

DOCKETED

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Project Title:	Electricity and Natural Gas Demand Forecast
TN #:	219803
Document Title:	PGE Confidentiality Application Form 8 1 a
Description:	PG&E Repeated Application for Confidentiality - 2017 IEPR Demand Form 8.1a. Confidential information contained in Retail Price and Rate Form. Last repeated application for confidentiality see Docket No. 15-IEPR-03; TN 205354-2.
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Organization:	Pacific Gas and Electric Co.
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REPEATED APPLICATION FOR CONFIDENTIAL
DESIGNATION
(20 CCR SECTION 2025)

2017 INTEGRATED ENERGY POLICY REPORT
Docket Number 17-IEPR-03

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

Electricity Demand Forecast forms issued by the California Energy Commission ("Energy Commission") for the 2017 Integrated Energy Policy Report.

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

PG&E is providing the information as requested in Electricity Demand Forecast Forms 8.1a and 8.1b. PG&E is requesting confidential designation for certain information designated as confidential in Electricity Demand Forecast Form 8.1a.

The data for which PG&E seeks confidential designation in Form 8.1a (Retail Price and Rate Form – Revenue Requirements by Major Cost Categories / Unbundled Rate Component) are clearly highlighted in yellow, and the confidential version is conspicuously labeled as Confidential.

The Energy Commission has previously granted confidentiality to the below data categories or substantially similar data in the 2013 IEPR and to additional data categories in PG&E's March 2015 IEPR submission of Form 8.1a with historic and 2015 forecast data. PG&E's request for confidentiality for this 2017 IEPR form is consistent with previous decisions for similar data. The new data being provided this year in these categories are unchanged or substantially similar to that provided in previous IEPR submittals. PG&E requests that these categories be deemed confidential for the same reasons as presented in its prior confidentiality applications, and that this Application be considered a **Repeated Application**.

(c) New information that is substantially similar to other information deemed confidential should also be granted confidentiality.

Demand Forecast Form 8.1a includes a new data field for the 2017 IEPR: Average Carbon Allowance Price (\$/MTCO₂E). Similar to the UOG Natural Gas Average Fuel Price data previously granted confidentiality by the Energy Commission, release of this information could allow other parties to achieve a competitive advantage that could potentially harm PG&E's customers through higher prices. PG&E requests that this new data be deemed confidential due to its commercially sensitive nature. Additionally, pursuant to the California Air Resources Board ("greenhouse gas") GHG non-disclosure regulations, Public Utilities Code Section 454(g), and California Public Utilities Commission Decision (D.) 06-06-066 as modified by D.08-04-23, utility GHG price forecasts internally derived for utility procurement planning purposes will not be disclosed to the public. For these reasons, the Carbon Allowance Price information should be granted confidential treatment.

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

PG&E requests that the following categories of information designated as confidential be kept confidential for a period of three years, through December 31, 2020. This length of protection is required to ensure that PG&E's detailed forecast data remains secure from market participants who could otherwise make competitive use of this information to the detriment of utility ratepayers. Three years is adequate time for the forecast data to become "stale" in terms of price movement in the relevant markets, and PG&E has no objection to the data being made public after that time.

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

Demand Forecast Form 8.1a (Revenue Requirements by Major Cost Categories/Unbundled Rate Component)

PG&E requests confidentiality for data 2015 through 2017:

- Generation cost forecasts for:
 - UOG Nuclear generation (Non-Fuel)
 - UOG Conventional Hydroelectric generation (Non-Fuel)
 - UOG Natural Gas-Fired generation (Non-Fuel)

PG&E requests confidentiality for 2015 through 2020:¹

- UOG Natural Gas-Fired Average Fuel Price (\$/MMBtu)

PG&E requests confidentiality for data 2015 through 2028:

- Average Carbon Allowance Price (\$/MTCO₂E)
- Generation cost forecasts for:
 - UOG Nuclear generation (Fuel)
 - UOG Conventional Hydroelectric generation (Fuel)

¹ PG&E's most recent forecast is for the three years 2018 through 2020, and therefore PG&E is requesting confidentiality through 2020.

- UOG Natural Gas-Fired generation (Fuel)
- Purchased Power cost forecasts for:
 - Other Contracts
 - Other Resources / Expenses

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: June 19, 2017



Name: Christopher J. Warner

Title: Chief Counsel
Pacific Gas and Electric Company