Application of SAN DIEGO GAS & ELECTRIC COMPANY (U 902-E) for Approval of its 2021 Electric Procurement Revenue Requirement Forecasts and GHG-Related Forecasts

Application	20-04-
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MOTION OF SAN DIEGO GAS & ELECTRIC COMPANY (U 902 E) FOR LEAVE TO FILE CONFIDENTIAL MATERIALS UNDER SEAL; CONFIDENTIAL MATERIALS ATTACHED AND FILED UNDER SEAL

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Application of SAN DIEGO GAS & ELECTRIC COMPANY (U 902-E) for Approval of its 2021 Electric Procurement Revenue Requirement Forecasts and GHG-Related Forecasts

Application 20-04

MOTION OF SAN DIEGO GAS & ELECTRIC COMPANY (U 902 E) FOR LEAVE TO FILE CONFIDENTIAL MATERIALS UNDER SEAL; CONFIDENTIAL MATERIALS ATTACHED AND FILED UNDER SEAL

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 the Application of San Diego Gas & Electric Company (U-902-E) for Approval of its 2021 Electric Procurement Revenue Requirement Forecasts and GHG-Related Forecasts ("Application"). Specifically, as described in the Declarations of Hillary Hebert and Elsa Valay-Paz (Attachment A to this Motion¹), SDG&E is seeking confidential treatment of limited greenhouse gas ("GHG")-related information in Templates D-2 (Annual GHG Emissions and Associated Costs) and D-5 (History of Revenue, Costs, and Emissions Intensity), both of which are included in Attachment G (GHG Revenue and Reconciliation Form) to the Application. As Ms. Hebert and Ms. Valay-Paz indicate, 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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These declarations are also attached to the testimony of Stefan Covic and Ana Garza-Beutz, respectively, both of whom refer to the confidential information.

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-2 and D-5 to Attachment G to the Application, 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).

DATED this 15th day of April 2020, at San Diego, California.

Respectfully submitted,

Roger A. Cerda

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Attorney for:

SAN DIEGO GAS & ELECTRIC COMPANY

ATTACHMENT A

DECLARATIONS OF HILLARY HEBERT AND ELSA VALAY-PAZ

DECLARATION OF HILLARY HEBERT REGARDING CONFIDENTIALITY OF CERTAIN DATA/DOCUMENTS PURSUANT TO D.16-08-024, et al.

I, Hillary Hebert, do declare as follows:

- 1. I am a Resource Planning Manager in the Resource Planning department for San Diego Gas & Electric Company ("SDG&E"). I have been delegated authority to sign this declaration by Miguel Romero, Vice President of Energy Supply. I have reviewed Stefan Covic's Prepared Direct Testimony ("Testimony") in support of SDG&E's "Application for Approval of its 2021 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 15th day of April, 2020, in San Diego.

HUM/HUT
Hillary Hebert

ATTACHMENT A

SDG&E Request for Confidentiality on the following information in its Application for Approval of Its 2021 Electric Procurement Revenue Requirement Forecasts and GHG-Related Forecasts

Location of Protected	Legal Authority	Narrative Justification
Information		
SC-25 Table 4, and	D.14-10-033;	The information does not expressly fall within
Attachment E - SDG&E	D.16-08-024;	any category of the IOU Matrix applicable to
Greenhouse Gas (GHG)	D.17-05-035;	electric procurement information, but is
Detail	D.17-09-023;	market-sensitive information in that providing
	Public Utilities	these GHG emissions forecasts to market
Application Attachment	Code Section	participants would allow them to know
G, Template D-2:	454.5(g).	SDG&E's forecasted GHG obligation, thereby
Forecasted Emissions		compromising SDG&E's contractual
and Costs, and		bargaining power such that customer costs are
Template D-5:		likely to rise. Thus, the release of this non-
Forecasted Emissions		public confidential information will
Intensity		unjustifiably allow market participants to use
		this information to the disadvantage of
		SDG&E's customers.

DECLARATION OF ELSA VALAY-PAZ REGARDING CONFIDENTIALITY OF CERTAIN DATA/DOCUMENTS PURSUANT TO D.16-08-24, et al.

I, Elsa Valay-Paz, do declare as follows:

- 1. I am the Director of Origination, Energy Supply & Dispatch in the Electric and Fuel Procurement department for San Diego Gas & Electric Company ("SDG&E"). I have been delegated authority to sign this declaration by Miguel Romero, Vice President of Energy Supply. I have reviewed Ana Garza-Beutz's Prepared Direct Testimony ("Testimony") and Appendix G, the GHG Revenue and Reconciliation Application Form, in support of SDG&E's April 15, 2020 "Application for approval of its 2021 Electric Procurement Revenue Requirement Forecasts and GHG Related-Forecasts ("Application"). I am personally familiar with the facts 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.") D.16-08-024, D.17-05-035 and D.17-09-023 to demonstrate that the confidential information ("Protected Information") provided in Ms. Garza-Beutz's Testimony and Appendix G are within the scope of data protected as confidential under applicable law.
- 3. In accordance with the legal citations and narrative justification described in Attachment A, 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 15th day of April, 2020, at San Diego.

DocuSigned by:

Elsa Valay-Paz

Director of Origination, Energy Supply & Dispatch

ATTACHMENT A

SDG&E Request for Confidentiality on the following information contained in Ana Garza-Beutz's Testimony and Appendix G in support of SDG&E's Application

Location of Protected	Legal Citations	Narrative Justification
Information		
1. SDG&E WAC prices and WAC calculations (The 2019 WAC price appears in Ana Garza-Beutz's Testimony. The 2013 - 2019 WAC calculations are utilized in tab "D-2" of Attachment G. The 2018 – 2019 Monthly WAC prices and calculations appear in Attachment A of Ana Garza-Beutz's Testimony.)	D.08-04-023 D.14-10-033, D.16-08-024, D.17-05-035, D.17-09-023, Public Utilities Code Section 454.5(g) General Order ("GO") 66-D 17 CCR § 95914(c) (the "ARB Confidentiality Regulations") The GHG Confidential Information Matrix in Attachment A of D.14-10-033 and revised in D.15-01-024 The Matrix makes the following confidential: "Weighted Average Cost (WAC) of compliance instruments, and the calculation of WAC" Gov't Code §§6254(k), 6254.7 (d), Evidence Code 1060, Civil Code §3426 et seq.	The Protected Information is entitled to confidential treatment under applicable law, including, but not limited to, the legal authority cited herein. The information does not expressly fall within any category of the IOU Matrix applicable to electric procurement information, but is market-sensitive information. Among other things, 17 CCR Section 95914(c)(1) of the Capand-Trade regulations prohibits disclosure of any auction-related information. Violation of Section 95914 may subject SDG&E to penalties by the California Air Resources Board. In addition, Attachments A, C & D of D.15-01-024 and Appendices A & B of D.15-10-032 require Auction-related information, forecasts of emissions intensity, forecasts of greenhouse gas (GHG) costs, GHG transactions, compliance instrument prices, weight average cost ("WAC") and other GHG information to be kept confidential. Additionally, the Protected Information also includes trade secret information because SDG&E's bidding/consignment strategies contain "commercial value," which gives SDG&E "an opportunity to obtain a business advantage over competitors who do not know or use it." Disclosure of this information would place SDG&E at an unfair business disadvantage relative to other Cap-and-Trade market participants and result in higher Cap-and-Trade compliance costs for SDG&E and its end-use ratepayers.
2. Historical/Reco rded UOG Emissions	D.08-04-023 D.14-10-033, D.16-08-024, D.17-05-035, D.17-09-023, Public Utilities Code Section 454.5(g)	The Protected Information is entitled to confidential treatment under applicable law, including, but not limited to, the legal authority cited herein. The information does not expressly fall within any category of the IOU Matrix applicable to electric procurement information, but is market-sensitive information.

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(The 2019 Historical UOG Emissions appear in Ana Garza- Beutz's Testimony. The 2013- 2019 Recorded UOG Emissions appear in Attachment G of this Application.)	General Order ("GO") 66-D 17 CCR § 95914(c) (the "ARB Confidentiality Regulations") Annual GHG Emissions and Associated Costs in Template D-2 of D.14-10-033 and revised in D.15-01-024 Template D-2 designates forecasted and recorded UOG emissions as confidential Gov't Code §§6254(k), 6254.7 (d), Evidence Code 1060, Civil	Among other things, 17 CCR Section 95914(c)(1) of the Capand-Trade regulations prohibits disclosure of any auction-related information. Violation of Section 95914 may subject SDG&E to penalties by the California Air Resources Board. In addition, Attachments A, C & D of D.15-01-024 and Appendices A & B of D.15-10-032 require Auction-related information, forecasts of emissions intensity, forecasts of greenhouse gas (GHG) costs, GHG transactions, compliance instrument prices, weight average cost ("WAC") and other GHG information to be kept confidential. Additionally, the Protected Information also includes trade secret information because SDG&E's bidding/consignment strategies contain "commercial value," which gives SDG&E "an opportunity to obtain a business advantage over competitors who do not know or use it." Disclosure of this information would place SDG&E at an unfair business disadvantage relative to other Cap-and-Trade market participants and result in higher Cap-and-Trade compliance costs for SDG&E and its end-use ratepayers.
2	Code §3426 et seq.	The Protected Information is entitled to confidential treatment
3. Historical/Reco rded California Tolling Agreement Emissions	D.08-04-023 D.14-10-033, D.16-08-024, D.17-05-035, D.17-09-023, Public Utilities Code Section 454.5(g)	under applicable law, including, but not limited to, the legal authority cited herein. The information does not expressly fall within any category of the IOU Matrix applicable to electric procurement information, but is market-sensitive information. Among other things, 17 CCR Section 95914(c)(1) of the Capand-Trade regulations prohibits disclosure of any auction-
	General Order ("GO") 66-D 17 CCR § 95914(c) (the	related information. Violation of Section 95914 may subject SDG&E to penalties by the California Air Resources Board.
	"ARB Confidentiality Regulations")	In addition, Attachments A, C & D of D.15-01-024 and Appendices A & B of D.15-10-032 require Auction-related information, forecasts of emissions intensity, forecasts of
(The 2019 Tolling Agreement Emissions appear in Ana Garza- Beutz's Testimony.	Annual GHG Emissions and Associated Costs in Template D-2 of D.14-10- 033 and revised in D.15-01- 024	greenhouse gas (GHG) costs, GHG transactions, compliance instrument prices, weight average cost ("WAC") and other GHG information to be kept confidential. Additionally, the Protected Information also includes trade secret information because SDG&E's bidding/consignment
The 2013- 2019 Tolling Agreement Emissions appear	Template D-2 designates forecasted and recorded Tolling Agreements emissions as confidential	strategies contain "commercial value," which gives SDG&E "an opportunity to obtain a business advantage over competitors who do not know or use it." Disclosure of this information would place SDG&E at an unfair
in Attachment G of this Application.)	Gov't Code §§6254(k), 6254.7 (d), Evidence Code 1060, Civil Code §3426 et seq.	business disadvantage relative to other Cap-and-Trade market participants and result in higher Cap-and-Trade compliance costs for SDG&E and its end-use ratepayers.

4. Historical/Rec	D.08-04-023	The Protected Information is entitled to confidential treatment
orded		under applicable law, including, but not limited to, the legal
Specified	D.14-10-033, D.16-08-024,	authority cited herein. The information does not expressly fall
	D.17-05-035, D.17-09-023,	within any category of the IOU Matrix applicable to electric
Imported	Public Utilities Code	procurement information, but is market-sensitive information.
MWh and	Section 454.5(g)	
calculated	Section 13 1.3(g)	Among other things, 17 CCR Section 95914(c)(1) of the Cap-
Emissions	General Order ("GO") 66-D	and-Trade regulations prohibits disclosure of any auction-
	General Order (GO) 60-D	related information. Violation of Section 95914 may subject
	17 CCD 8 05014(-) (4)	SDG&E to penalties by the California Air Resources Board.
	17 CCR § 95914(c) (the	I 11'' A CO D CD 15 01 024 1
	"ARB Confidentiality	In addition, Attachments A, C & D of D.15-01-024 and
	Regulations")	Appendices A & B of D.15-10-032 require Auction-related
		information, forecasts of emissions intensity, forecasts of
	Annual GHG Emissions and	greenhouse gas (GHG) costs, GHG transactions, compliance instrument prices, weight average cost ("WAC") and other
	Associated Costs in	GHG information to be kept confidential.
	Template D-2 of D.14-10-	GITO information to be kept confidential.
	033 and revised in D.15-01-	Additionally, the Protected Information also includes trade
	024	secret information because SDG&E's bidding/consignment
	024	strategies contain "commercial value," which gives SDG&E "an
(The 2019 Specified	Template D-2 designates	opportunity to obtain a business advantage over competitors
Imported MWh and calculated Emissions	forecasted and recorded	who do not know or use it."
	Energy Imports (Specified)	
appear in Ana Garza- Beutz's Testimony.	emissions as confidential.	Disclosure of this information would place SDG&E at an unfair
The 2013- 2019	Knowledge of the MWh	business disadvantage relative to other Cap-and-Trade market
Recorded Specified	makes discovery of the	participants and result in higher
Imported Emissions	emissions possible, thus the	Cap-and-Trade compliance costs for SDG&E and its end-use
appear in Attachment	MWh are also confidential.	ratepayers.
G of this Application.)	Wi will are also confidential.	
o of mass approximation	Gov't Code §§6254(k),	
	6254.7 (d), Evidence	
	Code 1060, Civil	
	· · · · · · · · · · · · · · · · · · ·	
5 II' 4 ' 1/D	Code §3426 et seq.	The Protected Information is entitled to confidential treatment
5. Historical/Rec	D.08-04-023	under applicable law, including, but not limited to, the legal
orded	D 14 10 022 D 16 09 024	authority cited herein. The information does not expressly fall
Unspecified	D.14-10-033, D.16-08-024,	admining check herein. The information does not expressly fall
	D 17 05 025 D 17 00 022	within any category of the IOU Matrix applicable to electric
Imported	D.17-05-035, D.17-09-023,	within any category of the IOU Matrix applicable to electric procurement information, but is market-sensitive information.
Imported MWh and	Public Utilities Code	within any category of the IOU Matrix applicable to electric procurement information, but is market-sensitive information.
MWh and		
MWh and calculated	Public Utilities Code Section 454.5(g)	procurement information, but is market-sensitive information.
MWh and	Public Utilities Code	procurement information, but is market-sensitive information. Among other things, 17 CCR Section 95914(c)(1) of the Capand-Trade regulations prohibits disclosure of any auction-related information. Violation of Section 95914 may subject
MWh and calculated	Public Utilities Code Section 454.5(g) General Order ("GO") 66-D	procurement information, but is market-sensitive information. Among other things, 17 CCR Section 95914(c)(1) of the Capand-Trade regulations prohibits disclosure of any auction-
MWh and calculated	Public Utilities Code Section 454.5(g) General Order ("GO") 66-D 17 CCR § 95914(c) (the	procurement information, but is market-sensitive information. Among other things, 17 CCR Section 95914(c)(1) of the Capand-Trade regulations prohibits disclosure of any auction-related information. Violation of Section 95914 may subject SDG&E to penalties by the California Air Resources Board.
MWh and calculated	Public Utilities Code Section 454.5(g) General Order ("GO") 66-D 17 CCR § 95914(c) (the "ARB Confidentiality	procurement information, but is market-sensitive information. Among other things, 17 CCR Section 95914(c)(1) of the Capand-Trade regulations prohibits disclosure of any auction-related information. Violation of Section 95914 may subject SDG&E to penalties by the California Air Resources Board. In addition, Attachments A, C & D of D.15-01-024 and
MWh and calculated	Public Utilities Code Section 454.5(g) General Order ("GO") 66-D 17 CCR § 95914(c) (the	procurement information, but is market-sensitive information. Among other things, 17 CCR Section 95914(c)(1) of the Capand-Trade regulations prohibits disclosure of any auction-related information. Violation of Section 95914 may subject SDG&E to penalties by the California Air Resources Board. In addition, Attachments A, C & D of D.15-01-024 and Appendices A & B of D.15-10-032 require Auction-related
MWh and calculated	Public Utilities Code Section 454.5(g) General Order ("GO") 66-D 17 CCR § 95914(c) (the "ARB Confidentiality	procurement information, but is market-sensitive information. Among other things, 17 CCR Section 95914(c)(1) of the Capand-Trade regulations prohibits disclosure of any auction-related information. Violation of Section 95914 may subject SDG&E to penalties by the California Air Resources Board. In addition, Attachments A, C & D of D.15-01-024 and Appendices A & B of D.15-10-032 require Auction-related information, forecasts of emissions intensity, forecasts of
MWh and calculated	Public Utilities Code Section 454.5(g) General Order ("GO") 66-D 17 CCR § 95914(c) (the "ARB Confidentiality Regulations")	procurement information, but is market-sensitive information. Among other things, 17 CCR Section 95914(c)(1) of the Capand-Trade regulations prohibits disclosure of any auction-related information. Violation of Section 95914 may subject SDG&E to penalties by the California Air Resources Board. In addition, Attachments A, C & D of D.15-01-024 and Appendices A & B of D.15-10-032 require Auction-related information, forecasts of emissions intensity, forecasts of greenhouse gas (GHG) costs, GHG transactions, compliance
MWh and calculated	Public Utilities Code Section 454.5(g) General Order ("GO") 66-D 17 CCR § 95914(c) (the "ARB Confidentiality Regulations") Annual GHG Emissions and	procurement information, but is market-sensitive information. Among other things, 17 CCR Section 95914(c)(1) of the Capand-Trade regulations prohibits disclosure of any auction-related information. Violation of Section 95914 may subject SDG&E to penalties by the California Air Resources Board. In addition, Attachments A, C & D of D.15-01-024 and Appendices A & B of D.15-10-032 require Auction-related information, forecasts of emissions intensity, forecasts of greenhouse gas (GHG) costs, GHG transactions, compliance instrument prices, weight average cost ("WAC") and other
MWh and calculated	Public Utilities Code Section 454.5(g) General Order ("GO") 66-D 17 CCR § 95914(c) (the "ARB Confidentiality Regulations") Annual GHG Emissions and Associated Costs in	procurement information, but is market-sensitive information. Among other things, 17 CCR Section 95914(c)(1) of the Capand-Trade regulations prohibits disclosure of any auction-related information. Violation of Section 95914 may subject SDG&E to penalties by the California Air Resources Board. In addition, Attachments A, C & D of D.15-01-024 and Appendices A & B of D.15-10-032 require Auction-related information, forecasts of emissions intensity, forecasts of greenhouse gas (GHG) costs, GHG transactions, compliance
MWh and calculated Emissions	Public Utilities Code Section 454.5(g) General Order ("GO") 66-D 17 CCR § 95914(c) (the "ARB Confidentiality Regulations") Annual GHG Emissions and	procurement information, but is market-sensitive information. Among other things, 17 CCR Section 95914(c)(1) of the Capand-Trade regulations prohibits disclosure of any auction-related information. Violation of Section 95914 may subject SDG&E to penalties by the California Air Resources Board. In addition, Attachments A, C & D of D.15-01-024 and Appendices A & B of D.15-10-032 require Auction-related information, forecasts of emissions intensity, forecasts of greenhouse gas (GHG) costs, GHG transactions, compliance instrument prices, weight average cost ("WAC") and other GHG information to be kept confidential.
MWh and calculated	Public Utilities Code Section 454.5(g) General Order ("GO") 66-D 17 CCR § 95914(c) (the "ARB Confidentiality Regulations") Annual GHG Emissions and Associated Costs in	procurement information, but is market-sensitive information. Among other things, 17 CCR Section 95914(c)(1) of the Capand-Trade regulations prohibits disclosure of any auction-related information. Violation of Section 95914 may subject SDG&E to penalties by the California Air Resources Board. In addition, Attachments A, C & D of D.15-01-024 and Appendices A & B of D.15-10-032 require Auction-related information, forecasts of emissions intensity, forecasts of greenhouse gas (GHG) costs, GHG transactions, compliance instrument prices, weight average cost ("WAC") and other

	Imported MWh and calculated Emissions appear in Ana Garza-Beutz's Testimony. The 2013- 2019 Unspecified Imported Emissions appear in Attachment G of this Application.)	033 and revised in D.15-01-024 Template D-2 designates forecasted and recorded Energy Imports (Unspecified) emissions as confidential. Knowledge of the MWh makes discovery of the emissions possible, thus the MWh are also confidential. Gov't Code §§6254(k), 6254.7 (d), Evidence Code 1060, Civil	strategies contain "commercial value," which gives SDG&E "an opportunity to obtain a business advantage over competitors who do not know or use it." Disclosure of this information would place SDG&E at an unfair business disadvantage relative to other Cap-and-Trade market participants and result in higher Cap-and-Trade compliance costs for SDG&E and its end-use ratepayers.
6.	Historical RPS Adjustment eligible MWh and calculated	D.08-04-023 D.14-10-033, D.16-08-024, D.17-05-035, D.17-09-023,	The Protected Information is entitled to confidential treatment under applicable law, including, but not limited to, the legal authority cited herein. The information does not expressly fall within any category of the IOU Matrix applicable to electric
	Emissions	Public Utilities Code Section 454.5(g) General Order ("GO") 66-D 17 CCR § 95914(c) (the "ARB Confidentiality Regulations")	procurement information, but is market-sensitive information. Among other things, 17 CCR Section 95914(c)(1) of the Capand-Trade regulations prohibits disclosure of any auction-related information. Violation of Section 95914 may subject SDG&E to penalties by the California Air Resources Board. In addition, Attachments A, C & D of D.15-01-024 and Appendices A & B of D.15-10-032 require Auction-related information, forecasts of emissions intensity, forecasts of greenhouse gas (GHG) costs, GHG transactions, compliance
	(The RPS Adjustment eligible MWh and calculated Emissions for 2019 appear in Ana Garza- Beutz's Testimony. The 2013- 2019 RPS Adjustment Emissions appear in Attachment G of this Application.)	Annual GHG Emissions and Associated Costs in Template D-2 of D.14-10-033 and revised in D.15-01-024 Template D-2 designates forecasted and recorded Energy Imports (Unspecified) emissions, which includes any applicable RPS Adjustments as confidential. Knowledge of the MWh makes discovery of the emissions possible, thus the MWh are also confidential. Gov't Code §§6254(k), 6254.7 (d), Evidence Code 1060, Civil Code §3426 et seq.	instrument prices, weight average cost ("WAC") and other GHG information to be kept confidential. Additionally, the Protected Information also includes trade secret information because SDG&E's bidding/consignment strategies contain "commercial value," which gives SDG&E "an opportunity to obtain a business advantage over competitors who do not know or use it." Disclosure of this information would place SDG&E at an unfair business disadvantage relative to other Cap-and-Trade market participants and result in higher Cap-and-Trade compliance costs for SDG&E and its end-use ratepayers.

7	Takal Diagraf	D 00 04 022	The Protected Information is entitled to confidential treatment
7.	Total Direct	D.08-04-023	under applicable law, including, but not limited to, the legal
	Compliance	D 14 10 022 D 16 00 024	authority cited herein. The information does not expressly fall
	Obligation	D.14-10-033, D.16-08-024,	within any category of the IOU Matrix applicable to electric
		D.17-05-035, D.17-09-023,	procurement information, but is market-sensitive information.
		Public Utilities Code	procurement information, out is market sensitive information.
	(The 2019 Total	Section 454.5(g)	Among other things, 17 CCR Section 95914(c)(1) of the Cap-
	Direct		and-Trade regulations prohibits disclosure of any auction-
	Compliance	General Order ("GO") 66-D	related information. Violation of Section 95914 may subject
	Obligation		SDG&E to penalties by the California Air Resources Board.
	appears in Ana	17 CCR § 95914(c) (the	
	Garza-Beutz's	"ARB Confidentiality	In addition, Attachments A, C & D of D.15-01-024 and
	Testimony. The 2013- 2019	Regulations")	Appendices A & B of D.15-10-032 require Auction-related
	The 2015- 2019 Total Direct		information, forecasts of emissions intensity, forecasts of
	Compliance		greenhouse gas (GHG) costs, GHG transactions, compliance
	Obligation appear	Annual GHG Emissions and	instrument prices, weight average cost ("WAC") and other
	in Attachment G	Associated Costs in	GHG information to be kept confidential.
	of this	Template D-2 of D.14-10-	
	Application.)	033 and revised in D.15-01-	Additionally, the Protected Information also includes trade
	1-pp	024	secret information because SDG&E's bidding/consignment
		Tamalata D 2 dasianatas	strategies contain "commercial value," which gives SDG&E "an
		Template D-2 designates	opportunity to obtain a business advantage over competitors
		forecasted and recorded	who do not know or use it."
		Direct GHG Emissions	Disclosure of this information would place SDG&E at an unfair
		Subtotal as confidential.	business disadvantage relative to other Cap-and-Trade market
			participants and result in higher
		Gov't Code §§6254(k),	Cap-and-Trade compliance costs for SDG&E and its end-use
		6254.7 (d), Evidence	ratepayers.
		Code 1060, Civil	1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1
		Code §3426 et seq.	
8.	Indirect	D.08-04-023	The Protected Information is entitled to confidential treatment
	Purchases in		under applicable law, including, but not limited to, the legal
	MWh and	D.14-10-033, D.16-08-024,	authority cited herein. The information does not expressly fall
	calculated	D.17-05-035, D.17-09-023,	within any category of the IOU Matrix applicable to electric
	Emissions	Public Utilities Code	procurement information, but is market-sensitive information.
		Section 454.5(g)	Among other things, 17 CCR Section 95914(c)(1) of the Cap-
			and-Trade regulations prohibits disclosure of any auction-
		General Order ("GO") 66-D	related information. Violation of Section 95914 may subject
1		ì	SDG&E to penalties by the California Air Resources Board.
		17 CCR § 95914(c) (the	== === so penames of the cantonia the reconstruction
	(The 2019	"ARB Confidentiality	In addition, Attachments A, C & D of D.15-01-024 and
	forecasted	Regulations")	Appendices A & B of D.15-10-032 require Auction-related
	Indirect Purchase	<i>g</i> ,	information, forecasts of emissions intensity, forecasts of
	MWhs and		greenhouse gas (GHG) costs, GHG transactions, compliance
1	calculated	Annual GHG Emissions and	instrument prices, weight average cost ("WAC") and other
1	Emissions appear	Associated Costs in	GHG information to be kept confidential.
	in Ana Garza-	Template D-2 of D.14-10-	
	Beutz's	033 and revised in D.15-01-	Additionally, the Protected Information also includes trade
	Testimony.	024	secret information because SDG&E's bidding/consignment
1	The 2013-2018	Template D-2 designates	strategies contain "commercial value," which gives SDG&E "an
	final and 2019	forecasted and recorded	opportunity to obtain a business advantage over competitors who do not know or use it."
	forecasted Indirect Emission	lorecasted and recorded	who do not know of use it.
	calculations		
	caicuidilons		

		T	
	appear in Attachment G of this Application.)	Indirect GHG Emissions as confidential. Knowledge of the MWh makes discovery of the emissions possible, thus, the MWh are also confidential. Gov't Code §§6254(k), 6254.7 (d), Evidence Code 1060, Civil	Disclosure of this information would place SDG&E at an unfair business disadvantage relative to other Cap-and-Trade market participants and result in higher Cap-and-Trade compliance costs for SDG&E and its end-use ratepayers.
		Code §3426 et seq.	
9.	Costs (The 2019 Direct GHG Costs appear in Ana Garza-Beutz's Testimony. The 2013 – 2018 final and 2019 estimated Direct GHG Costs appear in Attachment G of this Application.)	D.08-04-023 D.14-10-033, D.16-08-024, D.17-05-035, D.17-09-023, Public Utilities Code Section 454.5(g) General Order ("GO") 66-D 17 CCR § 95914(c) (the "ARB Confidentiality Regulations") Annual GHG Emissions and Associated Costs in Template D-2 of D.14-10-033 and revised in D.15-01-024 Template D-2 designates forecasted and recorded Direct GHG Costs as confidential. Gov't Code §§6254(k), 6254.7 (d), Evidence Code 1060, Civil Code §3426 et seq.	The Protected Information is entitled to confidential treatment under applicable law, including, but not limited to, the legal authority cited herein. The information does not expressly fall within any category of the IOU Matrix applicable to electric procurement information, but is market-sensitive information. Among other things, 17 CCR Section 95914(c)(1) of the Capand-Trade regulations prohibits disclosure of any auction-related information. Violation of Section 95914 may subject SDG&E to penalties by the California Air Resources Board. In addition, Attachments A, C & D of D.15-01-024 and Appendices A & B of D.15-10-032 require Auction-related information, forecasts of emissions intensity, forecasts of greenhouse gas (GHG) costs, GHG transactions, compliance instrument prices, weight average cost ("WAC") and other GHG information to be kept confidential. Additionally, the Protected Information also includes trade secret information because SDG&E's bidding/consignment strategies contain "commercial value," which gives SDG&E "an opportunity to obtain a business advantage over competitors who do not know or use it." Disclosure of this information would place SDG&E at an unfair business disadvantage relative to other Cap-and-Trade market participants and result in higher Cap-and-Trade compliance costs for SDG&E and its end-use ratepayers.
10.	Estimated Indirect GHG	D.08-04-023	The Protected Information is entitled to confidential treatment under applicable law, including, but not limited to, the legal
	Costs	D.14-10-033, D.16-08-024, D.17-05-035, D.17-09-023, Public Utilities Code Section 454.5(g) General Order ("GO") 66-D	authority cited herein. The information does not expressly fall within any category of the IOU Matrix applicable to electric procurement information, but is market-sensitive information. Among other things, 17 CCR Section 95914(c)(1) of the Capand-Trade regulations prohibits disclosure of any auction-related information. Violation of Section 95914 may subject SDG&E to penalties by the California Air Resources Board. In addition, Attachments A, C & D of D.15-01-024 and Appendices A & B of D.15-10-032 require Auction-related

(77. 2010	15 CCD 0 05014() (1	
(The 2019 estimated Indirect	17 CCR § 95914(c) (the	information, forecasts of emissions intensity, forecasts of greenhouse gas (GHG) costs, GHG transactions, compliance
GHG Costs	"ARB Confidentiality	instrument prices, weight average cost ("WAC") and other
appear in Ana	Regulations")	GHG information to be kept confidential.
Garza-Beutz's		GITO information to be kept confidential.
Testimony.	Annual GHG Emissions and	Additionally, the Protected Information also includes trade
The 2013 - 2019	Associated Costs in	secret information because SDG&E's bidding/consignment
estimated Indirect	Template D-2 of D.14-10-	strategies contain "commercial value," which gives SDG&E "an
GHG Costs	033 and revised in D.15-01-	opportunity to obtain a business advantage over competitors
appear in	024	who do not know or use it."
Attachment G of	024	
this Application.)	Template D-2 designates	Disclosure of this information would place SDG&E at an unfair
	forecasted and recorded	business disadvantage relative to other Cap-and-Trade market
	Indirect GHG Costs as	participants and result in higher
	confidential.	Cap-and-Trade compliance costs for SDG&E and its end-use
		ratepayers.
	Gov't Code §§6254(k),	
	6254.7 (d), Evidence	
	Code 1060, Civil	
	Code §3426 et seq.	
11. GHG Quarterly	D.08-04-023	The Protected Information is entitled to confidential treatment
Auction		under applicable law, including, but not limited to, the legal
Revenue	D.14-10-033, D.16-08-024,	authority cited herein. The information does not expressly fall
	D.17-05-035, D.17-09-023,	within any category of the IOU Matrix applicable to electric
	Public Utilities Code	procurement information, but is market-sensitive information.
	Section 454.5(g)	Among other things 17 CCD Section 05014(a)(1) of the Con
		Among other things, 17 CCR Section 95914(c)(1) of the Capand-Trade regulations prohibits disclosure of any auction-
	General Order ("GO") 66-D	related information. Violation of Section 95914 may subject
	, ,	SDG&E to penalties by the California Air Resources Board.
	17 CCR § 95914(c) (the	
	"ARB Confidentiality	In addition, Attachments A, C & D of D.15-01-024 and
	Regulations")	Appendices A & B of D.15-10-032 require Auction-related
(The 2019 GHG		information, forecasts of emissions intensity, forecasts of
Quarterly		greenhouse gas (GHG) costs, GHG transactions, compliance
Auction Revenues	1a. of Attachment A of	instrument prices, weight average cost ("WAC") and other
appear in Ana	D.14-10-033 and revised in	GHG information to be kept confidential.
Garza-Beutz's	D.15-01-024	Additionally the Dustrated Information also includes trade
Testimony.	1a. makes the following	Additionally, the Protected Information also includes trade secret information because SDG&E's bidding/consignment
The 2013 - 2019	confidential: "AB 32 GHG	strategies contain "commercial value," which gives SDG&E "an
actual GHG	auction participation."	opportunity to obtain a business advantage over competitors
Quarterly Auction Revenues	Although Annual Auction	who do not know or use it."
appear in	Revenues are public,	
Attachment G of	Quarterly Auction Revenues	Disclosure of this information would place SDG&E at an unfair
this Application.)	must be confidential since	business disadvantage relative to other Cap-and-Trade market
	public auction settlement	participants and result in higher
	prices and Quarterly Auction	Cap-and-Trade compliance costs for SDG&E and its end-use
	Revenues would reveal	ratepayers.
	SDG&E's quarterly auction	
	participation as a consigner	
	1 1	
	Gov't Code §§6254(k),	

	6254.7 (d), Evidence	
	Code 1060, Civil	
	Code §3426 et seq.	
12. Emissions Intensities	D.08-04-023 D.14-10-033, D.16-08-024, D.17-05-035, D.17-09-023, Public Utilities Code Section 454.5(g) General Order ("GO") 66-D 17 CCR § 95914(c) (the	The Protected Information is entitled to confidential treatment under applicable law, including, but not limited to, the legal authority cited herein. The information does not expressly fall within any category of the IOU Matrix applicable to electric procurement information, but is market-sensitive information. Among other things, 17 CCR Section 95914(c)(1) of the Capand-Trade regulations prohibits disclosure of any auction-related information. Violation of Section 95914 may subject SDG&E to penalties by the California Air Resources Board.
(The 2019-2021 forecasted Emissions Intensities appears in Attachment G of this Application.)	"ARB Confidentiality Regulations") The GHG Confidential Information Matrix in Attachment A of D.14-10-033 and revised in D.15-01-024 The Matrix makes the following confidential: "Forecast of GHG Emissions Intensity" Gov't Code §§6254(k), 6254.7 (d), Evidence Code 1060, Civil Code §3426 et seq.	In addition, Attachments A, C & D of D.15-01-024 and Appendices A & B of D.15-10-032 require Auction-related information, forecasts of emissions intensity, forecasts of greenhouse gas (GHG) costs, GHG transactions, compliance instrument prices, weight average cost ("WAC") and other GHG information to be kept confidential. Additionally, the Protected Information also includes trade secret information because SDG&E's bidding/consignment strategies contain "commercial value," which gives SDG&E "an opportunity to obtain a business advantage over competitors who do not know or use it." Disclosure of this information would place SDG&E at an unfair business disadvantage relative to other Cap-and-Trade market participants and result in higher Cap-and-Trade compliance costs for SDG&E and its end-use ratepayers.

ATTACHMENT B

PROPOSED ORDER

PROPOSED ORDER

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 April 15, 2020 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 Templates D-2 (Annual GHG Emissions and Associated Costs) and D-5 (History of Revenue, Costs, and Emissions Intensity), both of which are included in Attachment G (GHG Revenue and Reconciliation Form) to the Application of San Diego Gas & Electric Company (U-902-E) for Approval of its 2020 Electric Procurement Revenue Requirement Forecasts and GHG-Related Forecasts ("Application").

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 Templates D-2 and D-5 to Attachment G (GHG Revenue and Reconciliation Form) to the Application, 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;

- 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:	