



ALJ/SRT/kmh 09/01/2026

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A2606014

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.

Application 26-06-014

And Related Matter.

Application 26-06-015

**ADMINISTRATIVE LAW JUDGE'S RULING APPROVING IN PART MOTION
FOR PROTECTIVE ORDER AND NONDISCLOSURE CERTIFICATE**

1. Summary

This ruling approves a protective order for use in this proceeding when confidential data is shared with parties by Southern California Gas Company and San Diego Gas & Electric Company (collectively, Sempra). The Public Advocates Office at the Commission (Cal Advocates) is entitled to receive confidential data without resort to the protective order given its plenary access to data under Public Utilities Code Section 309.5.

2. Background

On August 6, 2026, Sempra filed a Motion seeking approval of a protective order and nondisclosure certificate that would facilitate its provision of confidential data to parties to this proceeding. An Administrative Law Judge (ALJ) Ruling dated August 7, 2026 asked Sempra to use a model protective order

approved by the Commission in connection with its confidentiality rulemaking, R.06-05-040, and Resolution E-4468.

Sempra resubmitted its proposed protective order on August 12, 2026 using the model protective order approved by the Commission, with a few proposed changes. One change updated the reference to General Order (GO) 66-C to 66-D, since GO 66-D was adopted after the model protective order. This change is approved.

Sempra's other proposed change was as follows:

Paragraph 3 – The word “CONFIDENTIAL” should be added to the list of words that can be used by parties to designate materials as Protected Materials. The word “confidential” is commonly used by the Applicants in regulatory proceedings to designate documents, attachments, or discovery responses as Protected Materials. In addition, the Applicants have already provided the Public Advocates Office confidential versions of testimony, workpapers, and data request responses utilizing the word “confidential” to designate Protected Materials. Modifying the Model Protective Order to expressly recognize the phrase “confidential” as a designating term would provide consistency and avoid ambiguity moving forward. *Joint Response of [SDG&E and SoCalGas] to Ruling re Protective Order and Submission of Revised Protective Order, August 12, 2026, at 2.*

On August 17, 2026, an ALJ Ruling shortened time to four business days for other parties to respond to the Motion so that this matter could be resolved and data furnished to parties expeditiously. Two parties, Utility Consumers Action Network (UCAN) and San Diego Community Power/Clean Energy Alliance (SD CCAs), filed responses to the Motion on August 21, 2026. UCAN asked that the model protective order allow parties to use documents produced under its terms not only in this GRC but in three cases that Cal Advocates sought to have consolidated with this GRC by motion dated July 20, 2026.

The SD CCAs asserted that the model protective order would effectively bar Community Choice Aggregators (CCAs) from gaining access to confidential data due to its treatment of "market participants." The SD CCAs further stated, "While the SD CCAs have not identified any such information marked as confidential in Sempra's direct testimony, information provided later in this proceeding such as through discovery or subsequent rounds of testimony could very well be marked as confidential and would be unreviewable by employees of the SD CCAs pursuant to Sempra's Proposed Protective Order." *Response of San Diego Community Power and Clean Energy Alliance to the Proposed Protective Order of [SDG&E and SoCalGas]*, filed August 21, 2026, at 5.

This ruling approves the protective order submitted by Sempra on August 12, 2026, without Sempra's "Confidential" language quoted above. GO 66-D provides support for this ruling, stating "A citation or general marking of confidentiality, such as 'GO-66' and/or 'Public Utilities Code Section 583' without additional justification of confidentiality does not satisfy the information submitter's burden to establish a basis for confidential treatment by the Commission." GO 66-D, Section 3.2(b).

As for the arguments of UCAN and SD CCAs, this ruling declines to make the changes they request on the grounds their requests are premature and, in the case of SD CCAs, also inconsistent with the language of the model protective order. Cal Advocates' motion to consolidate this GRC with the three cases UCAN cites is still pending, so those cases are not relevant to this proceeding at this time. Without prejudging Cal Advocates' motion to consolidate, if it is denied, then the three cases will not be the subject of discovery in this proceeding, and if it is granted, they will be appropriately the subject of discovery.

Given the above-quoted language by the SD CCAs that they "have not identified any ... information identified as confidential" they should bring this matter back to the Commission if they experience problems gaining access to information that is relevant to this proceeding. Further, the model protective order approved in Resolution E-4468 and used in Sempra's August 12, 2026 submission does allow market participants access to confidential data in Section 2(H) regarding "reviewing representatives" and market participants should seek information pursuant to its terms.

IT IS RULED that:

1. Sempra's Motion for a protective order, protective order and nondisclosure certificate are approved as set forth herein.
2. Sempra shall file and serve a final protective order and nondisclosure certificate within 5 business days of this ruling. It shall cite this ruling in the first paragraph of its submission.
3. Sempra shall produce confidential information to parties, including to market participants, subject to the terms of the protective order approved herein and to execution of a nondisclosure certificate. Cal Advocates is not required to execute a nondisclosure certificate to gain access to confidential documents.

Dated September 1, 2026, at San Francisco, California.

/s/ SARAH R. THOMAS

Sarah R. Thomas
Senior Administrative Law Judge