

**DOCKETED**

<b>Docket Number:</b>	25-IEPR-03
<b>Project Title:</b>	Electricity and Gas Demand Forecast
<b>TN #:</b>	264884
<b>Document Title:</b>	Ava 2025 IEPR Electricity Demand Forecast Confidentiality Application - Revised Forms 1-4
<b>Description:</b>	Application for confidential designation for updated Forms 1-4.
<b>Filer:</b>	Claire Huang
<b>Organization:</b>	Ava Community Energy
<b>Submitter Role:</b>	Public Agency
<b>Submission Date:</b>	7/18/2025 1:07:33 PM
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VIA CEC Docket Submittal

July 18, 2025

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

**RE:** CEC Docket No. 25-IEPR-03 Ava Community Energy Application for  
Confidentiality for Electricity Demand Forecast

Dear Mr. Bohan,

Ava Community Energy ("Ava") hereby submits its application for confidentiality and requests that information provided in Ava's 2025 Integrated Energy Policy Report (IEPR) Electricity Demand Forecast be designated as confidential for the time period stated herein, pursuant to Title 20, California Code of Regulations, Section 2505 et seq. for the reasons set forth below.

In accordance with Appendix A to the *Forms and Instructions for Submitting Electricity Demand Forecasts*, dated January 6, 2025 (TN #260901), Ava provides the following information in support of its application for confidentiality.

**Contact Information**

Applicant Name: Ava Community Energy  
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Proceeding Name: Electricity and Gas Demand Forecast  
Docket Number: 25-IEPR-03

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

Claire Huang  
Regulatory Analyst II  
Ava Community Energy  
[chuang@avaenergy.org](mailto:chuang@avaenergy.org)

### **Description and Identification of Confidential Information**

Ava seeks confidential treatment for the following information, as highlighted in the Ava's Electricity Demand Forecast forms.

- Form 1.1b, columns C-J: Current Year (2025) and forward years forecast load information.
- Form 1.3, columns C-J: Current Year (2025) and forward years forecast load information.
- Form 3, columns E-T: Current Year (2025) and forward years forecast load information.
- Form 4: Current Year (2025) and forward years forecast load information.

### **Length of Time the Information Should Be Kept Confidential**

Ava requests that the Commission keep Ava's information confidential and protected from public disclosure for a period of 3 years, until June 16, 2028. This length of time is needed to ensure that Ava's market-sensitive load forecast and supply information remains secure from market participants that could make competitive use of this information to the detriment of Ava, Ava's ratepayers, and the electricity market as a whole.

### **Provisions of Law Allowing the Commission to Keep the Documentation Confidential**

Ava seeks confidentiality for the designated information in its forms on the following bases:

1. **Public Entity Designation.** Ava 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 Ava as confidential under the Public Records Act.
2. **Balancing Tests.** Even if the above justification was 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 Ava's forms is highly commercially sensitive, not publicly known, and if revealed could cause significant harm to load-serving entities (LSEs), like Ava. 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**

The data provided in Ava's 2025 Integrated Energy Policy Report Electricity Demand Forecast forms can be disclosed if it is aggregated with other LSE load forecast and supply information at a level that does not permit Ava's confidential information to be derived from the aggregated data.

**The Submitted Information is Presently Confidential**

Ava does not publicly disclose its energy and demand forecast data or methodology. Ava considers such information market sensitive, as public disclosure of this information could compromise Ava'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 I am authorized to make the application and certification on behalf of Ava Community Energy.

/s/ Claire Huang

Claire Huang

Regulatory Analyst II

Ava Community Energy