

DOCKETED	
Docket Number:	24-IEPR-03
Project Title:	Electricity Demand Forecast
TN #:	266223
Document Title:	2024 IEPR App for Confidential Designation of Customer Information (002)_09-18-2025pdf
Description:	N/A
Filer:	Southern California Edison Company
Organization:	Southern California Edison
Submitter Role:	Applicant
Submission Date:	9/26/2025 6:57:14 PM
Docketed Date:	9/29/2025

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

2024 INTEGRATED ENERGY POLICY REPORT

DOCKET NUMBER 24-IEPR-03

1. Contact Information:

Contact the Applicant, Southern California Edison Company, at the information provided in the chart below.

Attorney for Applicant:	Rebecca Meiers-De Pastino
Address of Attorney:	2244 Walnut Grove Ave. Rosemead, California 91770 Rebecca.Meiers.DePastino@SCE.com (626) 302-6016

2. Title, date, and description (including number of pages) of the information or data for which you request confidential designation. (20 CCR 1208.1.)

Southern California Edison Company (SCE) seeks confidential designation of the columns and rows highlighted in magenta in the tabs in the accompanying four Load Forecasting and Bus Allocation Data Excel files with a total submission file size of _486,100_KB. The titles of the four Excel files are as follows:

- 002A_(Steps 1-3)_5-Year History of Hourly SCADA Data for NOL_v5.xlsx, 40,100_KB
- 003A_(Steps 4A-4B)_Submit Know Load Growth to CEC_v1.xlsx, 114,000_KB
- 004A_Part 3 - Substation Load Growth (10-Years).xlsx, 157,000_KB
- 005A_Part 4 - NOL_Forecast_Consolidated_Results_Draft.xlsx, 175,000_KB

3. Specify the part(s) of the information or data for which you request confidential designation. (If the data is in charts or spreadsheets, highlighting is sufficient.) (20 CCR 2505(a)(1)(B.))

SCE seeks confidential designation of customer data, which includes confidential information that identifies or would allow third parties to discern the customers' identity, as well as detailed confidential information about those customers' actual and forecasted load and energy usage at various times of the day over a period of years. In addition, given the nature of

the data and some of the customers' identities associated with that data, its revelation could put critical energy infrastructure and consequently the public at risk. Virtually every tab in the four Excel sheets listed above contains confidential customer data. For the Energy Commission's ease of reference, SCE has highlighted all rows and columns containing confidential information in magenta and requests that the Energy Commission designate all those highlighted rows and columns as confidential. SCE is also filing redacted public versions of these Excel files.

4. State and justify the length of time the CEC should keep the information or data confidential. The term requested must be relevant to the stated basis for confidentiality. (20 CCR 2505(a)(1)(C.))

SCE requests that the Energy Commission indefinitely restrict the specified information from public disclosure because it contains sensitive and confidential customer-specific information that cannot and should not be shared publicly.

5. State the provision(s) of the California Public Records Act or other law that allows the CEC to keep the information or data confidential and explain why the provision(s) apply to that material. (See Gov. Code, §§ 7920.000-7930.215.) (20 CCR (a)(1)(D.)).

A properly filed application for confidentiality shall be granted under California Code of Regulations, title 20, section 2505(a)(3)(A), "if the applicant makes a reasonable claim that the Public Records Act or other provision of law authorizes the Commission to keep the record confidential." California statutes, California Public Utilities Commission decisions, and SCE's tariffs prohibit the public disclosure of such information.¹ Public Resources Code section 8380 specifically prohibits electrical or gas corporations from disclosing information on individual customer consumption to the public. The submitted data sets contain confidential customer identification and energy consumption information that should be entitled to automatic

¹ See, e.g., Cal. Const., Art I, Sec. 1 ("Each citizen has the right to privacy."); Cal. Pub. Util. Code § 8380 (requiring utilities to keep customer energy consumption data confidential); CPUC Decision 11-07-056 (implementing PUC Code section 8380); Cal. Pub. Util. Code § 394.4 (prohibition utilities to share customer information without written customer consent); Cal. Civil Code §§ 1798.81-1798.85 (requiring businesses to take measures to protect Personally Identifiable Information (PII)); CPUC Decision 14-05-016 (protecting customer data, including usage data); SCE Tariff Rules 9, 22, CCA-INFO, 25 (protecting the privacy and security of customer usage data), 26 (restricting governmental and other institutions' access to customer data absent a legal obligation to collect it).

confidential designation under title 20, section 2505(a)(5)(A)(B),² is protected from public disclosure under Public Resources Code section 8380, and would not be in the public interest to disclose under California Government Code section 7922.000, which provides that an agency may withhold information from disclosure where the public interest served by nondisclosure clearly outweighs the public interest of disclosure. SCE therefore respectfully requests that the Commission designate the information as confidential.

6. If the applicant believes that the information or data should not be disclosed because it contains trade secrets or its disclosure would otherwise cause a loss of a competitive advantage, the application also shall state: (20 CCR (a)(1)(D.))

The customer information for which SCE seeks confidential treatment cannot be easily acquired or duplicated by others. SCE's policy and practice are to maintain the data as trade secrets. SCE does not and has not made this data public. SCE also employs rigorous cybersecurity measures and protocols. The data is safeguarded and kept confidential in SCE's secure systems to which it gives restricted access to employees on a need-to-know basis and that are password protected. SCE only discloses the data if it either has the customer's written consent or is legally compelled to do so.

The disclosure of the highlighted confidential customer information would communicate a great deal about these customers and their current and future personal or business activities and needs that would violate their privacy rights and/or be valuable to the market, such as entities that would like to do business with or compete with the customer, if it were publicly disclosed. For example, the data highlighted in the tabs in the four Excel files reflects, among other things,

² Cal. Code Regs. 20 § 2505(a)(5)(A),(B)(1)(a)(b) ("Automatic Designation. Information submitted by a private third party shall be designated confidential without an application for confidentiality if the requirements of subsections (a)(5)(A) and (B) of this Section are met. . . . (A) The entity submitting the information shall label each individual item of the submittal that is entitled to be designated confidential. (B) The entity submitting the information shall attest under penalty of perjury that the information submitted has not been previously released and that it falls within one of the following categories: 1. Information that is derived from energy consumption metering, energy load metering research projects, or energy surveys provided pursuant to Section 1343 or 1344 of Article 2 of Chapter 3, and that is one or more of the following: a. for the residential customer sector and the commercial customer sector -- customer identifiers, energy consumption, and any other information that could allow a third party to uniquely identify a specific respondent; b. industrial major customer sector -- all information. . .").

customer-dedicated substation data or substation data on which the load is primarily associated with a single customer such that, if revealed, the public could discern private and confidential information about that customer's actual or planned activities during certain times of the day over the course of years.

SCE cannot quantify the value of the information because it is potentially priceless.

- 7. State whether the information or data can be disclosed if it is aggregated with other information or masked to conceal certain portions. State the degree of aggregation or masking required. If the data cannot be disclosed even if aggregated or masked, explain why. (20 CCR 2505(a)(1)(E.))**

To deliver the information with the level of detail the Energy Commission requires, the information cannot be aggregated or masked to allow for its public disclosure beyond that which SCE has already aggregated in the Excel file and has not highlighted as confidential.

- 8. State how the information or data is kept confidential by the applicant and whether it has ever been disclosed to a person other than an employee of the applicant. If it has, explain the circumstances under which disclosure occurred. (20 CCR 2505(a)(1)(F.))**

SCE does not and has not ever made this data public. The data is safeguarded and kept confidential in SCE's secure systems to which it gives restricted access to employees on a need-to-know basis and that are password protected.

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. Finally, I also certify that I am authorized to make the application and certification on behalf of Southern California Edison.

Dated: September 19, 2025
Signed: *Manuel Avendano*
Print Name: Manuel Avendano
Title: Senior Manager, Central System Planning