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**APPLICATION FOR CONFIDENTIAL DESIGNATION
(20 CCR SECTION 2505)**

2024 INTEGRATED ENERGY POLICY REPORT
Docket No. 24-IEPR-02 Electricity Resource/Supply Plans

Applicant: San Diego Gas & Electric Company (“SDG&E”)

Attorney for Applicant: Aimee M. Smith
Address of Applicant: 8330 Century Park Court, CP 32
San Diego, CA 92123
amsmith@sdge.com
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1. Identification of the Information Being Submitted

SDG&E requests confidential treatment of certain data provided by SDG&E to the California Energy Commission (“Commission”) pursuant to the 2024 Integrated Energy Policy Report (“IEPR”) process (Docket No. 24-IEPR-02). Generally, the information for which confidential designation is requested pertains to SDG&E’s electric resource planning, energy balance resource accounting, bilateral contracts and power purchase agreements. The information being submitted is included in Excel spreadsheets and in total is approximately two megabytes in size.

2. Description of the Data or Information for which Confidentiality Is Being Sought

IEPR Form S-1: Forecast Total Peak-Hour 1-in-2 Demand, Col I-R, Row 11

IEPR Form S-1: Adjusted Demand: End-Use Customers, Col I-R, Row 19

IEPR Form S-1: Coincident Peak-Hour Demand, Col I-R, Row 21

IEPR Form S-1: Required Planning Reserve Margin, Col I-R, Row 22

IEPR Form S-1: Firm LSE Procurement Requirement, Col I-R, Row 25

IEPR Form S-1: Forecast Total Energy Demand/ Consumption, Col I-R, Row 29

IEPR Form S-1: Adjusted Demand: End-Use Customers, Col I-R, Row 37

IEPR Form S-1: Firm LSE Procurement Requirement, Col I-R, Row 39

IEPR Form S-2: Total Utility-Controlled Fossil Fuel Supply, Col AB-AM, Row 10-15

IEPR Form S-2: Total Hydroelectric Supply, Col AB-AM, Row 19-25

IEPR Form S-2: Total Utility-Controlled Renewable Supply, Col AB-AM, Row 26-27

IEPR Form S-2: Total Utility-Controlled Battery Supply, Col AB-AM, Row 28-49

IEPR Form S-2: Total Qualifying Facility (QF) Contract Supply, Col AB-AM, Row 53, Row 57

IEPR Form S-2: Total Other Bilateral Contract Supply, Col AB-AM, Row 102-117, Row 119-134

IEPR Form S-2: Total: Running Total of Unbundled RECs (GWh in Energy Table only), Col O-Z, Row 135-136

IEPR Form S-2: Total: Existing and Planned Supply, Col O-Z, Col AB-AM, Row 140

IEPR Form S-2: Firm LSE Procurement Requirement, Col O-Z, Col AB-AM, Row 141

IEPR Form S-2: Net Surplus (or Need), Col O-Z, Col AB-AM, Row 142

IEPR Form S-2: Specified Planning Reserve Margin, Col O-Z, Row 145

IEPR Form S-2A: Col G-DV, Rows (10, 12, 14, 16, 18, 20, 22, 24, 26, 28, 30, 32, 34, 36, 38, 40, 42, 44, 46, 48, 50, 52, 54, 56, 58, 60, 62, 64, 66, 68, 70, 72, 156, 158, 160, 162, 164, 166, 168, 170, 172, 174, 176, 178, 182, 184, 186, 188, 190, 192, 194, 196, 198)

IEPR Form S-5: Contract Start Date, Col G, Rows 60-70

IEPR Form S-5: Contract Expiration Date, Col H, Rows 60-70

IEPR Form S-5: Capacity (MW) Under Contract, Col I, Rows 60-70

3. Description of the period for which confidentiality is being sought

SDG&E requests that the data indicated be kept confidential for a period of three years, or through December 31, 2027. Protection for this length of time is required to ensure that SDG&E's market-sensitive data is not disclosed to other market participants, who could make competitive use of this information to the detriment of utility ratepayers. The three-year confidentiality period requested by SDG&E is consistent with the protection afforded to this same data by the California Public Utilities Commission ("CPUC"). Three years is adequate time for the demand forecast data to become "stale" in terms of price movement in the relevant markets, and SDG&E has no objection to the data being made public after that time.

4. Information Substantially Similar to Information Previously Deemed Confidential by the Commission Continues to Warrant Confidential Treatment

The information for which confidential treatment is requested is substantially similar to information that was previously deemed confidential by the Commission. Attachment A to this Application includes certifications executed under penalty of perjury affirming that the submitted information is substantially similar to information previously submitted to the Commission by SDG&E and granted confidential treatment. These certifications apply to the categories of information listed in Section 2 above. In accordance with California Code of Regulations ("CCR"), Title 20, Section 2505(a)(4), this information should be deemed confidential.

I certify under penalty of perjury that the information contained in this application is true, correct, and complete to the best of my knowledge. SDG&E is a California corporation, and I am authorized to make the application and certification on behalf of SDG&E.

Respectfully submitted this 22nd day of November, 2024.

/s/ Aimee Smith _____

Aimee Smith

Attorney for:
SAN DIEGO GAS & ELECTRIC
COMPANY

ATTACHMENT A

Certifications Regarding Information Substantially Similar to Information Previously Deemed Confidential by the Commission

- ***Certification of Kenneth Schiermeyer***
- ***Certification of James Elias***
- ***Certification of Matt Richardson***

**CERTIFICATION REGARDING INFORMATION SUBSTANTIALLY SIMILAR
TO INFORMATION PREVIOUSLY DEEMED
CONFIDENTIAL BY THE COMMISSION
Docket Number 24-IEPR-02 Electricity Resource/Supply Plans**

As described in the attached Application, San Diego Gas & Electric Company (“SDG&E”) requests that certain information be designated as confidential by the Commission Pursuant to CCR, Title 20, Section 2505(a)(4). Specifically, the following categories of information are subject to confidential treatment under CCR, Title 20, Section 2505(a)(4):

- IEPR Form S-1: Forecast Total Peak-Hour 1-in-2 Demand, Col I-R, Row 11
- IEPR Form S-1: Adjusted Demand: End-Use Customers, Col I-R, Row 19
- IEPR Form S-1: Coincident Peak-Hour Demand, Col I-R, Row 21
- IEPR Form S-1: Required Planning Reserve Margin, Col I-R, Row 22
- IEPR Form S-1: Firm LSE Procurement Requirement, Col I-R, Row 25
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- IEPR Form S-1: Adjusted Demand: End-Use Customers, Col I-R, Row 37
- IEPR Form S-1: Firm LSE Procurement Requirement, Col I-R, Row 39

SDG&E requests that the information be designated confidential for a period of three years, or through December 31, 2027. In the 2015 Integrated Energy Policy Report (“IEPR”) proceeding (Docket No. 15-IEPR-02-Electricity Resource Plans), the Commission’s Executive Director determined that substantially similar data in the same forms qualified for confidential protection for those same time periods under Government Code § 6254. *See Response to San Diego Gas & Electric Company’s Application for Confidentiality for Resource Plan Forms*, Docket No. 15-IEPR-02-Electricity Resource Plans (dated June 5, 2015). Commission Executive Directors made similar determinations for similar data in other past IEPR proceedings, going back as far as 2011 and 2013. *See Response to Application for Confidentiality – San Diego Gas & Electric*

Co. IEPR Electricity Resource Plan Submission, Docket No. 11-IEP-1B (dated June 3, 2011); and *Response to SDG&E's Application for Confidentiality for the 2013 Integrated Energy Policy Report Electricity Resource Plan Submission*, Docket No. 13-IEP-1B (dated June 10, 2013). More recently, the Commission's Executive Director determined that similar data presented in Docket 21-IEPR-02 was properly designated as confidential information. See *Response to Application for Confidential Designation of Data in Integrated Energy Policy Report*, Docket 21-IEPR-02 (dated November 12, 2021). Finally, the Commission's Executive Director again designated similar data as confidential information in Docket 22-IEPR-03. See *CEC Response Letter to SDG&E's Application for Confidentiality*, Docket 22-IEPR-03 (dated December 13, 2022).

Accordingly, pursuant to 20 CCR § 2505(a)(4), SDG&E submits the following certification regarding the Commission's prior confidentiality designations.

1. I certify under penalty of perjury that the information described above for which SDG&E seeks confidential treatment is substantially the same information as that which the Commission has previously designated as confidential in prior IEPR dockets and that the facts and circumstances relevant to confidentiality remain unchanged; and
2. I am authorized to make this application and certification on behalf of SDG&E.

Date: November 22, 2024

By: /s/ KENNETH SCHIERMEYER
Kenneth Schiermeyer
Electric Forecasting and Analysis
Manager
San Diego Gas & Electric Company

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SDG&E requests that the information be designated confidential for a period of three years, or through December 31, 2027. In the 2015 Integrated Energy Policy Report (“IEPR”) proceeding (Docket No. 15-IEPR-02-Electricity Resource Plans), the

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Date: November 22, 2024

By: /s/ JAMES ELIAS

James Elias

Senior Resource Planner

San Diego Gas & Electric Company

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Date: November 22, 2024

By: /s/ MATT RICHARDSON
Matt Richardson
Contract Administrator,
Settlements & Systems
San Diego Gas & Electric
Company