



January 9, 2009

Pedro J. Pizarro
Executive Vice President

Ms. Melissa Jones, Executive Director
California Energy Commission
1516 Ninth Street
Sacramento, CA 95814

DOCKET
09-IEP-1
DATE JAN 12 2009
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EXECUTIVE DIRECTOR

Re: California Energy Commission 2009 Integrated Energy Policy Report
(Docket No. IEP-09)

Dear Ms. Jones:

Southern California Edison Company (SCE) respectfully submits this letter to address the confidentiality of certain data and information requested by the California Energy Commission (Energy Commission) for the 2009 Integrated Energy Policy Report (IEPR) proceeding. SCE shares the Energy Commission's interest in ensuring that its data and information requirements for the 2009 IEPR are met, while at the same time protecting SCE's and other responding parties' market-sensitive data and information. SCE's interest in protecting confidential data and information is guided by the Confidentiality Matrix issued by the California Public Utilities Commission (CPUC) in Decision No. 06-06-066, which is intended to protect consumers.

SCE believes that through its discussions with Energy Commission staff it has been able to develop a common understanding concerning confidentiality for the 2009 IEPR. Specifically, SCE expects that the Energy Commission will agree to maintain and protect as confidential the following categories of data and information:

- All data and information that the Energy Commission previously determined should be protected as confidential in the 2007 IEPR;
- The data categories described in the table below.

Data Category	Form #	Line item
Annual Losses	1.2, 1.3 & 1.4	N/A
Generic Energy Needs	S-2	Lines 23, 24 & 25
QF Contractual Non-Renewable Resources Capacity	S-1	Line 20g
QF Contractual Non-Renewable Resources Energy	S-2	Line 17g
Forecast for SCE's Hydro Capacity Greater than 30 MW	S-1	Lines 17a & b
Forecast for SCE's Hydro Energy Greater than 30 MW	S-2	Lines 14a & b

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Consistent with the understanding outlined above, SCE will provide this information to the Energy Commission in the 2009 IEPR, with an application requesting confidential protection. SCE greatly appreciates the frank and thoughtful discussions that have taken place between our staffs.

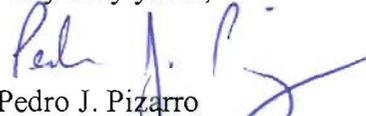
The lone issue in dispute concerns the Energy Division's request for SCE's bundled peak demand information. This information is designated as confidential under the CPUC-approved Confidentiality Matrix (Section V.B). However, the Energy Commission denied SCE's request that this information be designated as confidential during the 2005 and 2007 IEPR proceedings, and SCE understands based on discussions with staff that the Energy Commission likely will decline to provide a confidential designation for this information during the 2009 IEPR proceeding. This places SCE in the difficult position of receiving conflicting directions from different state agencies. As a result of these conflicting directions, SCE will provide bundled peak demand information in the 2009 IEPR, with an application requesting confidential protection. SCE respectfully urges the Energy Commission to reconsider its prior rulings and agree to designate this information as confidential so that there is consistency between the CPUC and Energy Commission concerning the treatment of this information.

Given the current market environment, SCE does not plan to pursue this issue further should the Energy Commission deny SCE's request for confidential treatment of bundled peak demand information. However, if market conditions change in the future (such as the reopening of direct access), thus making the disclosure of this information more market sensitive, SCE would like to have the opportunity to explain to the Energy Commission the nature and implications of these changed circumstances. For this reason, SCE expressly reserves its rights to pursue all available legal remedies to protect this information.

SCE appreciates the opportunity to submit this letter and is looking forward to participating in the 2009 IEPR. SCE is encouraged by the discussions that have already taken place between our staffs in workshops and other meetings, and is hopeful that the Energy Commission will continue to grant SCE the opportunity to provide input regarding this and other important issues.

If you do not share the understanding outlined above, have any questions, or need additional information concerning the issues discussed in this letter, please do not hesitate to contact me or Manuel Alvarez at (916) 441-2369.

Very truly yours,



Pedro J. Pizarro
Executive Vice President
Power Operations

cc: Paul Clanon, CPUC
Julie Fitch, CPUC