

DOCKETED

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Project Title:	Electricity and Natural Gas Demand Forecast
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Document Title:	Application for Confidentiality for CleanPowerSF IEPR Form 8
Description:	N/A
Filer:	Ben Gustafson
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June 30, 2021

California Energy Commission
Docket # 21-IEPR-03
1516 Ninth Street, MS-39
Sacramento, CA 95814

**RE: CleanPowerSF's Application for Confidentiality for Electricity
Demand Forecast Forms 8.1a and 8.1b in Docket No. 21-IEPR-03**

In conjunction with filing of its Electricity Demand Forecast Forms, CleanPowerSF hereby simultaneously submits its application for confidentiality in Docket No. 21-IEPR-03 for Forms 8.1a and 8.1b. CleanPowerSF is the community choice aggregator ("CCA") for the City and County of San Francisco, which is operated by the San Francisco Public Utilities Commission.

I. Identification of Confidential Information.

CleanPowerSF requests all responses in Electricity and Gas Demand Forecast Form 8.1a "Budget Appropriations or Actual Costs and Cost Projections by Major Expense Category" and form 8.1b "Revenue Requirements Allocation" be treated as confidential.

The data CleanPowerSF submits in Form 8.1a includes Actual Costs and Cost Projections of its portfolio of energy contracts for renewable energy, energy storage, and all other market transactions including energy, Resource Adequacy, and Ancillary Services. This information begins with actual costs from 2019 and 2020 and ends with forecasted amounts through 2032. In Form 8.2b CleanPowerSF calculates the revenue requirements based on the confidential inputs from Form 8.1a.

II. Time Period for Confidential Treatment

CleanPowerSF requests confidential treatment for three (3) years from the submission of Forms 8.1a and 8.2b until June 30, 2024.

CleanPowerSF is a program of the San Francisco Public Utilities Commission (SFPUC), an enterprise department of the City and County of San Francisco.

CleanPowerSF is committed to protecting customer privacy. Learn more at cleanpowersf.org/privacy.

OUR MISSION: To provide our customers with high-quality, efficient and reliable water, power and sewer services in a manner that values environmental and community interests and sustains the resources entrusted to our care.

London N. Breed
Mayor

Sophie Maxwell
President

Anson Moran
Vice President

Tim Paulson
Commissioner

Ed Harrington
Commissioner

Newsha Ajami
Commissioner

Michael Carlin
Acting
General Manager



III. Justification for Request of Confidential Treatment

CleanPowerSF seek confidential treatment on two grounds: 1) The data in 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. 2) The Commission's regulations allow for information to be designated as confidential if it "contains a trade secret or its disclosure would otherwise cause a loss of a competitive advantage."¹ Confidential protection for the information in Forms 8.1a and 8.2b are justified because this information constitute confidential and market-sensitive information, which, if released, would place CleanPowerSF at a competitive disadvantage to other market participants.

Public disclosure of this information would reveal CleanPowerSF's power purchase costs and residual market transaction costs; this would place CleanPowerSF at a competitive disadvantage in the electricity markets. Disclosure of this information could impact market prices and would compromise CleanPowerSF's ability to procure energy and other energy products and resources on terms favorable to its ratepayers because the information could be used to determine CleanPowerSF's past and forecasted energy and capacity needs. Suppliers could use this information, when negotiating the price and terms of procurement transactions, disadvantaging CleanPowerSF. That information could also be used by market participants to refine business strategies and cause competitive harm.

The information cannot currently be legitimately acquired or duplicated by others without access to our confidential financial and budgeting model. As such, this information is proprietary.

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.

IV. CleanPowerSF Maintains the Confidentiality of this Information.

CleanPowerSF guards the confidentiality and even only allows a subset of its staff to access to the information in Form 8.1(a). The information provided in Form 8.2(b) was calculated for the first time based on the confidential inputs from Form 8.1(a). CleanPowerSF seeks confidentiality for this information because this information could be used to back calculate the information in

¹ 20 Cal Code Regs. § 2505(a)(1)(D).

Form 8.1(a). Any time information of this nature is provided to a public agency, CleanPowerSF requests confidentiality.

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V. Certification of CleanPowerSF Director

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 CleanPowerSF.

Sincerely,

A handwritten signature in blue ink, appearing to read "Michael A. Hyams", with a long horizontal flourish extending to the right.

Michael A. Hyams
Director, CleanPowerSF