

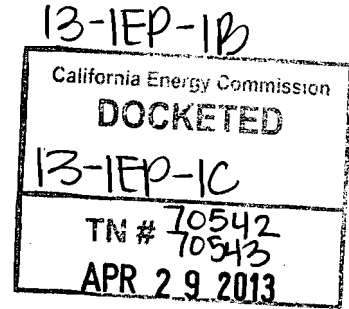
COMPLETED



City of Anaheim

PUBLIC UTILITIES DEPARTMENT

Integrated Resources Division



April 26, 2013

California Energy Commission
Attention: Docket# 13-IEP-1C & Docket #13-IEP-1B
1516 Ninth St., MS-4
Sacramento, CA 95814-5512

To Whom It May Concern,

Enclosed, you will find the City of Anaheim's CEC Integrated Energy Policy Report (IEPR) 2013 documents. This mailing includes a CD-ROM with the Electricity Demand Forms (Form 1-Form 8); including Form 4-6, which explain the Demand Forecast Methodology (details on Form 8.1aPOU will be emailed on 6/3/13). Also included in this mailing are the Electricity Resource Planning Forms, Form S-1 to S-5. Several of the S-5 Forms for Bilateral Contracts include a request for confidentiality (which has already been granted by the CEC in April 2009). Additionally, we are requesting confidentiality for some items in Form S-1, Form S-2, and 8.1a(POU). The confidentiality request for 2013 IEPR data is included. If you have any questions, please contact me.

Sincerely,

A handwritten signature in black ink, appearing to read "M K Samra".

Mandip Kaur Samra
Integrated Resource Planner
City of Anaheim, Public Utilities Department
201 S. Anaheim Blvd., Suite 802
Anaheim, CA 92805

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APPLICATION FOR CONFIDENTIAL DESIGNATION

(Title 20 Cal. Code. Regs., § 2505 et seq.)

DATE: April 25, 2013

TO: Robert P. Oglesby, Executive Director, California Energy Commission, 1516 Ninth Street MS-39, Sacramento CA, 95814-5504

ENERGY COMMISSION CONTRACT/DOCKET NO. (IF APPLICABLE):
Docket #13-IEP-1B City of Anaheim, Resource Plan

APPLICANT: City of Anaheim

ADDRESS: 201 S. Anaheim Blvd., Suite 1101, Anaheim, CA 92805

1. **Identification of the information being submitted, including title, date, size and description (including number of pages, sheets, MB) and docket number.**
 - a. *File name: CEC-200-2012-007-SD Supply Forms ANA, as part of CEC Docket # 13-IEP-1B City of Anaheim, Resource Plan. This is the 2013 Integrated Energy Policy Report data request for Electricity Resource Plans.*
 - i. *Supply Forms Tab S-1:CRATs" line 12d (Information pertaining to San Juan Unit 4), Supply Forms Tab " S-2 Energy Balance" line 8d (Information pertaining to San Juan Unit 4) is requested to be deemed confidential*
 - b. *This data will be submitted 4/26/2013.*
 - c. *The total MB of this file (which includes non-confidential data) is less than 1MB.*
2. **Description of the data for which confidentiality is being requested (for example, particular contract categories, specific narratives and time periods).**
 - a. *All information provided in CEC-200-2012-007-SD Supply Forms ANA, pertaining to data for San Juan Unit 4 in Tab S-1:CRATs" line 12d and Supply Forms Tab " S-2 Energy Balance" line 8d (please see 1a above for the description of the file).*
 - i. *All of the data listed in these forms pertaining to San Juan Unit 4 is confidential. Anaheim is discussing a potential divestiture of the plant, but the details of this potential divestiture are confidential, per our agreement with the other owners of the plant. This potential divestiture is in the early stages and there is no guarantee it will be successful. Currently, the contract for San Juan unit 4 expires on 7/1/2022.*
3. **A clear description of the length of time for which confidentiality is being sought, with an appropriate justification, for each confidential data category request**

- a. *It is requested that the referenced data be deemed confidential until January 1, 2018, at which time (if potential divestiture is successful), San Juan unit 4 will no longer be in our portfolio.*
4. **Applicable provisions of the California Public records Act (Code, § 6250 et seq.) and or other laws, for each confidential data category request**
 - a. *California Code of Regulations, Title 20 section 2505(b) Other Public Entities. When another state or local agency possesses information pertinent to the responsibilities of the Commission that has been designated by that agency as confidential under the Public Records Act, or the Freedom of Information Act, the Commission, the Executive Director, or the Chief Counsel may request and the agency submit the information to the Commission without an application for confidential designation. The Commission shall designate this information confidential.*
5. **A statement attesting that a) the specific records to be withheld from public disclosure are exempt under provisions of the Government Code, or b) the public interest in non-disclosure of these particular facts clearly outweighs the public interest in disclosure**
 - a. *Per #4 above, the specific records to be withheld from public disclosure are exempt under provisions of the Government Code of Regulations, Title 20 section 2505(b).*
 - b. *Disclosure of the requested information without a request for confidentiality may place Anaheim in violation of the terms and conditions of its agreement with other owners, to keep details of a potential divestiture confidential. This may jeopardize our chances for divestiture.*
6. **A statement that describes how each category of confidential data may be aggregated with other data for public disclosure**
 - a. *The information may be disclosed if it is aggregated with other information to a degree that it conceals the specifics of the resource.*

I certify under penalty of perjury that the information contained in this application for confidential designation is true, correct, and complete to the best of my knowledge and that I am authorized to make the application and certification on behalf of the applicant.

Dated: April 26, 2013

Signed:

A handwritten signature in black ink that reads "Marcie L. Edwards". The signature is fluid and cursive, with the first name "Marcie" and last name "Edwards" clearly legible.

Name: Marcie L. Edwards

Title: Public Utilities General Manager, City of Anaheim

Representing: City of Anaheim, Public Utilities Department

APPLICATION FOR CONFIDENTIAL DESIGNATION

(Title 20 Cal. Code. Regs., § 2505 et seq.)

DATE: April 25, 2013

TO: Robert P. Oglesby, Executive Director, California Energy Commission, 1516 Ninth Street MS-39, Sacramento CA, 95814-5504

ENERGY COMMISSION CONTRACT/DOCKET NO. (IF APPLICABLE):

Docket #13-IEP-1C City of Anaheim, Demand Forecast (in the email to the CEC, this is listed as Docket #13-IEP-1C Demand Forecast (City of Anaheim IEPR))

APPLICANT: City of Anaheim

ADDRESS: 201 S. Anaheim Blvd., Suite 1101, Anaheim, CA 92805

1. **Identification of the information being submitted, including title, date, size and description (including number of pages, sheets, MB) and docket number**
 - a. *File name: CEC-200-2012-006-SD Demand Forms ANA, as part of CEC Docket # 13-IEP-1C. This is the 2013 Integrated Energy Policy Report data request for Electricity Demand Forms.*
 - i. *Demand Forms Tab Form 8.1a(POU) line 21-23 and Form 8.1a Anaheim Annual Data (all data) is requested to be deemed confidential*
 - b. *The data was submitted 4/15/2013, with information on these tabs not fully complete, as these sections are not due until 6/3/2013. These sections will be submitted on 6/3/2013. We noted that this data was incomplete and Anaheim will be requesting confidentiality.*
 - c. *The total MB of this file (which includes non-confidential data) is slightly more than 1MB.*
2. **Description of the data for which confidentiality is being requested (for example, particular contract categories, specific narratives and time periods)**
 - a. *All information provided in CEC-200-2012-006-SD Demand Forms ANA, pertaining to data for San Juan Unit 4 in Tab Form 8.1a(POU) line 21-23 and Form 8.1a Anaheim Annual Data (all data) (please see 1a above for the description of the file).*
 - i. *The data listed Tab: Form 8.1a(POU) pertaining to San Juan Unit 4 is confidential, Anaheim is discussing a potential divestiture of the plant, but the details of this potential divestiture are confidential, per our agreement with the other owners of the plant. This potential divestiture is in the early stages and there is no guarantee it will be successful. Currently, the contract for San Juan unit 4 expires on 7/1/2022.*

- ii. *All of the data listed in Tab: "Form 8.1a Anaheim Annual Data is confidential as this includes detailed information on pricing, revenue and contracts. Pricing and revenue data is not made public, as it specifically lays out the way Anaheim projects its revenue stream. These are estimates that are used to run our power supply resource scenarios. This document provides the supplemental information to properly fill out Form 8.1a(POU), however, this includes additional information that is not required by the IEPR. This tab also includes details on Anaheim's possible divestiture of San Juan unit 4, which is in the early stages and might not happen. Though Anaheim is planning for this scenario, it is not guaranteed- as such, the dissemination of this information may be harmful to Anaheim's negotiation process for the San Juan Unit 4 contract. Currently, the contract will expire on 7/1/2022.*
3. **A clear description of the length of time for which confidentiality is being sought, with an appropriate justification, for each confidential data category request**
- a. *Tab: Form 8.1a(POU): It is requested that this data be deemed confidential until January 1, 2018, at which time (if our divestiture is successful), San Juan unit 4 will no longer be in our portfolio*
 - b. *Tab: Form 8.1a Anaheim Annual Data: This entire sheet is requested to be confidential indefinitely (with no end date), as it only provides supplemental material for Tab Form 8.1a(POU) and includes additional information that is not requested by the CEC. This was an additional form inserted by Anaheim to fill out Tabs "Form 8.1a(POU) and 8.2.*
4. **Applicable provisions of the California Public records Act (Code, § 6250 et seq.) and or other laws, for each confidential data category request**
- a. *California Code of Regulations, Title 20 section 2505(b) Other Public Entities. When another state or local agency possesses information pertinent to the responsibilities of the Commission that has been designated by that agency as confidential under the Public Records Act, or the Freedom of Information Act, the Commission, the Executive Director, or the Chief Counsel may request and the agency submit the information to the Commission without an application for confidential designation. The Commission shall designate this information confidential.*
5. **A statement attesting that a) the specific records to be withheld from public disclosure are exempt under provisions of the Government Code, or b) the public interest in non-disclosure of these particular facts clearly outweighs the public interest in disclosure**
- a. *Per #4 above, the specific records to be withheld from public disclosure are exempt under provisions of the Government Code of Regulations, Title 20 section 2505(b).*
 - b. *Disclosure of the requested information without a request for confidentiality may place Anaheim in violation of the terms and conditions of its agreement with other*

owners, to keep details of a potential divestiture confidential. This may jeopardize our chances for divestiture.

6. A statement that describes how each category of confidential data may be aggregated with other data for public disclosure

- a. The information may be disclosed if it is aggregated with other information to a degree that it conceals the specifics of the resource..*

I certify under penalty of perjury that the information contained in this application for confidential designation is true, correct, and complete to the best of my knowledge and that I am authorized to make the application and certification on behalf of the applicant.

Dated: April 26, 2013

Signed:



Name: Marcie L. Edwards

Title: Public Utilities General Manager, City of Anaheim

Representing: City of Anaheim, Public Utilities Department