DECLARATION OF DENNIS L. SULLIVAN SEEKING CONFIDENTIAL TREATMENT FOR DATA AND INFORMATION

CONTAINED IN A DATA REQUEST RESPONSE ASSOCIATED WITH THE PROJECT DEVELOPMENT STATUS REPORT SUBMITTED MARCH 1, 2010 (PACIFIC GAS AND ELECTRIC COMPANY - U 39 E)

- I. Dennis L. Sullivan, declare:
- 1. I am presently employed by Pacific Gas and Electric Company ("PG&E"). I am the manager of new resource procurement in PG&E's Competitive Solicitations Department. In this position, my responsibilities include project management of PG&E's Request for Offers solicitations and negotiation of agreements arising from those solicitations.
- 2. Based on my knowledge and experience, and in accordance with Decision ("D.") 08-04-023 and the August 22, 2006 "Administrative law Judge's Ruling Clarifying Interim Procedures for Complying with Decision 06-06-066," I make this declaration seeking confidential treatment of certain information and data contained in a data request response submitted on April 15, 2010, that is associated with PG&E's March 1, 2010 Project Development Status Report.
- 3. Attached to this declaration is a matrix identifying the data and information for which PG&E is seeking confidential treatment. The matrix specifies that the material PG&E is seeking to protect constitutes the particular type of data and information listed in Appendix 1 of D.06-06-066 and Appendix C of D.08-04-023 (the "IOU Matrix"), or constitutes information that should be protected under General Order 66-C. The matrix also specifies the category or categories in the IOU Matrix to which the data and information corresponds, if applicable, and why confidential protection is justified. Finally, the matrix specifies that: (1) PG&E is complying with the limitations specified in the IOU Matrix for that type of data or information, if applicable; (2) the information is not already public; and (3) the data cannot be aggregated,

redacted, summarized or otherwise protected in a way that allows partial disclosure. By this reference, I am incorporating into this declaration all of the explanatory text in the attached matrix.

I declare under penalty of perjury, under the laws of the State of California, that to the best of my knowledge, the foregoing is true and correct. Executed on April 15, 2010, at San Francisco, California.

Dennis L. Sullivan