

DOCKETED

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Project Title:	Electricity and Natural Gas Demand Forecast
TN #:	238579
Document Title:	Confidentiality Application for MCE Demand Forecast
Description:	N/A
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Organization:	Pacific Energy Advisors, Inc.
Submitter Role:	Applicant Consultant
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June 30, 2021

California Energy Commission
Dockets Office, MS-4
Re: Docket No. 21-IEPR-03
1516 Ninth Street
Sacramento, CA 95814-5512

Re: MGE's Application for Confidentiality for Electricity Demand Forecasts Form 8.1a

Marin Clean Energy (MCE) hereby submits its application for confidentiality requesting all responses on Form 8.1a: Budget Appropriations or Actual Costs and Cost Projections by Major Expense Category and Form 8.1b: Revenue Requirements Allocation be treated as confidential for the time period stated herein.

I. Identification of Confidential Information

MCE's submissions of Forms 8.1a and 8.1b to the 2012 IEPR Docket, in their entirety, are requested to be kept confidential per the specifications listed below.

II. Description of Confidential Data

The data MCE submits in Form 8.1a includes Actual Costs and Cost Projections of its energy contracts under the following categories: Power Purchases, Federal Power, Bilateral Contracts, Customer-related Expenses, and General and Administrative Expenses. The data MCE submits in Form 8.1b are derived from, and thus include, Actual Costs and Cost Projections of its energy contracts under the following categories: Power Purchases, Federal Power, Bilateral Contracts, Customer-related Expenses, and General and Administrative Expenses. This information is represented as nominal dollars in the thousands and is provided beginning with actual cost from 2019 and ending with forecasted amounts in 2032.

III. Requested Time Period of Confidential Treatment

MCE requests confidential treatment for three (3) years from the submission of the Forms 8.1a and 8.1b in the 2021 IEPR Docket. Therefore, MCE requests confidential treatment of the entire Forms 8.1a and 8.1b submissions until June 30, 2024.

IV. Justification for Request of Confidential Treatment

California Government Code Section 6255(a) allows for information to be exempt from public disclosure if on the facts that the public interest in nondisclosure clearly outweighs the public interest in disclosure. Confidential protection for the specified information in Form 8.1a is justified because it

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constitutes confidential and market-sensitive information, which, if released, would place MCE at a competitive disadvantage to other LSEs and market participants. Similarly, the information in Form 8.1b is derived from and thus contains the information in Form 8.1a.

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.

V. Declaration of Chief Executive 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,

/s/ Dawn Weisz

Dawn Weisz
MCE Chief Executive Officer