

**DOCKETED**

<b>Docket Number:</b>	19-IEPR-02
<b>Project Title:</b>	Electricity Resource Plans
<b>TN #:</b>	227754
<b>Document Title:</b>	Valley Clean Energy Alliance Application for Confidentiality
<b>Description:</b>	N/A
<b>Filer:</b>	Gary Lawson
<b>Organization:</b>	Sacramento Municipal Utility District
<b>Submitter Role:</b>	Public Agency
<b>Submission Date:</b>	4/18/2019 2:29:16 PM
<b>Docketed Date:</b>	4/18/2019



CES 2019-002  
April 18, 2019

Drew Bohan, Executive Director  
Docket No. 19-IEPR-02 Electricity Resource Plans  
California Energy Commission  
1516 Ninth Street, MS-39  
Sacramento, CA 95814-5504

**Re: Valley Clean Energy Alliance Application for Designation of Confidential Records and Submittal of Electricity Resource Planning Forms for Docket 19-IEPR-02**

SMUD is the Wholesale Energy Services (WES) provider for Valley Clean Energy Alliance (VCE) a registered Community Choice Aggregator. As VCE's WES provider, SMUD is acting as VCEA's agent in procuring its resources and in making its related compliance filings. My staff has responsibility for preparing and submitting VCE's load and resource-related compliance filings and has prepared VCE's various 2019 IEPR filings.

This confidentiality application is in support of the filing of VCE's 2019 IEPR Electricity Resource Planning Forms in Docket No. 19-IEPR-02. VCE hereby requests that the Commission designate as confidential the highlighted information and data set forth in the attached Electricity Resource Planning Forms S-2 and S-5.

Form S-2 (Supply) contains expected resource adequacy capacity under contract, and Form S-5 (Bilateral Contracts) contains commercial details for those resource adequacy arrangements. Neither of those sets of information have heretofore been publicly released.

The information highlighted on the forms as confidential is information that is commercially sensitive and could give suppliers and competitors an advantage and thereby harm VCE and its customers should the information become public.

VCE further requests that the designation of confidentiality be for a 3-year period. However, the data can be released immediately if aggregated with all the other load serving entity Electricity Resource Plans.

The undersigned is authorized to make this application and the following certification on behalf of Valley Clean Energy:

"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 Valley Clean Energy Alliance."

SACRAMENTO MUNICIPAL UTILITY DISTRICT

By: \_\_\_\_\_

Name: Gary W. Lawson

Title: Manager Wholesale Energy Services, Community Energy Services

Date: April 18, 2019