

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

**DECLARATION OF RODGER R. SCHWECKE
REGARDING CONFIDENTIALITY OF CERTAIN DATA**

I, Rodger R. Schwecke, declare as follows:

1. I am Vice President, Gas Transmission and Storage for Southern California Gas Company (“SoCalGas”). I have reviewed the response to the California Public Utilities Commission (CPUC) and Division of Oil, Gas, and Geothermal Resources (DOGGR) Checklist for Pre-Injection Safety Assurances, submitted concurrently herewith (the “CPUC/DOGGR Checklist”). 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 belief.

2. I provide this Declaration in accordance with Decision 16-08-024 to demonstrate that the following confidential information (“Protected Information”), highlighted in yellow in the CPUC/DOGGR Checklist submitted concurrently herewith, falls within the scope of data protected as confidential under applicable statutory provisions:

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Location of Data	Description of Data	Applicable Confidentiality Provisions	Basis for Confidentiality
CPUC/DOGGR Checklist	Checklist #4 – Updated Aliso Canyon Emergency Binder (October 2016)	<p>Critical Energy Infrastructure Information (CEII) under 18 CFR §388.113(c); Federal Energy Regulatory Commission (“FERC”) Orders 630, 643, 649, 662, 683, and 702 (defining CEII).</p> <p>Critical Infrastructure Information (CII) under 6 U.S.C. §§131(3), 133(a)(1)(E); 6 CFR §§ 29.2(b), 29.8 (defining CII and restricting its disclosure). CII is restricted to those government employees or contractors who “have a need to know” the specific information.</p>	<p>The map and schematic constitute critical energy infrastructure information (“CEII”) pursuant to 18 CFR § 388.113(c), 6 CFR §§ 29.2(b), 29.8, and 6 U.S.C. §§ 131(3), 133(a)(1)(E) because the map and schematic constitute specific engineering, vulnerability, or detailed design information about proposed or existing critical infrastructure. For the same reasons, the maps and schematics should be maintained as confidential CEII pursuant to FERC Orders 630, 643, 649, 662, 683, and 702.</p>

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		<p>Cal. Gov't Code § 6254(e) exempts from mandatory disclosure, plant production data, and similar information relating to utility systems.</p> <p>Gov't Code § 6254(c); Gov't Code 6255;</p> <p>Civil Code §§ 1798.3 & 1798.24 (the California Information Practices Act);</p> <p>Cal. Const., Art. I, § 1 (California constitutional right to privacy).</p>	<p>SoCalGas designates the enclosed personnel information and telephone numbers as confidential based on California Government Code § 6254(c) because the disclosure of such personnel records would constitute an unwarranted invasion of personal privacy.</p>

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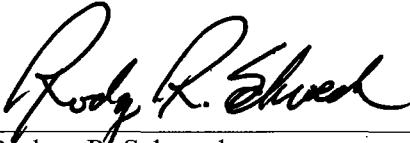
Location of Data	Description of Data	Applicable Confidentiality Provisions	Basis for Confidentiality
CPUC/DOGGR Checklist	Checklist #6 - Appendix A - Root Cause Analysis of Pinhole Leak in Ward 3A Withdrawal Pipeline	<p>The Pipeline and Hazardous Materials Safety Administration's (PHMSA) guidelines in the Federal Register, Vol 81, pg. 40764, published on 6/22/2016 and U.S. Department of Homeland Security Transportation Security Administration (TSA) guidelines consider the data to be restricted pipeline information.</p> <p>Critical Energy Infrastructure Information (CEII) under 18 CFR §388.113(c); Federal Energy Regulatory Commission ("FERC") Orders 630, 643, 649, 662, 683, and 702 (defining CEII).</p>	<p>Pipe size or diameter is a specific engineering design value depicting an attribute of a proposed or existing critical infrastructure that could be used to determine the criticality of a gas facility and identify vulnerabilities of the gas delivery network. The value can be used to identify the volume of gas present in an area and ascertain the relative potential consequences of intentional acts against the gas transportation and distribution network. Because of the critical nature of the attribute, it has been identified by PHMSA to be a restricted pipeline attribute in the Federal Register Vol 81, pg. 40764 published on 6/22/2016.</p> <p>Diameter is also exempt from public disclosure per the CEII and CII regulations for the same security reasons.</p> <p>Furthermore, under 2011 TSA Pipeline Security Guidelines, natural gas distribution pipelines are considered to be within scope for when developing Corporate Security programs.</p>

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CPUC/DOGGR Checklist	Checklist #21 – Aliso Canyon Rig Schedule	GO 66-C(2)(b) PUC § 583	Data is market sensitive information requested by the Commission that, if revealed, would place SoCalGas at an unfair business disadvantage because it provides market sensitive information regarding the operational status of the Aliso Canyon storage field.

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 1st day of November, 2016, at Los Angeles, California.



 Rodger B. Schwecke
 Vice President, Gas Transmission and Storage