

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

Order Instituting Investigation on the Commission's Own Motion into the California's One Million New Internet Users Coalition's Misuse of California Advanced Services Fund Grant Funds; and Order to Show Cause Why the Commission Should Not Impose Penalties and/or Other Remedies for Violating Terms of Their Grant and for Refusing to Return Funds Previously Demanded by the Commission's Division.

Investigation 18-07-009

DECLARATION OF VANESSA BALDWIN

My name is Vanessa Baldwin and I am an attorney in the Legal Division of the California Public Utilities Commission (Commission). I have personal knowledge of the facts stated herein.

1. In representing the Consumer Protection and Enforcement Division (CPED) of the Commission in the Commission's proceeding investigating California's One Million New Internet Users Coalition (NIU Coalition), I attended the status conference held on June 18, 2020 in I.18-07-009.
2. At the status conference, I raised the concern regarding the piecemeal discovery requests made by Community Union Inc. (CU) thus far. Administrative Law Judge Zhang explained that if CU sought additional discovery requests, it was required to put together a document specifically identifying and explaining CU's discovery requests.
3. On July 8, 2020, I called CU in an attempt to discuss and resolve discovery issues.
4. On the July 8, 2020 call, CU explained that it now seeks all emails from Communications Division (CD) relating to the NIU Coalition.
5. I informed CU that such a request was too broad and should be narrowed by CD staff person and time period.

6. I reminded CU that at the June 18, 2020 status conference, ALJ Zhang asked CU to put together a document specifically detailing all of CU's discovery requests.
7. CU did not offer a specific time period limiting its discovery request at the time of the July 8, 2020 call.
8. At the end of the July 8, 2020 call, CU agreed to put together a document specifying its discovery requests.
9. To date, CU has not provided the document containing all of its discovery requests.

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.

Dated: July 23, 2020

/s/ VANESSA BALDWIN

Vanessa Baldwin