

## CALIFORNIA ENERGY COMMISSION

1516 NINTH STREET  
SACRAMENTO, CA 95814-5512  
www.energy.ca.gov



July 1, 2011

**DOCKET**  
**11-IEP-1C**

DATE	July 01 2011
RECD.	July 01 2011

Mr. Paul Szymanski  
San Diego Gas & Electric Company  
101 Ash Street, HQ 12  
San Diego, CA 92101-3017

**RE: Application for Confidentiality—San Diego Gas & Electric  
Company  
Electricity Retail Demand Forecast Forms  
Docket No. 11-IEP-1C**

Dear Mr. Szymanski:

On June 17, 2011, the California Energy Commission (Energy Commission) received San Diego Gas & Electric Company's (SDG&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. SDG&E's application states, in part:

SDG&E seeks confidential designation for data provided to the Energy Commission as part of the 2011 Integrated Energy Policy Report. The information for which confidential designation is requested pertains to SDG&E's natural-gas fired average fuel price...IEPR Form 8.1(a), Line 21.

SDG&E requests that the forecast data indicated be kept confidential for a period of three years, or through December 31, 2013. This length of protection is required to ensure that SDG&E's detailed demand forecast data remains secure from market participants who could otherwise make competitive use of this information to the detriment of utility ratepayers.

Line 21, Average Fuel Price, is a utility-generated gas price forecast which is not publicly available. It is derived from the aggregate fuel cost of all natural gas-fired resources in the dispatch model.

The primary public interest to be protected is, among other things, that SDG&E will be disadvantaged in procurement such that consumers may well pay higher energy prices than they would if the information was not publicly released.

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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."

SDG&E's confidentiality application makes a reasonable claim to grant confidentiality for the forecasted natural-gas fired average fuel price—Form 8.1(a), line 21, columns E through P—based on the trade secret exemption to the California Public Records Act. (Gov. Code, § 6254 (k).) 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,

/S/

Robert P. Oglesby  
Executive Director

cc: Docket Unit