

PACIFIC GAS AND ELECTRIC COMPANY (S 39 E)
 PG&E'S RESPONSE TO ENERGY DIVISION DATA REQUEST REGARDING 2008 RFO
 June 7, 2012

IDENTIFICATION OF CONFIDENTIAL INFORMATION

Redaction Reference	1) Constitutes data listed in Appendix 1 to D.06-06-066 (Y/N)	2) Data correspond to category in Appendix 1:	3) Complies with limitations of D.06-06-066 (Y/N)	4) Data not already public (Y/N)	5) Lead to partial disclosure (Y/N)	PG&E's Justification for Confidential Treatment	Length of Time
Document: MegaWattOne, LLC Bid							
Entirety of Bid Document	Y	VIII.B	Y	Y	Y	Bid information from MegaWatt One used in the evaluation process for PG&E's 2008 Long-Term Request for Offers.	Three Years from the date winning bidders are selected

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

**DECLARATION OF ANGELA TORR IN SUPPORT OF
THE CONFIDENTIAL TREATMENT OF PG&E'S CONFIDENTIAL RESPONSE TO
ENERGY DIVISION DATA REQUEST REGARDING BID INFORMATION FROM
THE 2008 REQUEST FOR OFFERS**

I, David Lewis, declare:

1. I am a Director in the Structured Transactions section of the Energy Procurement Department at Pacific Gas and Electric Company ("PG&E"). I am responsible for managing the preparation of PG&E's response to Energy Division's request for MegaWatt One, LLC's bid information from the 2008 Request for Offers solicitation. This declaration is based on my personal knowledge of PG&E's electric energy procurement practices and my understanding of the Commission's decisions protecting the confidentiality of market-sensitive information concerning energy procurement of an investor-owned utility.

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 information contained in PG&E's response to Energy Division's data request for MegaWatt One, LLC's bid information from the 2008 Request for Offers.

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 (the "IOU Matrix") of Decision 06-06-066; if applicable GO 66-C, Section 2.2b, which would place PG&E in an unfair business advantage; and Public Utilities Code Section 454.4(g), which would reveal market sensitive information. The 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 all of the explanatory text that is pertinent to my testimony in 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 June 7, 2012 in San Francisco, California.



David Lewis

