

DOCKETED

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Project Title:	Electricity and Natural Gas Demand Forecast
TN #:	217854
Document Title:	PG&E Repeated Application for Confidentiality
Description:	PG&E Repeated Application for Confidentiality for Supply Forms S-1, S-2, S-3; Last repeated application for confidential designation was in Docket No. 15-IEPR-03; TN 205354-1, 205354-2 & 205355.
Filer:	Katherine Bird
Organization:	Pacific Gas and Electric Co.
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REPEATED APPLICATION FOR CONFIDENTIAL
DESIGNATION
(20 CCR SECTION 2025)

2017 INTEGRATED ENERGY POLICY REPORT
Docket Number 17-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 2017 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. 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 Accounting Table), and Form S-5 (Bilateral Contracts and Power Purchase Agreements). The Energy Commission granted confidentiality to the below data categories in the 2007, 2009, 2011, 2013, and 2015 IEPR forms. PG&E's request for confidentiality in these 2017 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, 2013, and 2015 IEPR forms. PG&E requests that these categories be deemed confidential for the same reasons

as presented in the 2007, 2009, 2011, 2013, and 2015 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 2015 through 2026; for other data for years 2017 through 2026, for other data for years 2015-2019, or for years 2017-2019, and for other data just for year 2017.)

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 2015 through 2026:

- Total Qualifying Facility (QF) Contract Supply
- Natural Gas
- Other
- Short-Term and Spot Market Purchases (and Sales)

PG&E requests confidentiality for the following lines for 2017 through 2026:

- Total Other Bilateral Contract Supply, each individual contract broken down

PG&E requests confidentiality for the following lines for 2017 through 2019:

- Total: Existing and Planned Supply
- Generic Non-Renewable Resources.

PG&E requests confidentiality for the following lines for 2015 through 2019:

- Firm Sales Obligations
- Firm LSE Procurement Requirement (line 11)
- Firm LSE Procurement Requirement (line 22)
- Net Surplus (or Need)

Supply Form S-2 (Energy Balance Accounting Table)

PG&E requests confidentiality for the following lines' yearly totals of 2017 through 2019:

- Forecast Total Energy Demand/Consumption
- Adjusted Demand: End-Use Customers
- Total Nuclear Energy Supply, Diablo Canyon 1 and 2 (lines 13a-b)
- Net Surplus (or Need)
- Generic Non-Renewable Energy

PG&E requests confidentiality for the following lines' yearly totals of 2017 through 2026:

- Firm Sales Obligations
- Firm LSE Procurement Requirement
- Total Fossil Fuel Supply; Fuel Cell, Colusa Generation Station, Gateway Generation Station, and Humboldt Generation Station (lines 12a-e)
- Total Qualifying Facility (QF) Contract Supply; Natural Gas, and Other (lines 17a, 17g-h)
- Total Other Bilateral Contract Supply, each individual contract broken down
- Total: Existing and Planned Resources
- Firm LSE Procurement Requirement

PG&E requests confidentiality for the following lines related to hydroelectric generation for 2017 only:

- Total Hydroelectric Supply
- Total: Hydro Supply from Plants larger than 30 MW

PG&E requests confidentiality for the following line for 2015 through 2019:

- Short Term and Spot Market Purchases (and Sales)

Supply Form S-5 (Bilateral Contracts and Power Purchase Agreements)

PG&E is requesting a Confidential Designation for the below-listed categories of data provided in Form S-5 for approximately 50 contracts. The information covered by these data categories in the 2017 IEPR includes competitively and commercially sensitive business and resource planning information, protected under the Public Records Act.

To release this information publicly would allow market participants to have access to competitively sensitive information that would normally not be available to them in this form or format. Additionally, release of this information could allow other parties to achieve a competitive advantage that could potentially harm PG&E's customers through higher power prices. Specifically, the specified data includes commercially sensitive information regarding the status of projects not yet operational or contains negotiated contract terms that are deemed confidential.

The type of information covered by these data categories in the 2017 IEPR is the same or substantially similar in nature to information granted confidentiality by the Energy Commission as part of the 2015 IEPR, as well as in previous IEPR proceedings (2007, 2009, 2011, and 2013). A new category of data being requested in the 2017 IEPR (Generation Unit(s) Status) falls into a similar category of commercially sensitive information as comparable to similar data requested in previous IEPR proceedings. PG&E requests that the information be deemed confidential for the specified contracts because these disclosure concerns are still relevant. Cells requested to be confidential are clearly highlighted in yellow, per the CEC's request.

PG&E requests confidentiality for the below-noted cells in the following columns:

- Column I, Generating Unit(s) Status: cells 19-24; 257-282, and 284-290
- Column N, Start Date: cells 19-24, 257-282, 284-290

- Column O, End Date: cells 19-24, 257-282, 284-290
- Column V, Termination & Extension Rights: cells 9, 11-24, 53, 57-62, 66-68, 76, 85, 89-91, 101, 103, 104, 122-124, 129, 132, 142, 190, 191, 224, 256-263, 285, 288-290

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 31, 2017

Signed: 

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