

**DOCKETED**

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<b>Project Title:</b>	Electricity Resource Plans
<b>TN #:</b>	228513
<b>Document Title:</b>	PGE Repeated Application for Confidentiality
<b>Description:</b>	for IEPR Supply Forms S 1 S 2 and S 5
<b>Filer:</b>	Katherine Bird
<b>Organization:</b>	Pacific Gas and Electric Co.
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REPEATED APPLICATION FOR CONFIDENTIAL  
DESIGNATION  
(20 CCR SECTION 2025)

*2019 INTEGRATED ENERGY POLICY REPORT*  
Docket Number 19-IEPR-02

Applicant: Pacific Gas and Electric Company ("PG&E")  
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**1. (a) Title, data, and description of the record.**

Electricity Resource Plan Supply forms issued by the California Energy Commission ("Energy Commission") for the 2019 Integrated Energy Policy Report.

**(b) Specify the part(s) of the record for which you request confidential designation.**

PG&E is providing the information as requested in Electricity Resource Plan Supply Forms S-1, S-2, and S-5. PG&E is requesting confidential designation for certain information designated as confidential in Electricity Resource Planning Forms S-1, S-2, and S-5.

The data for which PG&E seeks confidential designation in each of the S-1, S-2, and S-5 forms are clearly highlighted in yellow, and the confidential versions are conspicuously labeled as Confidential.

PG&E has provided Form S-1 (Capacity/Energy Requirement), Form S-2 (Capacity/Energy Supply Resources), and Form S-5 (Bilateral Contracts and Power Purchase Agreements). The Energy Commission granted confidentiality to the below and similar data categories in the 2007, 2009, 2011, 2013, 2015 and 2017 IEPR forms. PG&E's request for confidentiality in these 2019 IEPR forms is consistent with those decisions for similar data. The new data being provided this year in these categories are unchanged or substantially similar to that provided in the 2007, 2009, 2011, 2013, 2015 and 2017 IEPR forms. PG&E requests that these categories be deemed confidential for the same reasons as presented in the 2007, 2009, 2011, 2013, 2015 and 2017 IEPR, and that this Application be considered a **Repeated Application**.

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

PG&E requests that the following categories of information designated as confidential be kept confidential for the periods specified in the detailed listing below. (Confidentiality is being sought for some data for years 2017 through 2030; for other data for years 2019 through 2030, for other data for years 2017-2021, or for years 2019-2021, and for other data just for year 2021.)

Consistent with previous IEPR proceedings, PG&E requests that the specific categories of information listed for Form S-5 remain confidential through December 31, 2023, or the contract expiration date, whichever is later. Also consistent with previous IEPR proceedings, PG&E requests that the specific categories of information listed for Form S-1 and Form S-2 remain confidential through December 31, 2023, with the exception of the Additional Available Energy Efficiency category on Form S-1. Consistent with PG&E's Confidentiality request in the 2019 IEPR Demand Forecast docket, PG&E requests that this information remain confidential for three years.

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

**Supply Form S 1 Capacity/Energy Requirement (Capacity Section)**

PG&E requests confidentiality for the following lines 2017 through 2030:

- Firm LSE Procurement Requirement

PG&E requests confidentiality for the following lines for 2019 through 2030:

- Forecast Total Peak Demand
- Additional Available Energy Efficiency

PG&E requests confidentiality for line 11 for 2017 through 2021:

- Firm Sales Obligation

PG&E requests confidentiality for the following lines for 2021

- Adjusted Demand: End Use Customers
- Coincident Peak-Hour Demand
- Required Planning Reserve Margin

**Supply Form S 1 Capacity/Energy Requirement (Energy Section)**

PG&E requests confidentiality for the following lines' yearly totals of 2021:

- Adjusted Demand: End-Use Customers

PG&E requests confidentiality for the following lines' yearly totals of 2019 through 2030:

- Forecast Total Energy Demand (Consumption)
- Additional Achievable Energy Efficiency
- Firm Sales Obligations
- Firm LSE Procurement Requirement

**Supply Form S-2** Capacity/Energy Supply Resources (Capacity Section)

PG&E requests confidentiality for the following lines for 2017 through 2030:

- Firm LSE Procurement Requirement

PG&E requests confidentiality for the following lines for 2019 through 2030:

- Total Qualifying Facility (QF) Contract Supply
- Natural Gas
- Other
- Total Other Bilateral Contract Supply, each individual contract broken down
- Total: Existing and Planned Supply
- Short Term and Spot Market Purchases

PG&E requests confidentiality for the following lines for 2019 through 2021:

- Generic Non-Renewable

PG&E requests confidentiality for the following lines for 2017 through 2021:

- Net Surplus (or Need)

**Supply Form S-2** Capacity/Energy Supply Resources (Energy Section)

PG&E requests confidentiality for the following lines' yearly totals of 2019 through 2021:

- Total Nuclear Energy Supply, Diablo Canyon 1 and 2
- Hydro Supply from Plants 30 MW or More Total, each individual plant broken down
- Net Surplus (or Need)
- Generic Non-Renewable Energy

PG&E requests confidentiality for the following lines' yearly totals of 2019 through 2030:

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- Total Fossil Fuel Supply; Fuel Cell, Colusa Generation Station, Gateway Generation Station, and Humboldt Generation Station (lines 12a-e)
- Total Qualifying Facility (QF) Contract Supply; Natural Gas, and Other (lines 5a, 5g-h)
- Total Other Bilateral Contract Supply, each individual contract broken down
- Total: Existing and Planned Resources
- Firm LSE Procurement Requirement
- Short Term and Spot Market Purchases
- Short Term and Spot Market Purchases (and Sales)

**Supply Form S-5** (Bilateral Contracts and Power Purchase Agreements)

PG&E is requesting a Confidential Designation for the below-listed categories of data provided in Form S-5 for 14 contracts. The information covered by these data categories in the 2019 IEPR includes competitively and commercially sensitive business and resource planning information, protected under the Public Records Act. To release this information publicly would allow market participants to have access to competitively sensitive information that would normally not be available to them in this form or format. Additionally, release of this information could allow other parties to achieve a competitive advantage that could potentially harm PG&E's customers through higher power prices. Specifically, the identified data includes commercially sensitive information regarding the status of projects not yet operational.

The type of information covered by these data categories in the 2019 IEPR is the same or substantially similar in nature to information granted confidentiality by the Energy Commission as part of the 2017 IEPR, as well as in previous IEPR proceedings (2007, 2009, 2011, 2013 and 2015). PG&E requests that the information be deemed confidential for the specified contracts because these disclosure concerns are still relevant. Cells requested to be confidential are clearly highlighted in yellow, per the CEC's request.

PG&E requests confidentiality for the below-noted cells in the following columns:

- Column I, Contract Start Date: cells 48, 101, 106, 126, 188, 197, 204, 216, 217, 218, 269, 270, 280, 283
- Column J, Contract End Date: cells 48, 101, 106, 126, 188, 197, 204, 216, 217, 218, 269, 270, 280, 283

#### **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 and that I am authorized to make the application and certification on behalf of the Applicant.

Dated: June 3, 2019

Signed: Christopher J. Warner

Name: Christopher J. Warner  
Title: Chief Counsel  
Pacific Gas and Electric Company