

DOCKETED

Docket Number:	25-IEPR-03
Project Title:	Electricity and Gas Demand Forecast
TN #:	264246
Document Title:	SDG&E 2025 IEPR Electricity Forecast Confidential Application
Description:	SDG&E's application for confidential designation
Filer:	Sarah Taheri
Organization:	San Diego Gas & Electric Company (SDG&E)
Submitter Role:	Applicant
Submission Date:	6/16/2025 8:31:39 AM
Docketed Date:	6/16/2025

**APPLICATION FOR CONFIDENTIAL DESIGNATION
(20 CCR SECTION 2505)**

***2025 INTEGRATED ENERGY POLICY REPORT*
Docket No. 25-IEPR-03 Electricity Demand Forecast**

Applicant: San Diego Gas & Electric Company (“SDG&E”)

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1. Identification of the Information Being Submitted

SDG&E requests confidential treatment of certain data provided by SDG&E to the California Energy Commission (“Commission”) pursuant to the 2025 Integrated Energy Policy Report (“IEPR”) process (Docket No. 25-IEPR-03). Generally, the information for which confidential designation is requested pertains to SDG&E’s electricity demand and rate forecasts. The information being submitted is included in Excel spreadsheets and in total is approximately two megabytes in size. The cells that contain confidential information have been highlighted in yellow in the concurrently-submitted Excel workbook.

2. Description of the Data or Information for which Confidentiality Is Being Sought

- IEPR Form 1.1b: Retail Sales of Electricity by Class or Sector
- IEPR Form 1.2: Total Energy to Serve Load
- IEPR Form 1.3: LSE Coincident Peak Demand by Sector
- IEPR Form 1.4: Distribution Area Coincident Peak Demand
- IEPR Form 1.5: Peak Demand Weather Scenarios
- IEPR Form 1.6a: Recorded LSE Hourly Loads for 2023 and 2024 and Forecast Loads for 2025
- IEPR Form 2.2: Electricity Rate Forecast

3. Description of the period for which confidentiality is being sought

SDG&E requests that the data indicated be kept confidential for a period of three years, or through June 16, 2028. Protection for this length of time is required to ensure that SDG&E's market-sensitive data is not disclosed to other market participants, who could make competitive use of this information to the detriment of utility ratepayers. The three-year confidentiality period requested by SDG&E is consistent with the protection afforded to this same data by the California Public Utilities Commission ("CPUC"). Three years is adequate time for the demand forecast data to become "stale" in terms of price movement in the relevant markets, and SDG&E has no objection to the data being made public after that time.

4. Information Substantially Similar to Information Previously Deemed Confidential by the Commission Continues to Warrant Confidential Treatment

California Code of Regulations ("CCR"), Title 20, Section 2505(a)(4) states:

"Repeated Applications for Confidential Designation. If an applicant is seeking a confidential designation for information that is substantially similar to information that was previously deemed confidential by the CEC pursuant to section 2508, or for which an application for confidential designation was granted by the executive director pursuant to 2505(a)(3)(A) of this section, the new application need contain only a certification, executed under penalty of perjury, stating that the information submitted is substantially similar to the previously submitted information and that all the facts and circumstances relevant to confidentiality remain unchanged. An application meeting these criteria will be approved."

The information for which confidential treatment is requested here is substantially similar to information that was previously deemed confidential by the Commission. (See September 29, 2021 correspondence from D. Bohan to SDG&E counsel, J. Pacheco, approving confidential designation for electricity demand forecast information, Docket No. 21-IEPR-03.) Attachment A to this Application includes certifications executed under penalty of perjury affirming that the submitted information is substantially similar to information previously submitted to the Commission by SDG&E and granted confidential treatment. These certifications apply to the categories of information listed in Section 2 above. In accordance with California Code of Regulations ("CCR"), Title 20, Section 2505(a)(4), this information should be deemed confidential.

I certify under penalty of perjury that the information contained in this application is true, correct, and complete to the best of my knowledge. SDG&E is a California corporation, and I am authorized to make the application and certification on behalf of SDG&E.

Respectfully submitted this 16th day of June, 2025.

/s/ Aimee Smith

Aimee Smith

Attorney for:

SAN DIEGO GAS & ELECTRIC COMPANY

ATTACHMENT A

Certification Regarding Information Substantially Similar to Information Previously Deemed Confidential by the Commission

- ***Certification of Ken Schiermeyer***

Certification of Confidentiality by Ken Schiermeyer Pursuant to Title 20, §2505(a)(4)
(Repeated Applications for Confidential Designation)

I, Ken Schiermeyer, do certify as follows:

1. I am the Forecasting and Analysis Manager within the Customer Pricing Department of San Diego Gas & Electric Company. I have reviewed the confidential information provided within the *SDGE IEPR 2025 Demand Forecast Confidential Forms.xlsx* and am familiar with its contents. I am also familiar with SDG&E's previous request for confidential treatment of electricity demand forecast information, which was granted on September 29, 2021.
2. The electricity demand forecast information being provided here is substantially similar to the electricity demand forecast information that was previously granted confidential treatment on September 29, 2021.
3. The facts and circumstances for granting confidential treatment of this data are unchanged from SDG&E's previous submission addressed in the September 29, 2021, CEC letter.
4. The portions of the data for which confidential treatment is sought are marked with yellow highlighting.

I certify under penalty of perjury under the laws of the State of California that the foregoing is true, correct and complete to the best of my knowledge.

Date: June 16, 2025

Location: San Diego, California

Signed: /s/ *Ken Schiermeyer*

Print Name: Ken Schiermeyer

Title: Forecasting and Analysis Manager

Representing: SDG&E