

**BEFORE THE PUBLIC UTILITIES
COMMISSION OF THE STATE OF CALIFORNIA
DECLARATION OF DENITA WILLOUGHBY
REGARDING CONFIDENTIALITY OF CERTAIN DATA**

I, Denita Willoughby, do declare as follows:

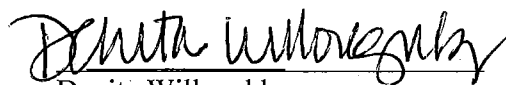
1. I am Denita Willoughby, Vice President of Supply Management and Support Services for Southern California Gas Company ("SoCalGas"). I have reviewed the "PO Screenshots" document. In addition, I am personally familiar with the facts and representations in this Declaration and, if called upon to testify, 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.") 17-09-023 and General Order ("GO") 66-D to demonstrate that the confidential information ("Protected Information") provided in the Response submitted concurrently herewith and as described in specificity in Attachment A is within the scope of data protected as confidential under applicable statutory provisions including, but not limited to, Public Utilities Code ("PUC") § 583, Govt. Code § 6254(k) and/or GO 66-D.

3. In accordance with the statutory provisions described herein, 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 August 27, 2019, at Los Angeles, California.


Denita Willoughby
Vice President
Supply Management & Support
Services

ATTACHMENT A

Confidentiality Justification for Protected Information as Provided in the Response

(Confidential Protected Information provided in the documents in response to this data request have been highlighted)

Location of Data	Description of Data	Legal Citations	Narrative Justification
<p>Highlighted portions of "PO Screenshots" document.</p>	<p>Names and consultant costs.</p>	<p>CPRA Exemption, Gov't Code § 6254(c) ("disclosure of which would constitute an unwarranted invasion of personal privacy").</p> <p>CPRA Exemption, Gov't Code § 6254(k) ("Records, the disclosure of which is exempted or prohibited pursuant to federal or state law")</p> <p>See, e.g., 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)</p> <p>Valley Bank of Nev. v. Superior Court, 15 Cal.3d 652, 658 (1975) (Financial information is protected – especially of non-parties)</p>	<p>Disclosing staff names in conjunction with other identifying information such as e-mail addresses, home addresses and telephone numbers could pose a risk to staff safety. Additionally, disclosure of such information increases the risks of cyber attacks, incessant robo-calls, and malicious emails.</p> <p>Based on input received by third party, and based on SoCalGas's concurring position, the produced documents are proprietary and represent and contain proprietary, commercially sensitive, trade secrets, and content not intended for public disclosure. Third party conducts efforts which involve communications and work product which is intended only for access by designated members. Public disclosure would pose potential negative impacts and/or harm to third party and SoCalGas.</p>