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

I, George P. Clavier, declare:

- I am presently employed by Pacific Gas and Electric Company (PG&E) and am a Principal in the Resource Development / Integrated Planning and Policy section, in the Integrated Resource Planning Department. In this position, I am responsible for forecasting costs of generation and associated integration costs. In carrying out these responsibilities, I have acquired knowledge of the types of Renewables Portfolio Standard transactions that are the subject of this supplemental 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 supplemental response to Question 3 of 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 would disclose the particular type of data and information listed in Appendix 1 (the "IOU Matrix") of Decision 06-06-066.
- 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.

I declare under penalty of perjury, under the laws of the State of California, that the foregoing is true and correct. Executed on January 24, 2011 at San Francisco, California.

-00 George X. Clavier

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	Supplemental Data Response to Question 3 of the DRA Request Regarding RPS Expenditures and Price Amendments							
I	January 24, 2011							
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		<		IDENTIFIC	ATION OF CONFIDE	I INFORMATION PE	R DECISION 06-06-066 AND DECISION 08-04-023	T
		1		·····			n	
		1) The material submitted constitutes a particular type of data listed in the		3) That it is		5) The data cannot be aggregated, redacted.		
		Matrix, appended as Appendix 1 to D.06- 06-066 and Appendix C to D.08-	2) Which category or	complying with the limitations on confidentiality specified in the	4) That the information is	summarized, masked or otherwise protected in a way		
	Redaction	04-023	categories in the Matrix the	Matrix for that type		that allows partial		
ļ	Reference	(Y/N)	data correspond to:	of data (Y/N)	public (Y/N)	disclosure (Y/N)	PG&E's Justification for Confidential Treatment	Length of Time
	Document: RenewablePortfolioStdsOIR-III-Admin_DR_DRA_009-Q03_Estimated Expenditures.xls, Contract Costs Tab							
1	All cells that are shaded grey,		Item VII (F) or (G) Renewable Resource Contracts under RPS program - Contracts with and without SEPs,	Y	Y	Y	The shaded cells in this document contain, for each listed PPA, the product of multiplying the contract quantity by the contract price. Because expected deliveries of the contracts are information that have been publicly disclosed in the past, a simply calculation would reveal the contract price, which is confidential per D.06-06-066 until the earlier of one year following contract expiration or three years following the COD date in the PPA. 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. Pricing information have been negotiated 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	following contract expiration.
					¢		were made public, it would put the counterparty at a business disadvantage, could create a disincentive to do business with PG&E and other regulated utilities, and could have a damaging effect on current and future nepotiations with other counterparties.	
Document: RenewablePortfolioStdsOIR-III-Admin_DR_DRA_009-Q03_Estimated Expenditures.xls, Summary Tab								
1	All cells that are shaded grey.		Item II (B) (4) Non-QF bilateral contracts generation cost forecasts	Y	Y	for 2011-2020 have been aggregated and provided non- confidentially in the	The shaded cells in this document contain either annual aggregated forecasted RPS contract costs or the sum of the RPS contracts costs and integration costs. The annual aggregated forecasted RPS contract costs fall within the category of non-QF bilateral contract generation cost forecasts in the Confidentiality Matrix. The sum of the RPS contract costs and the integration costs must also be made confidential to avoid disclosing the forecasted annual aggregated RPS contract costs through a simple calculation. However, PG&E has aggregated all years to provide a grand total of RPS expenditures that it is providing non-confidentially.	under Item II (B)(4), remain confidential for three years.