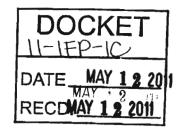
CALIFORNIA ENERGY COMMISSION

1516 NINTH STREET SACRAMENTO. CA 95814-5512



May 12, 2011



Mr. Carl H. Silsbee Southern California Edison Company 2244 Walnut Grove Avenue Rosemead, CA 91770

> RE: Application for Confidentiality--Southern California Edison Company Electricity Retail Demand Forecast Forms Docket No. 11-IEP-1C

Dear Mr. Silsbee:

On April 19, 2011, the California Energy Commission (Energy Commission) received Southern California Edison Company's (SCE) 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. SCE's application states, in part:

SCE requests that...parts of Forms 1.1, 1.2, 1.3, 1.4, 1.5, 1.6a, 1.6b and 2.2 of SCE's 2011 Electricity Demand Forecast Forms be designated as confidential and exempt from public disclosure.

...SCE requests that the specified information...be restricted from public disclosure based on either a window of confidentiality looking three years forward, one year back, or the entire forecast for a three-year period.

...to maintain consistency between the Energy Commission and the CPUC, the data that is designated on the 2011 Electricity Demand Forecast Forms as having been previously granted confidential treatment for the first three years of the forecast (i.e., 2011, 2012, and 2013) should also receive confidential treatment for year 2014.

... The data for which SCE seeks confidential protection here are trade secrets because they derive value from not being known to the public, and that SCE makes reasonable efforts to maintain its secrecy. Public disclosure of this information may cause electricity prices to rise.

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."

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

- Form 1.1 Sales to bundled customers in all sectors.
- Form 1.2 Direct access, community choice aggregators, and other departing load.
- Form 1.5 Distribution area coincident peak demand (MW) for 1-5, 1-10, 1-20 and 1-40 temperature scenarios.
- Form 1.6a Bundled and direct access hourly load for years 2010 and 2011.

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

SCE's confidentiality application does not make a reasonable claim to grant confidentiality for the following information identified in your application based on the trade secret exemption to the California Public Records Act (Gov. Code, § 6254 (k).):

- Forms 1.1, 1.2, 1.3 and 1.4 All data for year 2014.
- Form 1.1 Sales to bundled customers for year 2014 and average annual growth rate in sales to bundled customers from 2009 to 2015.
- Form 1.2 Losses, total distribution system energy requirements, and average annual growth rates of net electricity for load from 2009 to 2015.
- Form 1.3 All data concerning coincident peak demand for bundled customers.
- Form 1.4 All data concerning distribution area coincident peak demand.
- Form 1.6a Resale city load, municipal departing load, and total system hourly load.
- Form 1.6b All data relating to annual non-coincident peak by region.
- Form 2.2 All data relating to forecasted electricity rates.

Bundled customer annual peak electricity demand identified in Electricity Retail Demand

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Forecast Forms 1.2, 1.3 and 1.4 and data in Form 1.4, portions of Form 1.5, and Form 1.6b do not constitute a trade secret, nor does the public interest in nondisclosure of such data outweigh the public interest in its disclosure. This conclusion is supported by the Energy Commission's Order Denying Southern California Edison Company's Appeal of Executive Director Decision Denying Confidentiality, dated April 13, 2005, and, in part, in the subsequent decision in Superior Court upholding that Order (case No. 05cs00860). No hourly data was reported on Form 1.6b as required. The data that was reported appears to be annual non-coincident peak by region, which does not constitute a trade secret as defined above.

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,

MELISSA JONES

Executive Director

cc: Docket Unit

Mr. Manuel Alvarez

Manager, Regulatory Policy & Affairs Southern California Edison Company

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