

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

**DECLARATION OF BRIAN D'AGOSTINO
REGARDING CONFIDENTIALITY OF CERTAIN DATA/DOCUMENTS
PURSUANT TO D.17-09-023**

I, Brian D'Agostino, do declare as follows:

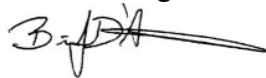
1. I am the Vice President of Wildfire and Climate Science for San Diego Gas & Electric Company ("SDG&E"). I have reviewed the confidential information included within the General Order 166 Emergency Response Plan Compliance Report, submitted concurrently herewith (the "2024 G.O. 166 Compliance Report"). 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.

2. I hereby provide this Declaration in accordance with Decision ("D.") 17-09-023 and General Order ("GO") 66-D Revision 1¹ to demonstrate that the confidential information ("Protected Information") provided in the "2024 G.O. 166 Compliance Report" is within the scope of data protected as confidential under applicable law.

3. In accordance with the narrative justification 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 25th day of April, 2025, at San Diego.



Brian D'Agostino
Vice President of Wildfire and Climate Science

¹GO 66-D was modified by D. 19-01-028 to create GO 66-D Revision 1 which became effective February 1, 2019

ATTACHMENT A

SDG&E Request for Confidentiality on the following information in its 2024 G.O. 166 Compliance Report

Location of Protected Information	Legal Citations	Narrative Justification
<p>Grey highlighted portion in Appendix 2, Company Disaster and Emergency Preparedness Plan, pages:</p> <ul style="list-style-type: none"> • Page 7 • Page 11 • Pages 15-16 • Page 44 EOC Secure addresses 	<p>Other categories where disclosure would be against the public interest (Govt. Code § 7922.000: Due to sensitivity around names, LAN IDs and phone numbers for individual employees, the public interest in maintaining the confidentiality of this information outweighs the public interest in disclosure.</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>Disclosure could result in information security concerns.</p> <p>Personnel and medical records are sensitive information and if misused could cause discrimination, loss of opportunities, or potential safety concerns. Protection should be afforded for utility employees' information, similar to Civil Code §§ 1798.80 et seq.'s protection of such information for customers.</p>
<p>Page 44, section 5.6</p>	<p>CPRA Exemption, Gov't Code § 7927.705 ("Records, the disclosure of which is exempted or prohibited pursuant to federal or state law")</p> <ul style="list-style-type: none"> • 6 U.S.C. §§ 131(3) (defining Critical infrastructure information) & 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 	<p>Public disclosure of this information could result in security concerns. The protected information is not publicly available or visible and could be vulnerable to attack or disruption if made public.</p>

	<p>infrastructure)</p> <ul style="list-style-type: none"> • 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.”) <p>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.)</p> <p>CPRA Exemption, Gov’t Code § 7922.000 (Balancing Test)</p>	
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