

<b>DOCKETED</b>	
<b>Docket Number:</b>	22-IEPR-03
<b>Project Title:</b>	Electricity Forecast
<b>TN #:</b>	247881
<b>Document Title:</b>	CONFIDENTIAL - PG&E Repeat Confidentiality Request for 2022 IEPR Supply Forms
<b>Description:</b>	PG&E's Repeated Request for Confidentiality for the 2022 IEPR Supply Forms S-1, S-2, S-2A, and S-5 as outlined in the Request. This data is to remain CONFIDENTIAL with a sunset date of December 31, 2031.
<b>Filer:</b>	Jennifer Privett
<b>Organization:</b>	Pacific Gas and Electric
<b>Submitter Role:</b>	Applicant
<b>Submission Date:</b>	12/1/2022 2:59:57 PM
<b>Docketed Date:</b>	12/1/2022

**REPEATED APPLICATION FOR CONFIDENTIAL DESIGNATION**

(20 CCR SECTION 2505)

*2022 INTEGRATED ENERGY POLICY REPORT UPDATE*

Docket Number 22-IEPR-03

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

Attorney for Applicant: Daniel S. Hashimi  
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**1. (a) Title, data, and description of the record.**

Electricity Resource Plan Supply Forms issued by the California Energy Commission(CEC) for the 2022 Integrated Energy Policy Report (IEPR) Update.

**(b) Specify the part(s) of the record for which you request confidential designation.**

PG&E is providing the information as requested in Electricity Resource Plan Supply Forms S-1, S-2, S-2 Addendum (S-2A), and S-5. PG&E is requesting confidential designation for certain information designated as confidential in Electricity Resource Planning Forms S-1, S-2, S-2A, and S-5.

The data for which PG&E seeks confidential designation in the S-1, S-2, S-2A, and S-5 forms are clearly highlighted in yellow, and the confidential versions are conspicuously labeled as Confidential.

PG&E has provided Form S-1 (Capacity / Energy Procurement Requirement), Form S-2 (Capacity / Energy Supply Resources), Form S-2A (Addendum Monthly Data), and Form S-5 (Bilateral Contracts and Power Purchase Agreements). The CEC granted confidentiality to the below and similar data categories in the 2007, 2009, 2011, 2013, 2015, 2017, 2019, and 2021 IEPR forms. PG&E's request for confidentiality in these 2022 IEPR forms is consistent with those decisions for similar data. The new data being provided this year in these categories are unchanged or substantially similar to that provided in the 2007, 2009, 2011, 2013, 2015, 2017, 2019 and 2021 IEPR forms. PG&E requests that these categories be deemed confidential for the same reasons as presented in the 2007, 2009, 2011, 2013, 2015, 2017, 2019 and 2021 IEPR, and that this Application be considered a **Repeated Application**.

**2. State the length of time the Commission should keep the record confidential.**

PG&E requests that the following categories of information be designated as confidential as specified in the detailed listing below. Confidentiality is being sought for some data for years 2020 through 2031; for other data for years 2022 through 2031, for other data for years 2020-2024 and for other data for years 2022-2024.

Consistent with previous IEPR proceedings, PG&E requests that the specific categories of information listed for Form S-5 remain confidential through December 31, 2027, or the contract expiration date, whichever is later. Also consistent with previous IEPR proceedings, PG&E requests that the specific categories of information listed for Form S-1, Form S-2, and Form S-2A remain confidential for three years from the date of this application (i.e., to December 1, 2025).

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

**Supply Form S 1:** (Capacity / Energy Procurement Requirement)

PG&E requests confidentiality for the following data for the specified years:

- Line 1: Forecast Total Peak Hour 1-in-2 Demand (2022 through 2031)
- Line 5: Adjusted Demand: End-Use Customers (2022 through 2031)
- Line 7: Coincident Peak-Hour Demand (2022 through 2031)
- Line 8: Required Planning Reserve Margin (2022 through 2031)
- Line 10: Firm Sales Obligations (2020 through 2024)
- Line 11: Firm LSE Procurement Requirement (2020 through 2031)
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**Supply Form S-2:** (Capacity / Energy Supply Resources)

PG&E requests confidentiality for the following data for the specified years:

**Capacity Supply Resources section:**

- Line 5a: Total Qualifying Facility (QF) Contract Supply (2022 through 2031)
- Line 5g: Natural Gas (2022 through 2031)
- Line 5h: Other (2022 through 2031)
- Line 7a: Total Other Bilateral Contract Supply (2022 through 2031) [*each individual contract broken down, lines 7b through 7fq*]
- Line 7b: Non-Renewable DG Supply (2022 through 2031)
- Line 9: Total Existing and Planned Supply (2022 through 2031)
- Line 10: Firm LSE Procurement Requirement (2020 through 2031)
- Line 11: Net Surplus (or Need) (2020 through 2024)

**Energy Supply Resources section:**

- Line 1a: Total Fossil Fuel Supply (2022 through 2031) [*each supply source broken down: New Humboldt Generation Station and Gateway Generation Station, Fuel Cells: UTC Units 1 and 2, Bloom Generation Station and Colusa Generation Station, Moss Landing Battery Energy Storage – lines 1b-1h*]
- Lines 2a, 2b, 2c: Total Nuclear Supply, Diablo Canyon 1 and Diablo Canyon 2 (2022 through 2024)
- Line 3a: Total Hydroelectric Supply (2022 through 2024)
- Line 3b: Hydro Supply from Plants 30 MW or More (2022 through 2024) [*each individual plant of 30 MW or more broken down, lines 3ba through 3bab*]
- Line 5 a: Total Qualifying Facility (QF) Contract Supply (2022 through 2031)
- Line 5g: Natural Gas QF Contract Supply (2022 through 2031)
- Line 5h: Other QF Contract Supply (2022 through 2031)
- Line 7a: Total Other Bilateral Contract Supply (2022 through 2031) [*each individual contract/source broken down, lines 7b through 7fq*]

- Line 7b: Non-Renewable DG Supply (2022 through 2031)

**Addendum Monthly tab:**

- Fossil Fuel Supply (2022 through 2031) [*resource, type, and contract GWh*]
- Nuclear Supply (2022 through 2031) [*resource, type, and contract GWh*]
- Hydro Supply from Plants 30 MW or More (2022 through 2031) [*resource, type, and contract GWh*]
- Other Bilateral Contract Supply (2022 through 2031) [*resource, type, contract GWh, and NQC MW*]

**Supply Form S-5** (Bilateral Contracts and Power Purchase Agreements)

PG&E is requesting a Confidential Designation for the below-listed categories of data provided in Form S-5 for 58 contracts. The information covered by these data categories in the 2022 IEPR includes competitively and commercially sensitive business and resource-planning information, protected under the Public Records Act.

To release this information publicly would allow market participants to have access to competitively sensitive information that would normally not be available to them in this form or format. Additionally, release of this information could allow other parties to achieve a competitive advantage that could potentially harm PG&E's customers through higher power prices. Specifically, the identified data includes commercially sensitive information regarding the status of projects not yet operational.

The type of information covered by these data categories in the 2022 IEPR is the same or substantially similar in nature to information granted confidentiality by the CEC as part of the 2021 IEPR, as well as in previous IEPR proceedings (2007, 2009, 2011, 2013, 2015, 2017 and 2019). PG&E requests that the information be deemed confidential for the specified contracts because these disclosure concerns are still relevant. Cells requested to be confidential are clearly highlighted in yellow, per the CEC's request.

PG&E requests confidentiality for the below-noted cells in the following columns:

- Column G, Contract Start Date: cells 191, 206, 207, 208, 212, 214, 215, 221, 225, 226, 227, 228, 229, 230, 231, 233, 234, 235, 236, 237, 238, 239, 240, 247, 249, 253, 254, 255, 256, 402, 403, 406, 414, 415, 417, 418, 420, 421, 424, 425, 426, 427, 428, 429, 430, 431, 432, 433, 434, 435, 436, 437, 438, 439, 440, 441, 442, 443
- Column H, Contract Expiration Date: cells 191, 206, 207, 208, 212, 214, 215, 221, 225, 226, 227, 228, 229, 230, 231, 233, 234, 235, 236, 237, 238, 239, 240, 247, 249, 253, 254, 255, 256, 402, 403, 406, 414, 415, 417, 418, 420, 421, 424, 425, 426, 427, 428, 429, 430, 431, 432, 433, 434, 435, 436, 437, 438, 439, 440, 441, 442, 443

**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: December 1, 2022

Signed: Original signed by /s/Daniel S. Hashimi

Name: Daniel S. Hashimi  
Title: Senior Counsel  
Pacific Gas and Electric Company