DOCKETED	
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Project Title:	Electricity and Gas Demand Forecast
TN #:	250221
Document Title:	Application for Confidentiality - 2023 IEPR Gas Demand Form 1-6
Description:	2023 IEPR Gas Demand Forms 1 and 2
Filer:	Jennifer Privett
Organization:	Pacific Gas and Electric Company
Submitter Role:	Applicant
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# APPLICATION FOR CONFIDENTIAL DESIGNATION

(20 CCR SECTION 2505)

# 2023 INTEGRATED ENERGY POLICY REPORT Docket Number 23-IEPR-03 Natural Gas Demand Forecast

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

Attorney for Applicant: Daniel S. Hashimi

Senior Counsel

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

Natural Gas Demand Forecast forms issued by the California Energy Commission (CEC) for the 2023 Integrated Energy Policy Report (IEPR).

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

PG&E is requesting confidential designation for three years for certain data cells pertaining to natural gas commodity prices in Form 1.6 to protect the confidentiality of proprietary, market-sensitive information that constitutes valuable PG&E intellectual property and trade secrets under California law.

## 2. State and justify the length of time the Commission should keep the record confidential.

PG&E requests that certain data cells in Form 1.6 be maintained as confidential for three years from the date of this Application.

PG&E requests confidentiality for its natural gas commodity prices for three years, as this data was provided under third-party contract as confidential and only to be shared with our regulators. Additionally, confidentiality is requested to protect that information from other market participants who could otherwise use the data to the detriment of PG&E ratepayers. The California Public Utilities Commission (CPUC) has granted PG&E confidentiality protection for this data and the CEC has granted confidentiality for similar data to the other investor-owned utilities. Three years of confidentiality strikes the right balance between protecting proprietary and market-sensitive data and the information becoming sufficiently dated to be released to the public without harm to PG&E ratepayers.

### 3. Identify the specific categories for which confidentiality is being sought.

PG&E requests that certain data cells in the natural gas demand forecast data in Form 1.6 be designated as newly confidential. PG&E is requesting this designation to prevent disclosure of PG&E proprietary information that constitutes valuable PG&E intellectual property and trade secrets under California law.

Specifically, for Form 1.6, *Fuel Prices*, the following category for the forecast years 2023-2025:

• Natural Gas Commodity Price

PG&E respectively requests that the CEC approve this application for confidentiality to maintain PG&E's proprietary and market-sensitive data consistent with the treatment for such data by the CPUC and afforded by the CEC to the other investor-owned utilities. Doing so will prevent higher costs to PG&E ratepayers and will preclude market participants from gaining an unfair advantage over PG&E ratepayers.

### 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.

May 5, 2023

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

Name: Daniel S. Hashimi Title: Senior Counsel

Pacific Gas and Electric Company