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February 27, 2013

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

**Re: Substitute Sheets for Advice 4193-E**

Dear Energy Division Tariff Unit:

An original and 4 copies of substitute sheets are attached for Advice 4193-E, "Power Purchase Agreements for the Procurement of Eligible Renewable Energy Resources between ABEC Bidart-Stockdale, LLC and ABEC Bidart-Old River, LLC and Pacific Gas and Electric Company."

In PG&E's Advice Letter 4193-E, filed on Thursday, February 14, 2013, PG&E inadvertently entered a typographical error in the declaration and matrix supporting confidential treatment. The title of the declaration is being corrected from Uday Mathur to Michael Avidan. Additionally, the header of the confidentiality matrix is being updated to reflect the Advice Letter number.

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. Please discard previously submitted declaration.

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

/S/ Kimberly Chang

**Kimberly Chang**  
Regulatory Relations

Attachment

**DECLARATION OF MICHAEL AVIDAN  
SEEKING CONFIDENTIAL TREATMENT  
FOR CERTAIN DATA AND INFORMATION  
CONTAINED IN ADVICE LETTER 4193-E  
(PACIFIC GAS AND ELECTRIC COMPANY - U 39 E)**

I, Michael Avidan, declare:

1. I am presently employed by Pacific Gas and Electric Company ("PG&E"), and have been an employee at PG&E since September 1, 2008. My current title is Senior Manager within PG&E's Energy Procurement organization. In this position, my responsibilities include negotiating PG&E's Renewables Portfolio Standard Program ("RPS") Power Purchase Agreements. In carrying out these responsibilities, I have acquired knowledge of PG&E's contracts with numerous counterparties and have also gained knowledge of the operations of electricity sellers in general. Through this experience, I have become familiar with the type of information that would affect the negotiating positions of electricity sellers with respect to price and other terms, as well as with the type of information that such 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 the "Administrative Law Judge's Ruling Clarifying Interim Procedures for Complying with Decision 06-06-066," I make this declaration seeking confidential treatment of Appendices A1, A2, B, C1, D1, D2, E1,E2, F1, F2, and G to Advice Letter 4193-E submitted on February 14, 2013. By this Advice Letter, PG&E is seeking this Commission's approval of two power purchase agreements that PG&E has executed with ABEC Stockdale, LLC and ABEC Old River, LLC.

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 and Appendix C of D.08-04-023 (“the IOU Matrix”), or constitutes information that should be protected under General Order 66-C. The matrix also specifies the category or categories in the IOU Matrix to which the data and information corresponds, if applicable, and why confidential protection is justified. Finally, the matrix specifies that: (1) PG&E is complying with the limitations specified in the IOU Matrix for that type of data or information, if applicable; (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 that is pertinent to this filing.

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. February 14, 2013 at San Francisco, California.



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Michael Avidan

**PACIFIC GAS AND ELECTRIC COMPANY'S (U 39 E)**

**Advice Letter 4193-E**

**February 14, 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: Advice Letter 4193-E</b>							
Appendices A1 – A2	Y	Item VII G) Renewable Resource Contracts under RPS program – Contracts without SEPs.  Item VII (un-numbered category following VII G)) Score sheets, analyses, evaluations of proposed RPS projects.  Item VIII A) Bid information and B) Specific quantitative analysis involved in scoring and evaluation of participating bids.  General Order 66-C.	Y	Y	Y	These Appendices contain bid information and evaluations from the 2011 Solicitation; discuss, analyze and evaluate the Projects and the terms of the Power Purchase Agreements (“PPAs”); contain information, analyses and evaluations of project viability; and contain confidential information of the counterparty (including financial information). Disclosure of this information would provide valuable market sensitive information to competitors. Release of this information would be damaging to negotiations.  In addition, if information about and evaluations of the projects’ viability is made public, it could harm the counterparties and adversely affect project viability. Finally, certain information has been obtained in confidence from the counterparty under an expectation of confidentiality. It is in the public interest to treat such information as confidential because if such information were made public, it would put the counterparty at a business disadvantage, could create a disincentive to do business with PG&E and other regulated utilities, and could have a damaging effect on current and future negotiations with other counterparties.	For information covered under Item VII G) remain confidential for three years after the commercial operation date, or one year after expiration (whichever is sooner).  For information covered under Item VII (un-numbered category following VII G), remain confidential for three years.  For information covered under Item VIII A), remain confidential until after final contracts submitted to CPUC for approval.  For information covered under Item VIII B), remain confidential for three years after winning bidders selected.  For information covered under General Order 66-C, remain confidential.

**PACIFIC GAS AND ELECTRIC COMPANY'S (U 39 E)**

**Advice Letter 4193-E**

**February 14, 2013**

**IDENTIFICATION OF CONFIDENTIAL INFORMATION**

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Appendix B	Y	Item VIII A) Bid information and B) Specific quantitative analysis involved in scoring and evaluation of participating bids.	Y	Y	Y	This Appendix contains bid information and bid evaluations from the 2011 Solicitation. This information would provide market sensitive information to competitors and is therefore considered confidential. Furthermore, offers received outside of the solicitations are still under negotiation, further substantiating why releasing this information would be damaging to the negotiation process.	For information covered under Item VIII A), remain confidential until after final contracts submitted to CPUC for approval  For information covered under Item VIII B), remain confidential for three years after winning bidders selected.

**PACIFIC GAS AND ELECTRIC COMPANY'S (U 39 E)**

**Advice Letter 4193-E**

**February 14, 2013**

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Appendix C1	Y	<p>Item VII G) Renewable Resource Contracts under RPS program - Contracts without SEPs.</p> <p>Item VII (un-numbered category following VII G) Score sheets, analyses, evaluations of proposed RPS projects.</p> <p>Item VIII A) Bid information and B) Specific quantitative analysis involved in scoring and evaluation of participating bids.</p> <p>General Order 66-C.</p>	Y	Y	Y	<p>This Appendix contains bid information and evaluations from the 2011 Solicitation; discusses, analyzes and evaluates the Projects and the terms of the PPAs; contains information, analyses, and evaluations of project viability; and it contains confidential information of the counterparty. Disclosure of this information would provide valuable market sensitive information to competitors. Release of this information would be damaging to negotiations with other counterparties and should remain confidential. In addition, if information about and evaluations of project viability is made public, it could harm the counterparty and adversely affect project viability.</p> <p>Finally, certain information has been obtained in confidence from the counterparty under an expectation of confidentiality. It is in the public interest to treat such information as confidential because if such information were made public, it would put the counterparty at a business disadvantage, could create a disincentive to do business with PG&amp;E and other regulated utilities, and could have a damaging effect on current and future negotiations with other counterparty.</p>	<p>For information covered under Item VII G) remain confidential for three years after the commercial operation date, or one year after expiration (whichever is sooner).</p> <p>For information covered under Item VII (un-numbered category following VII G), remain confidential for three years.</p> <p>For information covered under Item VIII A), remain confidential until after final contracts submitted to CPUC for approval.</p> <p>For information covered under Item VIII B), remain confidential for three years after winning bidders selected.</p> <p>For information covered under General Order 66-C, remain confidential.</p>

**PACIFIC GAS AND ELECTRIC COMPANY'S (U 39 E)**

**Advice Letter 4193-E**

**February 14, 2013**

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Appendices D1 – D2	Y	<p>Item VII G) Renewable Resource Contracts under RPS program - Contracts without SEPs.</p> <p>Item VII (un-numbered category following VII G) Score sheets, analyses, evaluations of proposed RPS projects.</p> <p>Item VIII A) Bid information and B) Specific quantitative analysis involved in scoring and evaluation of participating bids.</p> <p>General Order 66-C.</p>	Y	Y	Y	<p>These Appendices contain bid information and evaluations from the 2011 Solicitation; discuss, analyze and evaluate the Projects and the terms of the PPAs; and contains confidential information of the counterparty. Disclosure of this information would provide valuable market sensitive information to competitors. Release of this information would be damaging to negotiations with other counterparties and should remain confidential. Furthermore, the counterparty to the PPAs has an expectation that the terms of the PPAs will remain confidential.</p> <p>It is in the public interest to treat such information as confidential because if such information were made public, it would put the counterparty at a business disadvantage, could create a disincentive to do business with PG&amp;E and other regulated utilities, and could have a damaging effect on current and future negotiations with other counterparty.</p>	<p>For information covered under Item VII G) remain confidential for three years after the commercial operation date, or one year after expiration (whichever is sooner).</p> <p>For information covered under Item VII (un-numbered category following VII G), remain confidential for three years.</p> <p>For information covered under Item VIII A), remain confidential until after final contracts submitted to CPUC for approval.</p> <p>For information covered under Item VIII B), remain confidential for three years after winning bidders selected.</p> <p>For information covered under General Order 66-C, remain confidential.</p>

**PACIFIC GAS AND ELECTRIC COMPANY'S (U 39 E)**

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Appendices E1 – E2	Y	Item VII G) Renewable Resource Contracts under RPS program - Contracts without SEPs.	Y	Y	Y	These Appendices contain the PPAs for which PG&E seeks approval in the Advice Letter filing. Disclosure of certain terms of the PPAs would provide valuable market sensitive information to competitors. Release of this information would be damaging to negotiations with other counterparties and should remain confidential. Furthermore, the counterparty to the PPAs has an expectation that the terms of the PPAs will remain confidential.	For information covered under Item VII G), remain confidential for three years after the commercial operation date, or one year after expiration (whichever is sooner).
Appendices F1 – F2	Y	Item VII G) Renewable Resource Contracts under RPS program - Contracts without SEPs.	Y	Y	Y	These Appendices contain the PPAs for which PG&E seeks approval in the Advice Letter filing. Disclosure of certain terms of the PPAs would provide valuable market sensitive information to competitors. Release of this information would be damaging to negotiations with other counterparties and should remain confidential. Furthermore, the counterparty to the PPAs has an expectation that the terms of the PPAs will remain confidential.	For information covered under Item VII G), remain confidential for three years after the commercial operation date, or one year after expiration (whichever is sooner).
Appendix G	Y	Item VII (un-numbered category following VII G) Score sheets, analyses, evaluations of proposed RPS projects. Item VI B) Utility Bundled Net Open Position for Energy (MWh).	Y	Y	Y	This Appendix contains information that, if disclosed, would provide valuable market sensitive information to competitors and allow them to see PG&E's remaining RPS net open energy position. This information should remain confidential for three years.	Remain confidential for three years.