

<b>DOCKETED</b>	
<b>Docket Number:</b>	19-IEPR-03
<b>Project Title:</b>	Electricity and Natural Gas Demand Forecast
<b>TN #:</b>	228795
<b>Document Title:</b>	PGE Repeated Confidentiality Request for Form 8 1a
<b>Description:</b>	N/A
<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-03

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

Electricity Demand Forecast 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 Demand Forecast Forms 8.1a and 8.1b. PG&E is requesting confidential designation for certain information designated as confidential in Electricity Demand Forecast Form 8.1a.

The data for which PG&E seeks confidential designation in Form 8.1a (Retail Price and Rate Form- Revenue Requirements by Major Cost Categories / Unbundled Rate Component) are clearly highlighted in yellow, and the confidential version is conspicuously labeled as Confidential.

The Energy Commission has previously granted confidentiality to some of the below data categories or substantially similar data in the 2013 IEPR and to additional data categories in PG&E's 2015 and 2017 IEPR submissions of Form 8.1a with historic and forecast data. PG&E's request for confidentiality for this 2019 IEPR form is consistent with previous decisions for similar data. The new data being provided this year in these categories are unchanged or substantially similar to that provided in previous IEPR submittals. PG&E requests that these categories be deemed confidential for the same reasons as presented in its prior confidentiality applications, and that this Application be considered a **Repeated Application**.

(c) **Information that** was presented in prior filings in an aggregate form but being presented separately in this filing and some new information requested that are related to batteries that are protected in CPUC proceedings should also be granted confidentiality consistent with and for the same reasons as the prior confidentiality requests.

Costs associated with QF contracts and Non-QF renewables are protected in CPUC proceedings under D.06-06-066, D.14-10-033, and /or Public Utilities Code Section 454.5(g). In prior years these categories were aggregated and were made public. In this filing such aggregation is not allowed. In addition, the 2019 form also included UOG and Purchased Power Batteries. These two categories are also protected by the abovementioned decisions.

**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 a period of three years, through December 31, 2022. This length of protection is required to ensure that PG&E's detailed forecast data remains secure from market participants who could otherwise make competitive use of this information to the detriment of utility ratepayers. Three years is adequate time for the forecast data to become "stale" in terms of price movement in the relevant markets, and PG&E has no objection to the data being made public after that time.

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

**Demand Forecast Form 8.1a** (Revenue Requirements by Major Cost Categories / Unbundled Rate Component)

PG&E requests confidentiality for data 2017 through 2019:

- Generation cost forecasts for:
  - UOG Nuclear generation (Non-Fuel)
  - UOG Conventional Hydroelectric generation (Non-Fuel)
  - UOG Natural Gas-Fired generation (Non-Fuel)

PG&E requests confidentiality for 2017 through 2022:

- UOG Natural Gas-Fired Average Fuel Price (\$/MMBtu)

PG&E requests confidentiality for data 2017 through 2030:

- Average Carbon Allowance Price (\$/MTCO<sub>2</sub>E)
- Generation cost forecasts for:
  - UOG Nuclear generation (Fuel)
  - UOG Conventional Hydroelectric generation (Fuel)

- UOG Natural Gas-Fired generation (Fuel)
- UOG Battery Storage
- Purchased Power cost forecasts for:
  - Qualifying Facilities
  - Non-QF Renewables
  - Battery Storage
  - Other Contracts
  - Other Generation Expenses/Balancing Accounts


PG&E requests confidentiality for data 2020 through 2030:

- Generation cost forecasts for:
  - Hydroelectric Pumped Storage (Fuel)

**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 19, 2019



Name: Christopher J. Warner

Title: Chief Counsel

Pacific Gas and Electric Company