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| Docket Number:   | 25-IEPR-02  |
| Project Title:   | Electricity Resource Plans                          |
| TN #:            | 267710  |
| Document Title:  | PG&E 2025 IEPR Supply Forms Confidentiality Request |
| Description:     | N/A   |
| Filer:           | Fariya Ali  |
| Organization:    | Pacific Gas & Electric                              |
| Submitter Role:  | Intervenor  |
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# REPEATED APPLICATION FOR CONFIDENTIAL DESIGNATION

(20 CCR SECTION 2505)

# 2025 INTEGRATED ENERGY POLICY REPORT

Docket Number 25-IEPR-02

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

Attorney for Applicant: Daniel S. Hashimi

Senior Counsel

Address of Attorney: Law Department

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

Electricity Resource Plan Supply Forms issued by the California Energy Commission(CEC) for the 2025 Integrated Energy Policy Report (IEPR).

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

PG&E is providing the information as requested in Electricity Resource Plan Supply Forms S-1 (Capacity / Energy Requirement), Form S-2 (Capacity / Energy Supply Resources), Form S-2A (Addendum Monthly Capacity and Energy Data), and Form S-5 (Bilateral Contracts and Power Purchase Agreements). PG&E is requesting confidential designation for certain information designated as confidential in Electricity Resource Planning Forms S-1, S-2, S-2A, and S-5.

The data for which PG&E seeks confidential designation in the S-1, S-2, S-2A, and S-5 forms are clearly highlighted in yellow, and the confidential versions are conspicuously labeled as Confidential.

PG&E has provided Form S-1, S-2, S-2 Addendum (S-2A), and S-5. The CEC granted confidentiality to the below and similar data categories in the 2007, 2009, 2011, 2013, 2015, 2017, 2019, 2021, 2022, 2023, and 2024 IEPR forms. PG&E's request for confidentiality in these 2025 IEPR forms is consistent with those decisions for similar data. The new data being provided this year in these categories are unchanged or substantially similar to that provided in the 2007, 2009, 2011, 2013, 2015, 2017, 2019, 2021, 2022, 2023 and 2024 IEPR forms. PG&E requests that these categories be deemed confidential for the same reasons as presented in the 2007, 2009,2011, 2013, 2015, 2017, 2019, 2021, 2022, 2023 and 2024 IEPR, and that this Application be considered a **Repeated Application**.

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

Consistent with previous IEPR proceedings, PG&E requests that the specific categories of information listed for Form S-5 remain confidential through December 31, 2030, or the contract expiration date, whichever is later. Also consistent with previous IEPR proceedings, PG&E requests that the specific categories of information listed for Form S-1, Form S-2, and Form S-2A remain confidential for three years from the date of this application (i.e., to November 21, 2028).

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

**Supply Form S 1:** (Capacity / Energy Procurement Requirement)

PG&E requests confidentiality for the following data for the specified years:

- Line 1: Forecast Total Peak Hour 1-in-2 Demand (2025 through 2028)
- Line 5: Adjusted Demand: End-Use Customers (2025 through 2028)
- Line 6: Coincidence Adjustment (2025 through 2028)
- Line 7: Coincident Peak-Hour Demand (2025 through 2028)
- Line 8: Required Planning Reserve Margin (2025 through 2028)
- Line 11: Firm LSE Procurement Requirement (2025 through 2028)
- Line 12: Forecast Total Energy Demand/Consumption (2027 through 2028)
- Line 16: Adjusted Demand: End-Use Customers (2027 through 2028)
- Line 17: Firm Sales Obligations (2027 through 2028)
- Line 18: Firm LSE Procurement Requirement (2027 through 2028)

# **Supply Form S-2:** (Capacity / Energy Supply Resources)

PG&E requests confidentiality for the following data for the specified years:

#### **Capacity Supply Resources section:**

- Line 1h: PGE Moss Landing Energy Storage (2025 through 2034)
- Line 5a: Total Qualifying Facility (QF) Contract Supply (2025 through 2034)
- Line 5g: Natural Gas (2025 through 2034)
- Line 5h: Other (2025 through 2034)
- Line 7a: Total Other Bilateral Contract Supply (2025 through 2034) [each individual contract broken down, lines 7b through 7dt]
- Line 10: Firm LSE Procurement Requirement (2025 through 2028 for Capacity, 2027 through 28 for Energy)
- Line 11: Net Surplus (or Need) (2025 through 2028 for Capacity, 2027 through 28 for Energy)

## **Energy Supply Resources section:**

- Line 1a: Total Fossil Fuel Supply (2026 through 2034) [each supply source broken down: New Humboldt Generation Station and Gateway Generation Station, Fuel Cells: UTC Units 1 and 2, Bloom Generation Station and Colusa Generation Station, Moss Landing Battery Energy Storage lines 1b-1h]
- Lines 2a, 2b, 2c: Total Nuclear Supply, Diablo Canyon 2 and Diablo Canyon 1 (2026 through 2028)
- Line 3a: Total Hydroelectric Supply (2026 through 2028)
- Line 3b: Hydro Supply from Plants 30 MW or More (2026 through 2028) [each individual plant of 30 MW or more broken down, lines 3d through 3bd, and 3cg]
- Line 5 a: Total Qualifying Facility (QF) Contract Supply (2026 through 2034)
- Line 5g: Natural Gas QF Contract Supply (2026 through 2034)
- Line 5h: Other QF Contract Supply (2026 through 2034)

- Line 6: Renewable Contract Supply (2026 through 2034) [each individual contract/source broken down, lines 6jy through 6kf]
- Line 7a: Total Other Bilateral Contract Supply (2025 through 2034) [each individual contract/source broken down, lines 7b through 7dt]
- Line 10: Firm LSE Procurement Requirement (2027 through 2028)
- Line 11: Net Surplus (or Need) (2027 through 2028)
- Line 12: Generic Renewable Supply (2025 through 2034)
- Line 13: Generic Non-Renewable Resources (2025 through 2034)

## **S2A-Addendum Monthly tab:**

- For select resources, Contract GWh and NQC MW (2025 through 2034)
- For select resources, Contract GWh (2025 through 2034)

## **Supply Form S-5** (Bilateral Contracts Table)

PG&E is requesting a Confidential Designation for the below-listed categories of data provided in Form S-5 for 44contracts. The information covered by these data categories in the 2025 IEPR includes competitively and commercially sensitive business and resource-planning information, protected under the Public Records Act.

To release this information publicly would allow market participants to have access to competitively sensitive information that would normally not be available to them in this form or format. Additionally, release of this information could allow other parties to achieve a competitive advantage that could potentially harm PG&E's customers through higher power prices. Specifically, the identified data includes commercially sensitive information regarding the status of projects not yet operational.

The type of information covered by these data categories in the 2025 IEPR is the same or substantially similar in nature to information granted confidentiality by the CEC as part of the 2022 IEPR, as well as in previous IEPR proceedings (2007, 2009, 2011, 2013, 2015, 2017, 2019, 2021, 2022 and 2024). PG&E requests that the information be deemed confidential for the specified contracts because these disclosure concerns are still relevant. Cells requested to be confidential are clearly highlighted in yellow, per the CEC's request.

PG&E requests confidentiality for the below-noted cells in the following columns:

- Column C, Supplier / Seller: cells 414-438
- Column G, Contract Start Date: cells 210, 235, 240, 247, 248, 254-256, 258-265, 276-279, 332, 333, 340, 341, 382-385, 400-413
- Column H, Contract Expiration Date: cells 210, 235, 240, 247, 248, 254-256, 258-265, 276-279, 332, 333, 340, 341, 382-385, 400-413438
- Column I, Capacity (MW) Under Contract: 414-438

#### 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 and that I am authorized to make the application and certification on behalf of the Applicant.

Dated: November 21, 2025

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

Name: Daniel S. Hashimi Title: Senior Counsel

Pacific Gas and Electric Company