

CONFIDENTIAL & PRIVILEGED; ATTORNEY WORK PRODUCT

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

**DECLARATION OF CASEY W. BUTLER
REGARDING CONFIDENTIALITY OF CERTAIN DATA/DOCUMENTS
PURSUANT TO D.21-09-020**

I, Casey W. Butler, do declare as follows:

1. I am the Manager of Customer Field Operations for San Diego Gas & Electric Company (“SDG&E”). I have been delegated authority to sign this declaration by Dana Golan, Chief Customer Officer. I have reviewed the confidential information included within the following documents:

- Chapter 6 – Workpaper 1 – Finance and Rates.

2. 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.

3. I hereby provide this Declaration in accordance with Decision (“D.”) 21-09-020 and General Order (“GO”) 66-D to demonstrate that the confidential information (“Protected Information”) provided in the aforementioned Exhibits is within the scope of data protected as confidential under applicable law.

4. 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 18th day of December, 2025, at San Diego.

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DocuSigned by:

Casey Butler

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Casey W. Butler
Manager of Customer Field
Operations

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ATTACHMENT A

SDG&E Request for Confidentiality

Location of Protected Information	Legal Authority for Confidentiality	General Rationale
<p>Yellow highlighted portions in Chapter 6 – Workpaper 1 – Finance and Rates.</p>	<p>Based on input received by SM 2.0 bidders, and based on SDG&E’s concurring position, the produced documents are proprietary and represent and contain commercially sensitive information not intended for public disclosure. SM 2.0 bidders’ efforts involve communications which are intended only for access by designated members. Public disclosure would pose potential negative impacts and/or harm to SM 2.0 bidders.</p> <p>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"> Cal. Civil Code §§ 3426 <i>et seq.</i> (Uniform Trade Secrets Act) 	<p>Disclosure of the information poses a risk of financial damage to the SM 2.0 bidders. In addition,</p> <p><u>NDA:</u></p> <ul style="list-style-type: none"> There is an active non-disclosure agreement (NDA) contained in the RFP with bidders that requires SDG&E to seek confidential treatment of price quotes. <p><u>Uniform Trade Secrets Act:</u></p> <ul style="list-style-type: none"> While bidders represent that they are not disclosing trade secrets, price quotes typically have the potential to meet the definition of trade secrets under California Civil Code § 3426 <i>et seq.</i> Disclosure would cause competitive harm. NDA + internal controls show reasonable efforts to maintain secrecy. Even SM 2.0 bidder general pricing is not accessible publicly on their websites. Price quotes in connection with the bid submittal are even more sensitive as they are more specific.