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BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Application of Pacific Gas and Electric Company for Authority, Among Other Things, to Increase Rates and Charges for Electric and Gas Service Effective on January 1, 2027. (U39M)

Application 25-05-009

**ADMINISTRATIVE LAW JUDGE'S RULING
ON CONFIDENTIALITY MOTIONS**

This ruling partially grants party motions for confidential treatment.

1. Background

1.1. Proceeding Background

On March 10, 2026, the assigned Administrative Law Judges (ALJs) issued an e-mail ruling that addressed, among other matters, instructions regarding confidential treatment of information in the instant proceeding.¹ On March 24, 2026, ALJ Larsen issued an email ruling with additional information regarding confidentiality motions.²

Pursuant to Rules 11.1 and 11.4, Pacific Gas and Electric Company (PG&E), California Community Choice Association (CALCCA), California Solar and Storage Association (CALSSA), CALSTART, Inc. (CALSTART), Natural Resources Defense Council (NRDC), and The Utility Reform Network (TURN)

¹ Email Ruling Noticing Remote Hearings, Status Conference, and Providing Instructions, filed March 13, 2026.

² Email Ruling Clarifying Motion Regarding Confidentiality, filed March 25, 2026.

subsequently filed confidentiality motions, as follows:

Party	Motion Title	Filing Date
CalCCA	Motion of the California Community Choice Association Seeking Confidential Treatment of Evidence (CalCCA Motion)	April 21, 2026
CALSSA	Motion of California Solar and Storage Association Seeking Confidential Treatment of Evidence (CALSSA Motion)	April 21, 2026
CALSTART	Motion of CALSTART, Inc. Seeking Confidential Treatment of Evidence (CALSTART Motion)	March 30, 2026
NRDC	Motion Of Natural Resources Defense Council for Confidential Treatment of Attachment D to its Brinn Et Al. Intervenor Testimony (NRDC Motion)	April 1, 2026
PG&E	Motion of Pacific Gas and Electric Company (U 39 M) for Confidential Treatment of Information (PG&E March 27, 2026 Motion)	March 27, 2026
PG&E	Motion of Pacific Gas and Electric Company (U 39 M) for Confidential Treatment of Information (PG&E April 14, 2026 Motion)	April 14, 2026
TURN	Motion of the Utility Reform Network Seeking Confidential Treatment of Evidence (TURN Motion)	March 27, 2026

1.2. Additional Background

1.2.1. Decision 06-06-066

Decision (D.) 06-06-066, as modified by D.07-05-032, D.08-04-023, and D.20-07-005 addressed confidentiality of electric procurement data submitted to the Commission. D.06-06-066 adopted an “IOU Matrix” that specifies for investor-owned utilities (IOUs) the categories of information that should be treated as confidential. In addition, D.06-06-066 provides that stakeholders that

are non-market participants shall have access to IOUs' market-sensitive information as long as they agree to a protective order or confidentiality agreement.

1.2.2. General Order 66-D

General Order (GO) 66-D established, among other things, procedures for submission of information to the Commission with claims of confidentiality. According to Section 3 of GO 66-D, "An information submitter bears the burden of proving the reasons why the Commission shall withhold any information, or any portion thereof, from the public."³ In addition, GO 66-D notes that the information submitter must specify the basis for the Commission to provide confidential treatment with specific citation to an applicable provision of the California Public Records Act.⁴

1.2.3. 15/15 Rule

D.97-10-031 established the "15/15 Rule" to prevent the identification of individual customers. The 15/15 Rule requires that aggregated data must be compiled from at least 15 customers, with no single customer representing more than 15 percent of the total. Subsequent to its establishment in the context of Direct Access, the "15/15 Rule" has been applied to certain other large datasets used by the Commission that include protected customer information. For example, in D.24-10-030, the Commission directed utilities to use the 15/15 rule for data redaction in the context of Integration Capacity Analysis results in data portals.

³ GO 66-D, Section 3.2.

⁴ GO 66-D, Section 3.2(b).

2. CalCCA Motion

CalCCA's April 21, 2026 motion requested confidential treatment for selected portions of documents:

- Attachment RAM-2, pages 449-548, which includes PG&E's model to allocate Results of Operations Model results to the hydro plant level. CalCCA states that this excerpt originates from PG&E's confidential supplemental response to data request CalCCA-008-010.
- Attachment RAM-5, pages 3-14, which includes capital cost forecasts for each hydro facility, developed using data from PG&E's confidential supplemental response to data request CalCCA-008-010 included in Attachment RAM-2.
- Attachment RAM-6, pages 2-8. CalCCA states that this attachment includes an operations and maintenance cost forecast for each hydro facility, developed using data from PG&E's confidential supplemental response to data request CalCCA-008-010 included in Attachment RAM-2.

No party protested this motion and upon review, we find that the request satisfies the requirements of GO 66-D, Section 3. We therefore find good cause to grant it. These portions of documents shall be given the requested confidential treatment for a period of three years from the date of this ruling. At any point from six months from the date of this ruling to the conclusion of the three-year period of confidentiality, CalCCA or PG&E may move to seek a furtherance of the confidentiality treatment on the basis of whether additional good cause is shown.

3. CALSSA Motion

CALSSA's April 21, 2026 motion requested confidential treatment of PG&E's attachment in response to CALSSA_001-Q040 (Attachment 1), included in Attachment JRB-2 to CALSSA's Direct Testimony. CALSSA states that it seeks

confidential treatment because it is prohibited from disclosing the information under its non-disclosure agreement (NDA) with PG&E.

No party protested this motion and upon review, we find good cause to grant the motion. This portion of testimony shall be given the requested confidential treatment for a period of three years from the date of this ruling. At any point from six months from the date of this ruling to the conclusion of the three-year period of confidentiality, CALSSA or PG&E may move to seek a furtherance of the confidentiality treatment on the basis of whether additional good cause is shown.

4. CALSTART Motion

CALSTART's March 30, 2026 motion requests confidential treatment of material contained in the Direct Testimony of Alex Pfeifer-Rosenblum, served February 13, 2026. CALSTART specifically requests confidential treatment of PG&E's response to Data Request CALSTART-003, Question 005, included in Attachment B to CALSTART's Direct Testimony.

According to CALSTART, this material contains commercially sensitive information, including pricing, quantity, and contractual terms associated with the purchase and leasing of re-deployable battery energy storage systems provided by a PG&E supplier. CALSTART states that public disclosure of this information would allow competitors and market participants to infer the supplier's pricing structure, commercial terms, and competitive positioning, which could result in competitive harm to the supplier. In addition, CALSTART states that it is prohibited from disclosing this information pursuant to its November 7, 2025 NDA with PG&E.⁵

⁵ CALSTART Motion at 1-2.

No party protested this motion. We find that the CALSTART's request satisfies the requirements of GO 66-D, Section 3 and find good cause to grant the the CALSTART Motion. PG&E's response to Data Request CALSTART-003, Question 005, included in Attachment B to CALSTART's Direct Testimony shall be given the requested confidential treatment for a period of three years from the date of this ruling. At any point from six months from the date of this ruling to the conclusion of the three-year period of confidentiality, CALSTART or PG&E may move to seek a furtherance of the confidentiality treatment on the basis of whether additional good cause is shown.

5. NRDC Motion

The NRDC Motion requested confidential treatment for Attachment D to the exhibit pre-marked as NRDC Ex-01,⁶ a workpaper containing confidential information provided to NRDC by PG&E in response to a Data Request and pursuant to the NDA between PG&E and NRDC dated October 23, 2025. NRDC noted in this motion that it does not intend at this time to enter the confidential information contained in Attachment D into evidence and that it submitted this motion "out of an abundance of caution."⁷

No party protested this motion and upon review, we find good cause to grant the motion. Attachment D to NRDC Ex-01 shall be given the requested confidential treatment for a period of three years from the date of this ruling. At any point from six months from the date of this ruling to the conclusion of the

⁶ Pre-marked exhibits are subject to change.

At the April 16, 2026 status conference in the instant proceeding, ALJ John Larsen addressed questions regarding the numbering of exhibits and noted that going forward, all exhibits would be numbered as follows: [Party] Ex-[Number]. We use that format for exhibits here. *See Status Conference Transcript at 15-18.*

⁷ NRDC Motion at 2.

three-year period of confidentiality, NRDC or PG&E may move to seek a furtherance of the confidentiality treatment on the basis of whether additional good cause is shown.

6. PG&E Motions

6.1. March 27, 2026 Motion

PG&E's March 27, 2026 motion requested confidential treatment for 18 sets of documents/selected portions of documents.

6.1.1. PG&E's Request

For each of the 18 items PG&E identified, it provided a summary of its request in a table and an associated confidentiality declaration in an Appendix.⁸ Several of the items that PG&E identified appear twice in its list to accommodate multiple confidentiality designations; these items receive two numbers in the list below even though they refer to the same exhibit.

1. PG&E Ex-02, Chapter 1, Excel Version (CONFIDENTIAL): Policy – Workpapers Supporting.

PG&E justified the confidentiality designation as follows:

- a. Physical facility, cyber-security sensitive, or critical infrastructure data, including without limitation critical energy infrastructure information (CEII) as defined by the regulations of the Federal Energy Regulatory Commission (FERC) at 18 C.F.R. Section 388.113 and/or GO 66-D; and
 - b. Proprietary and trade secret information or other intellectual property and protected market sensitive/competitive data.
2. *[Placeholder for exhibit listed as two items with separate confidentiality designations, to be consistent with PG&E's motion.]*

⁸ See PG&E March 27, 2026 Motion, Table 1.

3. **PG&E Ex-05: Energy Supply – Specified workpapers supporting Chapters 4 and 7 (CONFIDENTIAL).** PG&E cited third-party information subject to non-disclosure or confidentiality agreements or obligations.
4. **PG&E Ex-06: Customer and Enterprise Solutions – Specified workpapers supporting Chapters 8-9 (CONFIDENTIAL).** PG&E requested confidential treatment of these workpapers, citing:
 - a. Proprietary and trade secret information or other intellectual property and protected market sensitive/competitive data,
 - b. Third-Party information subject to non-disclosure or confidentiality agreements or obligations, and
 - c. “[O]ther categories where disclosure would be against the public interest.”
5. **PG&E Ex-06: Customer and Enterprise Solutions – Specified Workpapers Supporting Chapters 8-9 (CONFIDENTIAL).** PG&E requested confidential treatment of these workpapers, citing:
 - a. Proprietary and trade secret information or other intellectual property and protected market sensitive/competitive data,
 - b. Third-Party information subject to non-disclosure or confidentiality agreements or obligations, and
 - c. “[O]ther categories where disclosure would be against the public interest.”
6. **PG&E Ex-07: Shared Services and Information Technology – Workpapers Supporting Chapter 7 (CONFIDENTIAL).** PG&E requested confidential treatment of specified workpapers, citing third-Party information subject to non-disclosure or confidentiality agreements or obligations.
7. *[Placeholder for exhibit listed as two items with separate confidentiality designations, to be consistent with PG&E’s motion.]*

8. **PG&E Ex-10: Results of Operations – Workpapers Supporting Chapters 10-11 (CONFIDENTIAL).** PG&E requested confidential treatment of specified workpapers, citing third-Party information subject to non-disclosure or confidentiality agreements or obligations.
9. **PG&E Ex-02: Policy – Errata Workpapers Supporting Chapter 1 (Excel Version) (CONFIDENTIAL).** PG&E requested confidential treatment of these workpapers, citing:
 - a. Proprietary and trade secret information or other intellectual property and protected market sensitive/competitive data,
 - b. Third-Party information subject to non-disclosure or confidentiality agreements or obligations, and
 - c. “[O]ther categories where disclosure would be against the public interest.”
10. *[Placeholder for exhibit listed as two items with separate confidentiality designations, to be consistent with PG&E’s motion.]*
11. **PG&E Ex-05: Energy Supply – Errata Workpapers Supporting Chapters 4 and (CONFIDENTIAL).** PG&E requested confidential treatment of specified workpapers, citing third-Party information subject to non-disclosure or confidentiality agreements or obligations.
12. *[Placeholder for exhibit listed as two items with separate confidentiality designations, to be consistent with PG&E’s motion.]*
13. **PG&E Ex-06: Customer and Enterprise Solutions – Errata Workpapers Supporting Chapters 8-9 (CONFIDENTIAL).** PG&E requested confidential treatment of these workpapers, citing:
 - a. Proprietary and trade secret information or other intellectual property and protected market sensitive/competitive data,

- b. Third-Party information subject to non-disclosure or confidentiality agreements or obligations, and
 - c. “[O]ther categories where disclosure would be against the public interest.”
14. *[Placeholder for exhibit listed as two items with separate confidentiality designations, to be consistent with PG&E’s motion.]*
15. **PG&E-10: Results of Operations – Errata Workpapers Supporting Chapters 10-11 (CONFIDENTIAL).** PG&E requested confidential treatment of these workpapers, citing:
- a. Proprietary and trade secret information or other intellectual property and protected market sensitive/competitive data,
 - b. Third-Party information subject to non-disclosure or confidentiality agreements or obligations, and
 - c. “[O]ther categories where disclosure would be against the public interest.”
16. **PG&E’s Response to Question No. 32 of the Administrative Law Judges’ Joint Ruling Requiring Additional Information (Served February 13, 2026).** This question pertains to data center projects. PG&E requested confidential treatment of this response due to its contents containing customer-specific data, which may include demand, loads, names, addresses, and billing data.
17. **PG&E’s Response to Question No. 40 of the Administrative Law Judges’ Joint Ruling Requiring Additional Information (Served February 13, 2026).** This question pertains to historical demand. PG&E requested confidential treatment of this response due to information on load (GWh) and Peak Load (MW) that includes confidential information on PG&E’s monthly service area and bundled energy and peak load forecasts. PG&E also cited protected categories identified in D.06-06-066, Appendix 1.

18. PG&E's Response to Question No. 42 of the Administrative Law Judges' Joint Ruling Requiring Additional Information (Served February 13, 2026). This question pertains to demand forecasts. PG&E requested confidential treatment of this response due to information on load (GWh) and Peak Load (MW) that includes confidential information on PG&E's monthly service area and bundled energy and peak load forecasts. PG&E also cited protected categories identified in D.06-06-066, Appendix 1.

6.1.2. Discussion

No party protested this motion and upon review, we find good cause to grant it for items 1-15 and 17-18. These items shall be given the requested confidential treatment for a period of three years from the date of this ruling. At any point from six months from the date of this ruling to the conclusion of the three-year period of confidentiality, PG&E may move to seek a furtherance of the confidentiality treatment on the basis of whether additional good cause is shown.

For item 16 pertaining to data centers, PG&E's confidentiality claims are reasonable, given that each line item in the Excel response includes customer-specific data that could reasonably be considered commercially sensitive, proprietary and/or trade secret information that may be subject to NDAs. Nonetheless, we find that the information in item 16's Excel spreadsheet *in aggregate* is not subject to confidentiality designation, given that the information within it can be aggregated to a level that would not reveal sensitive information to the public.⁹ Therefore, we direct PG&E to re-serve its response to ALJ Question No. 32 by May 5, 2026. The new submission shall be updated as follows:

⁹ See, for example, the 15/15 Rule described in Section 1.2.3.

1. PG&E shall update all information in the Excel spreadsheet with information that is current as of the date of this ruling.
2. PG&E shall provide aggregated information in a new, unredacted "Summary" tab in the Excel spreadsheet showing the following information for October 2025, February 2026, and April 2026:¹⁰
 - Proposed capacity additions in megawatts (MW) by project stage – Withdrawn, Preliminary Engineering, Final Engineering, Construction. Total capacity values shall exclude withdrawn projects.
 - Proposed project count by project stage – Withdrawn, Preliminary Engineering, Final Engineering, Construction. Project count values shall exclude withdrawn projects.
 - Proposed capacity additions (MW) by estimated interconnection year. Capacity values shall exclude withdrawn projects.
 - Proposed capacity additions (MW) broken out by expected interconnection type – transmission or distribution. Capacity values shall exclude withdrawn projects.

Therefore, we deny PG&E's confidentiality motion for item 16 but permit PG&E to refile a motion for confidentiality for this item with unredacted, aggregated data.

6.2. April 14, 2026 Motion.

PG&E's April 14, 2026 motion requested confidential treatment for five portions of the exhibit pre-marked as PG&E Ex-25 (Confidential):¹¹

1. **Rebuttal Testimony on Gas System Operations & Natural Gas Storage Strategy.** PG&E requested confidential

¹⁰ These dates correspond to past submissions of the same information to the Commission. An example format is shown in Attachment A.

¹¹ See PG&E April 14, 2026 Motion, Table 1.

treatment of this text, citing Third-Party information subject to non-disclosure or confidentiality agreements or obligations.

2. **Data Responses Included in PG&E Ex-16, Electric Distribution, Appendix A.** PG&E requested confidential treatment of this text, citing:
 - a. Proprietary and trade secret information or other intellectual property and protected market sensitive/competitive data, and
 - b. “[O]ther categories where disclosure would be against the public interest.”
 - c. Customer-specific data; and
 - d. Personal information.
3. **Confidential Attachment Supporting PG&E’s Long-Term Service Agreement (LTSA) Capitalization Proposal.** PG&E requested confidential treatment of this text, citing Third-Party information subject to non-disclosure or confidentiality agreements or obligations.
4. **Data Responses Included as Appendix A To PG&E’s Rebuttal Testimony in PG&E Ex-18.** PG&E requested confidential treatment of this text, citing proprietary and trade secret information or other intellectual property and protected market sensitive/competitive data.
5. **Data Responses Included as Appendix C To PG&E’s Rebuttal Testimony in Exhibit (PG&E Ex-22).** PG&E requested confidential treatment of this text, citing:
 - a. Customer-specific data;
 - b. Proprietary and trade secret information or other intellectual property and protected market sensitive/competitive data; and
 - c. Third-Party information subject to non-disclosure or confidentiality agreements or obligations.

No party protested this motion and upon review, we find good cause to grant the motion. These portions of testimony shall be given the requested

confidential treatment for a period of three years. At any point from six months from the date of this motion to the conclusion of the three-year period of confidentiality, PG&E may move to seek a furtherance of the confidentiality treatment on the basis of whether additional good cause is shown.

7. TURN Motion

The TURN Motion requested confidential treatment for excerpts of Exhibit TURN Ex-19 that include PG&E responses and attachments to TURN Data Request 135 (“TURN_DR_135”), Question 1 and Question 3. TURN states that it seeks confidential treatment because it is prohibited from disclosing the information under its NDA with PG&E.¹²

No party protested this motion and upon review, we find good cause to grant the motion. These filings shall be given the requested confidential treatment for a period of three years from the date of this ruling. At any point from six months from the date of this ruling to the conclusion of the three-year period of confidentiality, TURN or PG&E may move to seek a furtherance of the confidentiality treatment on the basis of whether additional good cause is shown.

IT IS RULED that:

The following motions are granted with timeframes as described above:

- CalCCA’s April 21, 2026 Motion of the California Community Choice Association Seeking Confidential Treatment of Evidence.
- CALSSA’s April 21, 2026 Motion of California Solar and Storage Association Seeking Confidential Treatment of Evidence.
- CALSTART’s March 30, 2026 Motion of CALSTART, Inc. Seeking Confidential Treatment of Evidence.

¹² TURN Motion at 1.

- NRDC's April 1, 2026 Motion of Natural Resources Defense Council for Confidential Treatment of Attachment D to its Brinn Et Al. Intervenor Testimony.
- PG&E's April 14, 2026 Motion of Pacific Gas and Electric Company (U 39 M) for Confidential Treatment of Information.
- TURN's March 27, 2026 Motion of the Utility Reform Network Seeking Confidential Treatment of Evidence.

1. PG&E's March 27, 2026 Motion of Pacific Gas and Electric Company (U39M) for Confidential Treatment of Information is granted for items 1-15 and 17-18 only.

2. For item 16 in PG&E's March 27, 2026 Motion of Pacific Gas and Electric Company (U39M) for Confidential Treatment of Information, PG&E shall serve an updated version with an unredacted summary sheet as described herein by May 5, 2026. PG&E may supplement this response with another confidentiality motion.

3. PG&E's March 27, 2026 Motion of Pacific Gas and Electric Company (U39M) for Confidential Treatment of Information is denied for item 16, pending PG&E's updated response.

Dated April 24, 2026, at San Francisco, California.

/s/ ELIZABETH FOX

Elizabeth Fox
Administrative Law Judge

/s/ JOHN LARSEN

John Larsen
Administrative Law Judge

/s/ DARRYL GRUEN

Darryl Gruen
Administrative Law Judge