

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

Application of SOUTHERN CALIFORNIA GAS COMPANY (U 904 G) for Authorization to (1) issue debt securities in an aggregate principal amount of up to \$1,730,000,000; (2) include certain features in debt securities or enter into certain derivative transactions; (3) hedge issuances of debt securities; and (4) take all other necessary, related actions.

Application No. 20-03-\_\_\_\_\_

**MOTION BY SOUTHERN CALIFORNIA GAS COMPANY (U 904-G) FOR LEAVE TO  
FILE CONFIDENTIAL INFORMATION UNDER SEAL TOGETHER WITH  
PROPOSED ORDER TO SEAL SCHEDULES I, II, III-A, III-B, AND IX TO  
APPLICATION FOR DEBT AUTHORIZATION**

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March 30, 2020

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

Application of SOUTHERN CALIFORNIA GAS COMPANY (U 904 G) for Authorization to (1) issue debt securities in an aggregate principal amount of up to \$1,730,000,000; (2) include certain features in debt securities or enter into certain derivative transactions; (3) hedge issuances of debt securities; and (4) take all other necessary, related actions.

Application No. 20-03-\_\_\_\_\_

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APPLICATION FOR DEBT AUTHORIZATION**

Pursuant to Rule 11.4 of the Rules of Practice and Procedure of the California Public Utilities Commission (the “Commission”), Southern California Gas Company (“SoCalGas”) requests an order allowing it to file under seal and to maintain the confidentiality of Schedules I, II, III-A, III-B, and IX, including estimated construction expenses, a cash flow statement, a statement of cash requirements, and projected capitalization ratios, filed concurrently herewith in support of the Company’s Application for Debt Authorization (the “Application”), pursuant to Public Utilities Code Section (“§” 583, California Public Records Act Sections 6254(d)(1) and (k) and General Order 66-D. Schedules I, II, III-A, III-B, and IX to the Application contain forward-looking statements that are necessarily subject to various risks and uncertainties and are subject to change.

SoCalGas notes that the Commission has previously granted confidential treatment to these most of these same schedules in similar proceedings in the past for the same reasons that SoCalGas is presently seeking confidential treatment.<sup>1</sup>

Because the unredacted version of the Application, including Schedules I, II, III-A, III-B, and IX, contains material, non-public information, the Company seeks confidential treatment of those responses and requests that the Commission accept the filing of Schedules I, II, III-A, III-B, and IX under seal. SoCalGas supports this Motion with the attached Declaration Supporting Confidential Designation on Behalf of Southern California Gas Company by its Declarant, Mia DeMontigny, Vice President – Controller and Chief Financial Officer of Southern California Gas Company. See Attachment A.

As is required by Rule 11.4, noted above, accompanying this Motion is a Proposed Ruling that would implement the relief specified in this Motion.

Respectfully submitted on behalf of

By: /s/ Jeffrey B. Fohrer  
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March 30, 2020

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<sup>1</sup> See e.g., D.15-01-030 at 2 and Ordering Paragraph (“OP”) 18 (according confidential treatment to the exact same schedules); D.12-04-015 at 2-3 and OP 7 (according confidential treatment to financial schedules that have related sensitivities).

**PROPOSED RULING**

**BEFORE THE PUBLIC UTILITIES COMMISSION  
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Application of SOUTHERN CALIFORNIA GAS COMPANY (U 902 G) for authorization to: (1) issue Debt Securities in an aggregate principal amount up to \$2,300 million of debt capital, in addition to previously-authorized amounts; (2) issue Roll-Over Debt Securities in an aggregate principal amount up to \$730 million of debt capital, in addition to previously-authorized amounts; (3) include certain features in the Debt Securities or to enter into certain derivative transactions related to underlying debt in order to improve the terms and conditions of the debt portfolio and with goal of lowering the cost of money for the benefit or ratepayers; (4) hedge planned issuances of Debt Securities; and (5) take all other necessary related actions.

Application No. 20-03-XXX

**ORDER**

Pursuant to Rule 11.4 of the Rules of Practice and Procedure of the California Public Utilities Commission (the “Commission”), Southern California Gas Company (“SoCalGas”) filed a motion on March 30, 2020 (the “Motion”) requesting authority to file and maintain certain confidential, commercially sensitive and proprietary information under seal. The Motion sought confidential treatment of four financial schedules, Schedules I, II, III-A, III-B, and IX, which accompany the Application captioned above.

The information for which confidential treatment is sought is protected by Public Utilities Code §583, California Public Records Act §§6254(d)(1) and (k). In its supporting Declaration of Mia L. DeMontigny, SoCalGas represents that these schedules contain financially sensitive information that is subject to Securities and Exchange Commission disclosure requirements, if

their confidential status is not protected by the Commission. The financial information contains forward-looking statements that are necessarily subject to various risks and uncertainties that are subject to change. This information has not been disclosed to the public and has been protected as confidential by SoCalGas. The data cannot be aggregated, further redacted, summarized, masked or otherwise protected in a way that allows partial disclosure.

Therefore, it is ordered that:

1. SoCalGas' Motion to File Under Seal is granted.
2. The confidential information contained in SoCalGas' March 30, 2020 Application captioned above, consisting of Schedules I, II, III-A, III-B, and IX, shall remain sealed and is not to be disclosed to anyone other than Commission staff, the Assigned Commissioner, the assigned Administrative Law Judge ("ALJ") or an ALJ designated to decide this motion;
3. Further proceedings, if any, held with respect to matters contained in the confidential information shall be conducted in a manner the assigned ALJ deems reasonably necessary to protect the confidentiality of the materials described herein;
4. Non-market participants may request access to the confidential information pursuant to applicable rules; and
5. All additional documentary evidence in this proceeding that addresses or relates to the subject matter of the confidential information must be treated in the confidential manner described in paragraphs 1, 2 and 3 above.

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Administrative Law Judge

Dated: \_\_\_\_\_

# **Attachment A**

**BEFORE THE PUBLIC UTILITIES COMMISSION  
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**DECLARATION SUPPORTING CONFIDENTIAL DESIGNATION  
ON BEHALF OF  
SOUTHERN CALIFORNIA GAS COMPANY**

1. I, Mia L. DeMontigny, am the Vice President – Controller and Chief Financial Officer of Southern California Gas Company (“SoCalGas”). My business office is located at:

Southern California Gas Company  
555 West 5th Street, GT21C2  
Los Angeles, CA 90013

2. As indicated in the Motion to File Under Seal accompanying this Declaration, SoCalGas seeks an order from the California Public Utilities Commission (“CPUC” or “Commission”) deeming confidential the following Schedules that support SoCalGas’ concurrently filed Application, captioned above:

- Schedule I – 2020-2022 Capital Expenditure Estimates;
- Schedule II – 2020-2022 Monthly Cash Flow Projections;
- Schedule III-A – Statement of Cash Requirements for the Years 2020-2022;
- Schedule III-B – Amount and Percentage of Internal Funds Provided for Years 2020-2022; and
- Schedule IX – Capital Ratios as of December 31, 2019 and Pro-forma.

My Declaration explains the reasons why confidential treatment of these schedules is necessary and SoCalGas’ Motion to File Under Seal should be granted.

3. These documents have been marked as confidential, and the basis for confidential Treatment is because they contain financially sensitive information that is subject to Securities Exchange Commission disclosure requirements, if their confidential status is not protected by the Commission. The financial information contains forward-looking statements that are necessarily

subject to various risks and uncertainties and are subject to change. The schedules for which SoCalGas has requested confidentiality include forecasted and pro-forma equity issuances and capitalization ratios over the period 2019-2022. This information has not been disclosed to the public, and has been protected as confidential by SoCalGas. The schedules constitute material, non-public financial forecasts which are subject to change. Debt applications such as this one are routinely monitored by the investment community. If they are made public, investors could later argue that they relied on these forecasts and were harmed, which creates grounds for a potential lawsuit. Further, premature disclosure of future cash requirements or capital expenditures could impact SoCalGas' bidding strategy with lenders and other potential counterparties, resulting in higher service costs.

4. 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.

I declare under penalty of perjury that the foregoing is true, correct, and complete to the best of my knowledge.

Executed on this 30th day of March, 2020 at San Diego, California.



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Mia L. DeMontigny  
Vice President  
Controller and Chief Financial Officer