## DECLARATION OF BROOKE A. REILLY SEEKING CONFIDENTIAL TREATMENT FOR DATA AND INFORMATION CONTAINED IN THE JULY 31, 2012 DATA RESPONSE "RenewablePortfolioStdsOIRIV\_DR\_ED\_001-Q01" (PACIFIC GAS AND ELECTRIC COMPANY - U 39 E)

## I, Brooke A. Reilly, declare:

- 1. I am presently employed by Pacific Gas and Electric Company ("PG&E") and have been an employee at PG&E since 2009. My current title is Manager, Renewable Energy Policy and Planning within PG&E's Energy Procurement organization. In this position my responsibilities include managing PG&E's renewables policy and compliance strategies. I also have experience as a case manager in PG&E's Regulatory Relations department. Through these experiences I have become familiar with the types of information that the Commission has indicated is confidential and gained knowledge about the types of information that electricity 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 certain information and data contained in PG&E's data response "RenewablePortfolioStdsOIR-IV\_DR\_ED\_001-Q01," submitted on July 31, 2012 in response to a July 16, 2012 Energy Division data request in California Public Utilities Commission Rulemaking 11-05-005.
- 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 (the "IOU Matrix"). 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: (I) 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 in the attached matrix.

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 on August 1, 2012, at San Francisco, California.

BROOKE A. REILLY

Brooke a Reilly