

**BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF CALIFORNIA**

Application of San Diego Gas & Electric Company  
(U 902-E) for Approval of its 2022 Electric  
Procurement Revenue Requirement Forecasts and  
GHG-Related Forecasts.

Application 21-04-010  
(Filed April 15, 2021)

**MOTION OF SAN DIEGO GAS & ELECTRIC COMPANY (U 902-E) FOR LEAVE TO  
FILE CONFIDENTIAL MATERIALS UNDER SEAL PURSUANT TO RULE 11.4**

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November 8, 2021

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**MOTION OF SAN DIEGO GAS & ELECTRIC COMPANY (U 902-E) FOR LEAVE  
TO FILE CONFIDENTIAL MATERIALS UNDER SEAL PURSUANT TO RULE 11**

Pursuant to Rule 11.4 of the Commission’s Rules of Practice and Procedure and Decisions (“D”) 06-06-066 and D.14-10-033, San Diego Gas & Electric Company (“SDG&E”) hereby files this Motion to File Under Seal regarding the confidential information in Attachment G to SDG&E’s *November Update to Application* filed concurrently herewith (“November Update”). Specifically, as described in the Declarations of Gwendolyn Morien and Praem Kodiath (**Attachment A** to this Motion<sup>1</sup>), SDG&E is seeking confidential treatment of limited greenhouse gas (“GHG”)-related information in Template D-1 (Annual Allowance Revenue Receipts and Customer Returns) and Template D-2 (Annual GHG Emissions and Associated Costs), all of which are included in Attachment G (GHG Revenue and Reconciliation Application Form) to the November Update. As Ms. Morien and Mr. Kodiath indicate in their confidentiality declarations, disclosure of this information would be inappropriate because disclosure of forecasts of GHG emissions and recorded and forecast GHG costs would allow market participants to gain insight into SDG&E’s GHG obligations and procurement strategies, which would comprise SDG&E’s contractual bargaining power and cause customer costs to rise

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<sup>1</sup> These confidentiality declarations are also attached to the updated testimonies of Gwendolyn Morien and Matthew O’Connell respectively.

In sum, the material for which SDG&E seeks confidential treatment is confidential according to D.06-06-066 and D.14-10-033. The confidential information should be protected as follows:

- the confidential information constitutes a particular type of data listed in the IOU Matrix;
- the confidential information is confidential in accordance with D.14-10-033;
- SDG&E is complying with the limitations on confidentiality specified in the IOU Matrix for each type of data;
- the confidential information is not already public; and
- the confidential information cannot be aggregated, redacted, summarized, masked or otherwise protected in a way that allows partial disclosure.

For good cause shown and because no party will be prejudiced by the redacted material set forth in the above-referenced Templates D-1 and D-2 in Attachment G to the November Update, SDG&E respectfully requests that this Motion be granted. SDG&E has attached a Proposed Order for the Commission's use in granting this Motion (**Attachment B** to this Motion).

Respectfully submitted,

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SAN DIEGO GAS & ELECTRIC COMPANY

November 8, 2021

**ATTACHMENT A**

**DECLARATIONS OF GWENDOLYN MORIEN AND PRAEM KODIATH**

**BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF CALIFORNIA**

**DECLARATION  
OF GWENDOLYN MORIEN**

**A.21-04-010**

Application of San Diego Gas & Electric Company (U 902-E)  
for Approval of Its 2022 Electric Procurement Revenue Requirement Forecasts and GHG-  
Related Forecasts

I, Gwendolyn Morien, declare as follows:

1. I am a Rate Strategy Project Manager for San Diego Gas & Electric Company (“SDG&E”). I included my Updated Direct Testimony (“Testimony”) in support of SDG&E’s November Update to Application for Approval of its 2022 Electric Procurement Revenue Requirement Forecasts and GHG-Related Forecasts (“Application”). Additionally, as the Rate Strategy Project Manager, I am thoroughly familiar with the facts and representations in this declaration, and if called upon to testify I could and would testify to the following based upon personal knowledge.

2. I am providing this Declaration to demonstrate that the confidential information (“Protected Information”) in support of the referenced Application falls within the scope of data provided confidential treatment in the IOU Matrix (“Matrix”) attached to the Commission’s Decision (“D.”) 06-06-066 (the Phase I Confidentiality decision). Pursuant to the procedure adopted in D.08-04-023, I am addressing each of the following five features of Ordering Paragraph 2 of D.06-06-066:

- that the material constitutes a particular type of data listed in the Matrix;
- the category or categories in the Matrix the data correspond to;
- that SDG&E is complying with the limitations on confidentiality specified in the Matrix for that type of data;
- that the information is not already public; and
- that the data cannot be aggregated, redacted, summarized, masked or otherwise protected in a way that allows partial disclosure.

3. The Protected Information contained in my Testimony constitutes material, market sensitive, electric procurement-related information that is within the scope of Section 454.5(g) of the Public Utilities Code.<sup>1</sup> As such, the Protected Information is allowed confidential treatment in accordance with the Matrix, as follows:

<b>Confidential Information</b>	<b>Matrix Reference</b>	<b>Reason for Confidentiality and Timing</b>
Cells highlighted in yellow in the excel file named “CONFIDENTIAL - PCIA Model_2022 ERRRA Forecast Nov Update.xlsx”	V.E V.C	LSE Energy Forecast by Service Area (MWh); confidential for the front three years LSE Total Energy Forecast – Bundled Customer, confidential for the front three years
Cells highlighted in yellow in the excel file named “CONFIDENTIAL - Class Avg Rates_2022 ERRRA Forecast Nov Update.xlsx”	V.E V.C	LSE Energy Forecast by Service Area (MWh); confidential for the front three years LSE Total Energy Forecast – Bundled Customer, confidential for the front three years
Application Appendix G, Template D-1: Revenue	V.C	LSE Total Energy Forecast – Bundled Customer, confidential for the front three years

4. I am not aware of any instances where the Protected Information has been disclosed to the public. To my knowledge, no party, including SDG&E, has publicly revealed any of the Protected Information.

5. SDG&E will comply with the limitations on confidentiality specified in the Matrix for the Protected Information.

6. The Protected Information cannot be provided in a form that is aggregated, partially redacted, or summarized, masked or otherwise protected in a manner that would allow further disclosure of the data while still protecting confidential information.

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<sup>1</sup> In addition to the details addressed herein, SDG&E believes that the information being furnished in my Testimony is governed by Public Utilities Code Section 583 and General Order 66-D. Accordingly, SDG&E seeks confidential treatment of this data under those provisions, as applicable.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed this 8th day of November, 2021, at San Diego, California.

/s/ Gwendolyn Morien  
Gwendolyn Morien  
Rate Strategy Project Manager III  
San Diego Gas & Electric Company

**BEFORE THE PUBLIC UTILITIES  
COMMISSION OF THE STATE OF CALIFORNIA**

**DECLARATION OF PRAEM KODIATH  
REGARDING CONFIDENTIALITY OF CERTAIN DATA/DOCUMENTS  
PURSUANT TO D.16-08-024, *et al.***

I, Praem Kodiath, do declare as follows:

1. I am the Resource Planning Manager in the Energy Supply Department for San Diego Gas & Electric Company (“SDG&E”). I have been delegated authority to sign this declaration by Estela de Llanos, Vice President of Energy Supply. I have reviewed Matthew O’Connell’s Updated Prepared Direct Testimony (“Testimony”) in support of SDG&E’s November Update to Application for Approval of its 2022 Electric Procurement Revenue Requirement Forecasts and GHG-Related Forecasts (“Application”). I am personally familiar with the facts and representations in this Declaration and, if called upon to testify, I could and would testify to the following based upon my personal knowledge and/or information and belief.

2. I hereby provide this Declaration in accordance with Decisions (“D.”) 16-08-024, D.17-05-035, and D.17-09-023 to demonstrate that the confidential information (“Protected Information”) provided in the Testimony is within the scope of data protected as confidential under applicable law.

3. In accordance with the legal authority described herein, the Protected Information should be protected from public disclosure.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct to the best of my knowledge.

Executed this 8th day of November, 2021, in San Diego.

*/s/ Praem Kodiath*  
Praem Kodiath  
Resource Planning Manager – Energy Supply



# ATTACHMENT A

## SDG&E Request for Confidentiality on the following information in its Application for Approval of Its 2022 Electric Procurement Revenue Requirement Forecasts and GHG- Related Forecasts

Location of Protected Information	Legal Authority	Narrative Justification
MO-26 Table 4, MO-27, and Attachment E - SDG&E Greenhouse Gas (GHG) Detail  Application Appendix G, Template D-2: Forecasted Emissions and Costs	D.14-10-033; D.16-08-024; D.17-05-035; D.17-09-023; Public Utilities Code Section 454.5(g).	The information does not expressly fall within any category of the IOU Matrix applicable to electric procurement information, but is market-sensitive information in that providing these GHG emissions forecasts to market participants would allow them to know SDG&E's forecasted GHG obligation, thereby compromising SDG&E's contractual bargaining power such that customer costs are likely to rise. Thus, the release of this non-public confidential information will unjustifiably allow market participants to use this information to the disadvantage of SDG&E's customers.

**ATTACHMENT B**

**PROPOSED ORDER**

## [PROPOSED] RULING

Pursuant to Rule 11.4 of the Rules of Practice and Procedure of the California Public Utilities Commission (the “Commission”) and D.06-06-066, D.08-04-023 and D.14-10-033, San Diego Gas & Electric Company (“SDG&E”) filed a motion on November 8, 2021 requesting authority to file and maintain confidential, commercially sensitive and proprietary information under seal (the “Motion”). The Motion sought confidential treatment of certain limited greenhouse gas (“GHG”)-related information appearing in Template D-1 (Annual Allowance Revenue Receipts and Customer Returns) and Template D-2 (Annual GHG Emissions and Associated Costs), all of which are included in Attachment G (GHG Revenue and Reconciliation Application Form) to SDG&E’s *November Update to Application* (“November Update”).

The information for which confidential treatment is sought is protected under the IOU Matrix adopted in D.06-06-066 (the “IOU Matrix”) or under D.14-10-033. In addition, the information complies with the limitations on confidentiality specified in the IOU Matrix for that type of data (as applicable) and has not been made public. In addition, the data cannot be aggregated, redacted, summarized, masked or otherwise protected in a way that allows partial disclosure.

Therefore, it is ordered that:

1. The confidential information contained in Template D-1 and D-2 to Attachment G (GHG Revenue and Reconciliation Application Form) to the November Update, shall remain sealed and is not to be disclosed to anyone other than Commission staff, the Assigned Commissioner, the assigned Administrative Law Judges (“ALJs”) or an ALJ designated to decide this motion;
2. Further proceedings, if any, held with respect to matters contained in the confidential information shall be conducted in a manner the assigned ALJs deem

reasonably necessary to protect the confidentiality of the materials described herein;

3. SDG&E has the right to consider and reject requests for access to this material by means of a non-disclosure agreement or other method; and
4. All additional documentary evidence in this proceeding that addresses or relates to the subject matter of the confidential information must be treated in the confidential manner described in paragraphs 1 and 2, above.

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Administrative Law Judge

Dated: \_\_\_\_\_