

## DOCKETED

<b>Docket Number:</b>	17-IEPR-03
<b>Project Title:</b>	Electricity and Natural Gas Demand Forecast
<b>TN #:</b>	217127
<b>Document Title:</b>	PG&E Request for Confidentiality
<b>Description:</b>	Confidential for certain data cells in the Electric Demand Forecast Forms 1.1a, 1.1b, 1.2, 1.5, 1.6(a), and 2.2
<b>Filer:</b>	Katherine Bird
<b>Organization:</b>	Pacific Gas and Electric Co.
<b>Submitter Role:</b>	Public
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REPEATED APPLICATION FOR CONFIDENTIAL  
DESIGNATION (20 CCR SECTION 2025)

*2017 INTEGRATED ENERGY POLICY REPORT*

Docket Number 17-IEPR-03

Electricity Demand Forecast

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

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

Electric Demand Forecast forms issued by the California Energy Commission (CEC) for the 2017 Integrated Energy Policy Report, excluding Forms 8.1a and 8.1b (revenue requirement data), separately provided.

**(b) Specify the part(s) of the record for which you request confidential designation.**

PG&E is requesting confidential designation for three years (2017-2019) for the contents of certain data cells in the Electric Demand Forecast Forms 1.1a, 1.1b, 1.2, 1.5, 1.6(a), and 2.2, related to near-term forecasted loads, as described in more detail below. Although previously not expressly granted confidentiality in the CEC's July 2, 2015, letter in PG&E's 2015 IEPR Electric Demand Forecast Submission, PG&E is also requesting confidential designation for certain data cells in Form 3.4 and new Form 1.6d, in order to protect the confidentiality of customer personal and market-sensitive information related to a single customer or a non-residential customer group with a small number of customers incapable of being adequately aggregated, in compliance with customer privacy requirements under the CEC's own privacy and data aggregation standards according to CCR, Title 2507(d) and (e).

The CEC previously has granted confidentiality to the below data categories or substantially similar data in the 2015 IEPR, per the CEC's 2015 IEPR letter to PG&E dated July 2, 2015. PG&E's request for confidentiality for this 2017 IEPR form is consistent with previous CEC 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 and justify the length of time the Commission should keep the record confidential.**

PG&E requests that certain data cells in the demand forecast data in Forms 1.1a, 1.1b, 1.2, 1.5, 1.6(a), 2.2, 3.4 and 1.6d be designated as confidential for the same categories listed in the CEC's 2015 IEPR letter dated July 2, 2015, and that the confidential designation of this information herein be maintained for three years.

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

Specifically for Form 1.1a and 1.1b, the following categories for the forecast years 2017-2019:

- Sales to Bundled Customers

Specifically for Form 1.2, the following categories for the forecast years 2017-2019:

- Distribution Area Net Electricity for Generation Load.

Specifically for Form 1.5, the following categories for the forecast years 2017-2019:

- Peak Demand Weather Scenarios: 1-in-5 temperatures; 1-in-10 temperatures; 1-in-20 temperatures, and 1-in-40 temperatures.

Specifically for Form 1.6(a), the following categories for all hours for the forecast year 2017:

- Bundled Load;
- Bundled Losses;
- Unbundled Load;
- Unbundled Losses;

Specifically for Form 2.2, all provided categories for the forecast years 2017-2028:

- Electricity Rate Forecast.

PG&E also requests that certain data cells in the demand forecast data in Form 3.4 and Form 1.6d be designated as confidential. PG&E is requesting this designation in order to prevent disclosure of the identity of a customer and the identity of non-residential customers in a small group incapable of being adequately aggregated, as provided by the confidentiality and aggregation standards adopted by the CEC for similar customer-specific confidential and market-sensitive information.

Specifically for Form 3.4, the following category for the years as detailed below:

- Embedded PLS for 2017-2027
- Incremental PLS for 2018

Specifically for Form 1.6d, the following category for the years 2013, 2014, and 2015:

- Non-residential load shapes for groups (identified by Building Type, Forecast Zone and Utility Electric Tariff) which include too few customers for protection by aggregation.

#### **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.

April 17, 2017

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