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REPEAT APPLICATION FOR CONFIDENTIAL DESIGNATION
(20 CCR SECTION 2505)

2025 INTEGRATED ENERGY POLICY REPORT

Docket Number 25-IEPR-03

Electricity Demand Forecast

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

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

This information is being submitted in response to a request from the California Energy Commission (CEC) via email on November 7, 2025, as well as a subsequent email request from the CEC on December 1, 2025. The CEC requested the following information for data center projects: 1) application status (group #), 2) total capacity requested (MW), 3) ramping schedule (MW/year), 4) the LSE expected to be responsible for procurement of each project, 5) CEC-defined forecast zone approximation 6) project identifiers consistent with the previous data submittal (including any cancelled projects for tracking purposes), 7) project identifiers consistent with the projects submitted for the 2024 IEPR, and 8) project identifiers consistent with the ERRA filing to the CPUC. In response to this request, Pacific Gas and Electric Company (PG&E) is providing disaggregated information for each facility: 1) project status (CEC-defined group # for applications, active/inactive for inquiries), 2) total capacity requested, 3) capacity ramp schedule (only for applications), 4) capacity ramp schedule uncertainty flag (+ year of latest energization) (only for certain applications), 5) name of CCA serving the area, 6) whether the project is expected to be served by direct access, 7) CEC-defined forecast zone approximation, 8) project identifiers consistent with the September 2025 CEC data submittal, 9) project identifiers consistent with the projects submitted for the 2024 IEPR, and 10) project identifiers consistent with the ERRA filing to the CPUC. Exceptions to providing this data include instances where the data does not exist. The CEC's original deadline for this request of December 5, 2025 was extended to the week of December 8, 2025; however, the CEC provided an extension to January 21, 2026 specifically for instances where PG&E had to conduct additional customers notifications.

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

PG&E is requesting confidential designation for the following parts of the record: 1) project status (CEC-defined group # for applications, active/inactive for inquiries), 2) total capacity requested, 3) capacity ramp schedule (only for applications), 4) capacity ramp schedule uncertainty flag (+ year of latest energization) (only for certain applications), 5) name of CCA serving the area, 6) whether the project is expected to be served by direct access, and 7) CEC-defined forecast zone approximation.

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

PG&E requests confidentiality for this information based on the following grounds:

- California Code of Regulations, Title 20, Section 2505(a)(5) provides that information submitted by a private third party shall be designated confidential without an application for confidentiality if the requirements of subsections 2505(a)(5)(A) and (B) are met. The confidential information being submitted by PG&E meets the requirements of these subsections. The confidential information submitted is properly labeled as confidential satisfying the requirement of Section 2505(a)(5)(A), and the confidential information has not been previously released and falls within the category of subsection 2505(a)(5)(B)(1)(a) as commercial customer sector information that includes customer identifiers, energy consumption, and other information that could allow a third party to uniquely identify the specific commercial customer. The data centers' total capacity

requested, capacity ramping schedules, and application status are private unique information that can be used as individual customer identifiers of energy consumption and demand rate by a third party.

- PG&E is under a confidentiality obligation under a non-disclosure agreement with the data centers that prohibits PG&E from publicly disclosing such private information for these customers. Although PG&E is supportive of working with the CEC and cooperating to be responsive to CEC's data request, however, the disclosure of the confidential information requested by the CEC would cause PG&E to violate its legal obligations to its customers in the absence of approval of PG&E's confidentiality request in this application. Disclosure of the confidential information without a confidentiality approval by the CEC would cause PG&E to violate its legal obligations to its customers, erode trust in PG&E's ability to maintain the confidentiality of information shared by customers, and cause to prevent future information sharing with the utility by its customers.
- California Government Code Section 6254.16 states that, subject to certain exceptions, the Public Records Act does not "require the disclosure of the name, *utility usage data*, home address, or telephone number of utility customers of local agencies." (emphasis added). This section of the government code protects utility customers energy usage data such as the energy usage information that can be gleaned from total capacity requested or capacity ramping schedules. In the event such private confidential information of customers is obtained by third parties, third parties can use such information to calculate and determine individual data center customer utility usage data.
- The confidential information being submitted is PG&E proprietary information and a trade secret. The information has independent value to PG&E and has been disclosed in secret by data center customers under a non-disclosure agreement to PG&E. PG&E derives significant value in the free exchange of information, including confidential information shared pursuant to a non-disclosure agreement, with its customers to be able to respond to their needs and demands and provide utility services to its customers at the lowest cost in the most reasonably effective way. Disclosure of such confidential proprietary information and trade secret would disadvantage PG&E and its customers as it would erode trust between the parties, prevent future disclosure of information and likely create unnecessary costs that would result in higher rates and less efficient service for PG&E customers. The confidential data center total capacity, capacity ramping schedules, and application status cannot be acquired or duplicated by any third party since it is unique individualized private customer information shared with PG&E under a non-disclosure agreement.

PG&E requests that the confidential designation of this information herein be maintained indefinitely. The information underlying this record was provided by customers to PG&E under a non-disclosure agreement that such information would remain confidential and does not indicate any expiration to the terms of nondisclosure; consequently, PG&E requests indefinite confidentiality for this information.

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

PG&E is requesting confidential designation for the following parts of the record: 1) project status (CEC-defined group # for applications, active/inactive for inquiries), 2) total capacity requested, 3) capacity ramp schedule (only for applications), 4) capacity ramp schedule uncertainty flag (+ year of latest energization) (only for certain applications), 5) name of CCA serving the area, 6) whether the project is expected to be served by direct access, and 7) CEC-defined forecast zone approximation.

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. I also certify that I am authorized to make the application and certification on behalf of Pacific Gas and Electric Company.

January 21, 2025

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

Name: Daniel S. Hashimi

Title: Senior Counsel
Pacific Gas and Electric Company