

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

**DECLARATION OF ANDREA SMITH
REGARDING CONFIDENTIALITY OF CERTAIN DATA/DOCUMENTS
PURSUANT TO D.17-09-023**

I, Andrea Smith, do declare as follows:

1. I am, Andrea Smith, Director of Marketing Communications, serving in the capacity of delegate for Scott Crider, Senior Vice President of Customer Service & External Affairs, in the Marketing & Communications Department for San Diego Gas & Electric Company ("SDG&E"). I have been delegated authority to sign this declaration by Scott Crider, Senior Vice President of Customer Service & External Affairs. I have reviewed the confidential information included within 2024 SDG&E General Order 166 Annual 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.

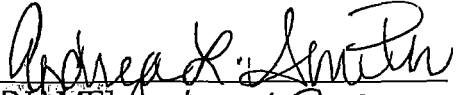
2. I hereby provide this Declaration in accordance with Decision ("D.") 17-09-023 and General Order ("GO") 66-D Revision 1¹ to demonstrate that the confidential information ("Protected Information") provided in "2024 G.O.166 Compliance Report" is within the scope of data protected as confidential under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

3. In accordance with the narrative justification described in Attachment A, the Protected Information should be protected from public disclosure.

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

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.


[NAME] Andrea L. Smith
[TITLE] Director, Marketing & Communications

ATTACHMENT A

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

Location of Protected Information	Legal Citations	Narrative Justification
Gray shaded portion(s) in Appendix 3, 2025 SDG&E Crisis Communications Plan, at pages 13, 14, and 16.	Other categories where disclosure would be against the public interest (Govt. Code § 6255(a): 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.	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. E-mail Addresses: Disclosure could result in information security concerns. 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 <i>et seq.</i> 's protection of such information for customers.