

DOCKETED

Docket Number:	21-IEPR-03
Project Title:	Electricity and Natural Gas Demand Forecast
TN #:	239107
Document Title:	PGE Application for Confidential Designation Forms 1.3 and 1.4
Description:	Application for confidentiality for some data in Electric Demand Forecast Forms 1.3, 1.4
Filer:	Katherine Bird
Organization:	Pacific Gas and Electric Co.
Submitter Role:	Public Agency
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APPLICATION FOR CONFIDENTIAL DESIGNATION
(20 CCR SECTION 2025)

2021 INTEGRATED ENERGY POLICY REPORT

Docket Number 21-IEPR-03

Electricity Demand Forecast

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

Attorney for Applicant: Daniel S. Hashimi
Senior Counsel

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

Electricity Demand Forecast forms issued by the California Energy Commission (CEC) for the 2021 Integrated Energy Policy Report (IEPR).

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

PG&E is requesting confidential designation for three years for certain data cells pertaining to forecast electricity peak demand in Form 1.3 and Form 1.4 in order to protect the confidentiality of proprietary, market-sensitive information that constitutes valuable PG&E intellectual property and trade secrets under California law.

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

PG&E requests that certain data cells in Form 1.3 and Form 1.4 be maintained as confidential for three years from the date of this Application.

PG&E requests confidentiality for its forecast electricity peak demand data for three years to protect that information from other market participants who could otherwise use the data to the detriment of PG&E ratepayers. The California Public Utilities Commission (CPUC) has granted PG&E confidentiality protection for this data and the CEC has granted confidentiality for similar data to the other investor-owned utilities. Three years of confidentiality strikes the right balance between protecting proprietary and market-sensitive data and the information becoming sufficiently dated to be released to the public without harm to PG&E ratepayers.

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

PG&E requests that certain data cells in the electricity demand forecast data in Form 1.3 and Form 1.4 be designated as newly confidential. PG&E is requesting this designation in order to prevent disclosure of PG&E proprietary information that constitutes valuable PG&E intellectual property and trade secrets under California law.

Specifically, for Form 1.3, *LSE Coincident Peak Demand by Section (Bundled Customers)*, the following categories for the forecast years 2021-2023:

- Losses
- Total Peak

Specifically, for Form 1.4, *Distribution Area Coincident Peak Demand*, the following categories for forecast years 2021-2023:

- Bundled Customer Peak
- Total Peak Demand

PG&E respectfully requests that the CEC approve this application for confidentiality to maintain PG&E's proprietary and market-sensitive data consistent with the treatment for such data by the CPUC and afforded by the CEC to the other investor-owned utilities. Doing so will prevent higher costs to PG&E ratepayers and will preclude market participants from gaining an unfair advantage over PG&E ratepayers.

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.

July 30, 2021

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

Name: Daniel S. Hashimi

Title: Senior Counsel
Pacific Gas and Electric Company