

**DOCKETED**

<b>Docket Number:</b>	22-IEPR-03
<b>Project Title:</b>	Electricity Forecast
<b>TN #:</b>	246267
<b>Document Title:</b>	Application - Electricity Resource Supply Form Confidentiality
<b>Description:</b>	seeking confidential designation for data provided to the CEC
<b>Filer:</b>	Lisa Fucci-Ortiz
<b>Organization:</b>	San Diego Gas & Electric Company
<b>Submitter Role:</b>	Applicant
<b>Submission Date:</b>	9/29/2022 9:05:02 AM
<b>Docketed Date:</b>	9/29/2022

**APPLICATION FOR CONFIDENTIAL DESIGNATION  
(20 CCR SECTION 2505)**

**2022 INTEGRATED ENERGY POLICY REPORT Docket  
No. 22-IEPR-03 Electricity Resource/Supply Plans**

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

Attorney for Applicant: John A. Pacheco  
Address of Applicant: 8330 Century Park Court, CP 32  
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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 2022 Integrated Energy Policy Report (“IEPR”) (Docket No. 22-IEPR-03) process and pursuant Title 20, Section 1345 of the California Code of Regulations (“CCR”). Generally, the information for which confidential designation is requested pertains to SDG&E’s electric resource planning, energy balance resource accounting, bilateral contracts and power purchase agreements. As shown below, depending on the specific Form, the data for which confidentiality is being sought ranges over the years 2022-2031. The data is being provided in Excel spreadsheets and in total is approximately less than one megabyte in size.

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

IEPR Form S-1: Forecast Total Peak-Hour 1-in-2 Demand, Col I-R, Row 11  
IEPR Form S-1: Adjusted Demand: End-Use Customers, Col I-R, Row 19  
IEPR Form S-1: Coincident Peak-Hour Demand, Col I-R, Row 21  
IEPR Form S-1: Required Planning Reserve Margin, Col I-R, Row 22  
IEPR Form S-1: Firm LSE Procurement Requirement, Col I-R, Row 25  
IEPR Form S-1: Forecast Total Energy Demand/ Consumption, Col I-R, Row 29  
IEPR Form S-1: Adjusted Demand: End-Use Customers, Col I-R, Row 37  
IEPR Form S-1: Firm LSE Procurement Requirement, Col I-R, Row 39  
IEPR Form S-2: Total Fossil Fuel and Energy Storage Supply, Col AC-AL, Row 10-32  
IEPR Form S-2: Total Hydroelectric Supply, Col Col AC-AL, Row 36, Row 39-42  
IEPR Form S-2: Total Utility-Controlled Renewable Supply, Col AC-AL, Row 43-44  
IEPR Form S-2: Total Qualifying Facility (QF) Contract Supply, Col AC-AL, Row 47, Row 50  
IEPR Form S-2: Total Other Bilateral Contract Supply, Col AC-AL, Row 101-130

IEPR Form S-2: Total: Existing and Planned Supply, Col P-Y, Col AC-AL, Row 134  
IEPR Form S-2: Firm LSE Procurement Requirement, Col P-Y, Col AC-AL, Row 135

IEPR Form S-2: Net Surplus (or Need), Col P-Y, Col AC-AL, Row 136

IEPR Form S-2: Generic Non-Renewable Resources, Col P-Y, Col AC-AL, Row 138

IEPR Form S-5: Capacity Under Contract, Col I, Row 48-49, For 60-63

IEPR Form S-5: Contract/Agreement Products, Col J, Row 48-49, For 60-63

IEPR Form S-5: Contract Type, Col K, Row 48-49, For 60-63

### **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, 2025. 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 S-1: Forecast Total Peak-Hour 1-in-2 Demand, Col I-R, Row 11

IEPR Form S-1: Adjusted Demand: End-Use Customers, Col I-R, Row 19

IEPR Form S-1: Coincident Peak-Hour Demand, Col I-R, Row 21

IEPR Form S-1: Required Planning Reserve Margin, Col I-R, Row 22

IEPR Form S-1: Firm LSE Procurement Requirement, Col I-R, Row 25

IEPR Form S-1: Forecast Total Energy Demand/ Consumption, Col I-R, Row 29

IEPR Form S-1: Adjusted Demand: End-Use Customers, Col I-R, Row 37

IEPR Form S-1: Firm LSE Procurement Requirement, Col I-R, Row 39

IEPR Form S-2: Total Fossil Fuel and Energy Storage Supply, Col AC-AL, Row 10-32

IEPR Form S-2: Total Hydroelectric Supply, Col Col AC-AL, Row 36, Row 39-42

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IEPR Form S-5: Contract Type, Col K, Row 48-49, For 60-63

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: September 16, 2022

Signed:           /s/          MATTHEW O'CONNELL            
Name: Matthew O'Connell  
Title: Principal Resource Planner

DATED this 16th day of September, 2022, 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 Number 22-IEPR-03 Electricity Resource/Supply Plans**

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 S-1: Forecast Total Peak-Hour 1-in-2 Demand, Col I-R, Row 11  
IEPR Form S-1: Adjusted Demand: End-Use Customers, Col I-R, Row 19  
IEPR Form S-1: Coincident Peak-Hour Demand, Col I-R, Row 21  
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IEPR Form S-2: Total Fossil Fuel and Energy Storage Supply, Col AC-AL, Row 10-32  
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IEPR Form S-5: Contract/Agreement Products, Col J, Row 48-49, For 60-63  
IEPR Form S-5: Contract Type, Col K, Row 48-49, For 60-63

SDG&E requests that the information be designated confidential for a period of three years, or through December 31, 2025. In the 2015 Integrated Energy Policy Report (“IEPR”) proceeding (Docket No. 15-IEPR-02-Electricity Resource Plans), the Commission’s Executive Director 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 San Diego Gas & Electric Company’s Application for Confidentiality for Resource Plan Forms*, Docket No. 15-IEPR-02-Electricity Resource Plans (dated June 5, 2015). Commission Executive Directors made similar determinations for similar data in other past IEPR proceedings, going back as far as 2011 and 2013. *See Response to Application for Confidentiality – San Diego Gas & Electric Co. IEPR Electricity Resource Plan Submission*, Docket No. 11-IEP-1B (dated June 3, 2011); and *Response to SDG&E’s Application for Confidentiality for the 2013 Integrated Energy Policy Report Electricity Resource Plan Submission*, Docket No. 13-IEP-1B (dated June 10, 2013). More recently, the Commission’s Executive Director determined that similar data presented in Docket 21-IEPR-02 was properly designated as confidential information. *See Response to Application for Confidential Designation of Data in Integrated Energy Policy Report*, Docket 21-IEPR-02 (dated November 12, 2021).

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 prior IEPR

dockets 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: September 16, 2022

By: /s/ MATTHEW O'CONNELL  
Matthew O'Connell  
Principal Resource Planner  
San Diego Gas & Electric Company