

**DECLARATION OF JEDEDIAH J. GIBSON  
IN SUPPORT OF CLAIMS OF CONFIDENTIALITY  
OF BEAR VALLEY ELECTRIC SERVICE**

I, Jedediah J. Gibson, declare as follows:

1. I am an attorney representing Bear Valley Electric Service (“Bear Valley”) in this matter.
2. I have reviewed, or caused to be reviewed, the December 28, 2012 RPS Compliance Report of Bear Valley.
3. The statements in this declaration are based on my knowledge, information, or belief.
4. An officer of Bear Valley 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 Bear Valley.
6. Those portions of Bear Valley’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 Investor Owned Utility (IOU) Data (“IOU Matrix”) attached as Appendix C to the latter decision.
7. The data for which Bear Valley 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 “2011-13 Compliance Period” RPS Summary Report Table: Cells E9:E10, G9:G10, H11.	Total Retail Sales (MWhs) for 2012 and CP Total; Annual RPS Targets and Compliance Period Procurement Requirement for 2012 and CP Total; Total RPS Eligible RECs Procured as a % of Total Retail Sales.	V – Load Forecast Information and Data – Electric. C) LSE Total Energy Forecast – Bundled Customer (MWh): Front three years of forecast data confidential.
Worksheet “Compliance Summary and Charts” Cells D10, D12, C13:E13.	Retail Sales (MWhs) for 2012; Annual RPS Target for 2012; Procurement Quantity Requirement for Compliance Period 1.	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

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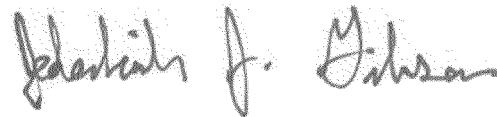
<b><i>RPS Compliance Report Worksheet Location</i></b>	<b><i>Type of Data</i></b>	<b><i>Matrix Category</i></b>
		(Long or Short) Position for Energy (MWh): Front three years of forecast data confidential.
Worksheet "Annual RPS Compliance Report: Compliance Status" Annual RPS Procurement and Percentages (MWh): Cell D18.	Annual Retail Sales for 2012.	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.
Worksheet "Annual RPS Compliance Report: Compliance Status" Procurement Quantity Requirement (MWh): Cells C26:E26.	Procurement Quantity Requirement (PQR) for Compliance Period 1.	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.
Worksheet "Annual RPS Compliance Report: Compliance Status" RPS Compliance Status (MWh): Cells C71:E71.	Additional RECs Needed to meet RPS Procurement Quantity Requirement.	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.

**TABLE 1: IDENTIFICATION OF CONFIDENTIAL INFORMATION**

<i>RPS Compliance Report Worksheet Location</i>	<i>Type of Data</i>	<i>Matrix Category</i>
		B) Utility Bundled Net Open (Long or Short) Position for Energy (MWh): Front three years of forecast data confidential.

8. The data for which Bear Valley is claiming confidentiality is not already public.
9. The confidentiality of the data for which Bear Valley 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.
10. Bear Valley'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 Bear Valley-specific procurement requirements and Bear Valley'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: December 28, 2012

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