

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

Application of PACIFIC GAS AND  
ELECTRIC COMPANY, a California  
corporation, for a Permit to Construct the  
Fulton-Fitch Mountain Reconductoring Project  
(U 39 E)

A.15-12-005

**DECLARATION SUPPORTING  
CONFIDENTIAL DESIGNATION  
ON BEHALF OF  
PACIFIC GAS AND ELECTRIC COMPANY**

1. I, Andrew Williams, am the Vice President of Safety, Health and Environment for Pacific Gas and Electric Company ("PG&E"), a California corporation. My business office is located at:

Pacific Gas and Electric Company  
77 Beale Street  
Mailstop B28P  
San Francisco, CA 94105

2. PG&E will produce the information identified in paragraph 3 of this Declaration to the California Public Utilities Commission ("CPUC") or departments within or contractors retained by the CPUC in response to a CPUC audit, data request, proceeding, or other CPUC request. Name or Docket No. of CPUC Proceeding (if applicable): Application of PACIFIC GAS AND ELECTRIC COMPANY, a California corporation, for a Permit to Construct the Fulton-Fitch Mountain Reconductoring Project, A.15-12-005.
3. Title and description of document(s): Compressed folders entitled CPUC DN2 GIS.zip and Remote\_Survey\_Area\_092116.zip containing GIS data layers in digital format and a kmz file entitled VM poles 51-52.kmz containing GIS data. Note that PG&E does not object to CPUC staff utilizing this digital information to prepare maps in pdf format for public review.

4. These documents contain confidential information that, based on my information and belief, has not been publicly disclosed. These documents have been marked as confidential, and the basis for confidential treatment and where the confidential information is located on the documents are identified on the following chart:

Check	Basis for Confidential Treatment	Where Confidential Information is located on the documents
<input type="checkbox"/>	<p>Customer-specific data, which may include demand, loads, names, addresses, and billing data</p> <p>(Protected under PUC § 8380; Civ. Code §§ 1798 <i>et seq.</i>; Govt. Code § 6254; Public Util. Code § 8380; Decisions (D.) 14-05-016, 04-08-055, 06-12-029; and General Order (G.O.) 77-M)</p>	
<input type="checkbox"/>	<p>Personal information that identifies or describes an individual (including employees), which may include home address or phone number; SSN, driver's license, or passport numbers; education; financial matters; medical or employment history (not including PG&amp;E job titles); and statements attributed to the individual</p> <p>(Protected under Civ. Code §§ 1798 <i>et seq.</i> and G.O. 66-C)</p>	
<input checked="" type="checkbox"/>	<p>Physical facility, cyber-security sensitive, or critical energy infrastructure data, including without limitation critical energy infrastructure information (CEII) as defined by the regulations of the Federal Energy Regulatory Commission at 18 C.F.R. § 388.113</p> <p>(Protected under Govt Code § 6254(k), (ab); 6 U.S.C. § 131; 6 CFR §29.2)</p>	All GIS data layers are confidential
<input type="checkbox"/>	<p>Accident reports</p> <p>(Protected under PUC § 315 and G.O. 66-C, 2.1)</p>	
<input type="checkbox"/>	<p>Commercial records that, if revealed, would place PG&amp;E at an unfair business disadvantage, including market-sensitive data; business plans and strategies; long-term fuel buying and hedging plans; price, load, or demand forecasts; power purchase agreements within three years of execution; and internal financial information</p> <p>(Protected under Govt Code §§ 6254, 6276.44; Evid Code § 1060; Civ. Code § 3426 <i>et seq.</i>; and G.O. 66-C, 2.2 (b))</p>	

<input type="checkbox"/>	Proprietary and trade secret information or other intellectual property (Protected under Civ. Code § 3426 <i>et seq.</i> ; Govt Code § 6254.15)
<input type="checkbox"/>	Corporate financial records (Protected under Govt Code § 6254.15)
<input type="checkbox"/>	Third-Party information subject to non-disclosure or confidentiality agreements ( <i>See, eg.</i> , D.11-01-036)
<input type="checkbox"/>	Other basis: _____ _____ _____

5. The importance of maintaining the confidentiality of this information outweighs any public interest in disclosure of this information. This information should be exempt from the public disclosure requirements under the Public Records Act and should be withheld from disclosure.
6. I declare under penalty of perjury that the foregoing is true, correct, and complete to the best of my knowledge.
7. Executed on this 17th day of October, 2016 at San Francisco, California.

Andrew K. Williams  
 Vice President, Safety, Health  
 and Environment  
 Pacific Gas and Electric  
 Company