



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

Order Instituting Rulemaking to Modernize
the Electric Grid for a High Distributed
Energy Resources Future.

R.21-06-017

FILED

10/21/26

10:11 AM

R2106017

**MOTION OF PACIFIC GAS AND ELECTRIC COMPANY (U 39 E) FOR
LEAVE TO FILE ITS CONFIDENTIAL AMENDED 2026 GRID NEEDS
ASSESSMENT REPORT, APPENDIX I**

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Dated: October 21, 2026

Attorney for
PACIFIC GAS AND ELECTRIC COMPANY

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Pursuant to Rules 11.1 and 11.4 of the California Public Utilities Commission (CPUC or Commission) Rules of Practice and Procedure and General Order 66-D, as well as Decision (D.) 24-10-030,¹ issued October 23, 2024, Pacific Gas and Electric Company (PG&E) respectfully submits this motion for leave to file its 2026 Grid Needs Assessment Report (2026 GNA Report), Appendix I under seal (Motion).

The material PG&E seeks to protect is the confidential, unredacted versions the 2026 GNA Report, Appendix I. PG&E concurrently files the public versions of the 2026 GNA Report, Appendix I with this Motion.

The 2026 GNA Report, Appendix I contains confidential information that, to the best of PG&E's knowledge, has not been publicly disclosed. The basis for designating Appendix I as confidential is that the information constitutes protected customer-sensitive data that cannot be aggregated sufficiently to comply with the "15/15 Rule" as defined by Ordering Paragraph (OP) 31 of D.24-10-030. Pursuant to the 15/15 Rule, if either of the following two conditions are met, or the data is not amendable to aggregation, additional protection is required: 1) contain fewer than 15 customers; or 2) have a single customer whose energy usage or demand exceeds 15% of the total amount of the data category.²

¹ See Decision (D.) 24-10-030, Ordering Paragraph (OP) 31 (Oct. 23, 2024).

² See *id.*

This request is consistent with the Commission's treatment of confidential customer information that is required to be protected, and, if publicly released, could be harmful to PG&E customers.³ The confidential information that does not meet the 15/15 Rule contained within Appendix I has been shaded in grey and the basis for confidential treatment is identified in the Declaration Supporting Confidential Designation on Behalf of PG&E (Confidentiality Declaration), included as Attachment A to this Motion. PG&E will securely upload the confidential 2026 GNA Report, Appendix I to the Commission.

For the reasons stated above and in Attachment A, PG&E's Motion requests leave under sections 583, 8380(b)(1) and (d), of the Public Utilities Code, D.97-10-031, D.14-04-016, D.24-10-030, and Commission General Order No. 66-D. Additionally, as required by Rule 11.4(a), attached is a proposed ruling granting this Motion as Attachment B.

Respectfully Submitted,

BENJAMIN C. ELLIS

By: /s/ Benjamin C. Ellis

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Dated: October 21, 2026

Attorney for
PACIFIC GAS AND ELECTRIC COMPANY

³ See Cal. Pub. Util. Code § 8380(b)(1), (d); see also D.97-10-031; D.14-04-016; D.24-10-030.

Attachment A

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

**DECLARATION SUPPORTING CONFIDENTIAL DESIGNATION
ON BEHALF OF
PACIFIC GAS AND ELECTRIC COMPANY (U 39 E)**

1. I, Satvir Nagra, am the Senior Director of Electric System Planning & Reliability for Pacific Gas and Electric Company (“PG&E”), a California corporation. Jason Glickman, Vice President of Electric System Strategy and Growth of PG&E, delegated authority to sign this declaration. My business office is located at:

Pacific Gas and Electric Company
8 East River Park Place
West Fresno, CA 93720

2. PG&E will produce the information identified in Paragraph 3 of this Declaration to the California Public Utilities Commission (“CPUC”) or departments within or contractors retained by the CPUC in response to a CPUC audit, data request, proceeding, or other CPUC request.

Name or Docket No. of CPUC Proceeding (if applicable): R.21-06-017

3. Title and description of document(s): PG&E’s Amended 2026 Grid Needs Assessment (GNA), Appendix I
4. These documents contain confidential information that, based on my information and belief, has not been publicly disclosed. These documents have been marked as confidential, and the basis for confidential treatment and where the confidential information is located on the documents are identified on the following chart:

Check	Basis for Confidential Treatment	Where Confidential Information is Located on the Documents
☒	Customer-specific data, which may include demand, loads, names, addresses, and billing data. (Protected under PUC § 8380; Civ. Code §§ 1798 <i>et seq.</i>; Govt. Code § 6254; Public Util. Code § 8380; Decisions (D.) 14-05-016, 04-08-055, 06-12-029)	Grey shaded data in Grid Needs Assessment (GNA), Appendix I.
☐	Personal information that identifies or describes an individual (including employees), which may include home address or phone number; SSN, driver's license, or passport numbers; education; financial matters; medical or employment history (not including PG&E job titles); and statements attributed to the individual. (Protected under Civ. Code §§ 1798 <i>et seq.</i>; Govt. Code § 6254; 42 U.S.C. § 1320d-6; and General Order (G.O.) 77-M)	
☐	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 at 18 C.F.R. § 388.113 and/or General Order 66-D ("The subject information: (1) is not customarily in the public domain by providing a declaration in compliance with Section 3.2(c) stating that the subject information is not related to the location of a physical structure that is visible with the naked eye or is available publicly online or in print; and (2) the subject information either: could allow a bad actor to attack, compromise or incapacitate physically or electronically a facility providing critical utility service; or discusses vulnerabilities of a facility providing critical utility service"). (Protected under Govt. Code § 6254(k), (ab); 6 U.S.C. § 131; 6 CFR § 29.2)	
☐	Proprietary and trade secret information or other intellectual property and protected market sensitive/competitive data. (Protected under Civ. Code §§3426 <i>et seq.</i>; Govt. Code §§ 6254, <i>et seq.</i>, e.g., 6254(e), 6254(k), 6254.15; Govt. Code § 6276.44; Evid. Code §1060; D.11-01-036)	
☐	Corporate financial records.	

(Protected under Govt. Code §§ 6254(k), 6254.15)

☐

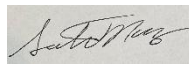
Third-Party information subject to non-disclosure or confidentiality agreements or obligations.

(Protected under Govt. Code § 6254(k); see, e.g., CPUC D.11-01-036)

☐

Other categories where disclosure would be against the public interest (Govt. Code § 6255(a)):

-
5. The importance of maintaining the confidentiality of this information outweighs any public interest in disclosure of this information. This information should be exempt from the public disclosure requirements under the Public Records Act and should be withheld from disclosure.
6. I declare under penalty of perjury that the foregoing is true, correct, and complete to the best of my knowledge.
7. Executed on this 21st day of October 2026 at Oakland, California.



Satvir Nagra
Senior Director, Electric System Planning &
Reliability
Pacific Gas and Electric Company

PACIFIC GAS AND ELECTRIC COMPANY (U 39 E)

R.21-06-017

ATTACHMENT TO DECLARATION

10/21/2026

ATTACHMENT NAME	DOCUMENT NAME	CATEGORY OF CONFIDENTIALITY	LOCATION
PGE_2026_Amended_GNA_Appendix_I_Known Loads Data	PG&E's Amended 2026 Grid Needs Assessment (GNA), Appendix I	Customer-specific data	Grey-shaded in confidential version of Appendix I

Attachment B

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

Order Instituting Rulemaking to
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Distributed Energy Resources Future.

Rulemaking 21-06-017

**[PROPOSED] RULING GRANTING MOTION OF PACIFIC GAS AND ELECTRIC
COMPANY (U 39 E) FOR LEAVE TO FILE ITS CONFIDENTIAL
2026 GRID NEEDS ASSESSMENT REPORT, APPENDIX I UNDER SEAL**

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 October 21, 2026, for leave to file confidential materials under seal (Motion), specifically confidential information in the 2026 Grid Needs Assessment Report (2026 GNA Report), Appendix I.

The Commission rules as follows:

1. PG&E's Motion is granted. The protected information in PG&E's 2026 GNA Report, Appendix I is described in the Motion and is properly treated as customer-sensitive data.
2. PG&E's confidential Appendix I 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 _____, 2026 at San Francisco, California.

Administrative Law Judge