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

Order Instituting Rulemaking to Enhance the
Role of Demand Response in Meeting the State's
Resource Planning Needs and Operational
Requirements

Rulemaking 13-09-011
(Filed September 19, 2013)

**MOTION OF PACIFIC GAS AND ELECTRIC COMPANY (U 39 E) FOR PERMISSION
TO FILE UNDER SEAL THE CONFIDENTIAL VERSION OF THE APPENDICES TO
THE EXECUTIVE SUMMARY: 2016-2026 DEMAND RESPONSE PORTFOLIO OF
PACIFIC GAS AND ELECTRIC COMPANY, FILED PURSUANT TO LOAD IMPACT
PROTOCOL FILING REQUIREMENT ADOPTED IN D.08-04-050, AS MODIFIED BY
D.10-04-006, AND D.10-06-034, AND SMARTRATE™ EX POST LOAD IMPACT
PURSUANT TO D.06-07-027**

SHIRLEY A. WOO
ERICH LICHTBLAU

Pacific Gas and Electric Company
77 Beale Street, B30A
San Francisco, CA 94105
Telephone: 415-973-2248
Facsimile: 415-973-0516
Email: SAW0@pgc.com

April 1, 2016

Attorney for
PACIFIC GAS AND ELECTRIC COMPANY

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PURSUANT TO D.06-07-027**

Pursuant to Rules 11.1 and 11.4 of the California Public Utilities Commission's ("Commission") Rules of Practice and Procedure, Pacific Gas and Electric Company ("PG&E") files this motion for leave to file confidential information under seal ("Motion"). The material PG&E seeks to protect is in the confidential, unredacted version of the appendices to PG&E's Executive Summary: 2016-2026 Demand Response Portfolio Compliance Filing (Executive Summary) which is included as Attachment A to the confidential version of PG&E's *Compliance Filing Pursuant to Load Impact Protocol Filing Requirements Adopted in D.08-04-050, as Modified by D.10-04-006, and D. 10-06-034, for Summary of Program Year 2015 Demand Response Program Evaluations, and SMARTRATE™ Ex Post Load Impact Pursuant to D.06-07-027* ("Compliance Report"). The public version of the appendices to the Executive Summary is being filed today with the public Executive Summary^{1/}, in compliance with D.08-04-050, as modified by D.10-04-006, in this docket.

1/ The Executive Summary itself does not contain confidential information. The confidential information is in its appendices.

Attachment 1 to this Motion contains a description of the confidential information in the appendices to the Executive Summary, the Declaration of Grant Brohard and the corresponding matrix which identifies the basis for the claim of confidentiality.

Public Utilities Code section 583 provides that, “[n]o information furnished to the commission by a public utility. . . except those matters specifically required to be open to public inspection by this part, shall be open to public inspection or made public except on order of the commission, or by the commission or commissioner in the course of a hearing or proceeding.”^{2/}

In D.14-05-016, the Commission gave guidance on protection of customer specific information. In that decision, the Commission indicated that customer information needs to be aggregated to meet a 15/15 standard for non-residential customers (more than 15 customers, and no customer exceeding 15% of the aggregated group’s load) in order to be released publicly. (D.14-05-016, p.118 and Finding of Fact 17.) General Order (“GO”) 66-C also applies in connection with protection of confidential information. In addition, some confidential information in the Appendices to the Executive Summary pertains to a single existing customer. Other confidential information involves two customers. Customer information about an individual customer is “covered information” under Electric Rule 27, section 1 (b), and is entitled to protection against public disclosure under Electric Rule 27, section 4 (c) (1). In D.08-04-023, the Commission required the IOUs make an oral or written motion for confidential treatment of market sensitive materials.^{3/} In its motion, the IOU must establish:

1. That the material it is submitting constitutes a particular type of data listed in the Matrix;
2. The category or categories in the Matrix to which the data correspond;
3. That it is complying with the limitations on confidentiality specified in the Matrix for that type of data;
4. That the information is not already public; and

^{2/} All further statutory references are to the California Public Utilities Code, unless otherwise indicated.

^{3/} D.08-04-023 at p. 21

Respectfully submitted,

By: /s/ Shirley A Woo
SHIRLEY A WOO

Pacific Gas and Electric Company
77 Beale Street, B30A
San Francisco, CA 94105
Telephone: (415) 973-2248
Facsimile: (415) 973-0516
E-Mail: SAW0@pge.com

Attorney for
PACIFIC GAS AND ELECTRIC COMPANY

April 1, 2016

**BEFORE THE PUBLIC UTILITIES COMMISSION
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**ALJ RULING GRANTING MOTION OF PACIFIC GAS AND ELECTRIC COMPANY
(U 39 E) FOR PERMISSION TO FILE UNDER SEAL THE CONFIDENTIAL VERSION
OF THE APPENDICES TO THE EXECUTIVE SUMMARY: 2016-2026 DEMAND
RESPONSE PORTFOLIO OF PACIFIC GAS AND ELECTRIC COMPANY, FILED
PURSUANT TO LOAD IMPACT PROTOCOL FILING REQUIREMENT ADOPTED IN
D.08-04-050, AS MODIFIED BY D.10-04-006, AND D.10-06-034, AND SMARTRATE™
EX POST LOAD IMPACT PURSUANT TO D.06-07-027**

[PROPOSED]

In accordance with its Rules of Practice and Procedure, the California Public Utilities Commission (“Commission”) has considered the motion of Pacific Gas and Electric Company (“PG&E”), filed April 1, 2016, for leave to file confidential materials under seal (“Motion”), namely certain information in the confidential, unredacted version of the appendices to its “Executive Summary: 2016-2026 Demand Response Portfolio Compliance Filing Pursuant To Load Impact Protocol Filing Requirement Adopted In D.08-04-050, As Modified By D.10-04-006, And D.10-06-034, For Summary Of 2016-2026 Demand Response Program Evaluations, And Smartrate™ Ex Post Load Impact Pursuant To D.06-07-027.” The Commission rules as follows:

1. PG&E’s Motion is granted. The confidential materials in the confidential, unredacted version of PG&E’s “Executive Summary: 2016-2026 Demand Response Portfolio Compliance Filing Pursuant To Load Impact Protocol Filing Requirement Adopted In D.08-04-050, As Modified By D.10-04-006, And D.10-06-034, For Summary Of 2016-2026 Demand Response Program Evaluations, And Smartrate™ Ex Post Load Impact Pursuant To D.06-07-027” are described in Attachment 1 to the Motion.

2. The confidential, unredacted version of this information shall remain under seal, and shall not be made accessible or disclosed to anyone other than the Commission staff except on the further order or ruling of the Commission, the Assigned Commissioner, the Assigned Administrative Law Judge (“ALJ”), or the ALJ then designated as Law and Motion Judge.

Dated _____, ____ at San Francisco, California.

Kelly A. Hymes, Administrative Law Judge

ATTACHMENT 1

Appendices to Executive Summary:

Tables B1, C1, D1, H1, L1, M1, N1, R1, V1, W1, X1, BB1, FF1, GG1, HH1, and LL1 load impacts for Permanent Load Shift, 2016,

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

**PACIFIC GAS AND ELECTRIC COMPANY
DEMAND RESPONSE RULEMAKING (R.13-09-011)**

**DECLARATION OF GRANT BROHARD
SEEKING CONFIDENTIAL TREATMENT
FOR CERTAIN DATA AND INFORMATION CONTAINED IN
THE APPENDICES TO THE EXECUTIVE SUMMARY: 2016-2026 DEMAND
RESPONSE PORTFOLIO OF PACIFIC GAS AND ELECTRIC COMPANY**

I, Grant Brohard, declare:

1. I am a Manager in the Demand Response Department within the Customer Care Organization at Pacific Gas and Electric Company (PG&E). In this position, my responsibilities include leading the management and development of PG&E's Demand Response programs and budgets. This declaration is based on my personal knowledge of PG&E's practices and my understanding of the Commission's decisions protecting the confidentiality of customer information.

2. Based on my knowledge and experience, and in accordance with the Decisions 06-06-066, 08-04-023, and relevant Commission rules, I make this declaration seeking confidential treatment for certain data and information contained in the Appendices to the Executive Summary: 2016-2026 Demand Response Portfolio of Pacific Gas And Electric Company.

3. Attached to this declaration is a matrix identifying the data and information for which PG&E is seeking confidential treatment. The matrix specifies that the material PG&E is seeking to protect constitutes confidential customer information covered by Commission decisions, Electric Rule 27, and General Order 66-C. The matrix also specifies why confidential protection is justified. Further, the data and information: (1) is not already public; and (2) cannot be aggregated, redacted, summarized or otherwise protected in a way that allows partial disclosure. By this reference, I am incorporating into this declaration all of

the explanatory text that is pertinent to my declaration in the attached matrix:

I declare under penalty of perjury, under the laws of the State of California, that the foregoing is true and correct. Executed on March 30, 2016 at San Francisco, California.

/s/Grant Brohard

GRANT BROHARD

PACIFIC GAS AND ELECTRIC COMPANY (U 39 E)

Demand Response Rulemaking R.13-09-11

The Appendices To The Executive Summary: 2016-2026 Demand Response Portfolio Of Pacific Gas And Electric Company, Filed Pursuant To Load Impact Protocol Filing Requirement Adopted In D.08-04-050, As Modified By D.10-04-006, And D.10-06-034 March 30, 2016

IDENTIFICATION OF CONFIDENTIAL INFORMATION

| Redaction Reference | Category from D.06-06-066, Appendix 1, or Separate Confidentiality Order That Data Corresponds To | Justification for Confidential Treatment | Length of Time Data To Be Kept Confidential |
|--|--|---|--|
| Document: | | | |
| Appendices to Executive Summary, Tables B1, C1, D1, H1, L1, M1, N1, R1, V1, W1, X1, BB1, FF1, GG1, HH1, and LL1, load impacts for Permanent Load Shift, 2016 | D.14-05-016, Electric Rule 27, D.11-07-056, General Order 66-C | Customer information for an individual customer that cannot be aggregated pursuant to the aggregation rules in D.14-05-016, and that is protected from unauthorized disclosure under Rule 27 as “covered information” (implementing D.11-07-056.) | Indefinite |