

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



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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

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**MOTION FOR LEAVE TO SUBMIT CONFIDENTIAL VERSION OF
CALIFORNIA COMMUNITY CHOICE ASSOCIATION'S BRIEF
IN RESPONSE TO ALJ'S MAY 22 RULING
UNDER SEAL**

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June 6, 2024

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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 June 6, 2024, *California Community Choice Association’s Brief in Response to ALJ’s May 22 Ruling* (Brief) in the above-captioned proceeding.

Certain information contained in the Brief 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. Certain other information contained in the Brief is derived from CalCCA’s direct testimony (and discovery

¹ 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.

responses attached thereto), which includes information designated by PG&E as protected (which CalCCA has not challenged). CalCCA subsequently offered its testimony including confidential information into evidence as Exhibit CalCCA-01C.

On January 18, 2024, PG&E filed a motion to seal a portion of the evidentiary record (Motion to Seal) including Exhibits CalCCA-01C and CalCCA-03C. The table attached to the Motion to Seal (Attachment B) 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. That table also states Exhibit CalCCA-01C includes market sensitive information which, if disclosed, could cause harm to PG&E's customers and put PG&E at an unfair business advantage. Further, it states Exhibit CalCCA-01C includes confidential bid information from solicitations; confidential quantitative analysis for scoring and evaluating bids in solicitation; and confidential information regarding forecasts of capacity ratings, expected output of certain generating resources; and bundled customer peak load forecast. The Brief therefore contains market-sensitive and other confidential information 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 Brief in the above-captioned docket under seal.

Respectfully submitted,



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CALIFORNIA COMMUNITY CHOICE
ASSOCIATION

Dated: June 6, 2024

**ATTACHMENT A
[PROPOSED RULING]**

**BEFORE THE PUBLIC UTILITIES COMMISSION
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Application 23-02-018

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**[PROPOSED] ADMINISTRATIVE LAW JUDGE RULING GRANTING MOTION
FOR LEAVE TO SUBMIT CONFIDENTIAL VERSION OF CALIFORNIA
COMMUNITY CHOICE ASSOCIATION’S BRIEF
IN RESPONSE TO ALJ’S MAY 22 RULING
UNDER SEAL**

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

Dated: _____

By: _____

Administrative Law Judge