

DOCKETED	
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Project Title:	Electricity Resource Plans
TN #:	260321
Document Title:	PG&E's Repeat Request for Confidentiality - 2024 IEPR Supply Forms
Description:	PG&E's Repeat Request for Confidentiality for the 2024 IEPR Electricity Resource (Supply) Forms (CONF version).
Filer:	Jennifer Privett
Organization:	Pacific Gas and Electric Company
Submitter Role:	Applicant
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REPEATED APPLICATION FOR CONFIDENTIAL DESIGNATION

(20 CCR SECTION 2505)

2025 INTEGRATED ENERGY POLICY REPORT

Docket Number 25-IEPR-02

Applicant: Pacific Gas and Electric Company (PG&E)

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1. (a) Title, data, and description of the record.

Electricity Resource Plan Supply Forms issued by the California Energy Commission(CEC) for the 2025 Integrated Energy Policy Report (IEPR).

(b) Specify the part(s) of the record for which you request confidential designation.

PG&E is providing the information as requested in Electricity Resource Plan Supply Forms S-1, S-2, S-2 Addendum (S-2A), and S-5. PG&E is requesting confidential designation for certain information designated as confidential in Electricity Resource Planning Forms S-1, S-2, S-2A, and S-5.

The data for which PG&E seeks confidential designation in the S-1, S-2, S-2A, and S-5 forms are clearly highlighted in yellow, and the confidential versions are conspicuously labeled as Confidential.

PG&E has provided Form S-1 (Capacity / Energy Procurement Requirement), Form S-2 (Capacity / Energy Supply Resources), Form S-2A (Addendum Monthly Data), and Form S-5 (Bilateral Contracts and Power Purchase Agreements). The CEC granted confidentiality to the below and similar data categories in the 2007, 2009, 2011, 2013, 2015, 2017, 2019, 2021 and 2022 IEPR forms. PG&E's request for confidentiality in these 2025 IEPR forms is consistent with those decisions for similar data. The new data being provided this year in these categories are unchanged or substantially similar to that provided in the 2007, 2009, 2011, 2013, 2015, 2017, 2019, 2021 and 2022 IEPR forms. PG&E requests that these categories be deemed confidential for the same reasons as presented in the 2007, 2009, 2011, 2013, 2015, 2017, 2019, 2021 and 2022 IEPR, and that this Application be considered a **Repeated Application**.

2. State the length of time the Commission should keep the record confidential.

PG&E requests that the following categories of information be designated as confidential as specified in the detailed listing below. Confidentiality is being sought for some data for years 2022 through 2033; for other data for years 2024 through 2033, for other data for years 2022-2026 and for other data for years 2024-2026.

Consistent with previous IEPR proceedings, PG&E requests that the specific categories of information listed for Form S-5 remain confidential through December 31, 2029, or the contract expiration date, whichever is later. Also consistent with previous IEPR proceedings, PG&E requests that the specific categories of information listed for Form S-1, Form S-2, and Form S-2A remain confidential for three years from the date of this application (i.e., to November 22, 2027).

3. **Identify the specific categories of data for which confidentiality is being sought.**

Supply Form S 1: (Capacity / Energy Procurement Requirement)

PG&E requests confidentiality for the following data for the specified years:

- Line 1: Forecast Total Peak Hour 1-in-2 Demand (2024 through 2033)
- Line 5: Adjusted Demand: End-Use Customers (2024 through 2033)
- Line 7: Coincident Peak-Hour Demand (2024 through 2033)
- Line 8: Required Planning Reserve Margin (2024 through 2033)
- Line 10: Firm Sales Obligations (2022 through 2026)
- Line 11: Firm LSE Procurement Requirement (2022 through 2033)

Supply Form S-2: (Capacity / Energy Supply Resources)

PG&E requests confidentiality for the following data for the specified years:

Capacity Supply Resources section:

- Line 5a: Total Qualifying Facility (QF) Contract Supply (2024 through 2033)
- Line 5g: Natural Gas (2024 through 2033)
- Line 5h: Other (2024 through 2033)
- Line 7a: Total Other Bilateral Contract Supply (2024 through 2033) *[each individual contract broken down, lines 7b through 7gl]*
- Line 10: Firm LSE Procurement Requirement (2024 through 2033)
- Line 11: Net Surplus (or Need) (2024 through 2026)

Energy Supply Resources section:

- Line 1a: Total Fossil Fuel Supply (2024 through 2033) *[each supply source broken down: New Humboldt Generation Station and Gateway Generation Station, Fuel Cells: UTC Units 1 and 2, Bloom Generation Station and Colusa Generation Station, Moss Landing Battery Energy Storage – lines 1b-1h]*
- Lines 2a, 2b, 2c: Total Nuclear Supply, Diablo Canyon 2 and Diablo Canyon 1 (2024 through 2026)
- Line 3a: Total Hydroelectric Supply (2024 through 2026)
- Line 3b: Hydro Supply from Plants 30 MW or More (2024 through 2026) *[each individual plant of 30 MW or more broken down, lines 3bb through 3bab, and 3bac]*
- Line 5 a: Total Qualifying Facility (QF) Contract Supply (2024 through 2033)
- Line 5g: Natural Gas QF Contract Supply (2024 through 2033)
- Line 5h: Other QF Contract Supply (2024 through 2033)
- Line 6: Renewable Contract Supply (2024 through 2033) *[each individual contract/source broken down, lines 6lb through 6li]*
- Line 7a: Total Other Bilateral Contract Supply (2024 through 2033) *[each individual contract/source broken down, lines 7b through 7gl]*

- Line 12: Generic Renewable Supply (2024 through 2033)
- Line 13: Generic Non-Renewable Resources (2024 through 2033)

Addendum Monthly tab:

- Fossil Fuel Supply (2024 through 2033) [*resource, type, and contract GWh*]
- Nuclear Supply (2024 through 2033) [*resource, type, and contract GWh*]
- Hydro Supply from Plants 30 MW or More (2024 through 2033) [*resource, type, and contract GWh*]
- Other Bilateral Contract Supply (2024 through 2033) [*resource, type, contract GWh, and NQC MW*]

Supply Form S-5 (Bilateral Contracts Table)

PG&E is requesting a Confidential Designation for the below-listed categories of data provided in Form S-5 for 96 contracts. The information covered by these data categories in the 2025 IEPR includes competitively and commercially sensitive business and resource-planning information, protected under the Public Records Act.

To release this information publicly would allow market participants to have access to competitively sensitive information that would normally not be available to them in this form or format. Additionally, release of this information could allow other parties to achieve a competitive advantage that could potentially harm PG&E's customers through higher power prices. Specifically, the identified data includes commercially sensitive information regarding the status of projects not yet operational.

The type of information covered by these data categories in the 2025 IEPR is the same or substantially similar in nature to information granted confidentiality by the CEC as part of the 2022 IEPR, as well as in previous IEPR proceedings (2007, 2009, 2011, 2013, 2015, 2017, 2019, and 2021). PG&E requests that the information be deemed confidential for the specified contracts because these disclosure concerns are still relevant. Cells requested to be confidential are clearly highlighted in yellow, per the CEC's request.

PG&E requests confidentiality for the below-noted cells in the following columns:

- Column G, Contract Start Date: cells 216, 218, 219, 232, 233, 234, 235, 239, 240, 241, 242, 243, 250, 252, 258, 260, 268, 269, 270, 271, 282, 283, 284, 285, 286, 287, 288, 289, 290, 291, 292, 293, 294, 296, 297, 298, 299, 300, 301, 302, 303, 326, 364, 370, 375, 377, 387, 393, 396, 398, 411, 413, 417, 436, 437, 438, 439, 440, 441, 442, 444, 445, 447, 448, 449, 450, 451, 452, 453, 454, 455, 456, 457, 458, 459, 460, 461, 462, 463, 464, 465, 466, 467, 468, 469, 470, 471, 472, 473, 474, 475, 476, 477, 478, 479, 480
- Column H, Contract Expiration Date: cells 216, 218, 219, 232, 233, 234, 235,

239, 240, 241, 242, 243, 250, 252, 258, 260, 268, 269, 270, 271, 282, 283, 284, 285, 286, 287, 288, 289, 290, 291, 292, 293, 294, 296, 297, 298, 299, 300, 301, 302, 303, 326, 364, 370, 375, 377, 387, 393, 396, 398, 411, 413, 417, 436, 437, 438, 439, 440, 441, 442, 444, 445, 447, 448, 449, 450, 451, 452, 453, 454, 455, 456, 457, 458, 459, 460, 461, 462, 463, 464, 465, 466, 467, 468, 469, 470, 471, 472, 473, 474, 475, 476, 477, 478, 479, 480

- Column I, Capacity (MW) Under Contract: 455, 456, 457, 458, 459, 460, 461, 462, 463, 464, 465, 466, 467, 468, 469, 470, 471, 472, 473, 474, 475, 476, 477, 478, 479, 480

4. Attestation

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 and that I am authorized to make the application and certification on behalf of the Applicant.

Dated: November 22, 2024

Signed: Original signed by /s/Daniel S. Hashimi

Name: Daniel S. Hashimi
Title: Senior Counsel
Pacific Gas and Electric Company