DOCKETED	
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Project Title:	Electricity Resource Plans
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Document Title:	2026 IEPR Supply Form Request for Confidential Treatment
Description:	Confidentiality Request for the 2026 IEPR Suppl y Report
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Submitter Role:	Applicant
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STATE OF CALIFORNIA
ENERGY RESOURCES CONSERVATION
AND DEVELOPMENT COMMISSION

In the Matter of: Integrated Energy Policy Report (IEPR) - Supply Plan -2026	26-IEPR-02 (Electricity Resource Plans)

APPLICATION OF DIRECT ENERGY BUSINESS, LLC
FOR DESIGNATION OF CONFIDENTIAL RECORDS

Pursuant to Section 25322 of the Public Resources Code ("PRC") and Section 2505(a) of Title 20 of the California Code of Regulations ("CCR"), Direct Energy Business, LLC, ("Applicant"), hereby requests that the Commission designate as confidential the information specified herein and submitted by Applicant on **November 11, 2026** concerning Applicant's bilateral contract information contained in Electricity Resource Planning Forms S-1, S-2 and S-5, respectively.

I. ELECTRICITY RESOURCE PLANNING FORMS

A. Form S-1— REQUIREMENT

1. Capacity Resource Accounting Table

Applicant has submitted Form S-1 that contains data for each utility distribution area in which it has forecasted load, with Form S-1 containing the following information for the applicable utility distribution areas that we deem as being confidential in nature and should remain confidential:

- Applicant's Forecast **Total Peak-Hour** load demand, in megawatts ("MWh"), for the period **2024 - 2035**.
- Applicant's forecast **Demand Existing Customer Contracts** (MWh) for the period **2026 - 2035**.
- Applicant's forecast **Demand and Renewed Contracts** for the period **2024 - 2035**.
- Applicant's annual peak-hour load **ESP Demand by Utility Distribution Area (MWh) lines 2c, 2d, and 2e**, for the period **2024 – 2035.**
- Applicants **Additional Achievable Energy Efficiency (MWh**) for the period **2024 – 2035**.
- Applicants **Demand Response / Interruptible Programs** for the period **2024 – 2035.**

- Applicant's **Adjusted Demand: End Use Customer** calculation for the period **2024 - 2035**.
- Applicant's **Coincident Peak-Hour Demand** calculation for the period **2024-2035**.
- Applicant's **Required Planning Reserve Margin** (MWh), for the period **2024 - 2035**.
- Applicant's forecast of **Firm Sales Obligations** (MWh), for the six-year period **2021 – 2026**.
- Applicant's **Firm LSE Procurement Requirement** (MWh), for the period **2024 – 2035**.

2. Energy Procurement Requirement Table

- Applicant's annual **Forecast Total Energy Demand / Consumption** for the period **2024 - 2035**.
- Applicant's forecast annual energy **Demand /Consumption (MWh) Existing Customer Contracts** for the period **2026 - 2035**.
- Applicant's forecast annual energy **Demand (MWh): New and Renewed Contracts** for the period **2024 - 2035**.
- Applicant's forecast annual energy **Demand (MWh), by Utility Distribution Area**, (lines 13c, 13d and 13e) for the period **2024 – 2035**.
- Applicant's **Additional Achievable Energy Efficiency, Demand Response / Interruptible programs and Adjusted Demand: End-User Customers** (MWh), for the six-year period **2024 - 2035**.
- Applicant's **Firm Sales Obligations** for the period **2024 - 2035**.
- Applicant's Firm **LSE Procurement Requirement** for the period **2024 - 2035**.

3. Historic LSE Peak Load:

- Applicant's **Peak Load / Actual Metered Deliveries** for the period **2024 – 2025.**
- Applicant's **Date of Peak Load for Annual Peak Deliveries** for period **2024 – 2025.**
- Applicant's **Hour Ending for Annual Peak Deliveries** for period **2024 -2025.**
- Applicant's **Adjusted Annual Peak Load** for period **2024 -2025.**

Additional information and details related to the Supply Plans for Direct Energy Business, LLC can be found in RPS and IRP filings made with the Commission.

B. Form S-2 — Energy Resource Supply Table

Applicant has submitted Form S-2 that contains data for each Capacity Supply Resource (MW), with Form S-2 containing the following information that we deem confidential in nature and should remain confidential:

1) Applicant's **Total Renewable Contract Supply (lines 6b -6d)**; that contains **Contract Name**; **Plant /Unit Identifier CEC ID**; **Plant /Unit Identifier EIA ID**; **Plant /Unit Identifier CAISO ID**; **Fuel Type**; **Name plate Capacity, BA Latitude, Longitude, County and Storage Duration Hours** for the Energy Supply Resources (GWh) for the years **2024 – 2035**.

2) Applicants **Total Other Bilateral Contract Supply** that contains the **Contract Name; Plant /Unit Identifier CEC ID; Plant /Unit Identifier EIA ID; Plant /Unit Identifier CAISO ID; Fuel Type, Name plate Capacity, BA Latitude, Longitude, County and Storage Duration Hours** for year period of **2024 – 2035**.

3) Applicant's **Short Term and Spot Market Purchases (Sales)** for years **2024 – 2035**.

4) Applicant's **Capacity / Energy Balance Summary**:

    (i) **Total Existing and Planned Resources (MWh**) for years **2024 - 2035**

    (ii) **Firm LSE Procurement Requirement (MWh)** for years 2024 - 2035.

    (iii) Applicant's **Net Surplus (or Need)** for year period **2024 – 2035**.

Additional information and details related to the Supply Plans for Direct Energy Business, LLC can be found in RPS and IRP filings made with the Commission.

C. Form S-5 — Bilateral Contracts and Power Purchase Agreements

Applicant has submitted Form S-5 that contains detailed information about each bilateral contract and power purchase agreement with a term of three months or more that it has signed with suppliers of energy and capacity. The contract information contained in Form S-5 includes **Contract Name; Fuels; Supplier / Seller, Unit Contingent; Generating Unit(s) Specified; Supply Resources(s) Balancing Area; Supply Resources(s) Delivery Zone / Point; Contract Start /Expiration Date, Capacity Under Contract, Contract / Agreement Products; Contract Type; and Resource Type**. This data is deemed confidential in nature and should remain confidential.

Additional information and details related to the Supply Plans for Direct Energy Business, LLC can be found in RPS and IRP filings made with the Commission.

D. Request for Confidential Designation

Applicant requests that all of the information identified as confidential in **Form S-1 and Form S-2 be designated as confidential for three (3) years** including the reporting year, i.e., to **December 31, 2029**. In addition, Applicant requests that all of the information contained in **Form S-5 be designated as confidential for three years** including the reporting year (i.e., to **December 31, 2029**) or through the end of the contract term, whichever is later.

E. Grounds for Confidential Designation

Section 2505(a)(4) of the Commission's regulations provides that an application for designation of confidential records will be granted if the information for which the applicant is seeking a confidential designation is "substantially similar to information that was previously deemed confidential by the Commission."

On April 13, 2007, Applicant submitted its responses to the Commission's Electricity Resources data requests for the 2005 IEPR. Applicant's responses included the following Electricity Supply forms:

- Form S-1 — Capacity Resource Accounting Tables
- Form S-2 — Energy Resource Balance Accounting Tables
- Form S-5 — Bilateral Contracts

At the time Applicant submitted the above Electricity Supply forms, it submitted an application to the Executive Director requesting that the information reported in the forms be designated as confidential on the grounds that the information contains trade secrets, and that disclosure of the information would cause Applicant to suffer a loss of competitive advantage.

By letter dated February 27, 2007, the Executive Director granted Applicant's confidentiality application for the information reported in Form S-1 and Form S-2 for a period of three (3) years ending December 31, 2009, except for information contained on Line 67 of Form S-2. In addition, the Executive Director granted confidentiality for the bilateral contract information reported in Form S-5 until December 31, 2009, or the end of the contract term, whichever is later. The Executive Director found that the aforesaid information constitutes a trade secret and that Applicant had made a reasonable argument for classifying the information as confidential since "it would place [Applicant] at a competitive disadvantage if made public."

The Electricity Resource Planning information for which Applicant is seeking a confidential designation is substantially similar to the Electricity Resources Planning information that was previously granted confidentiality as discussed above. Accordingly, all of the information contained

in the attached 2021 IEPR Electricity Resource Planning forms should be designated as confidential.

F. Aggregation of Data

The data and information submitted by Applicant in the attached Electricity Resource Planning forms may be released to the public if first aggregated with the data and information submitted by other load-serving entities ("LSEs") as follows:

1. Geographic-level data in Form S-1 and Form S-2 should be aggregated with the geographic-level data of all other LSEs serving load in the applicable geographic area (utility service territory).
2. Statewide-level data and information about existing and planned resources in Form S-1 and Form S-2 should be aggregated with the statewide-level data and resource information of all electric service providers ("ESPs").
3. Bilateral contract information in Form S-5 should be aggregated with the bilateral contract information of all other ESPs.

CERTIFICATIOM:

The undersigned is authorized to make this application and the following certification on behalf of Applicant:

"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."

DIRECT ENERGY BUSINESS, LLC

By: Barbara Farmer

Name: Barbara Farmer

Title: Regulatory Licensing and Reporting Analyst

Date: November 11, 2026