DOCKETED	
Docket Number:	26-IEPR-02
Project Title:	Electricity Resource Plans
TN #:	273494
Document Title:	SFPUC Application for Confidentiality for 2027 Supply and T-1 Forms
Description:	N/A
Filer:	Mallory Albright
Organization:	San Francisco Public Utilities Commission
Submitter Role:	Public Agency
Submission Date:	11/10/2026 3:33:27 PM
Docketed Date:	11/10/2026

San Francisco Water Power Sewer
Services of the San Francisco Public Utilities Commission

Hetch Hetchy POWER

525 Golden Gate Avenue
San Francisco, CA 94102
T (415) 551.4720
TTY (415) 554.3488
HHPower@sfwater.org

November 10, 2026

California Energy Commission
Docket # 26-IEPR-02
1516 Ninth Street, MS-39
Sacramento, CA 95814

RE: San Francisco Public Utilities Commission's Application for Confidential Designation for Electricity Resource Plan Forms S-2 and T-1 for the 2027 Integrated Energy Policy Report (Docket No. 26-IEPR-02)

Pursuant to Cal. Code Regs., tit. 20, section 2505, the San Francisco Public Utilities Commission (SFPUC), a department of the City and County of San Francisco, respectfully submits this Application for Confidential Designation of certain information in its 2027 Form S-2 Capacity/Energy Supply Resource Form. This request also serves as a Repeated Application for confidential designation of certain information in its 2027 Form T-1 (Transmission Form), pursuant to section 2505(a)(4).

I. Identification of Confidential Information

SFPUC requests confidentiality for the following data provided in its Forms S-2 and T-1. The data fields are clearly highlighted in yellow, and the confidential file is conspicuously labeled as "Confidential.

A. Form S-2 Capacity/Energy Supply Resource Form

SFPUC requests confidential treatment for the following data pursuant to section 2505(a) and (b). This information contains non-public and commercially sensitive contract volumes that reveal SFPUC's renewable energy procurement strategy and would permit market participants to infer SFPUC's current portfolio position, future supply requirements, and expected timing for future solicitations. As such, they derive independent economic value from not being generally known to market participants and the SFPUC has made reasonable efforts to maintain their secrecy.[1] Disclosure would confer an unfair competitive advantage on third parties in future procurement negotiations and impair the ability of SFPUC to negotiate favorable terms,

[1] Cal. Evid. Code section 1060 and Cal. Govt. Code section 7930.205. *See also* 20 Cal. Code Reg. section 2505(a)(1)(D).

Daniel Lurie
Mayor

Stephen E. Leveroni
President

Kate H. Stacy
Vice President

Joshua Arce
Commissioner

Avni Jamdar
Commissioner

Meghan Thurlow
Commissioner

Dennis J. Herrera
General Manager

resulting in economic harm to SFPUC and its ratepayers. Therefore, the public interest served by not disclosing this data clearly outweighs the public interest served by disclosure.[2] Finally, this data cannot be aggregated, redacted, summarized or otherwise protected in a way that allows partial disclosure.

Column AG, Rows 6c, 6d, 9, and 11
Column AH, Rows 6c, 6d, 9, and 11
Column AI, Rows 6c, 6d, 9, and 11
Column AJ, Rows 6c, 6d, 9, and 11
Column AK, Rows 6c, 6d, 9, and 11
Column AL, Rows 6c, 6d, 9, and 11
Column AM, Rows 6c, 6d, 9, and 11
Column AN, Rows 6c, 6d, 9, and 11
Column AO, Rows 6c, 6d, 9, and 11

B. Form T-1 (Transmission Form)

The Commission previously designated as confidential the information provided in SFPUC's 2025 Form T-1 pursuant to Cal. Code Reg. section 2505(b).[3] SFPUC requests the same confidentiality designation for the information provided in this year's 2027 Form T-1, because the information is substantially similar to the information previously submitted. All facts and circumstances relevant to confidentiality remain unchanged from those in SFPUC's 2025 Application for Confidentiality.[4] As explained in its 2025 Application, SFPUC relies on Government Code sections 7930.205 and 7922.000, and Evidence Code section 1060 as the basis for confidentiality of the information below:

Column 3a
Column 3b
Column 4
Column 5
Column 6
Column 7
Column 10
Column 15b
Column 16

[2] Cal. Govt. Code section 7922.000.

[3] Letter from California Energy Commission dated March 18, 2025, granting SFPUC's Application for Confidentiality, dated February 14, 2025, and designating as confidential the information in SFPUC's 2025 Electricity Resource Plan Form T-1.

[4] The Commission also granted SFPUC's Repeated Confidentiality Application for it's 2026 Form T-1 on November 26, 2025.

Column 24
Column 33
Column 49
Column 50
Column 51
Column 56

II. Time Period for Confidential Treatment

A. Form S-2 Capacity/Energy Supply Resource Form

SFPUC respectfully requests confidentiality for Form S-2 for 3 years, until December 31, 2029. This requested time period is reasonable to avoid disclosure of information that could impact SFPUC's near-term ongoing and anticipated procurement activities as discussed above in Section I.A.

B. Form T-1 (Transmission Form)

SFPUC respectfully requests confidentiality for Form T-1 data for two (2) years, until December 31, 2028, as previously granted by the Energy Commission.[5]

[5] *See* Letter from California Energy Commission dated November 26, 2025, granting two years of confidentiality for SFPUC's 2026 Form T-1.

III. **Attestations**

I certify under penalty of perjury that I am authorized to make this application and certification on behalf of SFPUC, and that the information contained in this application for confidential designation is true, correct, and completed to the best of my knowledge.

I also certify under penalty of perjury that the information submitted in SFPUC's 2027 Electricity Resource Plan Form T-1 is substantially similar to the previously submitted information in SFPUC's 2025 and 2026 Electricity Resource Plan Forms T-1 and that all the facts and circumstances relevant to confidentiality remain unchanged.

Sincerely,

Grace Kay Digitally signed by Grace Kay
Date: 2026.11.10 14:59:19
-08'00'

Grace Kay
Acting Deputy Assistant General Manager
Power Programs and Services
City and County of San Francisco
San Francisco Public Utilities Commission
525 Golden Gate Avenue, San Francisco, CA 94102
Telephone: 415.554.3129
Email: gkay@sfwater.org