

PACIFIC GAS AND ELECTRIC COMPANY

December 2012 RPS Procurement Compliance Report

IDENTIFICATION OF CONFIDENTIAL INFORMATION PER DECISION 06-06-066, D.08-04-023 and General Order 66-C

Date: December 28, 2012

Redaction Reference	(1) The material submitted constitutes a particular type of data listed in the Matrix, appended as Appendix 1 to D.06-06-066 and Appendix C to D.08-04-023 (Y/N)	(2) To which category or categories in the Matrix do the data correspond? ?	(3) That it is complying with the limitations on confidentiality specified in the Matrix for that type of data (Y/N)	(4) That the information is not already public (Y/N)	(5) The data cannot be aggregated, redacted, summarized, masked or otherwise protected in a way that allows partial disclosure (Y/N)	PG&E's Justification for Confidential Treatment	Length of Time
<p><u>Appendix A - PG&E's December 2012 RPS Procurement Compliance Report</u></p> <p><u>Compliance Period Summary Tab:</u> Rows 9 & 10: Columns E, F, G Rows 11 & 12: Column H</p> <p><u>33% RPS Progress Summary Tab:</u> Rows 10 & 12: Years 2012-2015 Row 13: Years 2011-2016</p>	Yes	Item V-C: LSE Total Energy Forecast Bundled Customer (MWh)	Yes	Yes	Yes	Front three years of PG&E's internal and proprietary forecast of its bundled customer total energy requirements. Linked cells whose values could reveal this confidential data are also redacted.	Front three years.

Accounting Tab:
Rows 18 & 21: Years
2012-2015
Row 26: Years 2011-
2016
Row 79: Years 2011-
2013

<p><u>Appendix A - PG&E's December 2012 RPS Procurement Compliance Report</u></p>	No	<p>The Matrix does not address this category of information. Protected pursuant to General Order (GO) 66-C.</p>	N/A	Yes	Yes	<p>This data constitutes commercially sensitive, proprietary information that should be withheld from public disclosure under GO 66-C paragraph 2.8. Developers have stated that they consider this information to be confidential. It is in the public interest to protect the confidentiality of this information since disclosure would discourage developers from frankly communicating project status to PG&E, and thus undermine PG&E's ability to adequately monitor RPS development progress.</p>	<p>Confidential until data no longer meets the standards in G.O. 66-C.</p>
<p><u>Procurement Detail Tab:</u> Facility Status Column P (spreadsheet rows: 69, 77-78, 87, 91, 92, 94-96, 105-112, 117-122, 126, 128-133, 152, 155, 162-163, 165-176, 183-185, 187, 188, 192-204, 206-278, 281-301)</p>						<p>PG&E's counterparties oppose making this information public. If this information is not protected, developers may be unwilling to respond to PG&E's solicitation for bids and impair PG&E's ability to increase its procurement of renewable energy resources. In addition, release of this information may result in developers increasing project costs in the future to compensate them for competitive harm resulting from disclosure.</p>	

Appendix B RPS Compliance Permitting	No	No Matrix Item. Corresponds to General Order 66-C.	N/A	Yes	Yes	<p>This data constitutes commercially sensitive, proprietary, or personally-identifiable information that should be withheld from public disclosure under General Order 66-C paragraph 2.8. It includes, for example, whether a particular project is on schedule in its permitting process and specific site information. There are several reasons why it is in the public interest to protect the confidentiality of this information.</p>	Remain confidential until no longer protected pursuant to the provisions of G.O. 66-C.
Column C							
Column G (except rows 2-10, 16, 18-23, 25, 26, 28-36, 41-43, 51-55, 57, 58)							
Column H (except rows 2-10, 16, 18-23, 25, 26, 28-36, 41-43, 51-55, 57, 58)						<p>First, disclosure of this information could discourage developers from frankly communicating project status to PG&E, and thus undermine PG&E's ability to adequately monitor RPS development progress. Second, PG&E's counterparties oppose making this information public. If this information is not protected, developers may not respond to PG&E's solicitation for bids, impairing PG&E's ability to increase its procurement of renewable energy resources. In addition, release of this information may result in developers increasing project costs in the future to compensate them for competitive harm resulting from disclosure. It is also in the public interest to protect the confidentiality of this information to ensure a vibrant, viable competitive market for renewable energy supplies. Disclosure of this information would provide valuable market sensitive information to competitors and could damage negotiations by providing information about other potential renewables projects.</p>	

Appendix C1 - Quantitative Information: Net Short Calculations Using PG&E Bundled Retail Sales Forecast In Near Term (2012 - 2016) and LTPP Methodology (2017 - 2030)	Yes	Item V(C): LSE Total Energy Forecast Bundled Customer (MWh) VI(B): Utility Bundled Net Open (Long or Short) Position for Energy	Yes	Yes	Yes	This information shows PG&E's net position for RPS-eligible energy in the periods within the front three years of the forecast. The redacted information in Rows 4, 5, 8, 15, 16, and 19 could also be manipulated in conjunction with publicly-available information to determine PG&E's internal and proprietary forecast of its bundled customer total energy requirements.	Front three years.
Lines 4-8, years 2012-2015;							
Lines 9, 2012-2014;							
Lines 15-19, years 2011-2016;							
Lines 20, years 2011-2013							

<p>Appendix C2 - Quantitative Information: Net Short Calculations Using PG&E Bundled Retail Sales Forecast</p> <p>Lines 4-8, years 2012-2015;</p> <p>Lines 9, 2012-2014;</p> <p>Lines 15-19, years 2011-2016;</p> <p>Lines 20, years 2011-2013</p>	Yes	<p>Item V(C): LSE Total Energy Forecast Bundled Customer (MWh)</p> <p>VI(B): Utility Bundled Net Open (Long or Short) Position for Energy</p>	Yes	Yes	Yes	<p>This information shows PG&E's net position for RPS-eligible energy in the periods within the front three years of the forecast.</p> <p>The redacted information in Rows 4, 5, 8, 15, 16, and 19 could also be manipulated in conjunction with publicly-available information to determine PG&E's internal and proprietary forecast of its bundled customer total energy requirements.</p>	Front three years.
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