Assigned ALJ or the Law and Motion ALJ, the parties to the dispute shall use their best efforts to resolve the dispute. Any Participant that contests the designation of materials

as protected shall notify the party that provided the Protected Materials by specifying in writing the materials whose designation is contested. The producing Participant has the burden of showing that the documents are Protected Materials, and merely marking a document “Protected Materials” is insufficient to meet that burden. If the Assigned ALJ finds that the materials at issue are not entitled to protection, the procedures of Paragraph 18 shall apply.

12. (a) All documents filed or served in these proceedings that reflect or contain Protected Materials (other than Protected Materials within data request responses and related correspondence from one Participant to another), including without limitation all motions, testimony, exhibits, briefs, and hearing transcripts, shall be filed or served in sealed envelopes or other appropriate containers endorsed to the effect that they are sealed pursuant to this Protective Order. Such documents shall be marked “PROTECTED MATERIALS” and shall be filed under seal and/or served under seal. (b) If any Participant desires to include, utilize, or refer to any Protected Materials or information derived from Protected Materials in testimony, workpapers, or evidentiary hearing exhibits in these proceedings, such Participant shall first notify both counsel for the producing Participant and the Assigned ALJ of such desire. If the producing Participant and the Assigned ALJ do not object to said use of Protected Materials, or upon a ruling by the Assigned ALJ or Commission granting said use of Protected Materials, thereafter during the hearing, presentation of such Protected Materials will be governed by procedures determined by the Commission or the Assigned ALJ.
13. Redaction of Documents. Whenever a Participant files, serves or provides in discovery a document that includes Protected Materials, such Participant shall also prepare a redacted version of such document. The redacted version shall enable persons familiar with this proceeding to determine with reasonable certainty the nature of the data that has been redacted and where the redactions occurred. The redacted version of a document to be filed shall be served on all persons on the service list, and the redacted version of a discovery document shall be served on all persons entitled thereto. However, in the case of the Applicants, Applicants shall only host the redacted version of a discovery document on their Discovery Portal for this proceeding and do not need to separately serve the redacted version of the discovery document on all persons on the service list.

14. Nothing in this Protective Order shall be construed as precluding Applicants or any Participant from objecting to the use of Protected Materials on any legal grounds.
15. Nothing in this Protective Order shall be construed as precluding any Participant, or employees, agents, and other representatives of that Participant, whether they are Reviewing Representatives or not, from accessing that Participant's own Protected Materials, and the portions of any documents filed or served in these proceedings that contain such Protected Materials.
16. Nothing in this Protective Order shall preclude any Participant from requesting the Assigned ALJ, the Law and Motion ALJ, the Commission, or any other body having appropriate authority, to find that this Protective Order should not apply to all or any materials previously designated as Protected Materials pursuant to this Protective Order. The Assigned ALJ may alter or amend this Protective Order as circumstances warrant at any time during the course of these proceedings.
17. All Protected Materials submitted to the Commission, the Assigned ALJ, or the Law and Motion ALJ, or any other judicial or administrative body, in support of, or as a part of, a motion, other pleading, brief, or other appropriate containers bearing prominent markings indicating that the contents include Protected Materials, are subject to this Protective Order.
18. If the Assigned ALJ, the Law and Motion ALJ, or the Commission finds at any time in the course of these proceedings that all or part of the Protected Materials need not be protected, those materials shall, nevertheless, be subject to the protection afforded by this Protective Order for seven (7) business days from the date of issuance of such decision, and if the Participant seeking protection files an interlocutory appeal and/or other available judicial remedy, until seven (7) business days after the final order resolving the question of confidentiality. None of the Participants waives the right to seek additional administrative or judicial remedies after a decision respecting Protected Materials or Reviewing Representatives, or the Commission's denial of any appeal thereof.
19. None of the Participants waives the right to pursue any other legal or equitable remedies that may be available in the event of actual or anticipated disclosure of Protected Materials. In particular, any actual or attempted release or use of Protected Materials or Notes of Protected Materials other than as contemplated under this Protective Order may

lead to irreparable injury that could not adequately be compensated through Commission remedies or monetary damages and may therefore be enjoined.

20. For confidential information containing extremely sensitive information for which a Participant believes “Protected Materials” status would not provide sufficient protection, such Participant may designate and mark the documents “Protected Materials – Government Eyes Only” in which case the documents can only be reviewed by a federal or state government representative and cannot be shared with any non-government person.
21. The contents of Protected Materials or any other form of information that copies or discloses Protected Materials shall not be disclosed to anyone other than in accordance with this Protective Order and shall be used only in connection with these proceedings. Any violation of this Protective Order and of any Non-Disclosure Certificate executed hereunder shall constitute a violation of an order of the Commission.
22. Failure to designate information or documents as Protected Materials prior to disclosure shall not be deemed a waiver in whole or in part of Applicants’ claim of confidentiality, and Applicants shall have the right to designate or re-designate such information and documents at any time. Upon receipt of notice from Applicants of any new designation or re-designation, the Participant thereafter shall treat said information or documents according to the new designation or re-designation, and/or will endeavor to return all copies of any newly designated or re-designated documents to Applicants in exchange for copies of the documents with the new designation.
23. The inadvertent disclosure of any information or documents which are subject to a claim of work product, the attorney-client privilege or other legal protection shall not waive the protection for such information or documents as long as Applicants request their return and take reasonable precautions to avoid such inadvertent disclosure. Upon written request, the Participant shall return to Applicants any such protected information or documents inadvertently disclosed, together with all copies and any notes pertaining thereto.

Dated _____, at San Francisco, California.

Administrative Law Judge

ATTACHMENT B

[DRAFT] NON-DISCLOSURE CERTIFICATE

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

Application of Southern California Gas Company (U904G) for Authority, Among Other Things, to Update its Gas Revenue Requirement and Base Rates Effective on January 1, 2028	A.26-06-014
And Related Matter.	A.26-06-015

[DRAFT] NON-DISCLOSURE CERTIFICATE

I hereby certify my understanding that access to Protected Materials is provided to me pursuant to the terms and restrictions of the Protective Order in this proceeding, that I have been given a copy of and have read the Protective Order, and that I agree to be bound by it. I understand that the contents of the Protected Materials, any notes or other memoranda, or any other form of information that copies or discloses Protected Materials shall not be disclosed to anyone other than in accordance with that Protective Order. I will use Protected Materials, Notes of Protected Materials, Electronic Notes of Protected Materials, and information contained therein solely for the purpose of addressing the issues in this proceeding. I will not use Protected Materials, Notes of Protected Materials, Electronic Notes of Protected Materials, and information contained therein for any other purpose or in any other regulatory or judicial proceeding. At the conclusion of this proceeding, I will return or destroy all Protected Materials and destroy all Notes of Protected Materials and Electronic Notes of Protected Materials. I acknowledge that a violation of this certificate constitutes a violation of an order of the California Public Utilities Commission.

Name: _____

Signature: _____

Title: _____

Date: _____

Party: _____

Phone: _____

E-mail: _____

ATTACHMENT C

**[DRAFT] ADMINISTRATIVE LAW JUDGE'S RULING APPROVING
PROTECTIVE ORDER**

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

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**[DRAFT]
ADMINISTRATIVE LAW JUDGE’S RULING APPROVING PROTECTIVE ORDER**

This ruling approves the text of a Protective Order designed for use during this proceeding to protect the confidential materials produced in discovery and submitted by the various parties to these proceedings. I have reviewed the Protective Order and find it reasonable for the purposes proposed by the parties.

Therefore, **IT IS RULED** that all Participants in this proceeding (as that term is defined in the Protective Order) shall, if they wish to receive Protected Materials (a term also defined in the Protective Order), be bound by the Protective Order and sign the Non-Disclosure Certificate accompanying the Protective Order.

Dated _____, at San Francisco, California.

Administrative Law Judge