

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

Order Instituting Rulemaking to Continue
Implementation and Administration of
California Renewables Portfolio Standard
Program.

Rulemaking 11-05-005
(Filed May 5, 2011)

**DECLARATION OF KENT WILLIAMS IN SUPPORT OF
CONFIDENTIAL TREATMENT OF DATA SUBMITTED BY
CALPINE POWERAMERICA-CA, LLC AS PART OF ITS 2006-2007 VERIFIED AND
AUGUST 2011 SEMI-ANNUAL COMPLIANCE REPORT PURSUANT TO
THE CALIFORNIA RENEWABLES PORTFOLIO STANDARD**

I, Kent Williams, declare:

1. I am a Vice President for Calpine PowerAmerica Corporation and authorized signatory for Calpine PowerAmerica-CA, LLC (“Calpine PowerAmerica”).
2. In this capacity, I have knowledge of the information contained in Calpine PowerAmerica’s 2006-2007 Verified and August 2011 Semi-Annual Compliance Report Pursuant to the California Renewables Portfolio Standard (“RPS Compliance Report”).
3. I make this declaration in support of Calpine PowerAmerica’s RPS Compliance Report pursuant to Decision 06-06-066, as modified by Decision 08-04-023 (collectively, “Confidentiality Decisions”).
4. In the Confidentiality Decisions, the California Public Utilities Commission (“Commission”) adopted rules governing the confidentiality of certain electric procurement data submitted to the Commission by electric service providers (“ESPs”). In the modified ESP matrix attached to Decision 08-04-023, the Commission identified categories of information and the confidentiality protections to be applied to those categories.¹ To the extent information submitted to the Commission by an ESP matches a category of information contained in the ESP

¹ See D.08-04-023 at Appendix B.

Matrix, the information is entitled to the protection provided for that category of information by the ESP Matrix.²

Attached hereto and incorporated by reference is a table identifying data for which Calpine PowerAmerica is seeking confidential treatment. As required by Ordering Paragraph 2 of Decision 06-06-066, the table specifies:

1. That the material Calpine PowerAmerica is submitting constitutes a particular type of data listed in the Matrix;
2. Which category or categories in the Matrix the data correspond to;
3. That Calpine PowerAmerica is complying with the limitations on confidentiality specified in the Matrix for that type of data;
4. That the information is not already public; and
5. That the data cannot be aggregated, redacted, summarized, masked or otherwise protected in a way that allows partial disclosure.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed this 1st day of August 2011, in Houston, Texas.


KENT WILLIAMS - Vice President ✓

²Decision 06-06-066, mimeo at 80 (Ordering Paragraph 2).

CALPINE POWERAMERICA-CA, LLC						
2006-2007 VERIFIED AND AUGUST 1, 2011 SEMI-ANNUAL COMPLIANCE REPORT						
IDENTIFICATION OF CONFIDENTIAL INFORMATION PER DECISION 06-06-066, as modified by D.08-04-023						
Date: AUGUST 1, 2011						
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 (Y/N)	2) Which category or categories in the Matrix do(es) 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 already public (Y/N)	5) The data cannot be aggregated, redacted, summarized, masked or otherwise protected in a way that allows partial disclosure (Y/N)	Calpine PowerAmerica's Justification for Confidential Treatment
Document: August 2011 RPS Compliance Report						
Summary 10 Tab: Cells D09; D10; D12; D37; D38; D42; E11; E13	Y	Item I-B	Y	Y	Y (but data may be aggregated with data of all ESPs)	Information can be used to calculate Calpine PowerAmerica's total energy requirements.
Accounting Tab: Cells K13 – N13; K15 – N 15 through K17 – N17; K19 – N19; K20 – N20	Y	Item IB, III-C	Y	Y	Y (but data may be aggregated with data of all ESPs)	Historical and front three years of forecast of Calpine PowerAmerica's total energy requirements. Linked cells whose values would reveal this confidential data are also redacted. This covers data from mid-year 2010 through mid-year 2013; accordingly, data is redacted for all four years.
Accounting Tab: Cells K25 – N25; K56 –N56; K79 – N79 through K82 – N82; K95 –N95; K96 – N96; K97; K98	Y	Item IB, III-C:	Y	Y	Y (but data may be aggregated with data of all ESPs)	Historical and front three years of forecast of Calpine PowerAmerica's total energy requirements. Linked cells whose values would reveal this confidential data are also redacted. This covers data from mid-year 2010 through mid-year 2013; accordingly, data is redacted for all four years.
Procurement Detail Tab: Cells J15 – M15;	Y	Item IB	Y	Y	Y (but data may be aggregated	Historical and front three years of forecast of Calpine PowerAmerica's total energy requirements. Linked cells whose values would reveal this confidential data

J16 – M16					with data of all ESPs)	are also redacted. This covers data from mid-year 2010 through mid-year 2013; accordingly, data is redacted for all four years.
-----------	--	--	--	--	---------------------------	---