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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 Peninsula Clean Energy Authority for Confidential Designation of Information Contained in its 2026 Electricity Resource Plan

Dear Mr. Bohan:

Peninsula Clean Energy Authority (“PCEA”) requests the California Energy Commission (“Commission”) designate information included in PCEA’s 2026 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*¹ and the *Application for Confidential Designation*², PCEA provides the following information in support of its application for confidentiality designation.

Contact Information

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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:

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¹ *Forms and Instructions for Submitting Electricity Resource Plans and Transmission Information*, Cal. Energy Commission (July 24, 2025), <https://efiling.energy.ca.gov/GetDocument.aspx?tn=264986&DocumentContentId=101760>. (TN#264986)

² *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.

Description and Identification of Confidential Information

For docket number 25-IEPR-02, PCEA seeks confidential treatment for the below listed cells of its IEPR 2026 Electricity Resource Plan (“Plan”), which contains information relating to energy demands, procurement, and resources. The Plan also includes details regarding capacity and energy positions, monthly resource adequacy contract values, and short-term energy contract values.

Cells to be Redacted	Information Protected in Cell
S-1_REQUIREMENT Row 11, Columns I-R Row 19, Columns I-R Row 20, Columns I-R Row 21, Columns I-R Row 22, Columns I-R Row 24, Columns I-R Row 25, Columns I-R	<ul style="list-style-type: none">• 2025-2034 Forecast Total Peak-Hour 1-in-2 Demand• 2025-2034 Adjusted Demand: End-Use Customers• 2025-2034 Coincidence Adjustment (-)• 2025-2034 Coincident Peak-Hour Demand• 2025-2034 Required Planning Reserve Margin• 2025-2034 Firm Sales Obligations• 2025-2034 Firm LSE Procurement Requirement
S-2_SUPPLY Rows 32, Columns R-AA Rows 77, 80-83, 87-91, Column F Rows 94, Column R-AA Rows 117-135, Columns R-AA Rows 136-172, Columns AE-AN Rows 179-181, Columns R-AA Rows 179, 181, Columns AE-AN	<ul style="list-style-type: none">• 2025-2034 Actual Capacity• Queue Number• 2025-2034 Actual Capacity• 2025-2034 Actual Capacity• 2025-2034 Actual Supply <p>Total: Existing and Planned supply, Net Surplus</p> <ul style="list-style-type: none">• Energy Supply Resources• Capacity Supply Resources <p>Firm LSE Procurement Requirement</p> <ul style="list-style-type: none">• Capacity Supply Resources
S-2A_Addendum Monthly Rows 56, 62, 64, 66, 68, 74, 76, 78, 80, 82, Column E Columns G-DV, Rows 84-107	<ul style="list-style-type: none">• Queue Number• 2025-2034 Contract GWh and NQC MW
S-5 Table <ul style="list-style-type: none">• I9-I25, I71-I111	<ul style="list-style-type: none">• Capacity (MW) Under Contract

Length of Time the Information Should Be Kept Confidential

PCEA requests that the Commission keep PCEA’s information confidential and protected from public disclosure for a period of 3 years, until November 14, 2028. This length of time is needed to ensure that PCEA’s detailed bilateral contract information, supply data, and load forecast information and data, in its Plan remains secure from market participants that could make competitive use of this information to the detriment of PCEA, PCEA’s ratepayers, and the

electricity market as a whole. Further, this length of time is consistent with how the Commission has treated similar information.³

Provisions of Law Allowing the Commission to Keep the Documentation Confidential

PCEA seeks confidentiality for these Forms on the following bases:

1. **Previous Confidentiality.** Under the CCR, Title 20, Section 2505(a)(4), information submitted to the Commission can be deemed confidential without the need for a new application so long as the new information is substantially similar to information previously granted confidentiality. The Commission granted PCEA's previous confidentiality application requesting confidential treatment for its Electricity Resource Plan as provided in PCEA's application for confidential designation submitted on November 15, 2024 in Docket No. 24-IEPR-02. PCEA's application for confidential designation was granted by the Executive Director on December 20, 2024. The information requested in this Application is substantially similar to the information protected in 24-IEPR-02, and should be similarly protected.⁴
2. **Public Entity Designation.** PCEA 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 PCEA as confidential under the Public Records Act.
3. **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 PCEA. 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 PCEA's confidential information to be derived from the aggregated data.

³ See 23-IEPR-02 and 21-IEPR-03 (CEC Response Letters to confidentiality applications addressing similar information).

⁴ See 24-IEPR-02, *CEC Response Letter to Peninsula Clean Energy's Application for Confidentiality*, Dec. 20, 2024 (TN#: 260774).

The Submitted Information Is Presently Confidential

PCEA does not publicly disclose its capacity and energy positions, monthly resource adequacy contract values, and short-term energy contract values., which is information required in its 2026 IEPR Electricity Resource Plan. PCEA considers such information market sensitive, as public disclosure of this information could compromise PCEA'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 as a community choice aggregator, PCEA is a local government agency, and I am authorized to make the application and certification on behalf of PCEA.

/s/ Jeremy Waen

Jeremy Waen
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Peninsula Clean Energy Authority
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