DOCKETED	
Docket Number:	15-IEPR-03
Project Title:	Electricity and Natural Gas Demand Forecast
TN #:	205001
Document Title:	Application for Confidentiality
Description:	Forms 81.a and 8.1b
Filer:	Sabrina Savala
Organization:	Pacific Gas & Electric Company
Submitter Role:	Public
Submission Date:	6/12/2015 11:49:01 AM
Docketed Date:	6/12/2015



Valerie Winn Chief State Agency Relations 77 Beale Street, B10C San Francisco, CA 94105

(415) 973-3839 (415) 973-7226 Fax Valerie.winn @pge.com

June 11, 2015

Mr. Robert Oglesby Executive Director California Energy Commission 1516 9th Street, MS-4 Docket No.: 15-IEPR-03 Sacramento, CA 95814-5512

Dear Mr. Oglesby:

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 Demand Forecasts* (CEC-200-2014-006-SF). Pursuant to the timelines established therein and subsequently modified through a request for extension to June 11, 2015, PG&E provides its historical and forecasted revenue requirements by major cost categories, by bundled-customer classes, and for direct access customers on Electricity Demand Forecast Retail Price and Rate Forms 8.1a, 8.1b (bundled) and 8.1b (direct access).

PG&E seeks confidential designation for a subset of the data and herein provides its Application for Confidential Designation, as specified in the enclosed documents. For ease of review, two electronic sets of the Demand 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 this and 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.

PG&E Letter to the CEC Transmitting Forms 8.1a, 8.1b (bundled), and 8.1b (direct access) June 11, 2015
Page 2

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 work and ambitious schedule ahead of you in the 2015 IEPR. Please call me at the number above with any questions or concerns you might have.

Sincerely,

Valerie J. Winn/

Enclosures

REPEATED APPLICATION FOR CONFIDENTIAL DESIGNATION (20 CCR SECTION 2025)

2015 INTEGRATED ENERGY POLICY REPORT Docket Number 15-IEPR-03

Applicant:

Pacific Gas and Electric Company ("PG&E")

Attorney for Applicant:

Christopher J. Warner

Address of Attorney:

Chief Counsel
Law Department

Pacific Gas and Electric Company

P.O. Box 7442

San Francisco, CA 94120-75442 CJW5@pge.com (415) 973-6695

Fax: (415) 973-0516

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

Electricity Demand Forecast form 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 Demand Forecast Forms 8.1a and 8.1b This information is available to all Commissioners and to staff members on the 2015 Integrated Energy Policy Report Committee solely for their own use in the IEPR proceeding. However, PG&E is requesting confidential designation for certain information designated as confidential in Electricity Demand Forecast Form 8.1a.

The data for which PG&E seeks confidential designation in Form 8.1a (Electric Retail Price and Rate Forecast Form – Revenue Requirements by Major Cost Categories / Unbundled Rate Component) are clearly highlighted in yellow, and the confidential version is conspicuously labeled as Confidential.

The Energy Commission has previously granted confidentiality to the below data categories or substantially similar data in the 2013 IEPR and to additional data categories in PG&E's March 2015 IEPR submission of Form 8.1a with historic and 2015 forecast data. PG&E's request for confidentiality for this 2015 IEPR form is consistent with previous decisions for similar data. The new data being provided this year in these categories are unchanged or substantially similar to that provided in previous IEPR submittals. PG&E requests that these categories be deemed confidential for the same

reasons as presented in its prior confidentiality applications, 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 three years from submission.

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

<u>Demand Forecast Form 8.1a</u> (Revenue Requirements by Major Cost Categories/Unbundled Rate Component)

PG&E requests confidentiality for data 2013 through 2015¹:

- 1) Generation cost forecasts for:
 - a) UOG nuclear generation (non-fuel)
 - b) UOG conventional hydroelectric generation (non-fuel)
 - c) UOG natural gas-fired generation (non-fuel)
- 2) Purchased Power cost forecasts for:
 - a) Other resources / expenses

PG&E requests confidentiality for 2013 through 2016²:

1) UOG natural gas average fuel price

PG&E requests confidentiality for data 2013 through 20263:

- 1) Generation cost forecasts for:
 - a) UOG nuclear generation (fuel)
 - b) UOG conventional hydroelectric generation (fuel)
 - c) UOG natural gas-fired generation (fuel)
- 2) Purchased Power cost forecasts for
 - a) Other contracts

¹ Confidentiality for this data for 2013-2015 previously granted by the Energy Commission in May 1, 2015, letter to PG&E.

² Confidentiality for this data for 2013-2015 previously granted by the Energy Commission in May 1, 2015, letter to PG&E.

³ Confidentiality for this data for 2013-2015 previously granted by the Energy Commission in May 1, 2015, letter to PG&E.

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: June 11, 2015

Signed: Mutzuker / Warre

Name: C

Christopher J. Warner

Title: Chief Counsel

Pacific Gas and Electric Company