

DOCKETED	
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November 13, 2025

California Energy Commission
Docket # 25-IEPR-02
1516 Ninth Street, MS-39
Sacramento, CA 95814

RE: CleanPowerSF's Repeated Application for Confidential Designation for Electricity Resource Plan Supply Forms issued by the California Energy Commission for the 2026 Integrated Energy Policy Report (Docket No. 25-IEPR-02)

In conjunction with the filing of its Electricity Resource Plan Supply forms, CleanPowerSF hereby submits a Repeated Application for Confidential Designation for its Electricity Resource Plan Supply Forms (Supply Forms) pursuant to Cal. Code Reg. section 2505(a)(4). 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.

The Energy Commission previously designated as confidential the information provided in CleanPowerSF's 2025 Supply Forms pursuant to Cal. Code Reg. section 2505(b).ⁱ CleanPowerSF requests the same confidentiality designation for the information provided in this year's Supply Forms, because the information is substantially similar to the information previously submitted in its 2025 Supply Forms. All facts and circumstances relevant to confidentiality remain unchanged from those in CleanPowerSF's 2025 Application for Confidentiality.ⁱⁱ As explained in its 2025 Application, CleanPowerSF relies on Government Code sections 7927.705 (formerly 6254(k)) and 7922.000 (formerly 6255(a)) and Evidence Code section 1060 as the basis for confidentiality of the information identified in this Repeated Application.

I. Identification of Confidential Information

CleanPowerSF requests confidentiality for certain information provided in the following Supply Forms:

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.

Daniel Lurie
Mayor

Joshua Arce
President

Stephen E. Leveroni
Vice President

Avni Jamdar
Commissioner

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Commissioner

Meghan Thurlow
Commissioner

Dennis J. Herrera
General Manager



- S-1, Capacity/Energy Requirement;
- S-2, Capacity/Energy Supply Resources; and
- S-2A, Addendum Monthly Capacity and Energy Data
- S-5, Bilateral Contracts Table

The data for which CleanPowerSF seeks confidential designation in S-1, S-2, S-2A, and S-5 is clearly highlighted in yellow, and the confidential file is conspicuously labeled as “Confidential.”

Similar to CleanPowerSF’s 2025 supply forms, the information provided in this year’s supply forms falls into two broad categories: 1) information related to CleanPowerSF’s Resource Adequacy (RA) obligation, forecasts, and projected compliance; and 2) CleanPowerSF’s energy demand forecasts and projected Renewables Portfolio Standard (RPS) compliance. The following specific data apply to either or both above categories for which CleanPowerSF requests confidential designation.

a. Form S-1, Capacity/Energy Requirement

The confidential information in Form S-1 includes the “Peak Load Calculations” and related inputs. Specifically, Lines 1, 5-8, and 11, Columns I-R. It also includes the “Energy Demand Calculations” and related inputs. Specifically, Lines 12, 16, and 18, Columns I-L.

b. Form S-2, Capacity/Energy Supply Resources

The confidential information in Form S-2 includes the “Total Renewable Contract Supply” and the contract supply and energy information from individual contracts as well as the Capacity/Energy Balance Summary which consists of “Total: Existing and Planned Supply,” “Firm LSE Procurement Requirement,” and “Net Surplus (or Need).” The confidential information is in the following cells by line and column:

Line 6a Columns Q-AA; Columns AE-AG

Line 6c1 Column B; Columns J-K; Columns Q-AA; Columns AE-AG

Line 6c2 Column B; Columns J-K; Columns Q-AA; Columns AE-AG

Line 6c3 Column B; Columns J-K; Columns Q-AA; Columns AE-AG

Line 6d Columns Q-AA

Line 6f Columns Q-AA

Line 6g Columns Q-AA

Line 6h Columns Q-AA

Line 6i Columns Q-AA

Line 6j Columns T-AA

Line 6k Column Q-AA; Columns AE-AF
Line 6l Columns Q-AA
Line 6n Columns AE-AF
Line 6o Columns S-AA; Column AF
Line 6p Columns AE-AF
Line 6r Columns AE-AG
Line 6s Columns AE-AF
Line 6t Column AE
Line 6u Columns S-AA; Columns AE-AG
Line 6v Columns S-AA; Columns AE-AG
Line 7a Columns R-AA; Columns AE-AG
Line 7b Columns Q-AA
Line 7e Columns Q-V
Line 7f Columns Q-V
Line 7g Columns Q-V
Line 7h9 Column AE
Line 7i Column AD
Line 7j Column AD
Line 7k Columns S-AA
Line 7l Column AD
Line 7v1 Column AD
Line 7v2 Column AD
Line 7x1 Column AD
Line 7x2 Column AD
Line 7x3 Column AD
Line 7x4 Column AD
Line 7x5 Column AD
Line 7x6 Column AD
Line 7x7 Column AD
Line 7x8 Column AD
Line 7x9 Column AD
Line 7x10 Column AD
Line 7x11 Column AD
Line 7x12 Column AD
Line 7x13 Column AD
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 Line 7x24 Column AD
 Line 7x25 Column AD
 Line 7x26 Column AD
 Line 7x27 Column AD
 Line 7z Columns P-Q
 Line 7aa Columns P-Q
 Line 7ab1 Column P
 Line 7ac Columns R-S; Column AD
 Line 7ad Column Q
 Line 7af Columns R-S
 Line 7ag Column S
 Line 7ah Column S
 Line 7am Column Q
 Line 7ar Columns R-S
 Line 7as Column R
 Line 7aw Column R
 Line 7ba Column B; Column E; Column R
 Line 7bb Column B; Column E; Column R
 Line 7bf Column B; Column R
 Line 7bg Column B; Column R; Column S
 Line 9 Columns R-AA; Columns AE-AF
 Line 10 Columns R-AA; Columns AE-AF
 Line 11 Columns R-AA; Columns AE-AF

c. Form S-2A, Addendum Monthly Capacity and Energy Data

The highlighted confidential information in Form S-2A includes recently acquired resources and monthly “NQC MW” data that relate to RA compliance, and the “Contract GWh” data, which relate to RPS compliance and energy net position.

d. Form S-5, Bilateral Contracts Table

The confidential information in Form S-5 includes recently acquired resources for RA obligations and system energy as indicated in Lines 6b, 6c, 6d, 6s, 6u, 6v, 7b, 7e, 7f, 7g, 7h, 7k, 7n, 7o, 7ac, 7ad, 7ae, 7af, 7ao, 7ap, 7aq, 7ar, 7as, 7at, 7au, 7av, 7aw, 7ax, 7ay, 7az, 7ba, 7bb, 7bf, and 7bg.

II. Time Period for Confidential Treatment

CleanPowerSF requests confidential treatment for the following time periods that parallel the amount of time that CleanPowerSF protects its forecasts in California Public Utilities Commission (CPUC) supply data submissions:

- RA data in Form S-2: 2024, plus ten (10) year forecast period (2024 to 2034).
- RPS data: Current year and a two (2) year forecast period (2025 to 2027); and
- RA capacity forecasts in Form S-2A: 2024, plus ten (10) year forecast period (2024 to 2034).

The Energy Commission previously granted the same lengths of time for confidential treatment related to substantially similar information provided in CleanPowerSF's 2025 Supply forms.ⁱⁱⁱ

III. Certification

I certify that the information submitted in CleanPowerSF's 2026 Electricity Resource Plan supply forms is substantially similar to the previously submitted information in CleanPowerSF's 2025 Electricity Resource Plan supply forms and that all the facts and circumstances relevant to confidentiality remain unchanged.

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,

A handwritten signature in blue ink, appearing to read 'Michael A. Hyams', with a long horizontal flourish extending to the right.

Michael A. Hyams, Deputy Assistant General Manager
CleanPowerSF and Power Resources

ⁱ 20 Cal. Code Reg. § 2505(b); See Letter from Drew Bohan, Executive Director, California Energy Commission, dated December 6, 2024, designating information as confidential in CleanPowerSF's 2025 Supply Forms.

ⁱⁱ 20 Cal. Code Reg. § 2505(a)(4); See CleanPowerSF's 2025 Repeated Application for Confidentiality for Electricity Resource Plan Supply Forms, dated November 15, 2024.

ⁱⁱⁱ See Letter from Drew Bohan, Executive Director, California Energy Commission, dated December 6, 2024, designating information as confidential in CleanPowerSF's 2025 Supply Forms.