

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

Application of SAN DIEGO GAS & ELECTRIC
COMPANY (U 902-E) for Approval of its 2017 Electric
Procurement Revenue Requirement Forecasts and GHG-
Related Forecasts

Application 16-04-____
(Filed April 15, 2016)

**MOTION OF SAN DIEGO GAS & ELECTRIC COMPANY (U 902 E) FOR
LEAVE TO FILE CONFIDENTIAL MATERIALS UNDER SEAL; CONFIDENTIAL
MATERIALS ATTACHED AND FILED UNDER SEAL**

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April 15, 2016

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Pursuant to Rule 11.4 of the Commission’s Rules of Practice and Procedure and Decisions (“D”) 06-06-066 and D.14-10-033, San Diego Gas & Electric Company (“SDG&E”) hereby files this Motion to File Under Seal, and Proposed Ruling, regarding the confidential information in Attachment G to the November Update to the Application of San Diego Gas & Electric Company (U-902-E) for Approval of its 2017 Electric Procurement Revenue Requirement Forecasts and GHG-Related Forecasts (“Application”). Specifically, as described in the Declarations of Benjamin A. Montoya and the Declaration of Ana Garza-Beutz,¹ SDG&E is seeking confidential treatment of limited greenhouse gas (“GHG”)-related information in Templates D-2 (Annual GHG Emissions and Associated Costs) and D-5 (History of Revenue, Costs, and Emissions Intensity) to Attachment G – the GHG Revenue and Reconciliation Form – to the Application. As Mr. Montoya and Ms. Garza-Beutz indicate, disclosure of this information would be inappropriate because disclosure of forecasts of GHG emissions and recorded and forecast GHG costs would allow market participants to gain insight SDG&E’s

¹ Mr. Montoya and Ms. Garza-Beutz are SDG&E witnesses who prepared direct testimony that accompanies the Application. Their Declarations appear at the end of their respective testimonies.

GHG obligations and procurement strategies, which would comprise SDG&E's contractual bargaining power and cause customer costs to rise.

In sum, the material for which SDG&E seeks confidential treatment is confidential according to D.06-06-066 and D.14-10-033. The confidential information should be protected as follows:

- The confidential information constitutes a particular type of data listed in the IOU Matrix, as described in Table 1 of the Confidentiality Declaration of Ms. Garza-Beutz;
- The confidential information is confidential in accordance with D.14-10-033, as described in Paragraph 4 and Table 2 of the Confidentiality Declaration of Ms. Garza-Beutz and the Table following Paragraph 3 of the Confidentiality Declaration of Mr. Montoya;
- SDG&E is complying with the limitations on confidentiality specified in the IOU Matrix for each type of data;
- The Protected Information is not already public; and
- The data cannot be aggregated, redacted, summarized, masked or otherwise protected in a way that allows partial disclosure.

For good cause shown and because no party will be prejudiced by the redacted material set forth in the above-referenced Templates D-2 and D-5 to Attachment G to the Application, SDG&E respectfully requests that this Motion be granted. SDG&E has attached a Proposed Ruling for the Commission's use in granting this Motion.

DATED this 15th day of April 2016, at San Diego, California.

Respectfully submitted,

By: /s/ Christopher M. Lyons
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April 15, 2016

PROPOSED ORDER

Pursuant to Rule 11.4 of the Rules of Practice and Procedure of the California Public Utilities Commission (the “Commission”) and D.06-06-066, D.08-04-023 and D.14-10-033, San Diego Gas & Electric Company (“SDG&E”) filed a motion on November 6, 2015, requesting authority to file and maintain confidential, commercially sensitive and proprietary information under seal (the “Motion”). The Motion sought confidential treatment of certain limited greenhouse gas (“GHG”)-related information appearing in in Templates D-2 (Annual GHG Emissions and Associated Costs) and D-5 (History of Revenue, Costs, and Emissions Intensity) to Attachment G – the GHG Revenue and Reconciliation Form – to the November Update to Application of San Diego Gas & Electric Company (U-902-E) for Approval of its 2016 Electric Procurement Revenue Requirement Forecasts and GHG-Related Forecasts (“Application”). .

The information for which confidential treatment is sought is protected under the IOU Matrix adopted in D.06-06-066 (the “IOU Matrix”) or under D.14-10-033. In addition, the information complies with the limitations on confidentiality specified in the IOU Matrix for that type of data (as applicable) and has not been made public. SDG&E has not publicly disclosed this information. The data cannot be aggregated, redacted, summarized, masked or otherwise protected in a way that allows partial disclosure.

Therefore, it is ordered that:

1. The confidential information contained in Templates D-2 and D-5 to Attachment G to the Application, shall remain sealed and is not to be disclosed to anyone other than Commission staff, the Assigned Commissioner, the assigned Administrative Law Judges (“ALJs”) or an ALJ designated to decide this motion;
2. Further proceedings, if any, held with respect to matters contained in the confidential

information shall be conducted in a manner the assigned ALJs deem reasonably necessary to protect the confidentiality of the materials described herein;

3. SDG&E has the right to consider and reject requests for access to this material by means of a non-disclosure agreement or other method; and
4. All additional documentary evidence in this proceeding that addresses or relates to the subject matter of the confidential information must be treated in the confidential manner described in paragraphs 1 and 2, above.

Administrative Law Judge

Dated: _____