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February 22, 2013

CPUC Energy Division  
ED Tariff Unit  
505 Van Ness Avenue, 4<sup>th</sup> Floor  
San Francisco, California 94102

Dear Energy Division Tariff Unit:

An original and 4 copies of substitute sheets for Advice 4132-E, "*Procurement Transaction Quarterly Compliance Filing (Q3 2012)*" are attached.

The substitute sheets amend Confidential Attachments as follows:

1. Confidential Attachment A – Third Quarter Transactions – Gas
2. Confidential Attachment B - Top Ten Counterparties
3. Confidential Attachment D – Gas Transaction Summary C

These revisions correct an inadvertent reporting error in the notional volume for three physical gas transactions.

The need for corrections came to light during an Audit of the Q3 2012 Quarterly Compliance Report (QCR) and the Auditors in the CPUC's Water and Audit Division recently requested that Pacific Gas and Electric Company (PG&E) submit amended attachments for the Q3 2013 QCR to correct the errors. PG&E is aware that per GO-96B, substitute sheets are to be submitted prior to the requested effective date of the Advice Letter and that in the case of Advice 4132-E, the requested effective date has passed. However, in light of the fact that the request for amended attachments was requested by Water and Audit Division staff at the CPUC, PG&E is submitting the amended attachments in compliance with staff's request. If there is a concern with this substitute sheet submittal, please advise on the procedural vehicle Energy Division would prefer PG&E utilize to submit the amended attachments.

In accordance with GO 96-B, Section 7.5.1, the substitute sheets are being served in the same manner as the original advice letter. A declaration supporting confidential treatment for Confidential Appendix A, B, and D was submitted with Advice 4132-E on October 20, 2012. The declaration submitted with Advice 4132-E is still applicable to the enclosed substitute sheets.

February 22, 2013

Please telephone me at (415) 972-5472 should you have any questions regarding the substitute sheets.

Sincerely,

/S/ Kimberly Chang

**Kimberly Chang**  
Regulatory Relations

Attachments

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

**DECLARATION OF MICHAEL KOWALEWSKI  
SEEKING CONFIDENTIAL TREATMENT OF FOR CERTAIN DATA AND  
INFORMATION CONTAINED IN PG&E'S ADVICE LETTER 4132-E SUBSTITUTE  
SHEETS REGARDING CONFIDENTIAL ATTACHMENTS A, B, AND D**

I, Michael Kowalewski, declare:

1. I am presently employed by Pacific Gas and Electric Company (PG&E) and have been an employee since 1992. My current title is Acting Director, Electric Gas Supply in the Energy Supply Management Department, which is part of the Energy Procurement Department. In this position, my responsibilities include physical and financial gas supply management and trading in support of PG&E's allocated DWR contracts, PG&E's company-owned generating facilities, and PG&E's tolling agreements. In carrying out these responsibilities, I have acquired knowledge of gas supply and gas hedging for electric generation, the markets for physical and financial products for gas supply and hedging, and the various types of transactions involved.
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 PG&E's October 30, 2012 Advice Letter 4132-E, Confidential Attachments A, B, and D. By this Application, PG&E is seeking the Commission's approval of Quarter Three, 2012 Quarterly Procurement Transaction Compliance Report, submitted by PG&E.
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 I of D.06-06-



**PACIFIC GAS AND ELECTRIC COMPANY'S (U 39 E)  
ADVICE LETTER 4132-E  
QUARTERLY PROCUREMENT TRANSACTION COMPLIANCE REPORT OF QUARTER THREE 2012  
SUBSTITUTE SHEETS  
February 22, 2013**

**IDENTIFICATION OF CONFIDENTIAL INFORMATION**

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 (Y/N)	2) Which category or categories in the Matrix the data correspond to:	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
<b>Document: Confidential Attachment 2</b>							
Attachment A – Physical Natural Gas Spot Transactions	Y	Item I)B) 2) Utility recorded gas procurement and cost information  XI) Monthly Procurement Costs (Energy Resource Recovery Account [ERRA] Filings)	Y	N	Y	Actual quantity and cost of procured gas are protected.	1 and 3 Years
Attachment A – Physical Natural Gas Term Transactions and/or Financial Natural Gas Transactions	Y	Item I) B) 2) Utility recorded gas procurement and cost information  Item I) A) 4) Long-term fuel (gas) buying and hedging plans  XI) Monthly Procurement Costs (Energy Resource Recovery Account [ERRA] Filings)	Y	N	Y	Actual quantity and cost of procured gas are protected.  Each transaction is a factor in PG&E's long term buying and hedging strategies. With the entire set of transactions PG&E's counterparties could reconstruct PG&E's gas buying and hedging plans.  This information reveals procurement cost categorized by transaction type, which is provided to Energy Division per Assembly Bill 57	1 and 3 Years; Confidential for three years past expiration of the last trade executed under the hedging plan. (Resolution E-4276, Finding 8) This date is

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							January 1, 2019.
Attachment B Counterparty information, including counterparty concentration – Table “List of Top Ten Counterparties” by transaction volume and dollar value	Y	CPUC General Order 66-C	Y	N	Y	Counterparty sales information constitutes confidential non-utility business information protected under GO 66-C.	Indefinite
Attachment D – Natural Gas Transactions	Y	Item I) B) 2) Utility recorded gas procurement and cost information  Item I) A) 4) Long-term fuel (gas) buying and hedging plans;  Item I) A) 4), Long-term fuel (gas) buying	Y	N	Y	PG&E's hedging strategies may be deduced through an analysis of PG&E's summarized transactions.	1 and 3 Years;  Confidential for three years past expiration of the last trade executed under the hedging plan.

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		and hedging plans  XI) Monthly Procurement Costs (Energy Resource Recovery Account [ERRA] Filings)					(Resolution E-4276, Finding 8) This date is January 1, 2019.