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| Docket Number: | 11-RPS-01 |
| Project Title: | Renewables Portfolio Standard |
| TN #: | 212124 |
| Document Title: | Los Angeles Department of Water & Power Application for Confidential Designation |
| Description: | Confidential designation for electric power plant specific hourly generation; price & energy sales data; residential home addresses of solar photovoltaic owners, Energy Transmission Pathway and generation data |
| Filer: | Patty Paul |
| Organization: | Los Angeles Department of Water & Power |
| Submitter Role: | Public |
| Submission Date: | 7/6/2016 8:33:45 AM |
| Docketed Date: | 7/5/2016 |

Los Angeles  Department of Water & Power

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June 29, 2016

California Energy Commission
Dockets Unit
1516 Ninth Street, MS 4
Sacramento, CA 95814

To Energy Commission Docket Unit:

Subject: **Confidential Records Designated Confidential by the CEC – Data**
Submitted by the Los Angeles Department of Water and Power for its 2015
Renewables Portfolio Standard Publically Owned Electric Utility Annual
Report

The Los Angeles Department of Water and Power (LADWP) is submitting confidential records to be deemed confidential by the California Energy Commission (CEC, also referred to as Commission) related to all of LADWP's:

1. Electric power plant specific hourly generation;
2. Price and energy sales data;
3. Residential home addresses of solar photovoltaic owners and other identifying data, such as name, system information or energy consumption; and
4. Energy Transmission Pathway and generation data found on North American Electronic Reliability Corporation (NERC) e-Tags, all its energy sales data, including pricing information, and customer data.¹

All information submitted to the CEC is collectively referenced as "Confidential Records".

The Confidential Records are submitted specifically with LADWP's filing to its RPS report for 2015.² In a letter dated July 31, 2015, from the CEC's Executive Director Robert Oglesby granting LADWP's request for confidentiality (2015 CEC Granting

¹ 20 California Code of Regulations §2505 (a)(5).

² 20 California Code of Regulations §3207(d).

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June 29, 2016

Letter), the CEC specifically referenced CEC's regulations Section 2505 (b) to designate the requested information as confidential, indefinitely. Section 2505 (b) provides as follows:

When another federal, state, regional, or local agency or state-created private entity, such as the California Independent System Operator, possesses information pertinent to the responsibilities of the Commission that has been designated by that agency as confidential under the Public Records Act, or the Freedom of Information Act, the Commission, the Executive Director, or the Chief Counsel may request, and the agency shall submit the information to the Commission without an application for confidential designation. The Commission shall designate this information confidential. [20 CCR §2505 (b)].

Furthermore, the 2015 CEC Granting Letter stated that, "In the future, information submitted to the Energy Commission can be deemed confidential without the need for a new application under [20 CCR Sections 2505(a)(1)(G) and 2505(a)(4)] if [LADWP files] a certification under penalty of perjury that the new information is substantially similar to the information previously granted confidentiality."⁴

LADWP is submitting the Confidential Records, which is new information that is substantially similar to the information the CEC previously granted confidentiality. The certification under penalty of perjury is provided below. Also, the Confidential Records should be deemed confidential indefinitely as previously granted in the 2015 CEC Granting Letter. Data may be released only if it is aggregated and anonymous, such that the underlying reasons for confidentiality are protected.

If there are any questions, or if the CEC disagrees with this letter, please contact me at (213) 367-0239 or email at louis.ting@ladwp.com as soon as possible so that LADWP may submit a formal application. You may also contact my staff Pjoy Chua at (213) 367-1750 or at pjoy.chua@ladwp.com.

Sincerely,



Louis C. Ting, P.E.
Director of Power Planning and Development Division
Los Angeles Department of Water and Power
111 North Hope Street, Room 921
Los Angeles, CA 90012

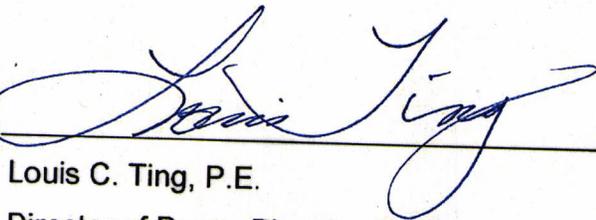
PC:ra
Enclosure
c: Pjoy T. Chua

⁴ See accompanying letter from the CEC, dated July 31, 2015.

CERTIFICATION BY LADWP

I declare under penalty of perjury under the laws of the State of California that the new information submitted by the Los Angeles Department of Water and Power for its 2015 Renewables Portfolio Standard for Publically Owned Electric Utility Annual Report is substantially similar to the information previously granted confidentiality by the CEC covering LADWP's Renewables Portfolio Standard data for the 2014 compliance period. I am authorized to make this certification on behalf of LADWP.

By

A handwritten signature in blue ink, appearing to read "Louis C. Ting", written over a horizontal line.

Louis C. Ting, P.E.

Director of Power Planning and Development Division

Los Angeles Department of Water and Power