

DOCKETED

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Project Title:	Electricity Resource Plans
TN #:	204497
Document Title:	Imperial Irrigation District (IID)'s Application for Confidentiality Designation
Description:	N/A
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April 30, 2015

Mr. Robert Oglesby, Executive Director
California Energy Commission
1515 Ninth St, MS-39
Sacramento, Ca 95814-5504

Subject: Application for CONFIDENTIALITY Designation of certain data included in Docket #15-IEP-02
Imperial Irrigation District Resource Plan

Dear Mr. Oglesby:

The Imperial Irrigation District (IID) is pleased to submit the attached data, in response to the CEC request for Docket #115-iep-02 Resource Plan.

IID would like to request confidentiality on some of the S-1, S-2 and S-5 data. The attached worksheet submittal contains the entire response to the information request with cells highlighted in yellow to distinguish as "Confidential". Specifically, on the S-1 form, we are requesting cells A:64-B:64 and A:65-B:65 to be kept Confidential; on the S-2 form, we are requesting cells A:60-B:60 and A:61-B:61 to be kept Confidential; and on the Form S-5 Tables form, we are requesting cells A:9-19, B:9-19 and P:9-19. Reasons for this request are provided in the attached form.

Thanks,

Scott Harding
Supervisor, Resource Planning & Acquisition
Imperial Irrigation District
Phone: (760) 482-3365
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An application to keep a record confidential should be submitted directly to the Docket Unit in paper form or on electronic media, but not by email. Five (5) copies of the record for which confidentiality is sought must be submitted, on separate media if electronic, each marked with the title of the record and "confidential." (§ 1209.5, subd. (a)(4).) The application should be on a sheet separate from, but may be attached to, the record. The application will then be acted upon by the Executive Director in consultation with the Chief Counsel of the Energy Commission. (§ 2505, subd. (a).) (November 30, 2011, Standing Order.)

Applications and associated documents related to power plant licensing proceedings must be uploaded directly to Dockets through the e-filing system. Paper copies or CDs do not need to be submitted. Links to the e-filing system are provided on each siting project's Commission webpage.

TO: Energy Commission Docket Unit

Applicant: Scott D Harding

Address: 333 E. Barioni Blvd., Imperial, CA92251

Phone and E-mail: sdharding@iid.com

Proceeding or Project Name: Electricity Resource Plans

Docket Number: 15-IEPR-02

- 1(a). Title, date, and description (including number of pages) of the information or data for which you request confidential designation. **Information or data seeking a designation of confidentiality must be included with this application.**

Electricity Resource Plans issued by the California Energy Commission (CEC) for the 2015 Integrated Energy Policy Report.

- 1(b). Specify the part(s) of the information or data for which you request confidential designation.

IID requests that confidential designation for the contents of certain data cells related to some contracts information in the Electricity Resource Plans Forms S-1 CRATs(A64:B65), S-2 Energy Balance(A60:B61), and S-5 Table(A9:E19; P9:P19).

2. State and justify the length of time the Energy Commission should keep the information or data confidential.

The technology types on Forms S-1 and S-2 are not public until approved. IID requests confidentiality on these forms until final plans are approved. Certain contract terms on S-5 are sensitive. IID requests confidentiality of this information until contract expiration.

- 3(a). State the provision(s) of the Public Records Act (Gov. Code, § 6250 et seq.) or other law that allows the Energy Commission to keep the information or data confidential, and explain why the provision(s) apply to that material. (See next page.)

Under Public Resources Code Section 25322, the Commission is required to grant a request for confidential designation of information if: (C) On the facts of the particular case, the public interest served by not disclosing the information clearly outweighs the public interest served by disclosure.

APPLICATION FOR CONFIDENTIAL DESIGNATION

(Title 20 Cal. Code Regs., § 2505 et seq.)

CEC-13 (Revised 04/14)



CALIFORNIA ENERGY COMMISSION

- 3(b). Discuss the public interest in nondisclosure of the material submitted for a confidential designation. If the material contains trade secrets or its disclosure would otherwise cause loss of a competitive advantage, please state how it would be lost, the value of the information to the applicant and the ease or difficulty with which the information could be legitimately acquired or duplicated by others.

The disclosure of the contract terms and unapproved technology may undermine IID's ability to procure the most favorable deals, hence leading to higher energy price than the ratepayers would pay for if the information was not publicly released.

4. State whether the information or data can be disclosed if it is aggregated with other information or masked to conceal certain portions (including but not limited to the identity of the applicant). State the degree of aggregation or masking required. If the data cannot be disclosed even if aggregated or masked, explain why.

The information may be disclosed if it is aggregated with other information to a degree that it conceals the confidential information such as the contract terms and the unapproved technology information designated above

5. State how the material is kept confidential by the applicant and whether it has even been disclosed to a person other than an employee of the applicant. If it has, explain the circumstances under which disclosure occurred.

IID has not previously released this information to the general public or to third parties or to market participants. Only IID employees with a need to know has limited access to this information.

I certify under penalty of perjury under the laws of the State of California 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: 5-4-15

Signed: 

Name (print or type): Scott D Harding

Title: (print or type) Supervisor, Resource Planning & Acquisition

Representing: Imperial Irrigation District (IID)

Include additional signature blocks if there are multiple partners in the project with shared responsibilities for making the request.