

**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 08-08-009
(Filed May 25, 2006)

**CONFIDENTIALITY DECLARATION
FOR YEAR 2012 MARCH SEMI-ANNUAL COMPLAINT REPORT
PURSUANT TO THE CALIFORNIA RENEWABLES PORTFOLIO STANDARD
OF
NOBLE AMERICAS ENERGY SOLUTIONS LLC**

The Year 2012 March Semi-Annual Compliance Report Pursuant to the California Renewables Portfolio Standard (“RPS Report”) which is the subject of this confidentiality declaration has been submitted to Commission staff, as well as the presiding administrative law judge for the above-captioned proceeding, pursuant to the RPS reporting requirements established in Decision (“D.”) 05-10-059 and specified further in the Energy Division’s most recent reporting instructions. In addition, a redacted (public) version of the report has been served on the parties to the above-captioned proceeding and also to the parties to Rulemaking 06-02-012.

Certain information contained in the subject RPS Report, as specified herein, is eligible for confidentiality treatment under the provisions of D.06-06-066 and the “Matrix of Allowed Confidential Treatment Energy Service Provider (ESP) Data” adopted in the aforesaid decision, as modified in D.08-04-023. In contrast to other RPS obligated entities, which typically own or wholly control the output of a significant portion of the generation resources that are used to meet their customers’ electricity requirements and associated resource adequacy (capacity) requirements, at this time Noble Americas Energy Solutions LLC (hereinafter referred to as “Noble Solutions”) does not own or wholly control the output of any generation facility that serves the electricity and/or associated resource adequacy requirements of its customers in California. Therefore, Noble Solutions’ “net short”, which is confidential under the ESP Matrix as modified in

D.08-04-23, may be essentially the same as its total retail sales in any given year, or could readily be derived for the year by comparing its total retail sales with its supply data (MWh) and resource mix data (MWh). With this fact in mind, the undersigned declarant hereby verifies that the following RPS-related compliance data¹ is confidential and the Commission is obligated to protect it so as to avoid material harm to Noble Solutions and its customers:

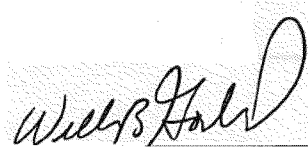
Description of Data	Spreadsheet Location	D.06-06-066 Requirements	Explanation
Total Retail Sales (MWh)	<i>Accounting,</i> Cells C10-F10;	Demonstrate that submitted material constitutes type of data listed in the Matrix.	Noble Solutions' net short is equivalent to its retail sales minus procured supplies.
		Identify the Matrix category (or categories) to which data correspond.	I.B
		Affirm compliance with limitations on confidentiality specified in the Matrix.	Consistent with the Matrix, Noble Solutions requests that its prior year's retail sales and the first three years of its forecasted retail sales be kept confidential so as not to reveal its net short.
		Affirm information is not already public.	This information is not already public.
		State whether data can be protected in a way that would allow partial disclosure.	Aggregated data of all ESPs could be made public without serious risk of harm.

¹ Not all cells referenced in the table are necessarily redacted, as they may not contain any data.

Description of Data	Spreadsheet Location	D.06-06-066 Requirements	Explanation
Annual Procurement Quantity Requirement (Forecast)	<i>Accounting,</i> Cell D16 and D18	Demonstrate that submitted material constitutes type of data listed in the Matrix.	Noble Solutions' Annual Procurement Quantity Requirement (APQR) is derived by a formula that is linked to retail sales; disclosure of APQR Requirement data would reveal Noble Solutions' retail sales.
		Identify the Matrix category (or categories) to which data correspond.	I.B
		Affirm compliance with limitations on confidentiality specified in the Matrix.	Consistent with the Matrix, Noble Solutions requests that information that would reveal the first three years of its forecasted retail sales be kept confidential so as not to reveal its net short.
		Affirm information is not already public.	This information is not already public.
		State whether data can be protected in a way that would allow partial disclosure.	Aggregated data of all ESPs could be made public without serious risk of harm.

I declare under penalty of perjury that the aforesaid is true of my own knowledge, except as to matters that are stated on information or belief, which statements I believe to be true.

Executed on February 27, 2012 at San Diego, CA.

A handwritten signature in black ink, appearing to read "William B. Goddard", is written over a rectangular area of the document that has been shaded with a stippled pattern. The signature is fluid and cursive.

William B. Goddard
Vice President – Commodity Supply & Ops
Noble Americas Energy Solutions LLC
401 West A Street, Suite 500
San Diego, CA 92101

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a copy of the attached *Noble Americas Energy Solutions LLC March 2012 Procurement Progress Report and Confidentiality Declaration for March 2012 Semi-Annual Compliance Report Pursuant to the California Renewables Portfolio Standard of Noble Americas Energy Solutions LLC* on all parties of record in proceedings *R.11-05-005* by serving an electronic copy on their email address of record and by mailing a properly addressed copy by first-class mail with postage prepaid to each party for whom an email address is not available.

Executed on February 28, 2012, at Woodland Hills, California.



Michelle Dangott