

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



**FILED**

03/21/24

04:59 PM

A2302018

Application of Pacific Gas and Electric Company for Compliance Review of Utility Owned Generation Operations, Portfolio Allocation Balancing Account Entries, Energy Resource Recovery Account Entries, Contract Administration, Economic Dispatch of Electric Resources, Utility Owned Generation Fuel Procurement, and Other Activities for the Record Period January 1 through December 31, 2022

Application 23-02-018

U 39 E

**MOTION FOR LEAVE TO SUBMIT CONFIDENTIAL VERSION OF REPLY IN  
SUPPORT OF MOTION FOR COMMISSION REVIEW 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](mailto:regulatory@cal-cca.org)

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

*On behalf of*  
California Community Choice Association

March 21, 2024

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

Application of Pacific Gas and Electric Company for Compliance Review of Utility Owned Generation Operations, Portfolio Allocation Balancing Account Entries, Energy Resource Recovery Account Entries, Contract Administration, Economic Dispatch of Electric Resources, Utility Owned Generation Fuel Procurement, and Other Activities for the Record Period January 1 through December 31, 2022

Application 23-02-018

U 39 E

**MOTION FOR LEAVE TO SUBMIT CONFIDENTIAL VERSION OF REPLY IN  
SUPPORT OF MOTION FOR COMMISSION REVIEW UNDER SEAL**

Pursuant to Rule 11.4 of the California Public Utilities Commission’s Rules of Practice and Procedure, California Community Choice Association<sup>1</sup> (CalCCA) hereby submits this motion for leave to file under seal the confidential version of the March 21, 2024, *California Community Choice Association’s Reply in Support of Motion for Commission Review of Administrative Law Judge’s Evidentiary Rulings* (Reply) in the above-captioned proceeding.

Certain information contained in the Reply is derived from Pacific Gas and Electric Company’s (PG&E) confidential Attachment to its Data Response to Cal Advocates MDR001-Q108 (confidential Appendix S to PG&E’s Bundled Procurement Plan). PG&E marked that information as protected and CalCCA has not challenged that designation. CalCCA subsequently offered that confidential Attachment into evidence as Exhibit CalCCA-03-C. On January 18, 2024, PG&E filed a motion to seal a portion of the evidentiary record (Motion to

---

<sup>1</sup> California Community Choice Association represents the interests of 24 community choice electricity providers in California: Apple Valley Choice Energy, Ava Community Energy, Central Coast Community Energy, Clean Energy Alliance, Clean Power Alliance, CleanPowerSF, Desert 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.

Seal) including Exhibit CalCCA-03C. The table attached to the Motion to Seal states Exhibit CalCCA-03C includes information that is market sensitive, and if released, could cause harm to PG&E's customers and put PG&E at an unfair business disadvantage.

The Reply therefore contains market-sensitive information regarding PG&E's confidential sales framework pursuant to Public Utilities Code Section 454.5(g) and Decisions (D.) 06-06-066, D.08-04-023, and D.14-10-033. For the foregoing reasons, CalCCA moves to file the confidential version of its Reply 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: March 21, 2024

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

Application of Pacific Gas and Electric Company for Compliance Review of Utility Owned Generation Operations, Portfolio Allocation Balancing Account Entries, Energy Resource Recovery Account Entries, Contract Administration, Economic Dispatch of Electric Resources, Utility Owned Generation Fuel Procurement, and Other Activities for the Record Period January 1 through December 31, 2022

Application 23-02-018

U 39 E

**[PROPOSED] ADMINISTRATIVE LAW JUDGE RULING GRANTING MOTION FOR  
LEAVE TO SUBMIT CONFIDENTIAL VERSION OF REPLY IN SUPPORT OF  
MOTION FOR COMMISSION REVIEW UNDER SEAL**

On March 21, 2024, the California Community Choice Association (CalCCA) submitted a motion for leave to file under seal the confidential version of the March 21, 2024, *California Community Choice Association's Reply in Support of Motion for Commission Review of Administrative Law Judge's Evidentiary Rulings* (Reply) in the above-captioned proceeding.

Certain information contained in the Reply is derived from Pacific Gas and Electric Company's (PG&E) confidential Attachment to its Data Response to Cal Advocates MDR001-Q108 (confidential Appendix S to PG&E's Bundled Procurement Plan). PG&E marked that information as protected and CalCCA has not challenged that designation. CalCCA subsequently offered that confidential Attachment into evidence as Exhibit CalCCA-03-C. On January 18, 2024, PG&E filed a motion to seal a portion of the evidentiary record (Motion to Seal) including Exhibit CalCCA-03C. The table attached to the Motion to Seal states Exhibit CalCCA-03C includes information that is market sensitive, and if released, could cause harm to PG&E's customers and put PG&E at an unfair business disadvantage.

The Reply therefore contains market-sensitive information regarding PG&E's confidential sales framework pursuant to Public Utilities Code Section 454.5(g) and Decisions (D.) 06-06-066, D.08-04-023, and D.14-10-033.

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

Dated: \_\_\_\_\_

By: \_\_\_\_\_

Administrative Law Judge