

DOCKETED

Docket Number:	22-IEPR-03
Project Title:	Electricity Forecast
TN #:	245935
Document Title:	Marin Clean Energy 22-IEPR-03 Application for Confidential Designation
Description:	Marin Clean Energy 22-IEPR-03 Application for Confidential Designation
Filer:	Alden Walden
Organization:	Pacific Energy Advisors Inc
Submitter Role:	Applicant Consultant
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MARIN COUNTY | NAPA COUNTY | UNINCORPORATED CONTRA COSTA COUNTY | UNINCORPORATED SOLANO COUNTY
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September 9, 2022

California Energy Commission
Dockets Office, MS-4
Re: Docket No. 22-IEPR-03
1516 Ninth Street
Sacramento, CA 95814-5512

Re: MCE's Application for Confidentiality for Electricity Resource Planning Forms

Marin Clean Energy (MCE) hereby submits its application for confidentiality requesting certain responses on its Electricity Resource Planning Forms be treated as confidential for the time period stated herein.

I. Identification of Confidential Information

The following data is requested to be kept confidential per the specifications listed below:

- S-1 Requirement Form
 - Capacity Procurement Requirement for years 2022 – 2031
 - Lines 1, 3-8, and 11, Columns I-R
- S-2 Supply Form
 - Total Renewable Contract Supply for years 2020 – 2031
 - Lines 6a-6co, Columns N-Y
 - Total Other Bilateral Contract Supply for years 2020 – 2031
 - Lines 7a-7jx, Columns N-Y and Columns AC-AL
 - Total Existing and Planned Supply for years 2022 – 2031
 - Line 9, Column P-Y and Columns AC-AL
 - Firm LSE Procurement Requirement for years 2022 – 2031
 - Line 10, Column P-Y
 - Net Surplus (or Need) for years 2022 – 2031
 - Line 11, Column P-Y and Columns AC-AL
 - Generic Renewable Supply for years 2022 – 2031
 - Line 12, Columns P-Y
 - Generic Non-Renewable Resources for years 2022 – 2031
 - Line 13, Column P-Y
- S-2A Addendum Monthly Form
 - 2022-1 – 2031-12
 - Entirety of Columns F-DU

- S-5 Table
 - Capacity (MW) Under Contract
 - Column I in its entirety

II. Description of Confidential Data

The data MCE submits in the sections identified above falls into two broad categories: 1) Information related to MCE's resource adequacy obligation, forecasts, and projected compliance, and 2) MCE's energy demand forecasts and projected Renewables Portfolio Standard compliance.

III. Requested Time Period of Confidential Treatment

MCE requests confidential treatment for three (3) years from the submission of this Electricity Resource Planning Form. Therefore, MCE requests confidential treatment of the sections identified above until September 9, 2025.

IV. Justification for Request of Confidential Treatment


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. Confidential protection for the specified information in Forms S-1, S-2, and S-5 is justified because it constitutes confidential and market-sensitive information, which, if released, would place MCE at a competitive disadvantage to other LSEs and market participants.

Consequently, disclosure of this information could impact market prices and would compromise MCE's ability to procure renewable energy resources on terms favorable to its ratepayers. 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.

V. Declaration of Chief Executive Officer

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 MCE.

Sincerely,

DocuSigned by:

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Jamie Tuckey
MCE Chief of Staff