

**DOCKETED**

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<b>Project Title:</b>	Electricity Demand Forecast
<b>TN #:</b>	260141
<b>Document Title:</b>	2024 Customer Data App for Confidential Designation_signed
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<b>Organization:</b>	Southern California Edison
<b>Submitter Role:</b>	Applicant
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**APPLICATION FOR CONFIDENTIAL DESIGNATION  
(20 CCR SECTION 2505)**

**ELECTRICITY FORECAST PLAN SUPPLY FORMS  
DOCKET NUMBER 24-IEPR-03**

**1. Contact Information:**

Contact the Applicant, Southern California Edison Company, at the information provided in the chart below.

<b>Attorney for Applicant:</b>	Rebecca Meiers-De Pastino
<b>Address of Attorney:</b>	2244 Walnut Grove Ave. Rosemead, California 91770 Rebecca.Meiers.DePastino@SCE.com (626) 302-6016

**2. Title, date, and description (including number of pages) of the information or data for which you request confidential designation. (20 CCR 1208.1.)**

Southern California Edison Company (SCE) seeks confidential designation of Electricity Demand Data in the Excel file titled, SCE Data Center Forecast Workbook for CEC 11.13.24.xlsx, dated November 13, 2024, with a file size of 209KB.

**3. Specify the part(s) of the information or data for which you request confidential designation. (If the data is in charts or spreadsheets, highlighting is sufficient.) (20 CCR 2505(a)(1)(B.))**

SCE seeks confidential designation of customer data, which includes customer identity and electricity consumption, in the tabs labeled “Final Project List” and “PY24” in the above listed Excel file. SCE has highlighted the confidential information in those tabs in yellow and requests that the Energy Commission designate all those highlighted rows and columns as confidential. SCE is also filing redacted public versions of this Excel file.

**4. State and justify the length of time the CEC should keep the information or data confidential. The term requested must be relevant to the stated basis for confidentiality. (20 CCR 2505(a)(1)(C.))**

This is private and confidential data regarding industrial customers, the number of which is so small and the load of which is so high that if even locational information is revealed without identifying the customer, others could still discern the customers’ identity and confidential information about that customer. SCE requests that the Energy Commission indefinitely restrict

the specified information from public disclosure because it contains sensitive and confidential customer-specific information that cannot and should not be shared publicly.

**5. State the provision(s) of the California Public Records Act or other law that allows the CEC to keep the information or data confidential and explain why the provision(s) apply to that material. (See Gov. Code, §§ 7920.000-7930.215.) (20 CCR (a)(1)(D.)).**

A properly filed application for confidentiality shall be granted under California Code of Regulations, title 20, section 2505(a)(3)(A), “if the applicant makes a reasonable claim that the Public Records Act or other provision of law authorizes the Commission to keep the record confidential.” California statutes, California Public Utilities Commission decisions, and SCE’s tariffs prohibit the public disclosure of such information.<sup>1</sup> Public Resources Code section 8380 specifically prohibits electrical or gas corporations from disclosing information on individual customer consumption to the public. The submitted data sets contain confidential customer identification and energy consumption information that should be entitled to automatic confidential designation under title 20, section 2505(a)(5)(A)(B), is protected from public disclosure under Public Resources Code section 8380, and would not be in the public interest to disclose under California Government Code section 7922.000, which provides that an agency may withhold information from disclosure where the public interest served by nondisclosure clearly outweighs the public interest of disclosure. SCE therefore respectfully requests that the Commission designate the information as confidential.

**6. If the applicant believes that the information or data should not be disclosed because it contains trade secrets or its disclosure would otherwise cause a loss of a competitive advantage, the application also shall state: (20 CCR (a)(1)(D.))**

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<sup>1</sup> See, e.g., Cal. Const., Art I, Sec. 1 (“Each citizen has the right to privacy.”); Cal. Pub. Util. Code § 8380 (requiring utilities to keep customer energy consumption data confidential); CPUC Decision 11-07-056 (implementing PUC Code section 8380); Cal. Pub. Util. Code § 394.4 (prohibition utilities to share customer information without written customer consent); Cal. Civil Code §§ 1798.81-1798.85 (requiring businesses to take measures to protect Personally Identifiable Information (PII)); CPUC Decision 14-05-016 (protecting customer data, including usage data); SCE Tariff Rules 9, 22, CCA-INFO, 25 (protecting the privacy and security of customer usage data), 26 (restricting governmental and other institutions’ access to customer data absent a legal obligation to collect it).

The customer information for which SCE seeks confidential treatment cannot be easily acquired or duplicated by others. In addition, the disclosure of the confidential customer information would communicate a great deal about these customers and their current and future business activities and needs that would be commercially valuable to the market, such as entities that would like to do business with or compete with the customer, if it were publicly disclosed. SCE cannot quantify the value of the information to SCE but the value of that information to SCE's customer is potentially priceless.

- 7. State whether the information or data can be disclosed if it is aggregated with other information or masked to conceal certain portions. State the degree of aggregation or masking required. If the data cannot be disclosed even if aggregated or masked, explain why. (20 CCR 2505(a)(1)(E.))**

For the reasons discussed in response to Question 4, the information cannot be aggregated or masked to allow for its public disclosure beyond that which SCE has already aggregated in the Excel file and has not highlighted as confidential.

- 8. State how the information or data is kept confidential by the applicant and whether it has ever been disclosed to a person other than an employee of the applicant. If it has, explain the circumstances under which disclosure occurred. (20 CCR 2505(a)(1)(F.))**

SCE does not and has not ever made this data public. The data is safeguarded and kept confidential in SCE's secure systems to which it gives restricted access to employees on a need-to-know basis and that are password protected.

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. Finally, I also certify that I am authorized to make the application and certification on behalf of Southern California Edison.

Dated: November 18, 2024  
Signed: *Joshua Copenhaver*  
Print Name: Joshua Copenhaver  
Title: Director, Resource & Environmental Planning & Strategy