

DOCKETED

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Project Title:	Electricity Resource Plans
TN #:	239825
Document Title:	PG&E Repeated Confidentiality Request S1 S2 S5
Description:	PG&E's Repeat Request for Confidentiality for Electric Supply Forms S-1, S-2, S-5
Filer:	Katherine Bird
Organization:	Pacific Gas and Electric Co.
Submitter Role:	Applicant
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REPEATED APPLICATION FOR CONFIDENTIAL DESIGNATION

(20 CCR SECTION 2025)

2021 INTEGRATED ENERGY POLICY REPORT

Docket Number 21-IEPR-02

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

Attorney for Applicant: Daniel S. Hashimi
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1. (a) Title, data, and description of the record.

Electricity Resource Plan Supply forms issued by the California Energy Commission (CEC) for the 2021 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 Resource Plan Supply Forms S-1, S-2, and S-5. PG&E is requesting confidential designation for certain information designated as confidential in Electricity Resource Planning Forms S-1, S-2, and S-5.

The data for which PG&E seeks confidential designation in the S-1, S-2, and S-5 forms are clearly highlighted in yellow, and the confidential versions are conspicuously labeled as Confidential.

PG&E has provided Form S-1 (Capacity / Energy Procurement Requirement), Form S-2 (Capacity / Energy Supply Resources), and Form S-5 (Bilateral Contracts and Power Purchase Agreements). The CEC granted confidentiality to the below and similar data categories on the 2007, 2009, 2011, 2013, 2015, 2017, and 2019 IEPR forms. PG&E's request for confidentiality for these 2021 IEPR forms is consistent with those decisions for similar data. The new data being provided this year in these categories are unchanged or substantially similar to that provided in the 2007, 2009, 2011, 2013, 2015, 2017, and 2019 IEPR forms. PG&E requests that these categories be deemed confidential for the same reasons as presented in the 2007, 2009, 2011, 2013, 2015, 2017, and 2019 IEPR proceedings, and that this Application be considered a **Repeated Application**.

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

PG&E requests that the following categories of information be designated as confidential as specified in the detailed listing below. Confidentiality is being sought for some data for years 2019 through 2030; for other data for years 2021 through 2030, for other data for years 2019 through 2023, and for other data for years 2021 through 2023.

Consistent with previous IEPR proceedings, PG&E requests that the specific categories of information listed for Form S-5 remain confidential through December 31, 2026, or the contract expiration date, whichever is later. Also consistent with previous IEPR proceedings, PG&E requests that the specific categories of information listed for Form S-1 and Form S-2 remain confidential for three years from the date of this application (i.e., to September 23, 2024).

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

Supply Form S 1: (Capacity / Energy Procurement Requirement)

PG&E requests confidentiality for the following data for the specified years:

- Line 1: Forecast Total Peak Hour 1-in-2 Demand (2021 through 2030)
- Line 5: Adjusted Demand: End-Use Customers (2021 through 2030)
- Line 7: Coincident Peak-Hour Demand (2021 through 2030)
- Line 8: Required Planning Reserve Margin (2021 through 2030)
- Line 10: Firm Sales Obligations (2019 through 2023)
- Line 11: Firm LSE Procurement Requirement (2019 through 2030)
- Line 12: Forecast Total Energy Demand / Consumption (2021 through 2030)
- Line 16: Adjusted Demand: End-Use Customers (2021 through 2030)
- Line 17: Firm Sales Obligations (2021 through 2030)
- Line 18: Firm LSE Procurement Requirement (2021 through 2030)

Supply Form S-2: (Capacity / Energy Supply Resources)

PG&E requests confidentiality for the following data for the specified years:

Capacity Supply Resources section:

- Line 5a: Total Qualifying Facility (QF) Contract Supply (2021 through 2030)
- Line 5g: Natural Gas (2021 through 2030)
- Line 5h: Other (2021 through 2030)
- Line 7a: Total Other Bilateral Contract Supply (2021 through 2030) *[each individual contract broken down, lines 7b through 7gr]*
- Line 8: Short-Term and Spot Market Purchases (2021 through 2030)
- Line 9: Total Existing and Planned Supply (2021 through 2030)
- Line 10: Firm LSE Procurement Requirement (2019 through 2030)
- Line 11: Net Surplus (or Need) (2019 through 2023)
- Line 13: Generic Non-Renewable Resources: (2021 through 2023)

Energy Supply Resources section:

- Line 1a: Total Fossil Fuel Supply (2021 through 2030) *[each supply source broken down: Bloom, Colusa, Gateway, New Humboldt, PG&E Moss Landing Energy Storage, UTC Unit 1, UTC Unit 2, lines 1b through 1h]*
- Lines 2a, 2b, 2c: Total Nuclear Supply, Diablo Canyon 1 and Diablo Canyon 2 (2021 through 2023)
- Line 3a: Total Hydroelectric Supply (2021 through 2023)
- Line 3b: Hydro Supply from Plants 30 MW or More (2021 through 2023) *[each individual plant of 30 MW or more broken down, lines 3ba through 3cb]*

- Line 5a: Total Qualifying Facility (QF) Contract Supply (2021 through 2030)
- Line 5g: Natural Gas QF Contract Supply (2021 through 2030)
- Line 5h: Other QF Contract Supply (2021 through 2030)
- Line 7a: Total Other Bilateral Contract Supply (2021 through 2030) [*each individual contract/source broken down, lines 7b through 7gr*]
- Line 8: Short-Term and Spot Market Purchases (and Sales) (2021 through 2030)
- Line 9: Total: Existing and Planned Supply (2021 through 2030)
- Line 10: Firm LSE Procurement Requirement (2021 through 2030)
- Line 11: Net Surplus (or Need) (2021 through 2023)
- Line 13: Generic Non-Renewable Resources (2021 through 2030)

Supply Form S-5 (Bilateral Contracts and Power Purchase Agreements)

PG&E is requesting a Confidential Designation for the below-listed categories of data provided in Form S-5 for 23 contracts. The information covered by these data categories in the 2021 IEPR includes competitively and commercially sensitive business and resource-planning information, protected under the Public Records Act.

To release this information publicly would allow market participants to have access to competitively sensitive information that would normally not be available to them in this form or format. Additionally, release of this information could allow other parties to achieve a competitive advantage that could potentially harm PG&E's customers through higher power prices. Specifically, the identified data includes commercially sensitive information regarding the status of projects not yet operational.

The type of information covered by these data categories in the 2021 IEPR is the same or substantially similar in nature to information granted confidentiality by the CEC as part of the 2019 IEPR, as well as in previous IEPR proceedings (2007, 2009, 2011, 2013, 2015, and 2017). PG&E requests that the information be deemed confidential for the specified contracts because these disclosure concerns are still relevant. Cells requested to be confidential are clearly highlighted in yellow, per the CEC's request.

PG&E requests confidentiality for the below-noted cells in the following columns:

- Column I, Contract Start Date: cells 248, 249, 250, 261, 263, 264, 281, 288, 289, 298, 299, 306, 307, 308, 309, 310, 311, 313, 314, 318, 319, 320, 331
- Column J, Contract End Date: cells 248, 249, 250, 261, 263, 264, 281, 288, 289, 298, 299, 306, 307, 308, 309, 310, 311, 313, 314, 318, 319, 320, 331

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: September 23, 2021

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

Name: Daniel S. Hashimi
Title: Senior Counsel
Pacific Gas and Electric Company