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| Project Title: | Electricity Resource Plans |
| TN #: | 268008 |
| Document Title: | Updated Confidentiality Application for MCE Resource Plan |
| Description: | N/A |
| Filer: | Troy Nordquist |
| Organization: | Marin Clean Energy |
| Submitter Role: | Public Agency |
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Empowering Our Clean Energy Future

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December 19, 2025

California Energy Commission

Dockets Office, MS-4

Re: Docket No. 25-IEPR-02

1516 Ninth Street

Sacramento, CA 95814-5512

Re: MCE's Updated Application for Confidentiality for Electricity Resource Planning Forms

As a supplement to its application filed on November 14, 2025, Marin Clean Energy (MCE) hereby submits its updated application for confidentiality requesting certain responses on its Electricity Resource Planning Forms be treated as confidential for the time period stated herein.

I. Identification of Confidential Information

The following data is requested to be kept confidential per the specifications listed below:

- S-1 Requirement Form
 - Capacity Procurement Requirement for years 2025 – 2034
 - Lines 1, 5-8, and 11, Columns I-R
- S-2 Supply Form
 - Total Renewable Contract Supply for years 2023 – 2034
 - Lines 6aa-6eb, Columns P-AA
 - Total Other Bilateral Contract Supply for years 2023 – 2034
 - Lines 7aa-7id, Columns P-AA and Columns AE-AN
 - Total Existing and Planned Supply for years 2025 – 2034
 - Line 9, Column R-AA and Columns AE-AN
 - Firm LSE Procurement Requirement for years 2025 – 2034
 - Line 10, Column R-AA
 - Net Surplus (or Need) for years 2025 – 2034
 - Line 11, Column R-AA and Columns AE-AN
 - Generic Renewable Supply for years 2025 – 2034
 - Line 12, Columns R-AA
 - Generic Non-Renewable Resources for years 2025 – 2034
 - Line 13, Column R-AA
- S-2A Addendum Monthly Form
 - 2025-1 – 2034-12
 - Entirety of Columns G-DV
- S-5 Table
 - Capacity (MW) Under Contract
 - Column I in its entirety

II. Description of Confidential Data

The data MCE submits in the sections identified above falls into two broad categories: 1) Information related to MCE's resource adequacy obligation, forecasts, and projected compliance, and 2) MCE's energy demand forecasts and projected Renewables Portfolio Standard compliance.

III. Requested Time Period of Confidential Treatment

MCE requests confidential treatment for three (3) years from the submission of this Electricity Resource Planning Form. Therefore, MCE requests confidential treatment of the sections identified above until November 14, 2028.

IV. Justification for Request of Confidential Treatment

- A. **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 MCE's previous confidentiality application requesting confidential treatment for its Electricity Resource Plan as provided in MCE's application for confidential designation submitted on November 15, 2024 in Docket No. 24-IEPR-02. MCE'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.¹
- B. **Public Entity Designation.** MCE 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 MCE as confidential under the Public Records Act.
- C. **Balancing Test.** California Government Code Section 7922.000 (previously Section 6255(a)) allows for information to be exempt from public disclosure if on the facts the public interest in nondisclosure clearly outweighs the public interest in disclosure. Confidential protection for the specified information in Forms S-1, S-2, S-2A, and S-5 is justified because the specified information constitutes confidential and market-sensitive information that is not generally known to the public, which, if released, would place MCE at a competitive disadvantage to other LSEs and market participants. Public access to this information could be used by others to gain economic value from its disclosure. This could negatively impact MCE's position in the market to the detriment of MCE's ratepayers.

Consequently, disclosure of this information could impact market prices and would compromise MCE's ability to procure renewable energy resources on terms favorable to its ratepayers. Further, the data and information: (1) is not already public; and (2) cannot be aggregated, redacted, summarized or otherwise protected in a way that allows partial disclosure.

¹ See 24-IEPR-02, CEC Response Letter to Silicon Valley Clean Energy Authority's Application for Confidentiality, Dec. 20, 2024 (TN#: 260780).

V. Declaration of Chief Operations Officer

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 MCE.

Sincerely,

Signed by:



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Vicken Kasarjian
MCE Chief Operations Officer