

<b>DOCKETED</b>	
<b>Docket Number:</b>	24-IEPR-02
<b>Project Title:</b>	Electricity Resource Plans
<b>TN #:</b>	260093
<b>Document Title:</b>	2025 IEPR Confidentiality Declaration
<b>Description:</b>	N/A
<b>Filer:</b>	Sandra
<b>Organization:</b>	City and County of San Francisco
<b>Submitter Role:</b>	Public Agency
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<b>Docketed Date:</b>	11/15/2024

November 15, 2024

California Energy Commission  
Docket # 24-IEPR-02  
1516 Ninth Street, MS-39  
Sacramento, CA 95814

**RE: CleanPowerSF's Repeated Application for Confidential Designation for Electricity Resource Plan Supply forms issued by the California Energy Commission for the 2025 Integrated Energy Policy Report (Docket No. 24-IEPR-02)**

In conjunction with the filing of its Electricity Resource Plan Supply forms, CleanPowerSF hereby submits a Repeated Application for Confidential Designation for its Electricity Resource Plan Supply forms (Supply Forms) pursuant to Cal. Code Reg. section 2505(a)(4). CleanPowerSF is the community choice aggregator (CCA) for the City and County of San Francisco, which is operated by the San Francisco Public Utilities Commission.

The Energy Commission previously designated as confidential the information provided in CleanPowerSF's 2022 Supply forms pursuant to Cal. Code Reg. section 2505(b).<sup>i</sup> CleanPowerSF requests the same confidentiality designation for the information provided in this year's Supply forms because the information is substantially similar to the information previously submitted in its 2022 Supply forms, and all the facts and circumstances relevant to confidentiality remain unchanged from those in CleanPowerSF's 2022 Application for Confidentiality.<sup>ii</sup> As explained in its 2022 Application, CleanPowerSF relies on Government Code sections 7927.705 (formerly 6254(k)) and 7922.000 (formerly 6255(a)) and Evidence Code section 1060 as the basis for confidentiality of the information identified in this Repeated Application.

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CleanPowerSF is a program of the San Francisco Public Utilities Commission (SFPUC), an enterprise department of the City and County of San Francisco.

CleanPowerSF is committed to protecting customer privacy. Learn more at [cleanpowersf.org/privacy](https://cleanpowersf.org/privacy).

**OUR MISSION:** To provide our customers with high-quality, efficient and reliable water, power and sewer services in a manner that values environmental and community interests and sustains the resources entrusted to our care.



## I. Identification of Confidential Information

CleanPowerSF requests confidentiality for certain information provided in the following Supply Forms:

- Form S-1, Capacity/Energy Requirement;
- Form S-2, Capacity/Energy Supply Resources; and
- Form S-2A, Addendum Monthly Capacity and Energy Data

The data for which CleanPowerSF seeks confidential designation in S-1, S-2, and S-2A is clearly highlighted in yellow, and the confidential file is conspicuously labeled as “Confidential.” CleanPowerSF is not requesting confidentiality for information in Form S-5, Bilateral Contracts Table.

Similar to CleanPowerSF’s 2022 Supply forms, the information provided in this year’s Supply forms falls into two broad categories: 1) information related to CleanPowerSF’s Resource Adequacy (RA) obligation, forecasts, and projected compliance; and 2) CleanPowerSF’s energy demand forecasts and projected Renewables Portfolio Standard (RPS) compliance. The following identifies the specific data for which CleanPowerSF requests confidential designation.

### a. Form S-1, Capacity/Energy Requirement

The confidential information in Form S-1 includes the “Peak Load Calculations” and related inputs. Specifically, Lines 1, 5-8, and 11, Columns I-R. It also includes the “Energy Demand Calculations” and related inputs. Specifically, Lines 12, 16, and 18, Columns I-L.

### b. Form S-2, Capacity/Energy Supply Resources

The confidential information in Form S-2 includes the “Total Renewable Contract Supply” and the contract supply and energy information from individual contracts as well as the Capacity/Energy Balance Summary which consists of “Total: Existing and Planned Supply,” “Firm LSE Procurement Requirement,” and “Net Surplus (or Need).” The confidential information is in the following cells by row and column:

- Line 6a Columns P-Y; Columns AD-AF
- Line 6b7 Column AD
- Line 6c, Columns Q-Z; Columns AD-AM
- Line 6d, Columns Q-Z; Column AD-AM
- Line 6f, Columns Q-Z
- Line 6g, Column H; Columns O-Z; Column AD
- Line 6h, Columns Q-Z

Line 6i, Columns Q-Z  
Line 6j Columns S-Z; Columns AC-AE  
Line 6k Column Q-Z; Columns AD-AF  
Line 6m Columns Q-Z  
Line 6n Column AD  
Line 6o Columns AE-AF  
Line 6p Columns S-Z; Column AF  
Line 6q Columns AD-AF  
Line 6r3 Column S-V  
Line 6t Column AD  
Line 6v2 Columns AE-AF  
Line 6x Columns AD-AE  
Line 7 Columns Q-Z; Columns AD-AF  
Line 7b Columns Q-Z  
Line 7c Columns Q-Z  
Line 7r Column Q-Z  
Line 7ae Columns Q-Z  
Line 7aj Column Q  
Line 7au3 Columns Q-V  
Line 7aw Columns Q-V Line 7ax Columns Q-V  
Line 7bd1 Column AD  
Line 7bd15 Column AE  
Line 7cm Column AD  
Lines 7cv and 7cm Column AD  
Line 7dd3 Column AD  
Line 7dh1 Column R Line 7dh2 Column R  
Line 7dy Column AC  
Line 7dz Columns -Z  
Line 7ea Columns Q-Z  
Line 7ee Column AD  
Line 7ef Columns  
Line 7el Column Q  
Line 7ex Column AD  
Line 7fi26 Column AD  
Line 7fj28 Column AD  
Line 7fq Column Q  
Line 7fv Column Q and Column AD  
Line 7fw Column AD  
Line 7gd Columns R-T  
Line 7ge Columns AC-AD; Columns AD-AE  
Line 9 Columns Q-Z; Columns AD-AF  
Line 10 Columns Q-Z; Columns AD-AF  
Line 11 Columns Q-Z; Columns AD-AF

c. Form S-2A, Addendum Monthly Capacity and Energy Data

The confidential information in Form S-2A includes the monthly “Contract GWh” and the “NQC MW” data for each resource.

## II. Time Period for Confidential Treatment

CleanPowerSF requests confidential treatment for the following time periods, which parallel the amount of time that CleanPowerSF protects its forecasts in California Public Utilities Commission (CPUC) supply data submissions:

- RA data: Three (3) year forecast period until December 31, 2027;
- RPS data: Current year and a two (2) year forecast period; and
- RA capacity forecasts: Current year, plus ten (10) year forecast period.

For RA capacity forecasts, CleanPowerSF requests confidentiality for the current year plus 10-year forecast period (2024-2033) because it keeps this data confidential where those years of the contract would reveal the capacity amount for each year.

CleanPowerSF’s CPUC annual procurement obligations for capacity are also kept confidential. The capacity data constitutes valuable, highly-sensitive market information because it would provide significant insight into CleanPowerSF’s procurement obligation and current and forecasted energy needs. Release of the information would allow dominant market participants to exercise market power and manipulate compliance with the CPUC’s RA program. As a consequence, it would severely compromise and negatively impact CleanPowerSF’s ability to negotiate and procure RA capacity on terms reasonable for its ratepayers.<sup>iii</sup> Given the sensitivity of this data, the public interest served by disclosing capacity information is clearly outweighed by the public interest in withholding such information from disclosure.<sup>iv</sup>

### III. Certification of CleanPowerSF Director

I certify that the information submitted in CleanPowerSF's 2025 Electricity Resource Plan Supply forms is substantially similar to the previously submitted information in CleanPowerSF's 2022 Electricity Resource Plan Supply forms, and that all the facts and circumstances relevant to confidentiality remain unchanged.

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 CleanPowerSF.

Sincerely,



Michael A. Hyams, Director  
CleanPowerSF

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<sup>i</sup> 20 Cal. Code Reg. § 2505(b); See Letter from Drew Bohan, Executive Director, California Energy Commission, dated December 13, 2022, designating information as confidential in CleanPowerSF's 2022 Supply forms.

<sup>ii</sup> 20 Cal. Code Reg. § 2505(a)(4); See CleanPowerSF's 2022 Application for Confidentiality for Electricity Resource Plan Supply Forms, dated September 9, 2022.

<sup>iii</sup> 20 Cal. Code Reg. § 2505(a)(1)(D). See *also* Evid. Code section 1060 and Govt. Code section 7930.205.

<sup>iv</sup> Government Code section 7922.000 (regarding the public interest exemption under the California Public Records Act).