

## DOCKETED

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<b>Project Title:</b>	Electricity Resource Plans
<b>TN #:</b>	204964
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**Pacific Gas and  
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May 28, 2015

Mr. Robert Oglesby  
Executive Director  
California Energy Commission  
1516 9th Street, MS-4  
Docket No.: 15-IEPR-02  
Sacramento, CA 95814-5512

Dear Mr. Oglesby:

*Rob,*

The accompanying compact discs contain Pacific Gas and Electric Company's ("PG&E") response to the California Energy Commission's ("Energy Commission") December 2014 request as detailed in the *Final Staff Report: Forms and Instructions for Submitting Electricity Resource Plans* (CEC-200-2014-007-SF). Pursuant to the timelines established therein and subsequently modified through a request for extension to June 1, 2015, PG&E provides its historical, forecasted, and contract data regarding electricity supply on Electricity Resource Plans Supply Forms S-1, S-2, and S-5.

PG&E seeks confidential designation for a subset of the data and its Application for Confidential Designation, as specified in the enclosed documents. For ease of review, two electronic sets of the Supply Forms are provided – one confidential version and one with the confidential cells redacted.

PG&E has previously requested Confidential Designation for substantially similar data submitted to the Energy Commission in previous Integrated Resource Planning Report ("IEPR") proceedings, and the Energy Commission has granted that confidentiality. PG&E requests, therefore, that the Energy Commission consider this a repeated application, and promptly grant PG&E's request for Confidential Designation to ensure protection of PG&E's confidential, proprietary, and competitive-sensitive trade secret information.

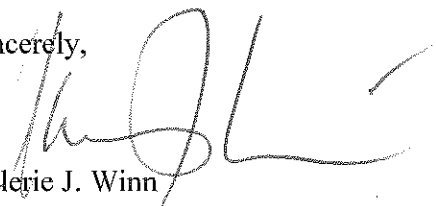
Please note that, as a general matter, the forward-looking information contained in this response is preliminary in nature, given that future events and regulatory decisions cannot be predicted and these events and decisions may significantly affect the information in this response. Thus, PG&E does not purport that the information contained in this response will reflect actual future resources or conditions.

We value the cooperative and collaborative working relationship we have with the Energy Commission and with your analysts. PG&E appreciates the tremendous amount of hard

PG&E Letter to the CEC Transmitting Forms S-1, S-2, and S-5  
May 28, 2015  
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work and ambitious schedule ahead of you in the 2015 IEPR, and encourages you to call me at the number above with any questions or concerns you might have.

Sincerely,

A handwritten signature in dark ink, appearing to be 'Valerie J. Winn', written over the printed name.

Valerie J. Winn

Enclosures



***Pacific Gas and  
Electric Company***

**2015**

**Integrated Energy Policy Report**

**Submitted to the  
California Energy Commission**

**June 1, 2015**

**CONFIDENTIAL VERSION**

*This document contains confidential information (identified by yellow shading). PG&E employees should not provide the confidential information in this document internally or externally without the approval of the Regulatory Affairs Case Manager or the Lead Attorney for the case.*

REPEATED APPLICATION FOR CONFIDENTIAL  
DESIGNATION  
(20 CCR SECTION 2025)

*2015 INTEGRATED ENERGY POLICY REPORT*  
Docket Number 15-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 ("Energy Commission") for the 2015 Integrated Energy Policy Report.

**(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, and S-5. This information is available to all Commissioners and to staff members on the 2013 Integrated Energy Policy Report Committee solely for its own use in the IEPR proceeding. However, PG&E is requesting confidential designation for certain information designated as confidential in Electricity Resource Planning Forms S-1, S-2, and S-5.

The data for which PG&E seeks confidential designation in each of the S-1, S-2, 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 Resource Accounting Table), Form S-2 (Energy Balance Table), and Form S-5 (Bilateral Contracts). The Energy Commission granted confidentiality to the below data categories in the 2007, 2009, 2011, and 2013 IEPR forms. PG&E's request for confidentiality in these 2015 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, and 2013 IEPR forms. PG&E requests that these categories be deemed confidential for the same

reasons as presented in the 2007, 2009, 2011, and 2013 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 designated as confidential be kept confidential for the periods specified in the detailed listing below. (Confidentiality is being sought for some data for years 2013 through 2024; for other data for years 2015 through 2024, for other data for years 2015-2017, and for other data just for year 2015.)

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

**Supply Form S-1** (Capacity Resource Accounting Table)

PG&E requests confidentiality for the following lines for 2013 through 2024:

- Line 17a, Total Qualifying Facility (QF) Capacity
- Line 17g, Natural Gas
- Line 17h, Other
- Line 20, Short-Term and Spot Market Purchases

PG&E requests confidentiality for the following lines for 2015 through 2024:

- Line 19a, Lines 19b-cv, Total Capacity from Other Bilateral Contracts, each individual contract broken down.

PG&E requests confidentiality for the following lines for 2015 through 2017:

- Line 21, Total: Existing and Planned Capacity
- Line 25, Generic Non-Renewable Resources.

PG&E requests confidentiality for the following lines for 2013 through 2017

- Line 10, Firm Sales Obligations
- Line 11, Firm LSE Peak-Hour Resource Requirement
- Line 22, Firm LSE Peak-Hour Resource Requirement
- Line 23, Capacity Surplus or (Capacity Need)

**Supply Form S-2** (Energy Balance Table)

PG&E requests confidentiality for the following lines yearly totals of 2015 through 2017:

- Line 1, Forecast Total Energy Demand/Consumption
- Line 5, Adjusted Energy Demand/Consumption
- Lines 9, Lines 9a-b, Total Nuclear Energy Supply, Diablo Canyon 1 and 2
- Line 19, Energy Surplus or (Energy Need)
- Line 21, Generic Non-Renewable Energy

PG&E requests confidentiality for the following lines yearly totals of 2015 through 2024:

- Line 6, Firm Sales Obligations
- Line 7, Firm LSE Energy Requirement
- Line 8, Lines 8a-d, Total Fossil Energy Supply; Fuel Cell, Colusa, Gateway, and New Humboldt
- Line 13, Lines 13f-g, Total Energy Supply from QF Contracts, Natural Gas, and Other
- Line 15, Lines 15a-bu, Total Energy Supply from Other Bilateral Contracts, each individual contract broken down
- Line 17, Total Energy: Existing and Planned Resources
- Line 18, Firm LSE Energy Requirement

PG&E requests confidentiality for the following lines related to hydroelectric generation for 2015 only:

- Line 10a, Total Hydroelectric Energy Generation
- Line 10b, Total Energy: Hydro Plants Larger than 30 MW

PG&E requests confidentiality for the following line for 2013 through 2017:

- Line 16, Short Term and Spot Market Purchases

**Supply Form S-5** (Bilateral Contracts)

PG&E is requesting a Confidential Designation for the below-listed categories of data provided in Form S-5 for approximately 300 contracts. The information covered by these data categories in the 2015 IEPR is the same or substantially similar to information granted confidentiality by the Energy Commission as part of the 2013 IEPR, as well as in previous IEPR proceedings (2007, 2009, and 2011). PG&E requests that these categories continue to be deemed confidential for all contracts because these same disclosure concerns are still relevant.

- Supplier / Seller
- Delivery Points (BAA/zone)
- Delivery Points (load pocket/substation)
- Locational Attributes of Unit (BAA/zone)
- Locational Attributes of Unit (load pocket/substation)
- Contract / Agreement Products
- Availability of Products
- Must Take
- Generating Units Specified
- Nameplate MW of Units
- Availability of the Units
- Unit Contingent/LD Contract
- Firm

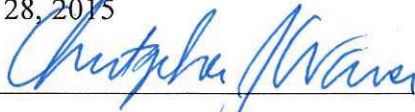
- Firming or Shaping
- Contract/Agreement Type
- Transmission Contingent & Path
- Termination & Extension Rights
- Performance Requirements
- Notes

**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: May 28, 2015

Signed: \_\_\_\_\_



Name: Christopher J. Warner  
Title: Chief Counsel  
Pacific Gas and Electric Company