

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



FILED

10/13/23
04:59 PM
A2305012

Application of Pacific Gas and Electric
Company For Adoption of Electric Revenue
Requirements and Rates Associated with its
2024 Energy Resource Recovery Account
(ERRA) and Generation Non-Bypassable
Charges Forecast and Greenhouse Gas
Forecast Revenue Return and Reconciliation

(U 39 E)

Application No. 23-05-012
(Filed May 15, 2023)

Expedited Application of Pacific Gas and
Electric Company Pursuant to the
Commission's Approved Energy Resource
Recovery (ERRA) Trigger Mechanism.

(U 39 E)

Application No. 23-07-012
(Filed July 28, 2023)

**MOTION FOR LEAVE TO SUBMIT CONFIDENTIAL VERSION OF OPENING BRIEF
UNDER SEAL**

Evelyn Kahl
General Counsel and Director of Policy
CALIFORNIA COMMUNITY CHOICE
ASSOCIATION
One Concord Center
2300 Clayton Road, Suite 1150
Concord, CA 94520
Telephone: (510) 980-9459
E-mail: regulatory@cal-cca.org

Tim Lindl
Nikhil Vijaykar
KEYES & FOX LLP
580 California Street, 12th Floor
San Francisco, CA 94104
Telephone: (510) 314-8385
E-mail: tlindl@keyesfox.com
nvijaykar@keyesfox.com

On behalf of
California Community Choice Association

October 13, 2023

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

Application of Pacific Gas and Electric Company For Adoption of Electric Revenue Requirements and Rates Associated with its 2024 Energy Resource Recovery Account (ERRA) and Generation Non-Bypassable Charges Forecast and Greenhouse Gas Forecast Revenue Return and Reconciliation

(U 39 E)

Application No. 23-05-012
(Filed May 15, 2023)

Expedited Application of Pacific Gas and Electric Company Pursuant to the Commission’s Approved Energy Resource Recovery (ERRA) Trigger Mechanism.

(U 39 E)

Application No. 23-07-012
(Filed July 28, 2023)

**MOTION FOR LEAVE TO SUBMIT CONFIDENTIAL VERSION OF OPENING BRIEF
UNDER SEAL**

Pursuant to Rule 11.4 of the California Public Utilities Commission’s Rules of Practice and Procedure, California Community Choice Association¹ (CalCCA) hereby submits this motion for leave to file under seal the confidential version of the October 13, 2023, *California Community Choice Association’s Opening Brief* (Opening Brief) in the above-captioned proceeding.

Certain information contained in the Opening Brief is derived from confidential data provided by Pacific Gas and Electric Company in its confidential prepared testimony. That

¹ California Community Choice Association represents the interests of 24 community choice electricity providers in California: Apple Valley Choice Energy, Central Coast Community Energy, Clean Energy Alliance, Clean Power Alliance, CleanPowerSF, Desert Community Energy, East Bay Community Energy, Energy for Palmdale’s Independent Choice, Lancaster Energy, Marin Clean Energy, Orange County Power Authority, Peninsula Clean Energy, Pico Rivera Innovative Municipal Energy, Pioneer Community Energy, Pomona Choice Energy, Rancho Mirage Energy Authority, Redwood Coast Energy Authority, San Diego Community Power, San Jacinto Power, San José Clean Energy, Santa Barbara Clean Energy, Silicon Valley Clean Energy, Sonoma Clean Power, and Valley Clean Energy.

testimony, including in particular Table 4-6² in Chapter 4 of the testimony, includes market-sensitive information regarding PG&E's 2024 System Resource Adequacy. PG&E has marked the information provided as protected, and CalCCA has not challenged that designation. The confidentiality declaration attached to the testimony states the material PG&E is seeking to protect constitutes confidential market sensitive data and information covered by D.06-06-066, D.08-04-923, D.14-10-033, and/or relevant Commission rules. The declaration further states the data is not already public and cannot be aggregated, redacted, summarized or otherwise protected in a way that allows partial disclosure.

For the foregoing reasons, CalCCA moves to file its Opening Brief in the above-captioned docket under seal.

Respectfully submitted,



Nikhil Vijaykar
KEYES & FOX LLP
580 California Street, 12th Floor
San Francisco, CA 94104
Telephone: (408) 621-3256
E-mail: nvijaykar@keyesfox.com

Counsel to CALIFORNIA COMMUNITY
CHOICE ASSOCIATION

Dated: October 13, 2023

² PG&E-01 at 4-18 (Table 4-6).

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

Application of Pacific Gas and Electric Company For Adoption of Electric Revenue Requirements and Rates Associated with its 2024 Energy Resource Recovery Account (ERRA) and Generation Non-Bypassable Charges Forecast and Greenhouse Gas Forecast Revenue Return and Reconciliation

(U 39 E)

Application No. 23-05-012
(Filed May 15, 2023)

Expedited Application of Pacific Gas and Electric Company Pursuant to the Commission's Approved Energy Resource Recovery (ERRA) Trigger Mechanism.

(U 39 E)

Application No. 23-07-012
(Filed July 28, 2023)

**[PROPOSED] ADMINISTRATIVE LAW JUDGE RULING GRANTING MOTION FOR
LEAVE TO SUBMIT CONFIDENTIAL VERSION OF OPENING BRIEF UNDER
SEAL**

On October 13, 2023, California Community Choice Association³ (CalCCA) submitted a motion for leave to file under seal the confidential version of the October 13, 2023, *California Community Choice Association's Opening Brief* (Opening Brief) in the above-captioned proceeding. Certain information contained in the Opening Brief is derived from confidential data provided by Pacific Gas and Electric Company in its confidential prepared

³ California Community Choice Association represents the interests of 24 community choice electricity providers in California: Apple Valley Choice Energy, Central Coast Community Energy, Clean Energy Alliance, Clean Power Alliance, CleanPowerSF, Desert Community Energy, East Bay Community Energy, Energy for Palmdale's Independent Choice, Lancaster Energy, Marin Clean Energy, Orange County Power Authority, Peninsula Clean Energy, Pico Rivera Innovative Municipal Energy, Pioneer Community Energy, Pomona Choice Energy, Rancho Mirage Energy Authority, Redwood Coast Energy Authority, San Diego Community Power, San Jacinto Power, San José Clean Energy, Santa Barbara Clean Energy, Silicon Valley Clean Energy, Sonoma Clean Power, and Valley Clean Energy.

testimony. That testimony, including in particular Table 4-6⁴ in Chapter 4 of the testimony, includes market-sensitive information regarding PG&E's 2024 System Resource Adequacy. PG&E has marked the information provided as protected, and CalCCA has not challenged that designation. The confidentiality declaration attached to the testimony states the material PG&E is seeking to protect constitutes confidential market sensitive data and information covered by D.06-06-066, D.08-04-923, D.14-10-033, and/or relevant Commission rules. The declaration further states the data is not already public and cannot be aggregated, redacted, summarized or otherwise protected in a way that allows partial disclosure.

IT IS HEREBY ORDERED that the CalCCA Opening Brief (confidential version) may be filed under seal.

Dated: _____

By: _____

Administrative Law Judge

⁴ PG&E-01 at 4-18 (Table 4-6).