

DOCKETED	
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Description:	N/A
Filer:	Erin Pennell
Organization:	San Diego Community Power
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November 15, 2024

Drew Bohan
Executive Director
Docket No. 24-IEPR-01, 24-IEPR-02, and 24-IEPR-03
California Energy Commission
715 P Street
Sacramento, CA 95814

Re: San Diego Community Power Electricity Resource Planning Filing for 2024

Dear Mr. Bohan:

San Diego Community Power (“SDCP”) requests the California Energy Commission (“Commission”) designate information included in Electricity Resource Planning Filing as confidential pursuant to Title 20, California Code of Regulations. (“CCR”), Section 2505 et seq. and the justifications set forth below.

Contact Information

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Proceeding Name: Resource Adequacy
Docket Number: 24-IEPR-01, 24-IEPR-02, and 24-IEPR-03

All correspondence regarding this filing should be directed by electronic mail to the attention of:

Erin Pennell
Compliance Analyst
San Diego Community Power
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Description and Identification of Confidential Information

SDCP seeks confidential treatment for the following information, as highlighted in the Electricity Resource Plan Template:

- S-1 Requirement Tab, columns I-R: Current Year (2024) and forward years forecast load information.
- S-2_Supply Tab:
 - Column H: Nameplate Capacity
 - Column L: Storage Duration Hours
 - Columns O-Z: Capacity
 - Columns AB-AM: Supply

- S-3 Addendum Monthly Tab, columns G-DV: Monthly Capacity
- S-5 Table Tab, column I: Capacity Under Contract

These documents contain market-sensitive load forecast and supply information.

Length of Time the Information Should Be Kept Confidential

SDCP requests that the Commission keep SDCP's information confidential and protected from public disclosure for a period of 3 years, until November 15, 2027. This length of time is needed to ensure that SDCP's market-sensitive load forecast and supply information remains secure from market participants that could make competitive use of this information to the detriment of SDCP, SDCP's ratepayers, and the electricity market as a whole.

Provisions of Law Allowing the Commission to Keep the Documentation Confidential

SDCP seeks confidentiality for these Forms on the following bases:

1. **Public Entity Designation.** SDCP asserts confidentiality under Section 2505(b) as a local agency which possesses information pertinent to the responsibilities of the Commission that has been designated by SDCP as confidential under the Public Records Act.
2. **Balancing Tests.** Even if the above justification was not available, the information should be protected under California Government Code, Section 7922.000, which permits protection of information where the public interest in nondisclosure clearly outweighs the public interest in disclosure. The information in SDCP's Electricity Resource Planning Filing is highly commercially sensitive, not publicly known, and if revealed could cause significant harm to load-serving entities ("LSEs"), like SDCP. Such information, if disclosed, would provide valuable market-sensitive information to market participants, could damage SDCP's future contract negotiations, and create distortions to the market. The public does not have a meaningful interest in reviewing this information in a disaggregated form, and disclosure may impact the energy and capacity market causing public harm.

Disclosure in an Aggregated Form

The information provided in SDCP's 2024 Electricity Resource Planning Filing is highly market-sensitive, confidential, and cannot be aggregated, redacted, summarized, masked, or otherwise protected in a way that allows partial disclosure.

The Submitted Information Is Presently Confidential

SDCP does not publicly disclose its Supply Data. SDCP considers such information market sensitive, as public disclosure of this information could compromise SDCP's competitive position in the electricity market.

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. I also certify that as a community choice aggregator, SDCP is a local government agency, and I am authorized to make the application and certification on behalf of SDCP.

/s/ Erin Pennell

Erin Pennell
Compliance Analyst
San Diego Community Power
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