

DOCKETED	
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Project Title:	Electricity Resource Plans
TN #:	267700
Document Title:	SDG&E_IEPR 2025_Supply Plan Filing - Application for Confidential Treatment
Description:	N/A
Filer:	Sarah Taheri
Organization:	San Diego Gas & Electric Company (SDG&E)
Submitter Role:	Applicant
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**APPLICATION FOR CONFIDENTIAL DESIGNATION
(20 CCR § 2505)**

2025 INTEGRATED ENERGY POLICY REPORT
Docket No. 25-IEPR-02 Electricity Resource/Supply Plans

Applicant: San Diego Gas & Electric Company (“SDG&E”)

Attorney for Applicant: Aimee M. Smith
Address of Applicant: 8330 Century Park Court, CP 32
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1. Identification of the Information Being Submitted

SDG&E requests confidential treatment for data included in its Electricity Resource Planning Supply Forms S-1, S-2, and S-5 concurrently submitted to the California Energy Commission (“Commission”) in accordance with the Commission’s instructions in the above-referenced docket. The confidential information being submitted is indicated in yellow highlight in the Excel workbook titled SDGE_Supply_Forms_2025_CONFIDENTIAL_Final. The total file size is approximately two megabytes.

2. Description of the Data or Information for which Confidentiality Is Being Sought

The information for which confidential designation is requested generally pertains to SDG&E’s electric resource planning, energy balance resource accounting, bilateral contracts and power purchase agreements.

3. Description of the period for which confidentiality is being sought

SDG&E requests that the data indicated be kept confidential for a period of three years from the date of this filing. Protection for this length of time is required to ensure that SDG&E’s market-sensitive data is not disclosed to other market participants, who could make competitive use of this information to the detriment of utility ratepayers. The three-year confidentiality period requested by SDG&E is consistent with the protection afforded to this same data by the California Public Utilities Commission (“CPUC”). Three years is adequate time for the demand forecast data to become “stale” in terms of price movement in the relevant markets, and SDG&E has no objection to the data being made public after that time.

4. Information is Substantially Similar to Information Previously Deemed Confidential by the Commission Continues to Warrant Confidential Treatment

California Code of Regulations (“CCR”), Title 20, § 2505(a)(4) states:

“Repeated Applications for Confidential Designation. If an applicant is seeking a confidential designation for information that is substantially similar to information that was previously deemed confidential by the CEC pursuant to section 2508, or for which an application for confidential designation was granted by the executive director pursuant to 2505(a)(3)(A) of this section, the new application need contain only a certification, executed under penalty of perjury, stating that the information submitted is substantially similar to the previously submitted information and that all the facts and circumstances relevant to confidentiality remain unchanged. An application meeting these criteria will be approved.”

Attachment A to this Application includes certifications executed under penalty of perjury affirming that the submitted information is substantially similar to information previously submitted to the Commission by SDG&E and granted confidential treatment, and that the facts and circumstances relevant to confidentiality remain unchanged. These certifications apply to the categories of information listed in Section 2 above. In accordance with California Code of Regulations (“CCR”), Title 20, § 2505(a)(4), this information should be deemed confidential.

I certify under penalty of perjury that the information contained in this application is true, correct, and complete to the best of my knowledge. SDG&E is a California corporation, and I am authorized to make the application and certification on behalf of SDG&E.

Respectfully submitted this 21st day of November, 2025.

/s/ Aimee Smith

Aimee Smith

Attorney for:
SAN DIEGO GAS & ELECTRIC
COMPANY

ATTACHMENT A

Certifications Regarding Information Substantially Similar to Information Previously Deemed Confidential by the Commission

- ***Certification of Kenneth Schiermeyer***
- ***Certification of James Elias***
- ***Certification of Matt Richardson***

**CERTIFICATION REGARDING INFORMATION SUBSTANTIALLY SIMILAR
TO INFORMATION PREVIOUSLY DEEMED
CONFIDENTIAL BY THE COMMISSION
Docket Number 25-IEPR-02 Electricity Resource/Supply Plans**

As described in the attached Application, San Diego Gas & Electric Company (“SDG&E”) respectfully requests pursuant to California Code of Regulations (“CCR”), Title 20, § 2505(a)(4) that the California Energy Commission (the “Commission”) grant confidential treatment to the following information until December 31, 2028, or such time as it may be publicly released, whichever is earlier:

IEPR Form S-1: Forecast Total Peak-Hour 1-in-2 Demand, Col I-R, Row 11

IEPR Form S-1: Adjusted Demand: End-Use Customers, Col I-R, Row 19

IEPR Form S-1: Coincident Peak-Hour Demand, Col I-R, Row 21

IEPR Form S-1: Required Planning Reserve Margin, Col I-R, Row 22

IEPR Form S-1: Firm LSE Procurement Requirement, Col I-R, Row 25

IEPR Form S-1: Forecast Total Energy Demand/ Consumption, Col I-R, Row 29

IEPR Form S-1: Adjusted Demand: End-Use Customers, Col I-R, Row 37

IEPR Form S-1: Firm LSE Procurement Requirement, Col I-R, Row 39

The Commission has previously granted designations of confidentiality for data substantially similar to the data referenced above. *See, e.g., Response to Application for Confidentiality – San Diego Gas & Electric Co. IEPR Electricity Resource Plan Submission*, Docket No. 11-IEP-1B (June 3, 2011); *Response to SDG&E’s Application for Confidentiality for the 2013 Integrated Energy Policy Report Electricity Resource Plan Submission*, Docket No. 13-IEP-1B (June 10, 2013); *Response to San Diego Gas & Electric Company’s Application for Confidentiality for Resource Plan Forms*, Docket No. 15-IEPR-02-Electricity Resource Plans (June 5, 2015).

Accordingly, pursuant to 20 CCR § 2505(a)(4), SDG&E submits the following certification regarding the Commission’s prior confidentiality designations.

1. I certify under penalty of perjury that the information described above for which SDG&E seeks confidential treatment is substantially similar to data previously designated as confidential in prior IEPR dockets, and the facts and circumstances relevant to confidentiality remain unchanged; and
2. I am authorized to make this application and certification on behalf of SDG&E.

Date: November 21, 2025

By: /s/ KENNETH SCHIERMEYER
Kenneth Schiermeyer
Electric Forecasting and Analysis
Manager
San Diego Gas & Electric Company

**CERTIFICATION REGARDING INFORMATION SUBSTANTIALLY SIMILAR
TO INFORMATION PREVIOUSLY DEEMED
CONFIDENTIAL BY THE COMMISSION
Docket Number 25-IEPR-02 Electricity Resource/Supply Plans**

As described in the attached Application, San Diego Gas & Electric Company (“SDG&E”) respectfully requests pursuant to California Code of Regulations (“CCR”), Title 20, § 2505(a)(4) that the California Energy Commission (the “Commission”) grant confidential treatment to the following information until December 31, 2028, or such time as it may be publicly released, whichever is earlier:

IEPR Form S-2: Total Utility-Controlled Fossil Fuel Supply, Col AC-AM, Row 10-15

IEPR Form S-2: Total Hydroelectric Supply, Col AC-AM, Row 19-25

IEPR Form S-2: Total Utility-Controlled Renewable Supply, Col AC-AM, Row 26-27

IEPR Form S-2: Total Utility-Controlled Battery Supply, Col AC-AM, Row 28-50

IEPR Form S-2: Total Qualifying Facility (QF) Contract Supply, Col AC-AM, Row 54, Row 58

IEPR Form S-2: Total Other Bilateral Contract Supply, Col AC-AM, Row 103-118, Row 120-135

IEPR Form S-2: Total: Running Total of Unbundled RECs (GWh in Energy Table only), Col P-AA, Row 136-137

IEPR Form S-2: Total: Existing and Planned Supply, Col P-AA, Col AC-AM, Row 141

IEPR Form S-2: Firm LSE Procurement Requirement, Col P-AA, Col AC-AM, Row 142

IEPR Form S-2: Net Surplus (or Need), Col P-AA, Col AC-AM, Row 143

IEPR Form S-2: Specified Planning Reserve Margin, Col P-AA, Row 146

IEPR Form S-2A: Col G-DV, Rows (10, 12, 14, 16, 18, 20, 22, 24, 26, 28, 30, 32, 34, 36, 38, 40, 42, 44, 46, 48, 50, 52, 54, 56, 58, 60, 62, 64, 66, 68, 70, 72, 156, 158, 160, 162, 164, 166, 168, 170, 172, 174, 176, 178, 182, 184, 186, 188, 190, 192, 194, 196, 198, 200, 202, 204, 206, 208, 210, 212)

The Commission has previously granted designations of confidentiality for data substantially similar to the data referenced above. *See, e.g., Response to Application for Confidentiality – San Diego Gas & Electric Co. IEPR Electricity Resource Plan Submission*, Docket No. 11-IEP-1B (June 3, 2011); *Response to SDG&E’s Application*

for Confidentiality for the 2013 Integrated Energy Policy Report Electricity Resource Plan Submission, Docket No. 13-IEP-1B (June 10, 2013); *Response to San Diego Gas & Electric Company's Application for Confidentiality for Resource Plan Forms*, Docket No. 15-IEPR-02-Electricity Resource Plans (June 5, 2015).

Accordingly, pursuant to 20 CCR § 2505(a)(4), SDG&E submits the following certification regarding the Commission's prior confidentiality designations.

1. I certify under penalty of perjury that the information described above for which SDG&E seeks confidential treatment is substantially similar to data previously designated as confidential in prior IEPR dockets, and the facts and circumstances relevant to confidentiality remain unchanged; and
2. I am authorized to make this application and certification on behalf of SDG&E.

Date: November 21, 2025

By: /s/ JAMES ELIAS

James Elias

Senior Resource Planner

San Diego Gas & Electric Company

**CERTIFICATION REGARDING INFORMATION SUBSTANTIALLY SIMILAR
TO INFORMATION PREVIOUSLY DEEMED
CONFIDENTIAL BY THE COMMISSION**

Docket Number 25-IEPR-02 Electricity Resource/Supply Plans

As described in the attached Application, San Diego Gas & Electric Company (“SDG&E”) respectfully requests pursuant to California Code of Regulations (“CCR”), Title 20, § 2505(a)(4) that the following categories of information be designated as confidential by the Commission to the end of the calendar year that is at least three years after the starting date of the indicated contract or one year after the expiration date, whichever comes first:¹

IEPR Form S-5: Contract Start Date, Col G, Rows 10, 60, 62-70

IEPR Form S-5: Contract Expiration Date, Col H, Rows 10, 60, 62-70

IEPR Form S-5: Capacity (MW) Under Contract, Col I, Rows 10, 60, 62-70

The Commission has previously granted designations of confidentiality for data substantially similar to the data referenced above. *See, e.g., Response to Application for Confidentiality – San Diego Gas & Electric Co. IEPR Electricity Resource Plan Submission*, Docket No. 11-IEP-1B (June 3, 2011); *Response to SDG&E’s Application for Confidentiality for the 2013 Integrated Energy Policy Report Electricity Resource Plan Submission*, Docket No. 13-IEP-1B (June 10, 2013); *Response to San Diego Gas & Electric Company’s Application for Confidentiality for Resource Plan Forms*, Docket No. 15-IEPR-02-Electricity Resource Plans (June 5, 2015).

Accordingly, pursuant to 20 CCR § 2505(a)(4), SDG&E submits the following certification regarding the Commission’s prior confidentiality designations.

¹ *Response to SDG&E’s Application for Confidentiality for the 2013 Integrated Energy Policy Report Electricity Resource Plan Submission*, Docket No. 13-IEP-1B (June 10, 2013), p. 5.

1. I certify under penalty of perjury that the information described above for which SDG&E seeks confidential treatment is substantially similar to data previously designated as confidential in prior IEPR dockets, and the facts and circumstances relevant to confidentiality remain unchanged; and
2. I am authorized to make this application and certification on behalf of SDG&E.

Date: November 21, 2025

By: /s/ MATT RICHARDSON
Matt Richardson
Contract Administrator
San Diego Gas & Electric Company