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| Docket Number: | 18-IRP-01 |
| Project Title: | Integrated Resource Plan |
| TN #: | 227162 |
| Document Title: | 2017 LADWP IRP Application for Confidentiality Designation |
| Description: | N/A |
| Filer: | Ramon D. Gamez |
| Organization: | Los Angeles Department of Water and Power |
| Submitter Role: | Applicant |
| Submission Date: | 2/22/2019 6:28:15 PM |
| Docketed Date: | 2/25/2019 |



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February 21, 2019

Drew Bohan, Executive Director
California Energy Commission
1516 Ninth Street, MS-39
Sacramento, California 95814-5504

Dear Mr. Bohan:

Subject: Application for Confidentiality Designation of Certain Data Included in the Los Angeles Department of Water and Power's (LADWP) 2017 Integrated Resource Plan and Standardized Reporting Tables (Docket 18-IRP-01) Submittal to the California Energy Commission (CEC) for the 2017 Integrated Resource Plan (IRP)

The Los Angeles Department of Water and Power (LADWP or Applicant) previously filed LADWP Form S-1: CRATs and Form S-2: EBT as part of the 2017 Integrated Energy Policy Report Submittal that was based on 2016 IRP modeling data. Since the filing for Docket 18-IRP-01 is based on updated 2017 IRP modeling data that is substantially different, LADWP requests that the CEC designate as confidential specific categories of data, identified in this application, contained within the California Energy Commission's Publicly Owned Utility (POU) IRP.

Applicant Name, Address, and Contact Information

Simon Zewdu
Manager of Regulatory Compliance and Specifications
Los Angeles Department of Water and Power
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1(a). Title, date, and description (including number of pages) of the information or data for which you request confidential designations. Information or data seeking a designation of confidentiality must be included with this application.

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| Item No. | 1 |
| Title: | Confidential Document – 2017 LADWP Integrated Resource Plan – 08-24-2018 |
| Date: | August 24, 2018 |
| File Type: | Adobe Acrobat PDF |
| Pages: | Information highlighted in yellow on pages 40 through 44 and pages 61 through 64. |

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| Item No. | 2 |
| Title: | Confidential Document – 2017 LADWP IRP Standardized Reporting Tables – 02-19-2019 |
| Date: | February 19, 2019 |
| File Type: | Microsoft Excel Worksheet |
| Pages: | Information highlighted in yellow on CRAT, EBT, GEAT and RPT tables (tabs) |

1(b). Specify the part(s) of the information or data for which you request confidential designation.

| Document Title: | Confidential Document – 2017 LADWP Integrated Resource Plan – 08-24-2018 | |
|------------------------------|---|-------------------------------|
| Section (page) | Title | Confidentiality Period |
| 5.2 (pages 40 – 44) | Local Reliability Area – All paragraphs in Section 5.2 except paragraphs 1 and 2 | 1/1/2017 – 12/31/2030 |
| 5.2 (pages 40 – 41) | Table: Summary of Findings in 2017 Transmission Assessment | 1/1/2017 – 12/31/2030 |
| 5.2 (page 42) | Table: Recommendations for Addressing the TPL Reliability Concerns in 2017 Assessment | 1/1/2017 – 12/31/2030 |
| 5.2 (page 44) | Table: Facilities that exceed 115% loading | 1/1/2017 – 12/31/2030 |
| Standardized Table (page 61) | CRAT – highlighted information | 1/1/2017 – 12/31/2030 |
| Standardized Table (page 62) | EBT– highlighted information | 1/1/2017 – 12/31/2030 |
| Standardized Table (page 63) | GEAT– highlighted information | 1/1/2017 – 12/31/2030 |
| Standardized Table (page 64) | RPT– highlighted information | 1/1/2017 – 12/31/2030 |

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| Document Title: | Confidential Document – 2017 LADWP IRP Standardized Reporting Tables – 02-19-2019 | |
| Sheet Title | CRAT | |
| Line | Title | Confidentiality Period |
| 11d | Utility-Owned Generation and Storage (not-RPS-eligible) | 1/1/2017 – 12/31/2030 |
| 11j | Utility-Owned Generation and Storage (not-RPS-eligible) | 1/1/2017 – 12/31/2030 |
| 11m – 11q | Utility-Owned Generation and Storage (not-RPS-eligible) | 1/1/2017 – 12/31/2030 |
| 11aa | Utility-Owned Generation and Storage (not-RPS-eligible) | 1/1/2017 – 12/31/2030 |
| 11ad – 11ae | Utility-Owned Generation and Storage (not-RPS-eligible) | 1/1/2017 – 12/31/2030 |
| 11am-11aq | Long-Term Contracts (not RPS-eligible) | 1/1/2017 – 12/31/2030 |
| 11ay-11bd | Long-Term Contracts (not RPS-eligible) | 1/1/2017 – 12/31/2030 |
| 12a – 12b | Utility-Owned RPS-eligible Resources | 1/1/2017 – 12/31/2030 |
| 12d-12l | Utility-Owned RPS-eligible Resources | 1/1/2017 – 12/31/2030 |
| 12m-12ah | Long-Term Contracts (RPS-eligible) | 1/1/2017 – 12/31/2030 |
| 12aj-12ak | Long-Term Contracts (RPS-eligible) | 1/1/2017 – 12/31/2030 |
| 12am | Long-Term Contracts (RPS-eligible) | 1/1/2017 – 12/31/2030 |
| 14a | Non-RPS Eligible Resources | 1/1/2017 – 12/31/2030 |
| 15a – 15k | RPS-Eligible Resources | 1/1/2017 – 12/31/2030 |
| Sheet Title | EBT | |
| Line | Title | Confidentiality Period |
| 12a – 12ai | Utility-Owned Generation Resources (not-RPS-eligible) | 1/1/2017 – 12/31/2030 |
| 12aj-12bd | Long-Term Contracts (not RPS-eligible) | 1/1/2017 – 12/31/2030 |
| 13a – 13l | Utility-Owned RPS-eligible Generation Resources | 1/1/2017 – 12/31/2030 |
| 13o-13aq | Long-Term Contracts (RPS-eligible) | 1/1/2017 – 12/31/2030 |
| 13z | Undelivered RPS energy | 1/1/2017 – 12/31/2030 |
| 15a | Non-RPS Eligible Resources | 1/1/2017 – 12/31/2030 |
| 15 | Total energy from generic supply resources (not RPS-eligible) | 1/1/2017 – 12/31/2030 |
| 16a – 16k | RPS-Eligible Resources | 1/1/2017 – 12/31/2030 |
| Sheet Title | GEAT | |
| Line | Title | Confidentiality Period |
| 1b-1w | Utility-Owned Generation (not-RPS-eligible) | 1/1/2017 – 12/31/2030 |
| 1aa-1ai | Utility-Owned Generation (not-RPS-eligible) | 1/1/2017 – 12/31/2030 |
| 1aj-1al | Long-Term Contracts (not RPS-eligible) | 1/1/2017 – 12/31/2030 |

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| 1ar | Long-Term Contracts (not RPS-eligible) | 1/1/2017 – 12/31/2030 |
| 1at-1au | Long-Term Contracts (not RPS-eligible) | 1/1/2017 – 12/31/2030 |
| 1ba-1bd | Long-Term Contracts (not RPS-eligible) | 1/1/2017 – 12/31/2030 |
| 1 | Total GHG emissions of existing and planned supply resources (not RPS-eligible) | 1/1/2017 – 12/31/2030 |
| 4a | Non-RPS Eligible Resources | 1/1/2017 – 12/31/2030 |
| 5a-5k | RPS-Eligible Resources | 1/1/2017 – 12/31/2030 |
| 5 | Total GHG emissions from RPS-eligible resources | 1/1/2017 – 12/31/2030 |
| 6 | Total GHG emissions from existing and planned supply resources (4+5) | 1/1/2017 – 12/31/2030 |
| 7 | Net spot market/short-term purchases | 1/1/2017 – 12/31/2030 |
| 8 | Total GHG emissions to meet net energy for load (3+6+7) | 1/1/2017 – 12/31/2030 |
| 8a | Undelivered RPS energy (MWh from EBT) | 1/1/2017 – 12/31/2030 |
| 8b | Firm Sales Obligations (MWh from EBT) | 1/1/2017 – 12/31/2030 |
| 8c | Total energy for emissions adjustment (8a+8b) | 1/1/2017 – 12/31/2030 |
| 8d | Emissions intensity (portfolio gas/short-term and spot market purchases) | 1/1/2017 – 12/31/2030 |
| 8e | Emissions adjustment (8Cx8D) | 1/1/2017 – 12/31/2030 |
| 8f | Adjusted Portfolio emission (8Cx8D) | 1/1/2017 – 12/31/2030 |
| 9 | GHG emissions reduction due to gasoline vehicle displacement by LD PEVs | 1/1/2017 – 12/31/2030 |
| 10 | GHG emissions increase due to LD PEV electricity loads | 1/1/2017 – 12/31/2030 |
| 11 | GHG emissions reduction due to fuel displacement - other transportation electrification | 1/1/2017 – 12/31/2030 |
| 12 | GHG emissions increase due to increased electricity loads - other transportation electrification | 1/1/2017 – 12/31/2030 |
| Sheet Title | RPT | |
| 5 | Excess balance at beginning/end of compliance period | 1/1/2017 – 12/31/2030 |
| 6 | RPS-eligible energy procured | 1/1/2017 – 12/31/2030 |
| 6A | Amount of energy applied to procurement obligation | 1/1/2017 – 12/31/2030 |
| 8 | Net change in balance/carryover (RECs and RPS-eligible energy) | 1/1/2017 – 12/31/2030 |

| | (6+7-6A-7A) | |
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| 9 | Excess balance at beginning/end of compliance period | 1/1/2017 – 12/31/2030 |
| 12 | Net change in REC balance | 1/1/2017 – 12/31/2030 |
| 13 | Total generation plus RECs (all Categories) applied to procurement requirement (6A + 7A + 11) | 1/1/2017 – 12/31/2030 |
| 14 | Over/under procurement for compliance period (13 - 4) | 1/1/2017 – 12/31/2030 |

Confidentiality is being requested for any and all information regarding planned future capacity expansion, anticipated future generation, planned future energy storage, resources with capacities that fluctuate from year to year, renewable energy procurement, anticipated carbon emissions, and renewable energy credit (REC) open positions. The lines containing such information are summarized in the table above.

All cells containing information identified in the tables above have been highlighted in yellow.

2. State and justify the length of time the Energy Commission should keep the information or data confidential.

Applicant’s confidential data relates to, among other things, the transmission and transportation of energy, which constitutes “critical energy/electric infrastructure information.” 18 C.F.R. §§ 388.113(c); 18 C.F.R. § 388.112; 6 U.S.C. §§ 131, 133. Data regarding critical energy infrastructure information is deemed confidential and exempted from disclosure pursuant to Government Code Sections 6254(k) and 6254(aa). The Federal Energy Regulatory Commission (FERC) treats this data as non-public information. To protect Critical Energy Infrastructure (CEII) and prevent market advantage to any particular developer or transaction counterparty, any and all information pertaining to planned future capacity expansion, anticipated future generation, planned future energy storage, resources with capacities that fluctuate from year to year, renewable energy procurement, anticipated carbon emissions, and renewable energy credit (REC) open positions must remain confidential until the procurement time period has passed, i.e. December 31, 2030.

3(a). State the provision(s) of the public Records Act (Gov. Code, § 6250 et seq.) or other law that allows the Energy Commission to keep the information or data confidential, and explain why the provision apply to that material.

In addition to California Government Code Sections 6254(e) (information related to plant production and utility systems development); 6254(k) (records exempted from disclosure pursuant to federal or state law, including the California Evidence Code); 6254 (aa) (documents that assess vulnerability to terrorist attack or other criminal acts intended to disrupt operations); and 6255 (public interest), California Code of Regulations, Title 20 section 2505(b) states, "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".

3(b). Discuss the public interest in nondisclosure of the material submitted for a confidential designation. If the material contains trade secrets or its disclosure would otherwise cause loss of a competitive advantage, please state how it would be lost, the value of the information to the applicant and the ease or difficulty with which the information could be legitimately acquired or duplicated by others.

- a. As indicated in Paragraph 3(a) above, the specific records to be withheld from public disclosure are exempt under provisions of the California Government Code Sections 6250, et seq. and California Code of Regulations, Title 20 section 2505(b). The confidential information includes critical energy/electric infrastructure information and trade secrets.
- b. Applicant's confidential data relates to, among other things, the transmission and transportation of energy, which constitutes "critical energy/electric infrastructure information." 18 C.F.R. §§ 388.113(c); 18 C.F.R. § 388.112; 6 U.S.C. §§ 131, 133. Data regarding critical energy infrastructure information is deemed confidential and exempted from disclosure pursuant to Government Code Sections 6254(k) and 6254(aa). The Federal Energy Regulatory Commission (FERC) treats this data as non-public information.
- c. The lines in the CRAT, EBT, GEAT, and RPT tables identified above in Paragraph 1(b) contain specific information regarding planned future

capacity expansion, anticipated future generation, planned future energy storage, resources with capacities that fluctuate from year to year, renewable energy procurement, anticipated carbon emissions, and renewable energy credit (REC) open positions. The information is considered a trade secret as defined in the California Evidence Code. The disclosure of such information will negatively impact Los Angeles Department of Water and Power's ability to effectively and competitively negotiate renewable contracts, to protect proprietary information, and ultimately ratepayer interests. That is, disclosure will negatively impact LADWP ratepayers.

4. State whether the information or data can be disclosed if it is aggregated with other information or masked to conceal certain portions (including but not limited to the identity of the applicant). State the degree of aggregation or masking required. If the data cannot be disclosed even if aggregated or masked, explain why.

The lines in the CRAT, EBT, and GEAT tables identified above in Paragraph 1(b) may be aggregated by fuel-type on a California-wide basis only. The RPT table identified above in Paragraph 1(b) may be aggregated on a California-wide basis only. Lower levels of aggregation will allow market participants to ascertain information regarding planned future capacity expansion, anticipated future generation, planned future energy storage, resources with capacities that fluctuate from year to year, renewable energy procurement, anticipated carbon emissions, and renewable energy credit (REC) open positions. The disclosure of such information will negatively impact Los Angeles Department of Water and Power's ability to effectively and competitively negotiate renewable contracts, to protect proprietary information, and ratepayer interests.

5. State how the material is kept confidential by the applicant and whether it has even been disclosed to a person other than an employee of the applicant.

The items mentioned above have not been disclosed to any person not an employee of the Applicant. As discussed above, some of the information may be similar to previously submitted information, however this updated information presented for SB350 compliance has not been previously disclosed. Such information has been marked as confidential internally and governed by the Applicant's internal policy on confidential information.

Mr. Drew Bohan
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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. I also certify that I am authorized to make the application and certification on behalf of the Los Angeles Department of Water and Power.

Sincerely,



Simon Zewdu
Manager of Regulatory Compliance and Specifications