

<b>DOCKETED</b>	
<b>Docket Number:</b>	19-IEPR-02
<b>Project Title:</b>	Electricity Resource Plans
<b>TN #:</b>	227750
<b>Document Title:</b>	Repeated Confidentiality Application
<b>Description:</b>	N/A
<b>Filer:</b>	Yushan Zhong
<b>Organization:</b>	Imperial Irrigation District
<b>Submitter Role:</b>	Public Agency
<b>Submission Date:</b>	4/18/2019 10:42:52 AM
<b>Docketed Date:</b>	4/18/2019



# IID

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April 10, 2019

Mr. Robert Oglesby, Executive Director  
California Energy Commission  
1515 Ninth St, MS-39  
Sacramento, Ca 95814-5504

Subject: Repeated Application for CONFIDENTIALITY Designation of certain data included in Docket #19-IEPR-02 Imperial Irrigation District Resource Plan

Dear Mr. Oglesby:

The Imperial Irrigation District (IID) is pleased to submit the attached data, in response to the CEC request for Docket #19-iepr-02 Resource Plan.

IID would like to repeat request confidentiality under CCR, Title 20, Section 2505(a)(1)(g) on some of the S-1, S-2 and S-5 data. The attached worksheet submittal contains the entire response to the information request with cells highlighted in yellow to distinguish as "Confidential". Specifically, on the S-2 form, we are requesting cells B:73-AI:73 to be kept Confidential; and on the Form S-5 Tables form, we are requesting cells B:12-18, D12-18 and I:12-18 through K:12-18. Reasons for this request are provided in the attached documentation.

Thanks,

Scott Harding  
Supervisor, Resource Planning & Acquisition  
Imperial Irrigation District  
Phone: (760) 482-3365  
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**APPLICATION FOR CONFIDENTIAL DESIGNATION**

**(Title 20 Cal. Code. Regs., § 2505 et seq.)**

CEC-13 (Revised 03/17)

CALIFORNIA ENERGY COMMISSION

**All confidential filings:** Individual documents may not exceed 30 MB<sup>1</sup> or be password protected.<sup>2</sup> The application must be a separate document from the confidential materials. The application itself is not confidential and is a public record. The application will be reviewed and acted upon by the Executive Director in consultation with the Chief Counsel of the Energy Commission. (§ 2505, subd. (a))

If you have questions, contact the Docket Unit at (916) 654-5076 or email: [docket@energy.ca.gov](mailto:docket@energy.ca.gov).

**Existing proceedings:** Applications for confidentiality and the confidential documents must be uploaded directly to the Docket Unit through the e-filing system. Paper copies or CDs do not need to be submitted. Links to the e-filing system are provided on most proceeding webpages labeled "Submit e-filing." Alternatively, go to: <http://www.energy.ca.gov/e-filing/index.html>. Registration is necessary the first time documents are uploaded. Once registration is complete, to submit a confidential filing click on **Quick Actions** from the **DASHBOARD** and select **Submit Confidential e-filing** from the dropdown list. The application must be uploaded first followed by one or more confidential files.

**Filings not associated with any proceeding:** Applications for confidentiality and the confidential materials must be submitted directly to the **Docket Unit** in paper form or on a CD, but not by email. Two copies must be submitted, on separate media if electronic, each marked with a descriptive title and "Confidential." (§ 1208.1)

**TO: Energy Commission Docket Unit**

Applicant: Scott D Harding

Address: 333 E. Barioni Blvd., Imperial, CA92251

Phone and E-mail: [sdharding@iid.com](mailto:sdharding@iid.com)

Proceeding or Project Name: Electricity Resource Plans

Docket Number: 19-IEPR-02

- 1(a). Title, date, and description (including number of pages) of the information or data for which you request confidential designation. **Information or data seeking a designation of confidentiality must be included with this application.**

Electricity Resource Plans issued by the California Energy Commission (CEC) for the 2019 Integrated Energy Policy Report.

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

IID requests that confidential designation for the contents of certain data cells related to some contracts information in the Electricity Resource Plans S-2 SUPPLY form B:73-AI:73; S-5 form cells B:12-18, D12-18 and I:12-18 through K:12-18

<sup>1</sup> Contact the Docket Unit if you cannot reduce the size of your file.

<sup>2</sup> If you wish to protect the files while in transit, you may combine them in a password-protected .zip file..



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CEC-13 (Revised 03/17)

CALIFORNIA ENERGY COMMISSION

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

The capacities under generic renewable supply on form S-2 are dependent on technology type and are confidential until approval.  
 Certain contract terms on S-5 are sensitive. IID requests confidentiality of this information until contract expiration.

- 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(s) apply to that material.

Under Public Resources Code Section 25322, the Commission is required to grant a request for confidential designation of information if: (C) On the facts of the particular case, the public interest served by not disclosing the information clearly outweighs the public interest served by disclosure.

- 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.

The disclosure of this market sensitive information regarding IID's supply portfolio development and risk management may undermine IID's ability to procure the most favorable deals for its customers, hence may leading to higher cost of electricity.

- 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 disclosure of aggregation of data collected by the CEC from all California electric and gas utilities on a statewide basis would be acceptable.

- 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. If it has, explain the circumstances under which disclosure occurred.

IID has a public approval process for each agreement signed for electric services. But various terms are often redacted for market sensitive confidentiality. Only IID employees with a need to know has limited access to this information.

I certify under penalty of perjury under the laws of the State of California 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: 4-10-19

Signed: 



**APPLICATION FOR CONFIDENTIAL DESIGNATION**  
**(Title 20 Cal. Code. Regs., § 2505 et seq.)**

CEC-13 (Revised 03/17)

CALIFORNIA ENERGY COMMISSION

Name (print or type): Scott D Harding  
Title: (print or type) Supervisor, Energy Optimization & Procurement  
Representing: Imperial Irrigation District (IID)

Include additional signature blocks if there are multiple partners in the project with shared responsibilities for making the request.