

**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 15, 2021

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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 *Revised 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 Motion¹), 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

¹ 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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ATTACHMENT A

DECLARATIONS OF GWENDOLYN MORIEN AND PRAEM KODIATH

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 15, 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 *Revised 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.

Administrative Law Judge

Dated: _____