

CALIFORNIA ENERGY COMMISSION

1516 NINTH STREET
SACRAMENTO, CA 95814-5512

May 9, 2011

Mr. Mark Krausse
Pacific Gas and Electric Company
1415 L Street, Suite 280
Sacramento, CA 95814

DOCKET 11-IEP-1C
DATE <u>May 9, 2011</u>
RECD. <u>May 9, 2011</u>

**RE: Application for Confidentiality—Pacific Gas and Electric
Company
IEPR Electricity Retail Demand Forecast Forms
Docket No. 11-IEP-1C**

Dear Mr. Krausse:

On April 15, 2011, the California Energy Commission (Energy Commission) received Pacific Gas and Electric Company's (PG&E) application for confidentiality in the above-captioned Docket. The application seeks confidentiality for some of the information contained in the Energy Commission's Electricity Retail Demand Forecast forms. PG&E's application states, in part:

PG&E requests that certain data cells in the demand forecast data in Forms 1.2, 1.6(a) and 1.6(b) be designated as confidential...

Specifically for Form 1.2, the following categories for the forecast years 2011-2013:

- Sales to bundled customers (from 1.1); and
- Direct access plus other non-utility procurement.

Specifically for Form 1.6(a), the following categories for all hours for the forecast year 2010:

- Bundled load;
- Bundled losses;
- Unbundled load (DA + BART);
- Unbundled losses; and
- Total system load.

Specifically for Form 1.6(b), the following categories for all hours for the forecast year 2010:

- NP_15; and
- ZP_26.

PG&E requests that confidential designation of this information be maintained for three years. PG&E believes that this is the length of time that is required to ensure that recent near-term forecasts do not reveal PG&E's ongoing and future procurement and competitive positions and strategies, thereby compromising PG&E's ability to secure the most favorable deals for customers and protect its business strategies and proprietary business planning information from disclosure to competitors.

A properly filed application for confidentiality shall be granted under the California Code of Regulations, title 20, section 2505(a)(3)(A), "if the applicant makes a reasonable claim that the Public Records Act or other provision of law authorizes the [Energy] Commission to keep the record confidential."

PG&E's confidentiality application makes a reasonable claim to grant confidentiality for the information identified in your application based on the trade secret exemption to the California Public Records Act. (Gov. Code, § 6254 (k).)

The Energy Commission will disclose these data only after aggregating to the PG&E transmission system area, including ESPs, POUs, and other entities served by the PG&E transmission system. The information will remain confidential until December 31, 2013.

Persons may petition to inspect or copy the records that I have designated as confidential. The procedures and criteria for filing, reviewing, and acting upon such petitions are set forth in the California Code of Regulations, title 20, section 2506. Finally, an appeal of this decision must be filed within fourteen days from the date of this decision. The procedures and criteria for appealing any part of this decision are set forth in the California Code of Regulations, title 20, section 2505.

If you have any questions concerning this matter, please contact Kerry Willis, Senior Staff Counsel, at (916) 654-3967.

Sincerely,

A handwritten signature in black ink, appearing to read 'Melissa Jones', with a large, stylized circular flourish at the end.

MELISSA JONES
Executive Director

cc: Docket Unit
Mr. Manuel Alvarez
Manager, Regulatory Policy & Affairs
Southern California Edison Company