

DOCKETED

Docket Number:	24-IEPR-02
Project Title:	Electricity Resource Plans
TN #:	260022
Document Title:	SCP IEPR 2024 Application for Confidential Designation
Description:	N/A
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 03/17)

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

Address: 431 E Street, Santa Rosa, CA 95404

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

Proceeding or Project Name: Integrated Energy Policy Report

Docket Number: 24-IEPR-02

- 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.**

Integrated Energy Policy Report – Tabs “S1_REQUIREMENT;” “S-2A_SUPPLY;” “S-2A_Addendum Monthly;” and “S-5 Table.”

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

The highlighted selections of Tab “S-1_REQUIREMENT,” Columns I-R, Lines 1, 5, 7, 8, 11, 12, 16, and 18.

The highlighted selections of Tab “S-2_SUPPLY,” Columns Q-Z, Rows 32-33, 35-90, 92-96, and 102-104.

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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The highlighted selections of Tab "S-2A_Addendum Monthly," Columns G-DV, Rows 11, 13, 15, 17, 19, 21, 23, 25, 27, 29, 31, 33, 35, 37, 39, and 41-43.

The highlighted selections of Tab "S-t Table," Column M.

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

For 3 years, or until November 15, 2027

- 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.

Government Code §§ 6255(a) 6254.7(d); California Evidence Code § 1060; and California Civil Code § 3426.1(d), This information consists of market sensitive and trade secret information relating to ongoing contract negotiations.

Additionally, under California Code of Regulations, Title 20 section 2505(b), states, "When another federal, state, regional, or local agency or state-created private entity, such as the California Independent System Operator, possesses information pertinent to the responsibilities of the Commission that has been designated by that agency as confidential under the Public Records Act, or the Freedom of Information Act, the Commission, the Executive Director, or the Chief Counsel may request, and the agency shall submit the information to the Commission without an application for confidential designation. The Commission shall designate this information confidential".

In accordance with the foregoing authority, Sonoma Clean Power has designated the highlighted data in the enclosed Report as confidential for the reasons identified below and submits such data to the CEC with the expectation that the CEC shall designate it as confidential, as well, and protect it accordingly.

- 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 identified information could be used by others to gain economic value from its disclosure and impact Sonoma Clean Power's negotiating positions. Counterparties could use this information to derive Sonoma Clean Power's exposure to other counterparties and financial status, which would result in a market disadvantage, and negatively affect rates for Sonoma Clean Power's customers.

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.

It would be possible to aggregate the costs of the redacted information on a statewide level if combined with all other entities' information (e.g., all submissions Line 39, Column G added together



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and presented as a single representation of all submitted "Firm LSE Procurement Requirement," all submissions Row 24, Column B totals added together and presented as a single representation of all submitted "total revenue requirements," etc.), so values would not be able to be linked to individual entities.

- 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.

The items mentioned above have not been disclosed to any person not an employee, counterparty, or consultant of SCP. Such information has been marked as confidential internally and governed by the Applicant's internal policy on confidential information.

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: November 12, 2024

Signed: 

Name (print or type): Brian Goldman

Title: (print or type): Principal Compliance Analyst

Representing: Sonoma Clean Power

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