

**DECLARATION OF JEDEDIAH J. GIBSON
IN SUPPORT OF CLAIMS OF CONFIDENTIALITY
OF PACIFICORP**

I, Jedediah J. Gibson, declare as follows:

1. I am an attorney representing PacifiCorp in this matter.
2. I have reviewed, or caused to be reviewed, the March 1, 2012 RPS Procurement Progress Report of PacifiCorp.
3. The statements in this declaration are based on my knowledge, information, or belief.
4. An officer of PacifiCorp is not located within the County of Sacramento and was not available to execute this declaration at the time the materials were prepared.
5. I have been authorized to make this declaration on behalf of PacifiCorp.
6. Those portions of PacifiCorp’s RPS Verification Compliance Report identified in Table 1 below are eligible for confidentiality protection pursuant to Decision (“D.”) 06-06-066 and D.08-04-023 and the Matrix of Allowed Confidential Treatment for Investor Owned Utility (IOU) Data (“IOU Matrix”) attached as Appendix C to the latter decision.
7. The data for which PacifiCorp requests confidentiality and thereby protection from public disclosure are of the types and correspond to the category (or categories) in the IOU Matrix specified below:

TABLE 1: IDENTIFICATION OF CONFIDENTIAL INFORMATION

<i>RPS Compliance Report Worksheet Location</i>	<i>Type of Data</i>	<i>Matrix Category</i>
Worksheet “Accounting” MWh detail for RPS Procurement and Targets: Cells D10:G10 (for 2012-2015: Forecast bundled retail sales in MWhs)	Retail sales (MWhs) for current year and 3 years of retail sales forecasts.	V – Load Forecast Information and Data – Electric. C) LSE Total Energy Forecast – Bundled Customer (MWh): Front three years of forecast data confidential. VI – Net Open Position Information – Electric. B) Utility Bundled Net Open (Long or Short) Position for Energy (MWh): Front three years of forecast data confidential.

TABLE 1: IDENTIFICATION OF CONFIDENTIAL INFORMATION

<i>RPS Compliance Report Worksheet Location</i>	<i>Type of Data</i>	<i>Matrix Category</i>
<p>Worksheet "Accounting" MWh detail for RPS Cumulative Procurement Summary: Cells D16, D18 (Procurement Quantity Requirement (Forecast) for Compliance Period 1 [2011-2013] and Compliance Period 2 [2014- 2016])</p>	<p>Procurement Quantity Requirement (Forecast) in MWhs for Compliance Period 1 [2011-2013] and Compliance Period 2 [2014-2016], based on retail sales (MWhs) for current year and 3 years of retail sales forecasts</p>	<p>V – Load Forecast Information and Data – Electric. C) LSE Total Energy Forecast – Bundled Customer (MWh): Front three years of forecast data confidential.</p> <p>VI – Net Open Position Information – Electric. B) Utility Bundled Net Open (Long or Short) Position for Energy (MWh): Front three years of forecast data confidential.</p>

TABLE 1: IDENTIFICATION OF CONFIDENTIAL INFORMATION

<i>RPS Compliance Report Worksheet Location</i>	<i>Type of Data</i>	<i>Matrix Category</i>
<p>Worksheet "Procurement Detail":</p> <p>MWh detail of 2005 Contracts: MWh detail of RPS-Eligible Procurement by Resource Type: Cells D68:L68, D71:L72;</p> <p>MWh detail of 2006 Contracts: MWh detail of RPS-Eligible Procurement by Resource Type: Cells D75:L77;</p> <p>MWh detail of 2007 Contracts: MWh detail of RPS-Eligible Procurement by Resource Type: Cells D83:L86;</p> <p>MWh detail of 2008 Contracts: MWh detail of RPS-Eligible Procurement by Resource Type: Cells D90:L109;</p> <p>MWh detail of 2009 Contracts: MWh detail of RPS-Eligible Procurement by Resource Type: Cells D115:L118;</p> <p>MWh detail of 2010 Contracts: MWh detail of RPS-Eligible Procurement by Resource Type: Cells D125:L127; D130:L131;</p> <p>MWh detail of Expired Contracts/ Contracts Expiring Before 2020: MWh detail of RPS-Eligible Procurement by Resource Type: Cells C163:L174, C177:L178</p>	<p>IOU generation and QF generation data that warrants protection to avoid identification of PacifiCorp's existing portfolio assets and modifications in demand and pricing for QF generation.</p>	<p>IV – Resource Planning Information – Electric</p> <p>A) Forecast of IOU Generation Resources (MW and MWh): Confidential for three years.</p> <p>B) Forecast of Qualifying Facility Generation: Confidential for three years</p>

8. The data for which PacifiCorp is claiming confidentiality is not already public.
9. The confidentiality of the data for which PacifiCorp is claiming confidentiality would not

{00055523;5}

be compromised if it were first aggregated with the equivalent data of all other load serving entities before being made public. Other than by the aforesaid process, the data cannot be aggregated, redacted, summarized, masked or otherwise protected in a way that allows partial disclosure.

10. PacifiCorp's customers may be harmed by the loss of confidentiality insofar as members of the public not eligible to review the data as non-market participating parties—primarily other market participants—can use this data to derive detailed estimates of PacifiCorp-specific procurement requirements and PacifiCorp's current compliance position.

Declared under penalty of perjury that the aforesaid is true of my own knowledge, except as to matters that are stated on information or belief and as to those matters I believe them to be true.



Dated: March 1, 2012

Jedediah J. Gibson
Ellison, Schneider & Harris, LLP
2600 Capitol Avenue, Suite 400
Sacramento, California 95816
T: (916) 447-2166
E: jjg@eslawfirm.com