

**DOCKETED**

<b>Docket Number:</b>	25-IEPR-03
<b>Project Title:</b>	Electricity and Gas Demand Forecast
<b>TN #:</b>	263246
<b>Document Title:</b>	PG&E Repeat Application for Confidentiality-Natural Gas Demand Forms_2025
<b>Description:</b>	PG&E Application for Confidentiality IEPR Gas Forms 1-3
<b>Filer:</b>	Josh Harmon
<b>Organization:</b>	PG&E
<b>Submitter Role:</b>	Applicant
<b>Submission Date:</b>	5/22/2025 3:06:11 PM
<b>Docketed Date:</b>	5/22/2025

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

*2025 INTEGRATED ENERGY POLICY REPORT*

Docket Number 25-IEPR-03  
Natural Gas Demand Forecast

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

Attorney for Applicant: Daniel S. Hashimi  
Senior Counsel

Address of Attorney: Law Department  
Pacific Gas and Electric Company  
300 Lakeside Drive  
Oakland, CA 94612  
Daniel.Hashimi@pge.com  
415-982-9071

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

Natural Gas Demand Forecast 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 requesting confidential designation for three years for certain data cells pertaining to natural gas commodity prices in Form 1.6 and Form 3.1 as well as two PDF attachments noted here to protect the confidentiality of proprietary, market-sensitive information that constitutes valuable PG&E, or PG&E service provider's, intellectual property and trade secrets under California law. These attachments provide the documentation that S&P Global Commodity Insights (a third party service provider to PG&E) provided to PG&E to help respond to the CEC's request for "a description of financial variables and assumptions used to derive the natural gas price forecasts." They are titled, "Question 10 Supplemental \_North American Natural Gas LongTerm Outlook February 2024\_CONF.pdf" and "Question 10 Supplemental \_Integrated modeling and analysis of North American natural gas power and power markets\_CONF.pdf." The data and information shared is S&P Global proprietary and market sensitive information that PG&E is required to maintain confidential pursuant to a services agreement between PG&E and S&P Global Commodity Insights.

The CEC previously granted confidentiality to the below data categories or substantially similar data in response to PG&E's confidentiality application filed with the CEC as part of the 2023 IEPR, per the CEC's disposition letter to PG&E dated June 30, 2023. The current PG&E request for confidentiality for the 2025 IEPR is consistent with previous CEC decisions for similar data and previous PG&E data submissions to the CEC.

PG&E requests that these categories be deemed confidential for the same reasons as presented in prior confidentiality applications, and that this Application be considered a **Repeated Application**.

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

PG&E requests that certain data cells in Form 1.6 and Form 3.1 and the above referenced attachments, be maintained as confidential for three years from the date of this Application.

PG&E requests confidentiality for its natural gas commodity prices for three years, as this data was provided to PG&E by S&P Global Commodity Insights under its contract with PG&E as confidential information that may be only shared with the CEC to the extent the confidentiality of such information is maintained by the CEC. Additionally, confidentiality is requested to protect such market sensitive information from other market participants who could otherwise use the data to the detriment of PG&E ratepayers. The California Public Utilities Commission (CPUC) has granted PG&E confidentiality protection for this data and the CEC has granted confidentiality for similar data to the other investor-owned utilities. Three years of confidentiality strikes the right balance between protecting proprietary and market-sensitive data and the information becoming sufficiently dated to be released to the public without harm to PG&E ratepayers.

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

PG&E requests that certain data cells in the natural gas demand forecast data in Form 1.6 and Form 3.1, as well as the two PDF attachments described below be designated as confidential. PG&E is requesting this designation to prevent disclosure of PG&E proprietary information that constitutes valuable PG&E intellectual property and trade secrets under California law, and/or market sensitive and proprietary information provided by PG&E's service providers that PG&E has a contractual obligation to maintain confidential.

Specifically, for Form 1.6, *Fuel Prices*, the following category for the forecast years 2025-2040:

- Natural Gas Commodity Price

Specifically, for Form 3.1, *Gas Prices*, the following categories for the forecast years 2025-2040:

- Henry Hub Price
- Southern California Border Topock
- Malin Average
- PG&E Citygate Average
- SoCal Citygate Average
- AECO
- Westcoast St 2
- Sumas
- Kingsgate
- Stanfield
- Opal
- Cheyenne
- San Juan
- Waha

Specifically, attachment, "Question 10 Supplemental \_North American Natural Gas LongTerm Outlook February 2024\_CONF.pdf" provides details of North American natural gas market conditions at the time that the commodity price forecasts referenced above and used in the 2024 California Gas Report (CGR) were developed.

Specifically, attachment "Question 10 Supplemental \_Integrated modeling and analysis of North American natural gas power and power markets\_CONF.pdf" provides an overview of the methodology that S&P Global uses when developing their natural gas commodity price forecasts.

These two attachments are provided in response to the CEC's request for "a description of financial variables and assumptions used to derive the natural gas price forecasts."

PG&E respectively requests that the CEC approve this repeat application for confidentiality to maintain PG&E's and third-party vendor's proprietary and market-sensitive data consistent with the treatment for such data by the CPUC and afforded by the CEC to the other investor-owned

utilities. Doing so will prevent higher costs to PG&E ratepayers and will preclude market participants from gaining an unfair advantage over PG&E ratepayers.

#### **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. I also certify that I am authorized to make the application and certification on behalf of Pacific Gas and Electric Company.

May 22, 2025

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

Name: Daniel S. Hashimi

Title: Senior Counsel  
Pacific Gas and Electric Company