

DOCKETED	
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APPLICATION FOR CONFIDENTIAL DESIGNATION
(20 CCR SECTION 2505)

2025 INTEGRATED ENERGY POLICY REPORT

Docket Number 25-IEPR-03

Electricity Demand Forecast

Applicant: Pacific Gas and Electric Company (PG&E)

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1. (a) Title, data, and description of the record.

This information is being submitted in response to a request from the California Energy Commission (CEC) via email on September 9, 2025. The CEC requested the following information for non-data center large load projects: 1) type of load, 2) expected energization date, 3) load profile, 4) load factor and utilization factor, and 5) certainty or confidence level of load materializing. In response to this request, Pacific Gas and Electric Company (PG&E) is providing, disaggregated information for each facility 1) type of load, 2) whether the project applied for transmission or distribution service, 3) expected energization date, 4) total load requested, and 5) the transmission bus identification number.

(b) Specify the part(s) of the record for which you request confidential designation.

PG&E is requesting confidential designation for information provided for total load requested.

2. State and justify the length of time the Commission should keep the record confidential.

PG&E requests confidentiality for the entirety of the confidential information shared concerning the total load requested for the projects for which the CEC has requested such information from PG&E.

PG&E requests confidentiality for this information based on the following grounds:

- California Code of Regulations, Title 20, Section 2505(a)(5) provides that information submitted by a private third party shall be designated confidential without an application for confidentiality if the requirements of subsections 2505(a)(5)(A) and (B) are met. The confidential information being submitted by PG&E meets the requirements of these subsections. The confidential information submitted is properly labeled as confidential satisfying the requirement of Section 2505(a)(5)(A), and the confidential information has not been previously released and falls within the category of subsection 2505(a)(5)(B)(1)(a) as commercial customer sector information that includes customer identifiers, energy consumption, and other information that could allow a third party to uniquely identify the specific commercial customer. The total load requested data is private unique information that can be used as individual customer identifiers of energy consumption and demand rate by a third party.
- California Government Code section 7927.410 exempts from disclosure utility customer usage data, the total load requested data for customers being shared can be manipulated to extrapolate such customer's usage data and the public disclosure of such information would allow a third party to calculate or determine customer-specific usage data for such customers.
- California Government Code Section 6254.16 states that, subject to certain exceptions, the Public Records Act does not "require the disclosure of the name, *utility usage data*, home address, or telephone number of utility customers of local agencies." (emphasis added).

This section of the government code protects utility customers energy usage data such as the energy usage information that can be gleaned from total capacity requested or capacity ramping schedules. In the event such private confidential information of customers is obtained by third parties, third parties can use such information to calculate and determine individual data center customer utility usage data.

- The confidential information being submitted is PG&E proprietary information and a trade secret. The information has independent value to PG&E and has been disclosed directly from PG&E customers to PG&E with no expectation that that information will be shared publicly. PG&E derives significant value in the free exchange of information with its customers to be able to respond to their needs and demands and provide utility services to its customers at the lowest cost in the most reasonably effective way. Disclosure of such confidential proprietary information and trade secrets would disadvantage PG&E and its customers as it would erode trust between the parties, prevent future disclosure of information and likely create unnecessary costs that would result in higher rates and less efficient service for PG&E customers. The confidential total capacity requested data shared directly by customers to PG&E cannot be acquired or duplicated by any third party since it is unique individualized private customer information shared with PG&E. The data reflects individualized total capacity requested for specific customers. The figures reveal PG&E's internal coordination with customers and provide insight into when and how the company plans to meet customer load requests. Disclosure would expose PG&E's customer relationships and network-planning assumptions, creating a competitive disadvantage both for PG&E in the procurement and interconnection market and for its customers. If competitors, third-party service providers, or market participants obtained this data, they could identify specific customers, estimate future capacity demand, and anticipate PG&E's system-upgrade timelines. That information could be used to poach customers, undercut pricing structures, or pre-empt projects. Such use would erode PG&E's contractual leverage in the capacity markets and the trust underlying its treatment of private customer data vis-à-vis its customers. The information has considerable commercial value because it enables PG&E to forecast energy capacity impacts, negotiate service arrangements, and plan infrastructure investments for large capacity demand customers. Maintaining confidentiality preserves PG&E's ability to operate efficiently and sustain collaborative relationships with those customers. The applicant's investment in data management, network modeling, and legal agreements reflects significant time and expense that would be undermined by public release.

PG&E requests that the confidential designation of this information herein be maintained indefinitely.

3. Identify the specific categories for which confidentiality is being sought.

PG&E is requesting confidential designation for information provided for total load requested.

4. Attestation

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 Pacific Gas and Electric Company.

November 7, 2025

Signed: Original signed by /s/Daniel S. Hashimi

Name: Daniel S. Hashimi

Title: Senior Counsel
Pacific Gas and Electric Company