

DOCKETED

Docket Number:	23-IEPR-02
Project Title:	Electricity Resource Plans
TN #:	251384
Document Title:	Request for repeated confidentiality
Description:	CleanPowerSF request for repeated confidentiality treatment of Form 8.1a and 8.1b data
Filer:	Cheryl Taylor
Organization:	City and County of San Francisco
Submitter Role:	Public Agency
Submission Date:	7/31/2023 8:31:20 AM
Docketed Date:	7/31/2023

July 31, 2023

VIA ELECTRONIC SUBMISSION

Mr. Drew Bohan
Executive Director
California Energy Commission
Docket Office, Docket No. 23-IEPR-02
1516 Ninth Street, MS-39
Sacramento, CA 95814
docket@energy.ca.gov

RE: CleanPowerSF's Repeat Application for Confidentiality for Electricity Demand Forecast Forms 8.1a and 8.1b in Docket No. 23-IEPR-02

In conjunction with the filing of its Electricity Demand Forecast Forms, CleanPowerSF requests that confidentiality be maintained for updated Forms 8.1a and 8.1b filed in Docket No. 23-IEPR-02 pursuant to California Code of Regulations, Title 20, Section 2505(a)(4), which covers repeated applicants for confidentiality. CleanPowerSF filed substantially similar data in Docket No. 21-IEPR-03 on June 30, 2021. California Energy Commission ("Commission") Executive Director Drew Bohan approved CleanPowerSF's application for confidential treatment of the data response on August 7, 2021.

I. Identification of Confidential Information

CleanPowerSF is the community choice aggregator ("CCA") for the City and County of San Francisco, which is operated by the San Francisco Public Utilities Commission. In response to the Commission's data request for CCAs and publicly owned utilities, CleanPowerSF provides the following data:

- Form 8.1a (CCA): Budget Appropriations or Actual Costs and Cost Projections by Major Expense Category, in dollars, for 2021-2034
- Form 8.1b (CCA): Revenue Requirements Allocation, in dollars, for 2021-2034

CleanPowerSF is a program of the San Francisco Public Utilities Commission (SFPUC), an enterprise department of the City and County of San Francisco.

CleanPowerSF is committed to protecting customer privacy. Learn more at cleanpowersf.org/privacy.

OUR MISSION: To provide our customers with high-quality, efficient and reliable water, power and sewer services in a manner that values environmental and community interests and sustains the resources entrusted to our care.

London N. Breed
Mayor

Newsha K. Ajami
President

Sophie Maxwell
Vice President

Tim Paulson
Commissioner

Anthony Rivera
Commissioner

Kate H. Stacy
Commissioner

Dennis J. Herrera
General Manager



CleanPowerSF requests that all responses in the preceding forms continue to be treated as confidential.

The data CleanPowerSF submits in Form 8.1a includes Actual Costs and Cost Projections of its portfolio of energy contracts for renewable energy, energy storage, and all other market transactions including energy, Resource Adequacy, and Ancillary Services. This information begins with actual costs from 2021 and 2022 and ends with forecasted amounts through 2034. In Form 8.2b, CleanPowerSF calculates the revenue requirements based on the confidential inputs from Form 8.1a.

II. Time Period for Confidential Treatment

CleanPowerSF requests confidential treatment for three (3) years from the submission of Forms 8.1a and 8.2b until July 31, 2026.

III. CleanPowerSF Maintains the Confidentiality of this Information

CleanPowerSF guards the confidentiality of, and even only allows a subset of its staff to access, the information in Form 8.1(a). The information provided in Form 8.2(b) was calculated for the first time based on the confidential inputs from Form 8.1(a). CleanPowerSF seeks confidentiality for this information because this information could be used to back calculate the information in Form 8.1(a). Any time information of this nature is provided to a public agency, CleanPowerSF requests confidentiality.

IV. Certification of CleanPowerSF Director

I certify under penalty of perjury that the records at issue in this application for confidential designation are substantially similar to the records previously designated by the Commission as confidential and that the facts and circumstances have not changed. I further 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 CleanPowerSF.

Sincerely,



Michael A. Hyams
Director, CleanPowerSF