BEFORE THE PUBLIC UTILITIES COMMISSION

OF THE STATE OF CALIFORNIA

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Delia Lovell, Complainant, vs. Southern California Gas Company (U 904 G), Defendant.	C.26-06-024 (Filed June 23, 2026)

MOTION OF SOUTHERN CALIFORNA GAS COMPANY FOR LEAVE TO FILE UNDER SEAL; [PROPOSED] ORDER

ISMAEL BAUTISTA, JR.

Attorney for:
SOUTHERN CALIFORNIA GAS COMPANY
350 South Grand Avenue, Suite 2500
Los Angeles, California 90071
Telephone: (213) 231-5978
Facsimile: (213) 629-9620
E-Mail: IBautista@SoCalGas.com

November 9, 2026

BEFORE THE PUBLIC UTILITIES COMMISSION

OF THE STATE OF CALIFORNIA

Delia Lovell, Complainant, vs. Southern California Gas Company (U 904 G), Defendant.	C.26-06-024 (Filed June 23, 2026)

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In accordance with Rule 11.4 of the California Public Utilities Commission's (Commission) Rules of Practice and Procedure and pursuant to the Administrative Law Judge Ruling Requiring Additional Information issued on November 4, 2026 (Ruling), Southern California Gas Company (SoCalGas) respectfully files this motion for leave to file under seal (Motion) the confidential version of (a) Exhibits SCG-04C (Statement of Account and Billing Recap), SCG-05C (Statement of Account Archive Report), and SCG-06C (Complainant's monthly bills from September 2024 to October 2026), and (b) all other exhibits it plans to introduce at the hearing scheduled for November 10, 2026. Therefore, SoCalGas requests to file under seal the following exhibits:

- **Exhibit SCG-04C**: Statement of Account and Billing Recap
- **Exhibit SCG-05C**: Statement of Account Archive Report
- **Exhibit SCG-06C**: Complainant's monthly bills from September 2024 to October 2026
- **Exhibit SCG-07C**: Screenshots re MSA Calibration and Checks Records
- **Exhibit SCG-08C**: Meter Reads Summary June 2023-Present
- **Exhibit SCG-09C**: Return Payment Screenshot (Missed February 2025 Payment)
- **Exhibit SCG-10C**: CPED DR-DIS-00254-2 SoCalGas Final 07312026
- **Exhibit SCG-11C**: Delia Lovell's MyAccount Logins

- **Exhibit SCG-12C**: Delia Lovell's My Account Activity
- **Exhibit SCG-13C**: List of Notifications Sent to Delia Lovell
- **Exhibit SCG-14C**: Delia Lovell Service Orders
- **Exhibit SCG-15C**: March 12, 2026 Past Due Amount Notice and Envelope
- **Exhibit SCG-18C**: Screenshots re Medical Baseline Forms Messages Sent to Delia Lovell
- **Exhibit SCG-19C**: Delia Lovell – Medical Baseline English Forms Sent Images
- **Exhibit SCG-21C**: March 2026 Service Rescheduling Requests Screenshot
- **Exhibit SCG-22C**: April 1, 2026 Restore
- **Exhibit SCG-23C**: Meter Photo from April 1, 2026
- **Exhibit SCG-24C**: AMP 2024 Welcome Letter
- **Exhibit SCG-25C**: AMP 2024 Quarterly Letter
- **Exhibit SCG-26C**: AMP 2025 Termination Letter
- **Exhibit SCG-27C**: AMP Program Payments Screenshot
- **Exhibit SCG-28C**: February 2025 Return Payment Screenshot

Concurrently filed with this Motion, SoCalGas has filed the redacted public version of these exhibits. As detailed in the declaration of Roy M. Christian in support of SoCalGas's Motion (Christian Decl.), these exhibits contain information that is confidential pursuant to the California Constitution (Cal. Const., art. I, §1), California Civil Code §1798.2, California Civil Code §1798.24, California Civil Code §§1798.80, California Civil Code §1798.81.5, California Civil Code §1798.81.5(b), and *Britt v. Superior Court*, 20 Cal. 3d 844, 855-856 (1978). (Christian Decl.). Specifically, the confidential version of these exhibits contains confidential customer information, such as monthly bills, gas usage, account notes, and similar customer-related information.

SoCalGas respectfully requests that the Commission grant this Motion designating these exhibits as confidential and protect the material under seal.

Respectfully submitted,

By: */s/ Ismael Bautista, Jr.*
Ismael Bautista, Jr.

Attorney for:
SOUTHERN CALIFORNIA GAS COMPANY
350 South Grand Avenue, Suite 2500
Los Angeles, California 90071
Telephone: (213) 231-5978
Facsimile: (213) 629-9620
E-Mail: IBautista@socalgas.com

November 9, 2026

DECLARATION OF ROY M. CHRISTIAN

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

DECLARATION OF ROY M. CHRISTIAN REGARDING CONFIDENTIALITY OF CERTAIN DOCUMENTS PURSUANT TO D.25-01-005 AND G.O. 66-D (REV 3)

I, Roy M. Christian, do declare as follows:

1. I am Roy M. Christian, Manager of Regulatory Affairs, Customer Programs & Assistance for Southern California Gas Company (SoCalGas). I was delegated authority to sign this declaration by Christina Ihrig, in her role as Senior Vice President of Communications & Stakeholder Engagement at SoCalGas. I have reviewed the confidential information included within SoCalGas's Motion to File Under Seal (Motion). 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 information and belief.

2. I hereby provide this Declaration in accordance with Decision (D.) 25-01-005 and General Order (GO) 66-D to demonstrate that the confidential information (Protected Information) identified in the Motion is within the scope of data protected as confidential under applicable law.

3. In accordance with the legal authority described 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 9th day of November, 2026 at Monterey Park, CA.

Roy Christian

ROY M. CHRISTIAN
Manager of Regulatory Affairs
Customer Programs & Assistance
Southern California Gas Company

ATTACHMENT A

SoCalGas Request for Confidentiality on the following Protected Information in its Motion to File Under Seal

Location of Data	Applicable Confidentiality Provisions	Basis for Confidentiality
The entirety of SoCalGas exhibits SCG-04C, SCG-05C, SCG-06C, SCG-07C, SCG-08C, SCG-09C, SCG-10C, SCG-11C, SCG-12C, SCG-13C, SCG-14C, SCG-15C, SCG-18C, SCG-19C, SCG-21C, SCG-22C, SCG-23C, SCG-24C, SCG-25C, SCG-26C, SCG-27C, and SCG-28C (Exhibits).	California Public Records Act (CPRA) Exemption, Gov't Code §6254(k) ("Records, the disclosure of which is exempted or prohibited pursuant to federal or state law"):[1] • Cal. Civil Code §1798.21 (requiring agencies to "ensure the security and confidentiality of" personal data) • Cal. Civil Code §1798.24 (limiting disclosure of personal information) • Cal. Civil Code §§1798.80, *et seq*. (process for protecting customer records) • Cal. Civil Code §1798.81.5 (security procedures and practices with respect to personal information about California residents) • *Britt v. Superior Court*, 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) CPRA Exemption, Gov't Code §6254(c) ("disclosure of which would constitute an unwarranted invasion of personal privacy")	The Exhibits contain confidential customer-related information, such as billing, energy usage data, account notes, and similar information. If publicly disclosed, such personal information could pose a risk of fraud, identity theft, or other personal, commercial, or financial damage to customers. Disclosure may also constitute an "unwarranted invasion of personal privacy."

[1] *But see Cnty. of Santa Clara v. Superior Court*, 170 Cal. App. 4th 1301, 1320 (6th Dist. 2009), *as modified* (Feb. 27, 2009) (noting that section 6254(k) "is not an independent exemption. It merely incorporates other prohibitions established by law."). "An information submitter may cite §6254(k) but must cite the specific federal or state law that allows confidential treatment and explain why it applies to the information at hand." D.17-09-023 at 22.

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[PROPOSED] ORDER

In accordance with the Rules of Practice and Procedure, the California Public Utilities Commission (Commission) has considered Southern California Gas Company's (SoCalGas) Motion to File Under Seal (Motion) the confidential version of SoCalGas exhibits SCG-04C, SCG-05C, SCG-06C, SCG-07C, SCG-08C, SCG-09C, SCG-10C, SCG-11C, SCG-12C, SCG-13C, SCG-14C, SCG-15C, SCG-18C, SCG-19C, SCG-21C, SCG-22C, SCG-23C, SCG-24C, SCG-25C, SCG-26C, SCG-27C, and SCG-28C (Exhibits).

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

1. The Motion is GRANTED. The protected information in the confidential version of the Exhibits is described in the Motion. The request is supported by the Declaration of Roy Christian.
2. The Exhibits 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 Los Angeles, California.

Administrative Law Judge
Camille Watts-Zagha