

DOCKETED

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Description:	PG&E 2021 IEPR Repeated Confidentiality Request Electric Demand Forecast Form 8.1a
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REPEATED APPLICATION FOR CONFIDENTIAL DESIGNATION
(20 CCR SECTION 2025)

2021 INTEGRATED ENERGY POLICY REPORT
Docket Number 21-IEPR-03
Electricity Demand Forecast

Applicant: Pacific Gas and Electric Company (PG&E)

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1. (a) Title, data, and description of the record.

Electricity Demand Forecast forms issued by the California Energy Commission (CEC) for the 2021 Integrated Energy Policy Report (IEPR).

(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 (Revenue Requirements by Major Cost Categories / Unbundled Rate Component) are 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, 2017, and 2019 IEPR submissions of Form 8.1a with historic and forecast data. PG&E's request for confidentiality for this 2021 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 the data 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) Data on greenhouse gas (GHG) Allowance Revenue Returns should also be granted confidentiality designation consistent with and for the same reasons as prior confidentiality requests have been granted by the CEC for similar data, such as the Average Carbon Allowance Prices. PG&E is requesting this designation for the GHG Allowance Revenue Returns in order to prevent disclosure of PG&E proprietary information that constitutes valuable PG&E intellectual property and trade secrets under California law. Consistent with the confidential treatment of Average Carbon Allowance Prices, revenues associated with the GHG Allowance Revenue Returns should be protected for forecast years where the GHG Allowance volumes have been established in Table 9-4 of 17 CCR 95892 and the GHG Allowance revenues are based on the same confidential Average Carbon Allowance Prices. Without confidential treatment for the requested years, PG&E's Average Carbon Allowance Prices could be derived using the publicly available GHG Allowance volumes and GHG Allowance Revenue Return amounts.

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 from the date of this Repeated Application. This length of protection is required to ensure that PG&E's detailed historic and 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 utility owned / retained generation (UOG) data for 2019 through 2021:

- Nuclear generation – Non-Fuel
- Conventional Hydroelectric generation – Non-Fuel
- Natural Gas-Fired generation – Non-Fuel

PG&E requests confidentiality for UOG data for 2019 through 2024:

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

PG&E requests confidentiality for UOG data for 2019 through 2032:

- Natural Gas-Fired generation – Average Carbon Allowance Price (\$/MTCO₂E)
- Nuclear generation – Fuel
- Conventional Hydroelectric generation – Fuel
- Natural Gas-Fired generation – Fuel
- Battery Storage

PG&E requests confidentiality for UOG data for 2022 through 2032:

- Hydroelectric Pumped Storage – Fuel

PG&E requests confidentiality for Purchased Power data for 2019 through 2032:

- Qualifying Facilities (QF)
- Non-QF Renewables
- Battery Storage
- New System Generation
- Other Contracts
- Other Generation Expenses / Balancing Accounts

PG&E requests confidentiality for GHG Allowance Revenue Returns data for 2022 through 2030

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. I also certify that I am authorized to make the application and certification on behalf of Pacific Gas and Electric Company.

Dated: August 30, 2021

Signed: Original signed by /s/*Daniel S. Hashimi*
Name: Daniel S. Hashimi
Title: Senior Counsel
Pacific Gas and Electric Company