

DOCKETED	
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February 14, 2025

California Energy Commission
 Docket # 24-IEPR-02
 1516 Ninth Street, MS-39
 Sacramento, CA 95814

RE: San Francisco Public Utilities Commission’s Application for Confidential Designation for Electricity Resource Plan Form T-1 issued by the California Energy Commission in support of the 2025 Integrated Energy Policy Report (Docket No. 24-IEPR-02)

In conjunction with the filing of its Electricity Resource Plan Transmission Form T-1 (Form T-1), the San Francisco Public Utilities Commission (SFPUC), a department of the City and County of San Francisco, respectfully submits this Application for Confidential Designation pursuant to Cal. Code Reg. Tit. 20, section 2505.

I. Identification of Confidential Information

SFPUC requests confidentiality for the following data provided in its Form T-1. These data fields are clearly highlighted in yellow, and the confidential file is conspicuously labeled as “Confidential.”

- Columns C:I
- Column L
- Columns S:T
- Columns AB
- Column AK
- Columns BD:BF
- Column BL

II. Justification for Confidential Designation and Requested Time Period

SFPUC requests confidential treatment of the information identified in Section 1 above because the data constitutes transmission information that SFPUC must keep confidential for project viability. The data specifically relates to SFPUC’s proposed Warnerville-Newark Transmission Expansion Project (WaNTEP),

Daniel L. Lurie
 Mayor

Kate H. Stacy
 President

Joshua Arce
 Vice President

Avni Jamdar
 Commissioner

Steve Leveroni
 Commissioner

Dennis J. Herrera
 General Manager



which it recently submitted to the California ISO (CAISO) as part of CAISO's 2024-2025 Transmission Planning Process (TPP).¹ While the WaNTEP is being considered as a reliability alternative in the current TPP cycle, disclosing certain geographical attributes and market-sensitive data before the conclusion of CAISO's TPP could put project development at risk. Confidentiality would prevent market participants from gaining a competitive advantage from the disclosure of valuable project details that have not been finalized.² The public interest served by withholding such information from disclosure significantly outweighs any public interest served by disclosure.³

Thus, in order to accommodate the TPP and SFPUC's project management process, SFPUC respectfully requests confidentiality for three (3) years, until December 31, 2027.

III. Attestation

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 SFPUC.

Sincerely,



Grace Kay
Manager, Power Enterprise, Regulatory and Legislative Affairs
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¹ <https://stakeholdercenter.caiso.com/InitiativeDocuments/Presentation-2024-2025TransmissionPlanningProcess-Nov13-2024.pdf>

² Cal. Evid. Code §1060 and Cal. Govt. Code § 7930.205.

³ Cal. Govt. Code §7922.000 (regarding the public interest exemption under the California Public Records Act).