

**DOCKETED**

<b>Docket Number:</b>	19-IEPR-03
<b>Project Title:</b>	Electricity and Natural Gas Demand Forecast
<b>TN #:</b>	228482
<b>Document Title:</b>	Marin Clean Energy (MCE) Application for Confidentiality
<b>Description:</b>	Application for confidentiality IEPR 2019 Demand Forms: Form 8.1a
<b>Filer:</b>	Dona Stein
<b>Organization:</b>	Pacific Energy Advisors, Inc.
<b>Submitter Role:</b>	Applicant Consultant
<b>Submission Date:</b>	6/3/2019 12:44:50 PM
<b>Docketed Date:</b>	6/3/2019



MARIN COUNTY    NAPA COUNTY    UNINCORPORATED CONTRA COSTA COUNTY  
BENICIA    CONCORD    DANVILLE    EL CERRITO    LAFAYETTE    MARTINEZ    MORAGA  
OAKLEY    PINOLE    PITTSBURG    RICHMOND    SAN PABLO    SAN RAMON    WALNUT CREEK

June 3, 2019

California Energy Commission  
Dockets Office, MS-4  
**Re: Docket No. 19-IEPR-03**  
1516 Ninth Street  
Sacramento, CA 95814-5512

**Re: MCE's Application for Confidentiality for Electricity Demand Forecasts Form 8.1a**

Marin Clean Energy (MCE) hereby submits its application for confidentiality requesting all responses on Form 8.1a: Budget Appropriations or Actual Costs and Cost Projections by Major Expense Category be treated as confidential for the time period stated herein.

**I. Identification of Confidential Information**

MCE's submission of Form 8.1a to the 2019 IEPR Docket, in its entirety, is requested to be kept confidential per the specifications listed below.

**II. Description of Confidential Data**

The data MCE submits in Form 8.1a includes Actual Costs and Cost Projections of its energy contracts under the following categories: Power Purchases, Federal Power, Bilateral Contracts, Customer-related Expenses, and General and Administrative Expenses. This information is represented as nominal dollars in the thousands and is provided beginning with actual cost from 2017 and ending with forecasted amounts in 2030.

**III. Requested Time Period of Confidential Treatment**

MCE requests confidential treatment for three (3) years from the submission of this Form 8.1a in the 2019 IEPR Docket. Therefore, MCE requests confidential treatment of the entire Form 8.1a submission until June 3, 2022.

**IV. Justification for Request of Confidential Treatment**

California Government Code Section 6255(a) allows for information to be exempt from public disclosure if on the facts that the public interest in nondisclosure clearly outweighs the public interest in disclosure. Confidential protection for the specified information in Form 8.1a is justified because it constitutes confidential and market-sensitive information, which, if released, would place MCE at a competitive disadvantage to other LSEs and market participants.

Consequently, disclosure of this information could impact market prices and would compromise MCE's ability to procure renewable energy resources on terms favorable to its ratepayers. Further, the data and information: (1) is not already public; and (2) cannot be aggregated, redacted, summarized or otherwise protected in a way that allows partial disclosure.

**CONCORD OFFICE:** 2300 Clayton Road, Suite 1150, Concord, CA 94520

**SAN RAFAEL OFFICE:** 1125 Tamalpais Avenue, San Rafael, CA 94901

[mceCleanEnergy.org](http://mceCleanEnergy.org)

**V. Declaration of Chief Executive Officer**

I certify under penalty of perjury that the information contained in this application for confidential designation is true, correct, and completed to the best of my knowledge. I also certify that I am authorized to make the application and certification on behalf of MCE.

Sincerely,

A handwritten signature in blue ink, appearing to read "Dawn Weisz", with a long, sweeping flourish extending to the right.

Dawn Weisz  
MCE Chief Executive Officer