DECLARATION OF Redacted SEEKING CONFIDENTIAL TREATMENT FOR CERTAIN DATA AND INFORMATION CONTAINED IN PG&E'S RESPONSE TO DRA DATA REQUEST

I, Redacted	declare:
-------------	----------

- 1. I am presently employed by Pacific Gas and Electric Company (PG&E) and am a Regulatory Principal in the electric proceedings section, in the Energy Proceedings Department. In this position, I am responsible for electric procurement cost recovery and reporting requirements at PG&E. In carrying out these responsibilities, I have acquired knowledge of the transactions types purchased for the portfolio and recorded to the ERRA, which are the subject of this data response.
- 2. Based on my knowledge and experience, and in accordance with the "Administrative Law Judge's Ruling Clarifying Interim Procedures For Complying With Decision 06-06-066," issued in Rulemaking 05-06-040 on August 22, 2006, I make this declaration seeking confidential treatment for certain data contained in PG&E's response to DRA's Data Request regarding price amendments to Renewable Portfolio Standard (RPS) contracts and expenditures pursuant to the RPS Program.
- 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 (the "IOU Matrix") of Decision 06-06-066, if applicable, or may otherwise be withheld as confidential pursuant to CPUC G.O. 66-C.
- 4. The attached matrix also specifies the category or categories in the IOU Matrix to which the data and information corresponds, 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; (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 the attached matrix.

_

SB
GT&S
0801
64(

						January 14,	S Expenditures and Price Amendments	
	Redaction Reference	1) The material submitted constitutes a particular type of data listed in the Matrix, appended as Appendix 1 to D.06-06-066 and Appendix C to D.08-04-023 (Y/N)	Which category or categories in the Matrix the data correspond to:	3) That it is complying with the limitations on confidentiality specified in the Matrix for that type of data (Y/N)	4) That the information is not alroady public (Y/N)	5) The data cannot be aggregated, redacted, summarized, masked or otherwise protected in a way that allows partial disclosure (Y/N)	PG&E's Justification for Confidential Treatment	Length of Time
1	All cells that are shaded grey.		est question 1.xls Item VII (F) or (G) Renewable Resource Contracts under RPS program - Contracts with and without SEPs; Item VII (unlettered item after (G)) Analysis and Evaluations of Proposed RPS Contracts; G.O. 66-C.	Y	Y		The shaded cells in this document contain either: (a) the original or amended pricing terms of RPS PPAs in which either the contract states that energy deliveries began or will begin later than 3 years in the past or whose amendments were executed less than 3 years in the past; or (b) PG&E's internal assessment of the date on which future deliveries may begin under RPS contracts based on current information. Disclosure of this information would provide valuable market sensitive information to competitors. Since negotiations are still in progress with bidders from the 2005, 2006, 2007, 2008, and 2009 solicitations and with other counterparties, this information should remain confidential. Release of this information would be damaging to negotiations. Release of PG&E's internal assessment of expected energy deliveries under the PPAs could provide the market with information regarding PG&E's net open position and thereby allow for market manipulation. Both categories of information have been obtained in confidence from the counterparty under an expectation of confidentiality. It is in the public interest to treat such information as confidential because if such information were made public	For information covered under Item VII (unlettered category following (G)), remain confidential for thr years
	All cells that are shaded grey.	Y	sOIR-III-Admin_DR_DRA_009-Q0 Item XI Monthly Procurement Costs (ERRA Fillngs)	3-Atch01-CONF.xis Y	Y	Y	Data from the ERRA Activity Reports contains confidential information (Protected Information) that is material, market sensitive, electric procurement-related information within the scope of Public Utilities Code section 454.5(g).	For information covered under Item XI), remain confidential for three year