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| Project Title: | Electricity and Natural Gas Demand Forecast |
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| Document Title: | SDGE Application For Confidentiality for 2019 IEPR |
| Description: | 19-IEPR Form 8.1 a |
| Filer: | Lisa Fucci-Ortiz |
| Organization: | San Diego Gas & Electric Company |
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**APPLICATION FOR CONFIDENTIAL DESIGNATION
(20 CCR SECTION 2505)**

2019 INTEGRATED ENERGY POLICY REPORT
Docket No. 19-IEPR-03 Electricity and Natural Gas Demand Forecast

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

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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-03) process and pursuant Title 20, Section 1345 of the California Code of Regulations (“CCR”). The information for which confidential designation is requested pertains to natural gas-fired average fuel prices (\$/MMBtu) and average carbon allowance prices (\$/MTC02E). The data for which confidentiality is being sought ranges over the years 2017-2030. The data is being provided in Excel spreadsheets and in total is less than one megabyte in size.

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

- IEPR Form 8.1a (IOU) Natural Gas-Fired Average Fuel Price (\$/MMBtu):
Row 21, Col. C-P (for years 2017-2030)
- IEPR Form 8.1a (IOU) Average Carbon Allowance Price (\$/MTC02E):
Row 22, Col. G-P (for years 2021-2030)

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 8.1a (IOU) Natural Gas-Fired Average Fuel Price (\$/MMBtu): Row 21, Col. C-P (for years 2017-2030)
- IEPR Form 8.1a (IOU) Average Carbon Allowance Price (\$/MTC02E): Row 22, Col. G-P (for years 2021-2030)

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: June 14, 2019

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

DATED this 14th day of June, 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

**DECLARATION REGARDING INFORMATION SUBSTANTIALLY SIMILAR
TO INFORMATION PREVIOUSLY DEEMED
CONFIDENTIAL BY THE COMMISSION
Docket No. 19-IEPR-03 Electricity and Natural Gas Demand Forecast**

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 8.1a (IOU) Natural Gas-Fired Average Fuel Price (\$/MMBtu): Row 18, Col. B-O (for years 2015-2028)
- IEPR Form 8.1a (IOU) Average Carbon Allowance Price (\$/MTC02E): Row 22, Col. G-P (for years 2021-2030)

SDG&E requests that the information be designated confidential for a period of three years, or through December 31, 2019. In the 2017 Integrated Energy Policy Report (“IEPR”) proceeding (Docket No. 17-IEPR-03-Electricity and Natural Gas Demand Forecast), the Commission’s Executive Director (Robert P. Oglesby) 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. 15-IEPR-03-Electricity and Natural Gas Demand Forecast (dated June 23, 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. 17-IEPR-03-Electricity and Natural Gas Demand Forecast 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: June 14, 2019

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