

**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 of Gas Transmission and Storage for Southern California Gas Company (“SoCalGas”) and San Diego Gas & Electric Company. I have reviewed the September 26, 2016, SoCalGas Response to California Public Utilities Commission – Safety and Enforcement Division Directive to conduct an Internal Corrosion Threat Assessment on injection and withdrawal pipelines at the Aliso Canyon Storage Facility (SoCalGas Response), submitted concurrently herewith. 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 falls within the scope of data protected as confidential under applicable statutory provisions:

Location of Data	Description of Data	Applicable Confidentiality Provisions	Basis for Confidentiality
SoCalGas Response - Appendix A	Appendix A - Root Cause Analysis of Pinhole in Ward 3A Withdrawal Pipeline	Sensitive Security Information (SSI) under 49 CFR §1520.5(a)(3), that, if revealed would be detrimental to transportation security. 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. The SSI regulation requires that only “covered persons with a need to know” may have access to SSI. The CPUC’s access to this	Operating pressure is a specific engineering design value as well as an operating parameter depicting an attribute of an existing critical infrastructure. This operating parameter could be used to determine the criticality of a gas pipe or facility and identify vulnerabilities of the gas delivery network. The release of this operating parameter is detrimental to public safety as it can be used as a means to identify the volume of gas present and potential energy that could be released in an area in order to identify the potential consequences of an intentional act of sabotage. Because of the critical nature of the parameter, it has been identified by PHMSA to be restricted pipeline information as well being an SSI element in the Federal Register Vol 81, pg. 40764 published on 6/22/2016. Pressure information is also exempt from public

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		<p>information must be necessary for the performance of its official duties and is restricted to CPUC Staff, Air Resources Board (ARB) Staff under the ARB/CPUC Interagency Information Sharing Agreement, and the Office of Ratepayer Advocates only.</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>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>Cal. Gov’t Code § 6254(e) exempts from mandatory disclosure, plant production data, and similar information relating to utility systems.</p>	<p>disclosure per the CEII and CII regulations for the same security reasons</p> <p>Pressure information is also exempt from public disclosure per Cal. Gov’t Code § 6254(e) as it is a type of production data relating to utility systems similar to plant production data.</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. 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>

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 26th day of September, 2016, at Los Angeles, California.



Rodger R. Schwecke
Vice President, Gas Transmission and Storage