DECLARATION OF CANDACE CHAN SEEKING CONFIDENTIAL TREATMENT FOR CERTAIN DATA AND INFORMATION CONTAINED IN PG&E'S RESPONSE TO ENERGY DIVISION'S DATA REQUEST SEEKING ADDITIONAL INFORMATION PERTAINING TO SENATE BILL 836 (PADILLA, 2011) (PACIFIC GAS AND ELECTRIC COMPANY - U 39 E)

I, Candice Chan, declare:

- 1. I am presently employed by Pacific Gas and Electric Company ("PG&E"), and have been an employee at PG&E since 2002. My current title is Director within PG&E's Energy Procurement organization. In this position, my responsibilities include overseeing the management of PG&E's electric Power Purchase Agreements and financial settlements related to those contracts. In carrying out these responsibilities, I have acquired knowledge of PG&E's contracts with numerous counterparties and have also gained knowledge of the operations of electricity sellers in general. Through this experience, I have become familiar with the type of information that would affect the negotiating positions of electricity sellers with respect to price and other terms, as well as with the type of information that such 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 the data within columns H and J of the tab named "nonUOG_RPS cost combined" in the attachment to the response submitted by PG&E on January 12, 2012 to Energy Division's Data Response Seeking Additional Information Pertaining to Senate Bill 836 (Padilla, 2011).
- 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"), and/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. By this reference, I am incorporating into this declaration all of the explanatory text in the attached matrix that is pertinent to this filing.

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 January 12, 2012, at San Francisco, California.

Candice Chan