

**DECLARATION OF INGER GOODMAN IN SUPPORT OF CLAIMS OF  
CONFIDENTIALITY OF COMMERCE ENERGY, INC.**

I, Inger Goodman, declare as follows:

1. I am employed by Commerce Energy, Inc. (“Commerce”) in the position of Regulatory Affairs Specialist.
2. I have reviewed, or caused to be reviewed, the December 27, 2012 RPS Compliance Report of Commerce.
3. The statements in this declaration are based on my knowledge, information, or belief.
4. I am authorized to make this declaration on behalf of Commerce.
5. Those portions of Commerce’s RPS 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 Energy Service Provider Data (“ESP Matrix”) attached as Appendix B to the latter decision.
6. The data for which Commerce requests confidentiality and thereby protection from public disclosure are of the types and correspond to the category (or categories) in the ESP Matrix specified below:

**TABLE 1: IDENTIFICATION OF CONFIDENTIAL INFORMATION**

<b><i>RPS Compliance Report Worksheet Location</i></b>	<b><i>Type of Data</i></b>	<b><i>Matrix Category</i></b>
Worksheet “2011 Annual Summary”, RPS Summary Report Table, Cells D9:D10, E11	Total Retail Sales MWh 2011; Annual RPS Target; Total RPS Eligible RECs Procured percentage	I – Renewables Portfolio Standard (RPS) Information. A) RPS compliance filings required by CPUC, by ESP: data redacted because disclosure of first three years of forecast retail sales and resource mix data (MWh) and of historical retail sales and supply data (MWh) for prior year would reveal entire net short of ESP. B) Annual RPS compliance filings, by ESP: data redacted because disclosure of first three years of forecast retail sales and resource mix data (MWh) and historical retail sales and supply data would reveal the entire net short of ESP.
Worksheet “2011-13 Compliance Period”, RPS Summary Report Table, Cells D9:G10, H11	Total Retail Sales MWh 2011-2013 and CP Total; Annual RPS Targets and Compliance Period	I – Renewables Portfolio Standard (RPS) Information. A) RPS compliance filings required by CPUC, by ESP: data redacted because

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	Procurement Requirement percentage; Total RPS Eligible RECs Procured percentage	disclosure of first three years of forecast retail sales and resource mix data (MWh) and of historical retail sales and supply data (MWh) for prior year would reveal entire net short of ESP. B) Annual RPS compliance filings, by ESP: data redacted because disclosure of first three years of forecast retail sales and resource mix data (MWh) and historical retail sales and supply data would reveal the entire net short of ESP.
Worksheet "Compliance Summary and Charts", Cells C10:G10, C12:G12, C13:H13	Retail Sales (MWh) 2011-2015, Annual RPS Target MWh 2011-2015, Procurement Quantity Requirements 2011-2013 and 2014-2016	I – Renewables Portfolio Standard (RPS) Information. A) RPS compliance filings required by CPUC, by ESP: data redacted because disclosure of first three years of forecast retail sales and resource mix data (MWh) and of historical retail sales and supply data (MWh) for prior year would reveal entire net short of ESP. B) Annual RPS compliance filings, by ESP: data redacted because disclosure of first three years of forecast retail sales and resource mix data (MWh) and historical retail sales and supply data would reveal the entire net short of ESP.

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<b><i>RPS Compliance Report Worksheet Location</i></b>	<b><i>Type of Data</i></b>	<b><i>Matrix Category</i></b>
Worksheet “Annual RPS Compliance Report: Compliance Status”, Annual RPS Procurement and Percentages (MWh) Table: Cells C18:G18, C21:G21	Annual Retail Sales MWh 2011-2015; Annual RPS Procurement Percentage 2011-2015	I – Renewables Portfolio Standard (RPS) Information. A) RPS compliance filings required by CPUC, by ESP: data redacted because disclosure of first three years of forecast retail sales and resource mix data (MWh) and of historical retail sales and supply data (MWh) for prior year would reveal entire net short of ESP. B) Annual RPS compliance filings, by ESP: data redacted because disclosure of first three years of forecast retail sales and resource mix data (MWh) and historical retail sales and supply data would reveal the entire net short of ESP.
Worksheet “Annual RPS Compliance Report: Compliance Status”, Procurement Quantity Requirement (MWh) Table: Cells C26:H26	Procurement Quantity Requirements (PQR) MWh 2011-2013 and 2014-2016	I – Renewables Portfolio Standard (RPS) Information. A) RPS compliance filings required by CPUC, by ESP: data redacted because disclosure of first three years of forecast retail sales and resource mix data (MWh) and of historical retail sales and supply data (MWh) for prior year would reveal entire net short of ESP. B) Annual RPS compliance filings, by ESP: data redacted because disclosure of first three years of forecast retail sales and resource mix data (MWh) and historical retail sales and supply data would reveal the entire net short of ESP.
Worksheet “Annual RPS Compliance Report: Compliance Status”, RPS Compliance Status (MWh) Table: Cell C79:E79	Additional RECs Needed to meet RPS Procurement Quantity Requirement	I – Renewables Portfolio Standard (RPS) Information. A) RPS compliance filings required by CPUC, by ESP: data redacted because disclosure of first three years of forecast retail sales and resource mix data (MWh) and of historical retail sales and supply data (MWh) for prior year would reveal entire net short of ESP. B) Annual RPS compliance filings, by ESP: data redacted because disclosure of first three

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		years of forecast retail sales and resource mix data (MWh) and historical retail sales and supply data would reveal the entire net short of ESP.

7. The data for which Commerce is claiming confidentiality is not already public.
8. The confidentiality of the data for which Commerce is claiming confidentiality would not 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.
9. Commerce'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 such as other ESPs or wholesale suppliers or RPS supplies—can use this data to derive Commerce-specific RPS procurement requirements (net short) and Commerce's current compliance position, particularly in light of the relative scarcity of such resources eligible for the product content category one resources.

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: December 27, 2012

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