

DOCKETED

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**REVISED APPLICATION FOR CONFIDENTIAL DESIGNATION
(20 CCR SECTION 2505)**

**2019 INTEGRATED ENERGY POLICY REPORT
Docket No. 19-IEPR-02 Electricity Resource/Supply Plans**

Applicant: San Diego Gas & Electric Company (“SDG&E”)

Attorney for Applicant: John A. Pacheco
Address of Applicant: 8330 Century Park Court, CP 32
San Diego, CA 92123
jpacheco@semprautilities.com
(858) 654-1761

1. Identification of the Information Being Submitted

SDG&E seeks confidential designation for data provided to the California Energy Commission (“Commission”). SDG&E is providing such data to the Commission as part of the 2019 Integrated Energy Policy Report (“IEPR”) (Docket No. 19-IEPR-02) process and pursuant Title 20, Section 1345 of the California Code of Regulations (“CCR”). Generally, the information for which confidential designation is requested pertains to SDG&E’s electric resource planning, energy balance resource accounting, bilateral contracts and power purchase agreements. As shown below, depending on the specific Form, the data for which confidentiality is being sought ranges over the years 2019-2030. The data is being provided in Excel spreadsheets and in total is approximately less than one megabyte in size.

2. Description of the Data or Information for which Confidentiality Is Being Sought

IEPR Form S-1: Forecast Total Peak-Hour 1-in-2 Demand, Col I-T, Row 1
IEPR Form S-1: Additional Achievable Energy Efficiency / Demand Response-Interruptible Programs, Col I-T, Row 3-4
IEPR Form S-1: Adjusted Demand: End-Use Customers, Col I-T, Row 5
IEPR Form S-1: Coincidence Adjustment, Col I-T, Row 6
IEPR Form S-1: Coincident Peak-Hour Demand, Col I-T, Row 7
IEPR Form S-1: Required Planning Reserve Margin, Col I-T, Row 8
IEPR Form S-1: Firm LSE Procurement Requirement, Col I-T, Row 11
IEPR Form S-1: Forecast Total Energy Demand/ Consumption, Col I-T, Row 12
IEPR Form S-1: Additional Achievable Energy Efficiency / Demand Response-Interruptible Programs, Col I-T, Row 14-15
IEPR Form S-1: Adjusted Demand: End-Use Customers, Col I-T, Row 16
IEPR Form S-1: Firm LSE Procurement Requirement, Col I-T, Row 18

IEPR Form S-2: Total Fossil Fuel Supply, Col X-AI, Row 1a-1h
IEPR Form S-2: Total Hydroelectric Supply, Col X-AI, Row 3a-3c
IEPR Form S-2: Total Qualifying Facility (QF) Contract Supply, Col X-AI, Row 5a-5h
IEPR Form S-2: Total Other Bilateral Contract Supply, Col X-AI, Row 7a-7o
IEPR Form S-2: Total: Existing and Planned Supply, Col X-AI, Col I-T, Row 9
IEPR Form S-2: Firm LSE Procurement Requirement, Col X-AI, Col I-T, Row 10
IEPR Form S-2: Net Surplus (or Need), Col X-AI, Col I-T, Row 11
IEPR Form S-2: Generic Non-Renewable Resources, Col X-AI, Col I-T Row 13

3. Description of the period for which confidentiality is being sought

SDG&E requests that the data indicated be kept confidential for a period of three years, or through December 31, 2021. This length of protection is required to ensure that SDG&E's detailed supply forecast data remains secure from market participants who could otherwise make competitive use of this information to the detriment of utility ratepayers. The three-year confidentiality period requested by SDG&E is consistent with the protection given to this same data by the California Public Utilities Commission ("CPUC"). Three years is adequate time for the demand forecast data to become "stale" in terms of price movement in the relevant markets, and SDG&E has no objection to the data being made public after that time.

4. Information Substantially Similar to Information Previously Deemed Confidential by the Commission Continues to Warrant Confidential Treatment

The information for which confidentiality is being sought is substantially similar to information that was previously deemed confidential by the Commission. Accordingly, attached as Attachment A to this Application is a certification, executed under penalty of perjury, stating that the submitted information is substantially similar to the previously submitted information. This certification applies to the following categories of information:

IEPR Form S-1: Forecast Total Peak-Hour 1-in-2 Demand, Col I-T, Row 1
IEPR Form S-1: Additional Achievable Energy Efficiency / Demand Response-Interruptible Programs, Col I-T, Row 3-4
IEPR Form S-1: Adjusted Demand: End-Use Customers, Col I-T, Row 5
IEPR Form S-1: Coincidence Adjustment, Col I-T, Row 6
IEPR Form S-1: Coincident Peak-Hour Demand, Col I-T, Row 7
IEPR Form S-1: Required Planning Reserve Margin, Col I-T, Row 8
IEPR Form S-1: Firm LSE Procurement Requirement, Col I-T, Row 11
IEPR Form S-1: Forecast Total Energy Demand/ Consumption, Col I-T, Row 12
IEPR Form S-1: Additional Achievable Energy Efficiency / Demand Response-Interruptible Programs, Col I-T, Row 14-15

IEPR Form S-1: Adjusted Demand: End-Use Customers, Col I-T, Row 16
IEPR Form S-1: Firm LSE Procurement Requirement, Col I-T, Row 18
IEPR Form S-2: Total Fossil Fuel Supply, Col X-AI, Row 1a-1h
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IEPR Form S-2: Net Surplus (or Need), Col X-AI, Col I-T, Row 11
IEPR Form S-2: Generic Non-Renewable Resources, Col X-AI, Col I-T Row 13

Pursuant to CCR, Title 20, Section 2505(a)(4), the foregoing information should be deemed confidential.

5. Certification

SDG&E is a California corporation, and I am authorized to make the application and certification on behalf of SDG&E.

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. Also, to the best of my knowledge, SDG&E has not previously publicly released the information that is the subject of this Application in precisely the presented format or projected over the presented duration of time.

Dated: May 29, 2019

Signed: /s/ BENJAMIN A. MONTOYA
Name: Benjamin A. Montoya
Title: Principal Resource Planner

DATED this 29th day of May, 2019, at San Diego, California.

Respectfully submitted,

/s/ JOHN A. PACHECO
John A. Pacheco

Attorney for
San Diego Gas & Electric Company
8330 Century Park Court, CP32
San Diego, CA 92123

ATTACHMENT A

**REVISED DECLARATION REGARDING INFORMATION SUBSTANTIALLY
SIMILAR TO INFORMATION PREVIOUSLY DEEMED
CONFIDENTIAL BY THE COMMISSION
Docket Number 19-IEPR-02 Electricity Resource/Supply Plans**

As described in the attached Application, San Diego Gas & Electric Company (“SDG&E”) requests that certain information be designated as confidential by the Commission Pursuant to CCR, Title 20, Section 2505(a)(4). Specifically, the following categories of information are subject to confidential treatment under CCR, Title 20, Section 2505(a)(4):

- IEPR Form S-1: Forecast Total Peak-Hour 1-in-2 Demand, Col I-T, Row 1
- IEPR Form S-1: Additional Achievable Energy Efficiency / Demand Response-Interruptible Programs, Col I-T, Row 3-4
- IEPR Form S-1: Adjusted Demand: End-Use Customers, Col I-T, Row 5
- IEPR Form S-1: Coincidence Adjustment, Col I-T, Row 6
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- IEPR Form S-2: Total Fossil Fuel Supply, Col X-AI, Row 1a-1h
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- IEPR Form S-2: Firm LSE Procurement Requirement, Col X-AI, Col I-T, Row 10
- IEPR Form S-2: Net Surplus (or Need), Col X-AI, Col I-T, Row 11
- IEPR Form S-2: Generic Non-Renewable Resources, Col X-AI, Col I-T Row 13

SDG&E requests that the information be designated confidential for a period of three years, or through December 31, 2021. In the 2017 Integrated Energy Policy Report (“IEPR”) proceeding (Docket No. 17-IEPR-02-Electricity Resource Plans), the

Commission's Executive Director determined that substantially similar data in the same forms qualified for confidential protection for those same time periods under Government Code § 6254. *See Response to SDG&E Application for Confidentiality for Resource Plan Forms*, Docket No. 17-IEPR-02-Electricity Resource Plans (dated June 5, 2015).

Accordingly, pursuant to 20 CCR § 2505(a)(4), SDG&E submits the following certification regarding the Commission's prior confidentiality designations.

1. I certify under penalty of perjury that the information described above for which SDG&E seeks confidential treatment is substantially the same information as that which the Commission has previously designated as confidential in Docket No. 19-IEPR-02 and that the facts and circumstances relevant to confidentiality remain unchanged; and
2. I am authorized to make this application and certification on behalf of SDG&E.

Date: May 29, 2019

By: /s/ BENJAMIN A. MONTOYA
Benjamin A. Montoya
Principal Research Planner
San Diego Gas & Electric Company