

DOCKETED	
Docket Number:	25-IEPR-03
Project Title:	Electricity and Gas Demand Forecast
TN #:	264272
Document Title:	SCP 2025 IEPR Demand Forecast Confidentiality Declaration
Description:	N/A
Filer:	Jen-Ann Lee
Organization:	Braun Blaising and Wynne
Submitter Role:	Public Agency
Submission Date:	6/16/2025 10:34:40 AM
Docketed Date:	6/16/2025

June 16, 2025

Drew Bohan
Executive Director
Docket No. 25-IEPR-03, Electricity Resource Plans
California Energy Commission
715 P Street
Sacramento, CA 95814

**Re: Application of Sonoma Clean Power for Confidential Designation of Information
Contained in its 2025 Electricity Demand Forecast**

Dear Mr. Bohan,

Sonoma Clean Power (“SCP”) requests the California Energy Commission (“Commission”) designate information included in SCP’s 2025 Electricity Demand Forecast Forms 8.1a and 8.1b as confidential pursuant to Title 20, Cal. Code. Regs. (“CCR”), Section 2505 et seq. and the justifications set forth below. In accordance with the Commission’s *2025 Instructions for Submitting Demand Forecasts*¹, SCP provides the following information in support of its application for confidentiality designation.

Contact Information

Applicant Name: Sonoma Clean Power
Phone Number: (707) 890-8488
Email: nreardon@sonomacleanpower.org
Address: 431 E Street
Santa Rosa, CA 95404
Proceeding Name: Electricity Resource Plans
Docket Number: 25-IEPR-03

All correspondence regarding this filing should be directed by electronic mail to the attention of:

Neal Reardon
Director of Regulatory Affairs
Sonoma Clean Power
nreardon@sonomacleanpower.org

Description and Identification of Confidential Information

For docket number 25-IEPR-03, SCP seeks confidential treatment for the entirety of Form 8.1a, which contains information relating to budget appropriations, actual costs, and other projected costs. SCP further requests confidential treatment for the entirety of Form 8.1b, which includes confidential total revenue requirements, separated by customer class. SCP has yellow-

¹ *2025 Instructions for Submitting Demand Forecasts*, Cal. Energy Commission (Jan. 6, 2025), <https://efiling.energy.ca.gov/GetDocument.aspx?tn=260901&DocumentContentId=97333>. (TN #260901)

highlighted the confidential information in SCP's Forms 8.1a and 8.1b in the Electricity Demand Forecast.

Length of Time the Information Should Be Kept Confidential

SCP requests that the Commission keep SCP's information confidential and protected from public disclosure for a period of 3 years, until June 15, 2028. This length of time is needed to ensure that SCP's detailed budget appropriations, cost information, and revenue allocations in Forms 8.1a and 8.1b remains secure from market participants that could make competitive use of this information to the detriment of SCP, SCP's ratepayers, and the electricity market as a whole. Further, this length of time is consistent with how the Commission has treated similar information.²

Provisions of Law Allowing the Commission to Keep the Documentation Confidential

SCP seeks confidentiality for these Forms on the following bases:

1. **Previous Confidentiality.** Under the CCR, Title 20, Section 2505(a)(4), information submitted to the Commission can be deemed confidential without the need for a new application so long as the new information is substantially similar to information previously granted confidentiality. The Commission granted SCP's previous confidentiality application requesting confidential treatment for its Electricity Demand Forecast, Forms 8.1a and 8.1b, as provided in *Application for Confidential Designation for Data in Integrated Energy Policy Report, Docket 25-IEPR-02*, issued August 9, 2023. The information requested in this Application is substantially similar to the information protected in 23-IEPR-02, and should be similarly protected.
2. **Public Entity Designation.** SCP also asserts confidentiality under Section 2505(b) as a local agency which possesses information pertinent to the responsibilities of the Commission that has been designated by SCP as confidential under the Public Records Act. The Commission has previously recognized SCP's claim of confidentiality under Section 2505(b), and should do so here.
3. **Balancing Tests.** Even if the above justifications were not available, the information should be protected under California Government Code, Section 7922.000, which permits protection of information where the public interest in nondisclosure clearly outweighs the public interest in disclosure. The information in Forms 8.1a and 8.1b is highly commercially sensitive, not publicly known, and if revealed could cause significant harm to load serving entities, like SCP. Such information, if disclosed, would reveal contract prices, actual costs, projected costs, and projected revenues, which would have a significant impact on the energy and capacity market in California. The public does not have a meaningful interest in reviewing this information in a disaggregated form, and disclosure may impact the energy and capacity market causing public harm.

Disclosure in an Aggregated Form

² See 23-IEPR-02, *CEC response for Confidential Designation Sonoma Clean Power July 31, 2023, Docket 23-IEPR-02* (August 9, 2023) (TN#: 251560).

The data in question can be disclosed if it is aggregated with other LSE load forecast and supply information at a level that does not permit SCP's confidential information to be derived from the aggregated data.

The Submitted Information Is Presently Confidential

SCP does not publicly disclose its bilateral contract prices, actual costs, projected costs, or projected revenues, which is information required in Forms 8.1a and 8.1b. SCP considers such information market sensitive, as public disclosure of this information could compromise SCP's competitive position in the electricity market.

I certify under penalty of perjury that the information contained in this application for confidential designation is true, correct, and complete to the best of my knowledge. I also certify that as a community choice aggregator, SCP is a local government agency, and I am authorized to make the application and certification on behalf of SCP.

Dated: June 16, 2025

/s/ Neal Reardon

Neal Reardon
Director of Regulatory Affairs
Sonoma Clean Power
nreardon@sonomacleanpower.org