

DOCKETED

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Project Title:	Electricity Forecast
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Document Title:	SCP Application for Confidential Designation For Supply Forms 2022
Description:	SCP Application for Confidential Designation For Supply Forms 2022
Filer:	Brian Goldman
Organization:	Sonoma Clean Power
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APPLICATION FOR CONFIDENTIAL DESIGNATION (Title 20 Cal. Code. Regs., § 2505 et seq.)

CEC-13 (Revised 11/2021)

CALIFORNIA ENERGY COMMISSION

All confidential filings: Individual documents may not exceed 30 MB¹ or be password protected.² The application must be a separate document from the confidential materials. The application itself is not confidential and is a public record. The application will be reviewed and acted upon by the Executive Director in consultation with the Chief Counsel of the Energy Commission. (§ 2505, subd. (a))

If you have questions, contact the Docket Unit at (916) 654-5076 or email: docket@energy.ca.gov.

Existing proceedings: Applications for confidentiality and the confidential documents must be uploaded directly to the Docket Unit through the e-filing system. Paper copies or CDs do not need to be submitted. Links to the e-filing system are provided on most proceeding webpages labeled “**Submit e-filing.**” Alternatively, go to: https://efiling.energy.ca.gov/Login.aspx?perms_1&returnurl=http%3A//efiling.energy.ca.gov/EFiling/EfileSelect/Proceeding.aspx. Registration is necessary the first time documents are uploaded. Once registration is complete, to submit a confidential filing click on **Quick Actions** from the **DASHBOARD** and select **Submit Confidential e-filing** from the dropdown list. The application must be uploaded first followed by one or more confidential files.

Filings not associated with any proceeding: Applications for confidentiality and the confidential materials must be submitted directly to the **Docket Unit** in paper form or on a CD, but not by email. Two copies must be submitted, on separate media if electronic, each marked with a descriptive title and “Confidential.” (§ 1208.1)

TO: Energy Commission Docket Unit

Applicant: Sonoma Clean Power Authority

Address: 431 E Street, Santa Rosa, CA 95404

Phone and E-mail: 1 (855) 202-2139, info@sonomacleanpower.org

Proceeding or Project Name: IEPR 2022 - Sonoma Clean Power Supply Forms 2022

Docket Number: 22-IEPR-03

- 1(a). Title, date, and description (including number of pages) of the information or data for which you request confidential designation. **Information or data seeking a designation of confidentiality must be included with this application.**

Sonoma Clean Power (SCP) seeks confidential designation and treatment of the yellow-highlighted data in form S-1 REQUIREMENT of the attached Sonoma Clean Power Supply Forms 2022 document.

- 1(b). Specify the part(s) of the information or data for which you request confidential designation.

Form S-1 REQUIREMENT: The highlighted content in the Columns J-R, Excel spreadsheet Rows 11, 19, 21, 22, and 25.

¹ Contact the Docket Unit if you cannot reduce the size of your file.

² If you wish to protect the files while in transit, you may combine them in a password-protected .zip file..



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2. State and justify the length of time the Energy Commission should keep the information or data confidential.

SCP requests confidentiality for three years from the date recorded in the Excel spreadsheet row 9 of the same column as the data (E.g. highlighted data in Column J should be kept confidential until January 1, 2026; highlighted data in Column K should be kept confidential until January 1, 2027; etc.)

3(a). State the provision(s) of the Public Records Act (Gov. Code, § 6250 et seq.) or other law that allows the Energy Commission to keep the information or data confidential, and explain why the provision(s) apply to that material.

Cal. Govt. Code sections 6254(k) and 6255(a); and Cal. Evid. Code section 1060. SCP has designated this information as confidential This data consists of commercial sensitive, trade secret, and other information.

3(b). Discuss the public interest in nondisclosure of the material submitted for a confidential designation. If the material contains trade secrets or its disclosure would otherwise cause loss of a competitive advantage, please state how it would be lost, the value of the information to the applicant and the ease or difficulty with which the information could be legitimately acquired or duplicated by others.

The confidential data included in the highlighted area of the table consists of SCP's forecasted peak load, and data that can be used to calculate its forecasted peak load. If publicly disclosed, the data could be used to determine power and capacity needs which could be used to cause competitive harm by undermining SCP's negotiating position with counter parties. The confidential data has commercial value, and is not readily available to the public. The public interest in nondisclosure of these particular facts clearly outweighs the public interest in disclosure.

4. State whether the information or data can be disclosed if it is aggregated with other information or masked to conceal certain portions (including but not limited to the identity of the applicant). State the degree of aggregation or masking required. If the data cannot be disclosed even if aggregated or masked, explain why.

The data can be disclosed if it is aggregated with other LSEs' forecasts at a level that does not permit SCP's confidential information to be derived from the aggregated data.

5. State how the material is kept confidential by the applicant and whether it has even been disclosed to a person other than an employee of the applicant. If it has, explain the circumstances under which disclosure occurred.

This information is used only internally at SCP, and not readily available to the public. SCP has previously disclosed similar information in previous IEPR filings without seeking confidentiality. However, notwithstanding this prior disclosure, SCP now seeks confidential treatment of this market sensitive data.

I certify under penalty of perjury under the laws of the State of California 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: 9/8/2022

Signed: 



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CALIFORNIA ENERGY COMMISSION

Name (print or type): Deb Emerson

Title: (print or type) Managing Director

Representing: Sonoma Clean Power Authority

Include additional signature blocks if there are multiple partners in the project with shared responsibilities for making the request.