

DOCKETED	
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June 16, 2025

Mr. Drew Bohan
Executive Director
California Energy Commission
Docket Office, Docket No. 25-IEPR-03
1516 Ninth Street, MS-39
Sacramento, CA 95814

RE: CleanPowerSF's Application for Confidential Designation for Electricity Demand Forecast Forms 1.1b, 1.3, and 3 (Docket No. 25-IEPR-03)

In conjunction with the filing of its Electricity Demand Forecast Forms, CleanPowerSF hereby submits an Application for Confidential Designation for in for Forms 1.1b, 1.3, and 3, pursuant to Cal. Code Reg. section 2505. CleanPowerSF is the community choice aggregator (CCA) for the City and County of San Francisco, which is operated by the San Francisco Public Utilities Commission.

I. Identification of Confidential Information.

CleanPowerSF requests confidentiality for certain information provided in the following forms:

- Form 1.1b, Retail Sales of Electricity by Class or Sector
 - C:11 – I:22
 - J:11 – J:13
- Form 1.3, LSE Coincident Peak Demand by Sector
 - C:11 – K:22
- Form 3, Incremental Demand Modifier Impacts
 - K:44 – T:91

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CleanPowerSF is a program of the San Francisco Public Utilities Commission (SFPUC), an enterprise department of the City and County of San Francisco.

CleanPowerSF is committed to protecting customer privacy. Learn more at cleanpowersf.org/privacy.

OUR MISSION: To provide our customers with high-quality, efficient and reliable water, power and sewer services in a manner that values environmental and community interests and sustains the resources entrusted to our care.



These forms consist of historical data for 2023 through 2024 and forecast data from 2025 through 2036. CleanPowerSF requests confidential treatment for data related to 2025-2027 and certain forecast data from 2028 through 2036, as indicated with yellow highlight in the forms.

II. Time Period for Confidential Treatment

CleanPowerSF requests confidential treatment for three (3) years from the submission of these forms until June 16, 2028.

This amount of time parallels the amount of time that CleanPowerSF protects its forecasted data submitted to the California Public Utilities Commission (CPUC). Specifically, CleanPowerSF protects data for three years (current year, plus two forward years) when the data constitutes valuable, highly-sensitive market information. A three-year time period provides an adequate amount of time to prevent disclosure of this information to current market participants who can exercise market power and negatively impact CleanPowerSF's ability to negotiate and procure energy resources on terms reasonable for its ratepayers.¹

III. Justification for Request of Confidential Treatment

CleanPowerSF seeks confidential treatment for the data identified in Section I above because the public interest served by not disclosing the information clearly outweighs the public interest served by disclosure of that information.² In addition, the Commission's regulations allow for information to be designated as confidential if it "contains a trade secret or its disclosure would otherwise cause a loss of a competitive advantage."³

As noted in Section II, confidential treatment for the identified data in Forms 1.1b, 1.3 and 3 are justified because of their market-sensitive nature and, if released, would place CleanPowerSF at a competitive disadvantage to other market participants. Public disclosure would reveal CleanPowerSF's load in the current and forecasted years, placing CleanPowerSF at a competitive disadvantage in electricity markets. Disclosure of this information could impact market prices and would compromise CleanPowerSF's ability to procure

¹ 20 Cal. Code Reg. § 2505(a)(I)(D). See also Evid. Code section 1060 and Govt. Code section 7930.205

² Cal. Govt. Code § 6255(a).

³ 20 Cal Code Regs. § 2505(a)(I)(D).

energy and other energy products on terms favorable to its ratepayers, because the information could be used to determine CleanPowerSF's forecasted energy needs. Suppliers could use this information, when negotiating the price and terms of procurement transactions, disadvantaging CleanPowerSF. That information could also be used by market participants to refine business strategies and cause competitive harm. Thus, the public interest served by not disclosing the forecast data clearly outweighs the public interest served by disclosure of that data.

The data identified in Section I currently cannot be legitimately acquired or duplicated by others without access to our confidential financial and budgeting model. As such, this information is also proprietary. Further, the data: (1) is not already public; and (2) cannot be aggregated, redacted, summarized or otherwise protected in a way that allows partial disclosure.

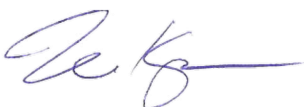
IV. CleanPowerSF Maintains the Confidentiality of this Information.

CleanPowerSF guards the confidentiality and only allows a subset of its staff access to the information in Forms 1.1b, 1.3 and 3.

V. Certification of CleanPowerSF Director

I certify under penalty of perjury that the information contained in this application for confidential designation is true, correct, and completed to the best of my knowledge. I also certify that I am authorized to make the application and certification on behalf of CleanPowerSF.

Sincerely,



Michael A. Hyams
Director, CleanPowerSF