

DOCKETED

Docket Number:	19-IEPR-03
Project Title:	Electricity and Natural Gas Demand Forecast
TN #:	227686
Document Title:	PGE REPEAT and NEW confidentiality designationsaffadavits
Description:	Combined document describing REPEAT confidential request for portions of attached forms and NEW confidentiality request for forms or portions of forms
Filer:	Katherine Bird
Organization:	Pacific Gas and Electric Co.
Submitter Role:	Public
Submission Date:	4/15/2019 2:01:29 PM
Docketed Date:	4/15/2019

REPEATED APPLICATION FOR CONFIDENTIAL
DESIGNATION (20 CCR SECTION 2025)

2019 INTEGRATED ENERGY POLICY REPORT

Docket Number 19-IEPR-03

Electricity Demand Forecast

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

Attorney for Applicant: Christopher J. Warner
Chief Counsel

Address of Attorney: Law Department
Pacific Gas and Electric Company
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(415) 973-6695
(415) 973-0516

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

Electricity Demand Forecast forms issued by the California Energy Commission (CEC) for the 2019 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 (2019-2021) for the contents of certain data cells in the Electric Demand Forecast Forms 1.1a, 1.1b, 1.2, 1.5, 1.6a, and 2.2, related to near-term forecasted loads, as described in more detail below.

The CEC previously has granted confidentiality to the below data categories or substantially similar data in the 2017 IEPR, per the CEC's 2017 IEPR letter to PG&E dated May 3, 2017. PG&E's request for confidentiality for this 2019 IEPR 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, 1.6a, and 2.2 be designated as confidential for the same categories approved in the CEC's 2017 IEPR letter dated May 3, 2017, 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 Forms 1.1a and 1.1b, Retail Sales of Electricity by Class or Sector, the following categories for the forecast years 2019-2021:

- Sales to Bundled Customers

Specifically for Form 1.2, Total Energy to Serve Load, [formerly titled Distribution Area Net Electricity for Generation Load], the following categories for the forecast years 2019-2021:

- All load categories

Specifically for Form 1.5, Peak Demand Weather Scenarios, the following categories for the forecast years 2019-2021:

- 1-in-5 temperatures
- 1-in-10 temperatures
- 1-in-20 temperatures

Specifically for Form 1.6a, Bundled LSE Hourly Loads, the following categories for all hours for the forecast year 2019:

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

Specifically for Form 2.2, Electricity Rate Forecast, for the forecast years 2019-2030:

- Electricity rate forecast, all provided categories

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. I also certify that I am authorized to make the application and certification on behalf of Pacific Gas and Electric Company.

April 15, 2019

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

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

Electricity Demand Forecast forms issued by the California Energy Commission (CEC) for the 2019 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 (2019-2021) for certain data cells in Form 1.7a, 1.7b and 1.7c, Form 3.2, Form 6 and related portions of Forms 1.1a and Form 1.2 in order to protect the confidentiality of proprietary, market-sensitive information that constitutes valuable PG&E intellectual property and trade secrets under California law. PG&E is also requesting confidential designation for Form 2.1 and certain additional data cells in Form 2.2 to protect proprietary information owned by Moody's Analytics that constitutes intellectual property and trade secrets under California law.

2. State and justify the length of time the Commission should keep the record confidential.

PG&E requests that certain data cells in Form 1.7a, 1.7b and 1.7c, Form 2.1, Form 2.2, Form 3.2, Form 6 and related portions of Forms 1.1a, and Form 1.2 herein be maintained as confidential for three years.

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

PG&E requests that certain data cells in the demand forecast data in Forms 1.7a, 1.7b and 1.7c; Form 6; and related portions of Form 1.1a and Form 1.2 be designated as newly confidential. PG&E is requesting this designation in order to prevent disclosure of PG&E proprietary information that constitutes valuable PG&E intellectual property and trade secrets under California law. Additionally, PG&E requests that specific portions of Form 2.1 and Form 2.2 be designated as newly confidential in order to prevent the disclosure of proprietary information that is owned by Moody's Analytics and, therefore, is a protected trade secret under California law.

Specifically for Form 1.7a, Cumulative Historical and Forecasted Impacts of Photovoltaics (PV) and Combined Heat and Power (CHP); 1.7b, Cumulative Historical and Forecasted Impacts of Battery Energy Storage, and 1.7c, Cumulative Historical and Forecasted Peak Impacts of Battery Energy Storage, the following categories for the years as detailed below:

- Form 1.7a: PV forecast (2019- 2030), and other distributed generation (DG) forecasts including fuel cell and CHP (2019- 2030)
- Form 1.7b: Storage forecast (2019- 2030)
- Form 1.7c: Storage forecast (2019- 2030)

Specifically for Form 3.2, Cumulative Incremental Impacts of Energy Efficiency (EE), the following category for the years as detailed below:

- Energy Efficiency forecast (2019- 2030)
- Building Electrification forecast (2019-2030)

Specifically for Form 6, Demand Side Management Methodology Documentation, the following categories for the years as detailed below:

- Descriptions of forecast methods for PV, non-PV DG, EE, Electric Vehicles (EV), Building Electrification and Storage

Specifically for Forms 1.1a and 1.2 the following categories for the years as detailed below:

- Form 1.1a: Electric vehicles forecasted values
- Form 1.2: Energy efficiency forecasted values

Specifically for Forms 2.1 and 2.2 the following categories for the years as detailed below:

- Form 2.1: All economic and demographic assumptions for PG&E service area owned by Moody's Analytics
- Form 2.2: GDP Deflator Series for PG&E service area owned by Moody's Analytics

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. I also certify that I am authorized to make the application and certification on behalf of Pacific Gas and Electric Company.

April 15, 2019

Signed: Original signed by /s/Christopher J. Warner
Name: Christopher J. Warner
Title: Chief Counsel
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