

DOCKETED	
Docket Number:	25-IEPR-02
Project Title:	Electricity Resource Plans
TN #:	260230
Document Title:	PG&E's Request for Confidentiality - TPR process workbook
Description:	PG&E's Transmission Project Review process workbook filed with the CPUC on November 1, 2024. This workbook is submitted to the docket in lieu of CEC's 2025 IEPR Transmission T-1 form.
Filer:	Jennifer Privett
Organization:	Pacific Gas and Electric Company
Submitter Role:	Applicant
Submission Date:	11/22/2024 2:37:37 PM
Docketed Date:	11/22/2024

APPLICATION FOR CONFIDENTIAL DESIGNATION
(20 CCR SECTION 2505)

2025 INTEGRATED ENERGY POLICY REPORT
Docket Number 25-IEPR-02
Transmission Information

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

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Senior Counsel

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

Transmission Project Review (TPR) Process workbook to fulfill the Transmission T-1 form issued by the California Energy Commission (CEC) for the 2025 Integrated Energy Policy Report (IEPR).

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

PG&E is providing the information as requested in Transmission Form T-1 and requests confidential designation for certain information designated as confidential in the TPR workbook. The data for which PG&E seeks confidential designation is clearly highlighted in yellow and the confidential version is conspicuously labeled as Confidential.

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

PG&E requests that certain categories of information be designated as confidential as specified in the detailed listing below. PG&E requests that the specific categories of information remain confidential through December 31, 2033, or two years after the contract expiration date, whichever is later.

Confidential designation is being sought for electric transmission project data and customer-specific data to protect critical energy infrastructure information, customer personal identifiable information and the confidentiality of proprietary, market-sensitive/competitive data that constitutes valuable PG&E intellectual property and trade secrets under California law.

The California Public Utilities Commission (CPUC) has granted PG&E confidentiality protection for this data in past TPR filings, including the most recent November 1, 2024 TPR filing.

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

PG&E requests confidentiality for Project Name, Location 1 (Lat/Long Coordinates), Location 2 (City), Project Description, and Utility Unique ID #2 (T.Dot Name), as this data is not customarily in the public domain and could compromise or incapacitate physically or electronically a facility providing critical utility service. The information covered by these data categories includes competitively and commercially sensitive business and resource-planning information protected under the Public Records Act, and information regarding the status of projects not yet operational. 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.

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.

Specifically, the following categories for the years 2023-2033:

- Data Field #2: Project Name
- Data Field #3: Location 1 (Lat/Long Coordinates)
- Data Field #4: Location 2 (City)

- Data Field #5: Project Description
- Data Field #27: Utility Unique ID #2 (T.Dot Name)

PG&E respectively requests that the CEC approve this application for confidentiality to protect the confidentiality of physical facility, cyber-security sensitive, or critical infrastructure data and to maintain PG&E's proprietary and market-sensitive data consistent with the treatment for such data by the CPUC. Doing so will protect the physical and electronic security of a facility providing critical utility service or vulnerabilities of a facility providing critical utility service.

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.

November 22, 2024

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

Name: Daniel S. Hashimi

Title: Senior Counsel
Pacific Gas and Electric Company