DECLARATION OF VALERIE J. WINN SEEKING CONFIDENTIAL TREATMENT FOR DATA AND INFORMATION

CONTAINED IN PG&E'S DATA REQUEST RESPONSE REGARDING TREC SCENARIOS SUBMITTED APRIL 21, 2010 (PACIFIC GAS AND ELECTRIC COMPANY - U 39 E)

I, Valerie J. Winn, declare:

- 1. I am presently employed by Pacific Gas and Electric Company ("PG&E"), and have been an employee at PG&E since 1997. My current title is Manager, Renewable Energy Policy and Planning, within PG&E's Energy Procurement organization. In this position, my responsibilities include managing renewable energy regulatory policy matters including RPS compliance. I also have extensive experience in PG&E's Regulatory Relations organization and have been involved in long-term procurement planning, renewables, QF, confidentiality and other procurement-related proceedings before the Commission. Through this experience, I have become familiar with the type of information that the Commission has indicated is confidential and gained knowledge about the types of information that electricity sellers consider confidential and proprietary.
- 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 PG&E's data request response submitted on April 21, 2010.
- 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 21, 2010, at San Francisco, California.

VALERIEJ, WINN