

## CALIFORNIA ENERGY COMMISSION

1516 NINTH STREET  
SACRAMENTO, CA 95814-5512

May 24, 2013

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

California Energy Commission

**DOCKETED****13-IEP-1C**

TN 70966

MAY 24 2013

RE: San Diego Gas & Electric Company's Application for Confidentiality for the 2013  
*Integrated Energy Policy Report* Electricity Demand Forecast Submission  
Docket No. 13-IEP-1C

Dear Mr. Szymanski:

On April 29, 2013, 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 describes this information explicitly as follows:

IEPR Form 1.1b: Retail Sales of Electricity by Class or Sector - Bundled Customers (GWh) Col C-G, Rows 23-25, and Col K, Rows 23-25

IEPR Form 1.2: Distribution Area Net Electricity For Generation Load (GWh), Col C-D, Rows 23-25

IEPR Form 1.3: LSE Coincident Peak Demand by Sector (Bundled Customers) (MW), Col C-N, Rows 23-25 and Col P, Rows 23-25

IEPR Form 1.4: Distribution Area Coincident Peak Demand (MW) Col C-F, Rows 23-25

IEPR Form 1.5: Peak Demand Weather Scenarios, Distribution Area Coincident Peak Demand (MW), Col D-G, Rows 23-34

IEPR Form 1.6a 2012: Recorded Hourly Loads for 2012, Col C-F, all rows and Col H, all rows

IEPR Form 1.6a 2013: Forecasted Hourly Loads for 2013, Col C-F, all rows and Col H, all rows

IEPR Form 2.2: Electricity Rate Forecast (2011 cents/kWh), Col E-I, Rows 23-34

SDG&E requests that the forecast data indicated be kept confidential for a period of three years, or through December 31, 2015.

A properly filed application for confidentiality shall be granted under California Code of Regulations, Title 20, Section 2505(a)(3)(A), "if the applicant makes a reasonable claim that the California Public Records Act or other provision of law authorizes the [Energy] Commission to keep the record confidential."

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

Specifically for Form 1.1(b), information pertaining to migrating load.

Specifically for Form 1.3, all forecasts of LSE coincident peak demand for bundled customers.

Specifically for Form 1.4, forecasts of distribution area coincident peak demand for bundled and direct access customers.

Specifically for Form 1.6(a), the total system hourly load.

Bundled and direct access customer annual peak electricity demand in Form 1.3 and Form 1.4 and total system load in Form 1.6(a) 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, in part, 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).

SDG&E'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)):

Specifically for Form 1.1(b), all forecasts of retail sales to bundled customers for the forecast years 2013-2015.

Specifically for Form 1.2, the following categories for the forecast years 2013-2015:

- Sales to bundled customers
- Direct access sales

Specifically for Form 1.5, the following distribution area coincident peak demand scenarios for the forecast years 2013-2015:

- 1-in-5 temperatures
- 1-in-10 temperatures
- 1-in-20 temperatures
- 1-in-40 temperatures

Specifically for Form 1.6(a), the following categories for all hours for the years 2012 and 2013:

- Bundled load
- Bundled losses
- Unbundled load
- Unbundled losses

Specifically for Form 2.2, the electricity rate forecast for all sectors for years 2013 to 2024.

The Energy Commission will disclose this data only after aggregating to the SDG&E transmission system area, including Electric Service Providers (ESP), Publicly Owned Utilities (POU), and other entities served by the SDG&E transmission system. The information will remain confidential through December 31, 2015.

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 California Code of Regulations, Title 20, Section 2506. Finally, an appeal of this decision must be filed within 14 days from the date of this decision. The procedures and criteria for appealing any part of this decision are set forth in 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,



Robert P. Oglesby  
Executive Director

cc: Docket Unit  
Sylvia Bender