

DOCKETED	
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Project Title:	Electricity Resource Plans
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Document Title:	MCE 2025 Electricity Resource Planning Forms Confidentiality Application
Description:	N/A
Filer:	Troy Nordquist
Organization:	Marin Clean Energy
Submitter Role:	Public Agency
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November 15, 2024

California Energy Commission
 Dockets Office, MS-4
Re: Docket No. 24-IEPR-02
 1516 Ninth Street
 Sacramento, CA 95814-5512

Re: MCE's Application for Confidentiality for Electricity Resource Planning Forms

Marin Clean Energy (MCE) hereby submits its application for confidentiality requesting certain responses on its Electricity Resource Planning Forms be treated as confidential for the time period stated herein.

I. Identification of Confidential Information

The following data is requested to be kept confidential per the specifications listed below:

- S-1 Requirement Form
 - Capacity Procurement Requirement for years 2024 – 2033
 - Lines 1, 3-8, and 11, Columns I-R
- S-2 Supply Form
 - Total Renewable Contract Supply for years 2022 – 2033
 - Lines 6a-6dz, Columns O-Z
 - Total Other Bilateral Contract Supply for years 2022 – 2033
 - Lines 7a-7kc, Columns O-Z and Columns AD-AM
 - Total Existing and Planned Supply for years 2024 – 2033
 - Line 9, Column Q-Z and Columns AD-AM
 - Firm LSE Procurement Requirement for years 2024 – 2033
 - Line 10, Column Q-Z
 - Net Surplus (or Need) for years 2024 – 2033
 - Line 11, Column Q-Z and Columns AD-AM
 - Generic Renewable Supply for years 2024 – 2033
 - Line 12, Columns Q-Z
 - Generic Non-Renewable Resources for years 2024 – 2033
 - Line 13, Column Q-Z
- S-2A Addendum Monthly Form
 - 2024-1 – 2033-12
 - Entirety of Columns G-DV
- S-5 Table
 - Capacity (MW) Under Contract
 - Column I in its entirety

II. Description of Confidential Data

The data MCE submits in the sections identified above falls into two broad categories: 1) Information related to MCE's resource adequacy obligation, forecasts, and projected compliance, and 2) MCE's energy demand forecasts and projected Renewables Portfolio Standard compliance.

III. Requested Time Period of Confidential Treatment

MCE requests confidential treatment for three (3) years from the submission of this Electricity Resource Planning Form. Therefore, MCE requests confidential treatment of the sections identified above until November 15, 2027.

IV. Justification for Request of Confidential Treatment

California Government Code Section 7922.000 (previously Section 6255(a)) allows for information to be exempt from public disclosure if on the facts the public interest in nondisclosure clearly outweighs the public interest in disclosure. Confidential protection for the specified information in Forms S-1, S-2, S-2A, and S-5 is justified because the specified information constitutes confidential and market-sensitive information that is not generally known to the public, which, if released, would place MCE at a competitive disadvantage to other LSEs and market participants. Public access to this information could be used by others to gain economic value from its disclosure. This could negatively impact MCE's position in the market to the detriment of MCE's ratepayers.

Consequently, disclosure of this information could impact market prices and would compromise MCE's ability to procure renewable energy resources on terms favorable to its ratepayers. Further, the data and information: (1) is not already public; and (2) cannot be aggregated, redacted, summarized or otherwise protected in a way that allows partial disclosure.

V. Declaration of Chief Operating Officer

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 MCE.

Sincerely,

Signed by:

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Vicken Kasarjian
MCE Chief Operating Officer