

CALIFORNIA ENERGY COMMISSION

1516 NINTH STREET
SACRAMENTO, CA 95814-5512

June 24, 2011

DOCKET	
11-IEP-1C	
DATE	JUN 24 2011
RECD.	JUN 24 2011

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

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

Dear Mr. Krausse:

On June 3, 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 Demand Forecast forms. PG&E's application states, in part:

PG&E is requesting confidential designation for...Form 8.1a – forecast fuel and non-fuel revenue requirements, and forecast fuel costs for 2011-2022 for utility-owned natural gas-fired generation.

PG&E requests that the portions of the forms for which it requests confidential designation herein be kept confidential for a period of three years from submission.

These forms contain detailed disaggregated forecast information...that relatively easily allows a party to calculate PG&E's current energy supply and capacity needs on a disaggregated basis – the same annual energy supply information for which PG&E has requested confidentiality in Electricity Supply Form 5-2.

For example, Using the fuel cost revenue requirement for utility-owned natural gas-fired generation, plus the forecast natural price, both of which are contained in Form 8.1a, the forecast annual energy supply volumes from its gas-fired generation can be estimated by using the publicly available average heat rate for the unit. By thus calculating PG&E's "residual net short" position, potential suppliers achieve a competitive advantage that potentially harms PG&E's customers who may end up paying higher power prices.

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

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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 June 3, 2014.

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 'R. P. Oglesby', with a stylized flourish at the end.

ROBERT P. OGLESBY
Executive Director

cc: Docket Unit