

CALIFORNIA ENERGY COMMISSION

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



July 31, 2015

California Energy Commission

DOCKETED**11-RPS-01**

TN # 71 F61

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Pjoy T. Chua, P.E.
Power System Planning and Development Division
City of Los Angeles, Department of Water and Power
111 North Hope St, Room 807
Los Angeles, CA 90012

**RE: Application for Designation of Confidential Records relating LADWP's
RPS Compliance Period Report**

Dear Ms. Chua:

LADWP has submitted to the Energy Commission an application for confidentiality covering Renewable Portfolio Standard data for the 2014 compliance period. The application requests confidential designation for the following data regardless of what form it appears on:

1. Electric power plant specific hourly generation data.
2. Price and energy sales data found in the contracts with generators.
3. Residential home address of PV owners coupled with other identifying data such as name, system information or energy consumption.
4. Energy Transmission Pathway and generation data found on the NERC e-tag.

LADWP requests that the data be kept confidential indefinitely which is consistent with LADWP's practice. Data may be released if it is aggregated or anonymous, such that the underlying reason for confidentiality is protected.

Under the Commission's regulations section 2505(b):

When another federal, state, regional, or local agency or state-created private entity, such as the California Independent System Operator, 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 shall submit the information to the

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Commission without an application for confidential designation. The Commission shall designate this information confidential.

Under 2505(b) the Commission will designate the four items noted above as confidential. The data will remain confidential indefinitely, but can be disclosed if aggregated with other data to a state wide or higher level or otherwise masked.

In the future, information submitted to the Energy Commission can be deemed confidential without the need for a new application under California Code of Regulations, title 20, sections 2505(a)(1)(G) and 2505(a)(4) if you file a certification under penalty of perjury that the new information is substantially similar to the information previously granted confidentiality.

Be advised that persons may petition to inspect or copy 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. If you have any questions concerning this matter, please contact Jared Babula, Staff Counsel, at (916) 651-1462.

Sincerely,

A handwritten signature in black ink, appearing to read 'R. P. Oglesby', with a long horizontal line extending to the right.

Robert P. Oglesby
Executive Director

cc: Docket Unit
Emily Chisholm, Renewable Energy Office