

<b>DOCKETED</b>	
<b>Docket Number:</b>	25-IEPR-02
<b>Project Title:</b>	Electricity Resource Plans
<b>TN #:</b>	267250
<b>Document Title:</b>	CCCE Confidentiality Application
<b>Description:</b>	N/A
<b>Filer:</b>	Justin Wynne
<b>Organization:</b>	Braun Blaising & Wynne
<b>Submitter Role:</b>	Applicant Representative
<b>Submission Date:</b>	11/14/2025 2:47:00 PM
<b>Docketed Date:</b>	11/14/2025

November 14, 2025

Drew Bohan  
Executive Director  
Docket No. 25-IEPR-02, Electricity Resource Plans  
California Energy Commission  
715 P Street  
Sacramento, CA 95814

**Re: Application of Central Coast Community Energy for Confidential Designation of Information Contained in its 2025 Electricity Demand Forecast**

Dear Mr. Bohan:

Central Coast Community Energy (“CCCE”) requests the California Energy Commission (“Commission”) designate information included in CCCE’s 2025 Electricity Resource Plan as confidential pursuant to Title 20, California Code of Regulations. (“CCR”), Section 2505 et seq. and the justifications set forth below. In accordance with the Commission’s *Forms and Instructions for Submitting Electricity Resource Plans and Transmission Information*<sup>1</sup> and the *Application for Confidential Designation*<sup>2</sup>, CCCE provides the following information in support of its application for confidentiality designation.

**Contact Information**

Applicant Name: Central Coast Community Energy  
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Proceeding Name: Electricity Resource Plans  
Docket Number: 25-IEPR-02

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

Leonardo Kim  
Director of Power Supply Resources  
Central Coast Community Energy  
Lkim@3ce.org

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<sup>1</sup> *Forms and Instructions for Submitting Electricity Resource Plans and Transmission Information*, Cal. Energy Commission (July 30, 2024), <https://efiling.energy.ca.gov/GetDocument.aspx?tn=258177&DocumentContentId=94146>. (TN #258177)

<sup>2</sup> *Application for Confidential Designation*, Cal. Energy Commission (April 23, 2023), [https://www.energy.ca.gov/sites/default/files/2023-04/CEC\\_13\\_Application%20for%20Confidential\\_04-24-2023.pdf](https://www.energy.ca.gov/sites/default/files/2023-04/CEC_13_Application%20for%20Confidential_04-24-2023.pdf).

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

For docket number 24-IEPR-02, CCCE seeks confidential treatment for the below listed cells of its IEPR 2025 Electricity Resource Plan (“Plan”), which contains information relating to energy demands, procurement, and resources. The Plan also includes details regarding capacity and energy procurement requirements and actual capacity and supply values for 2023-2034. The data highlighted in yellow in the submitted forms are considered confidential and correspond to this request.

<b>Cells to be Redacted</b>	<b>Information Protected in Cell</b>
<b>S-1_REQUIREMENT</b> Columns G-R, Rows: <ul style="list-style-type: none"> <li>• 11</li> <li>• 19</li> <li>• 20</li> <li>• 21</li> <li>• 22</li> <li>• 25</li> <li>• 29</li> <li>• 37</li> <li>• 39</li> <li>• 44</li> <li>• 45</li> <li>• 46</li> <li>• 50</li> </ul>	2023-2034 <u>Capacity Procurement Requirement (MW)</u> <ul style="list-style-type: none"> <li>• Forecast Total Peak-Hour 1-in-2 Demand</li> <li>• Adjusted Demand: End-Use Customers</li> <li>• Coincidence Adjustment (-)</li> <li>• Coincident Peak-Hour Demand</li> <li>• Required Planning Reserve Margin</li> <li>• Firm LSE Procurement Requirement</li> </ul> <u>Energy Procurement Requirement (GWh)</u> <ul style="list-style-type: none"> <li>• Forecast Total Energy Demand / Consumption</li> <li>• Adjusted Demand: End-Use Customers</li> <li>• Firm LSE Procurement Requirement</li> </ul> <u>Historic LSE Peak Load</u> <ul style="list-style-type: none"> <li>• Annual Peak Load / Actual Metered Deliveries</li> <li>• Date of Peak Load for Annual Peak Deliveries</li> <li>• Hour Ending for Annual Peak Deliveries</li> <li>• Adjusted Annual Peak Load</li> </ul>
<b>S-2_SUPPLY</b> Rows 32-189 <ul style="list-style-type: none"> <li>• Columns H</li> <li>• Columns M</li> <li>• Columns P-AA</li> <li>• Columns AC-AN</li> </ul> Rows 193-194 <ul style="list-style-type: none"> <li>• Columns P-AA</li> <li>• Columns AC-AN</li> </ul> Rows 196-199 <ul style="list-style-type: none"> <li>• Columns P-AA</li> <li>• Columns AC-AN</li> </ul>	<ul style="list-style-type: none"> <li>• Nameplate Capacity</li> <li>• Storage Duration Hours</li> <li>• 2023-2034 Actual Capacity for Total Renewable Contract Supply and Total Other Bilateral Contract Supply</li> <li>• 2023-2034 Energy Supply Resources for Total Other Bilateral Contract Supply</li> <li>• Total: Existing and Planned Supply</li> <li>• Net Surplus</li> </ul>
<b>S-2A_ADDENDUM MONTHLY</b> Rows 10-105 <ul style="list-style-type: none"> <li>• Columns G-DV</li> </ul>	<ul style="list-style-type: none"> <li>• Contract GWh 2025-2034</li> <li>• NQG MW 2025-2034</li> </ul>

S-5 TABLE Rows 9-145 <ul style="list-style-type: none"> <li>• Columns C</li> <li>• Columns G</li> <li>• Columns H</li> <li>• Columns I</li> <li>• Columns J</li> <li>• Contracts K</li> </ul>	<ul style="list-style-type: none"> <li>• Supplier / Seller</li> <li>• Contract Start Date</li> <li>• Contract Expiration Date</li> <li>• Capacity (MW) Under Contract</li> <li>• Contract / Agreement Products</li> <li>• Contract Type</li> </ul>
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### **Length of Time the Information Should Be Kept Confidential**

CCCE requests that the Commission keep CCCE's information confidential and protected from public disclosure for a period of 10 years. This length of time is needed because the data requested by the CEC includes detailed contract information, supply data, and load forecasts through 2034. Public disclosure of this information could allow market participants to use it competitively to the detriment of CCCE, its ratepayers, and the electricity market as a whole. Further, this extended period aligns with the long-term nature of the resource planning horizon and is consistent with the treatment of similar information in prior IEPR cycles.

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

CCCE seeks confidentiality for these Forms on the following basis:

1. Public Entity Designation. CCCE also 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 CCCE 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 the Plan is highly commercially sensitive, not publicly known, and if revealed could cause significant harm to load-serving entities ("LSEs"), like CCCE. 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 in question can be disclosed if it is aggregated with other LSE load forecast and supply information at a level that does not permit CCCE's confidential information to be derived from the aggregated data.

### **The Submitted Information Is Presently Confidential**

CCCE does not publicly disclose its capacity and energy procurement requirements, actual capacity and supply values, or detailed contract information such as supplier names, contract terms, and capacity commitments. This information is required in its 2025 IEPR Electricity Resource Plan and is highly market-sensitive. Public disclosure of these details could compromise CCCE's competitive position in the electricity market and harm CCCE's ratepayers by enabling other market participants to use this information for competitive advantage.

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 as a community choice aggregator, CCCE is a local government agency, and I am authorized to make the application and certification on behalf of CCCE.

*Leonardo Kim*

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