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Fax: 415-973-7226

September 11, 2013

Energy Division Tariff Unit California Public Utilities Commission 505 Van Ness Avenue San Francisco, California 94102

Dear Energy Division Tariff Unit:

An original and one copy of substitute sheets for Advice 4266-E, "*Procurement Transaction Quarterly Compliance Report (Q2 2013)*" are attached.

The substitute sheets amend Confidential Attachments as follows:

- 1. Confidential Attachment E PGE Convergence Bidding Report Q2 2013: "Tab A Current Quarter Q2 2013," and "Tab C Cumulative Data Q2 2013."
- 2. Confidential Attachment J PGE Convergence Bidding Report Q2 2013: "Tab A Current Quarter Q2 2013," and "Tab C Cumulative Data Q2 2013."

These revisions correct the CPUC convergence bidding strategy number, for convergence bidding activities in May and June 2013. The changes are gray shaded in blue font.

PG&E is aware that per General Order (G.O.) 96-B, substitute sheets are to be submitted prior to the requested effective date of the Advice Letter and that in the case of Advice 4266-E, the <u>requested</u> effective date has passed; however, the advice letter is still pending approval. If there is a concern with this substitute sheet submittal, please advise PG&E on the procedural vehicle Energy Division would prefer be utilized to submit the amended attachments.

In accordance with G.O. 96-B, Section 7.5.1, the substitute sheets are being served in the same manner as the original advice letter. A copy of this letter excluding the confidential attachments is being sent electronically and via U.S. mail to the parties listed below.

Please telephone me at (415) 973-8580 should you have any questions regarding the substitute sheets.

Sincerely, /s/ **Igor Grinberg** Regulatory Relations

cc: Service Lists R.12-03-014, R.01-10-024, R.11-10-023 PG&E's Procurement Review Group PG&E's G.O. 96-B List

**Confidential Attachments** 

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

## DECLARATION OF MARIANNE AIKAWA SEEKING CONFIDENTIAL TREATMENT OF FOR CERTAIN DATA AND INFORMATION CONTAINED IN PG&E'S ADVICE LETTER 4266-E SUBSTITUTE SHEETS REGARDING CONFIDENTIAL ATTACHMENTS E AND J

I, Marianne Aikawa, declare:

1. I am presently employed by Pacific Gas and Electric Company ("PG&E"), and have been an employee at PG&E since 1989. My current title is Senior Manager within PG&E's Energy Procurement organization. In this position my responsibilities include reviewing regulatory reports. In carrying out these responsibilities, I have acquired knowledge of PG&E's regulatory reporting and have also gained knowledge of electric energy procurement data, processes, and practices. Through this experience, I have become familiar with the type of information that would affect the regulatory filing, as well as with the type of information that would be considered confidential and proprietary.

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 the substitute sheets for PG&E's July 30, 2013 Advice Letter 4266-E, Confidential Attachments E and J. By this Application, PG&E is seeking the Commission's approval of Quarter Two, 2013 Procurement Transaction Quarterly 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-

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066 and Appendix D.08-04-023 (the "IOU Matrix"), and/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, 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; (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 submittal.

I declare under penalty of perjury, under the laws of the State of California, that the foregoing is true and correct.

Executed on September 11, 2013, at San Francisco, California.

/s/

Marianne Aikawa Senior Manager Energy Compliance and Report Energy Procurement PACIFIC GAS AND ELECTRIC COMPANY

PACIFIC GAS AND ELECTRIC COMPANY'S (U 39 E) PROPOSAL REGARDING ADVICE LETTER 4266-E SUBSTITUTE SHEETS PROCUREMENT TRANSACTION QUARTERLY COMPLIANCE REPORT OF QUARTER TWO 2013 September 11, 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 corresponds 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
Document: Substitute Sheets							
Attachment E – Other Transactions	Y	VII) B) Bilateral Contract Terms and Conditions – contracts and power purchase agreements between utilities and non- affiliated third parties,	Y	N	Y	This information includes confidential contract information for contracts between PG&E and non-affiliated third parties.	3 Years
Attachment J – System Conditions	Y	Item VI) E) and F) Utility Planning Area Matrix Net Open (Electric) Item VI) Utility Bundled Net Open Position (Electric)	Y	N	Y	Residual net short/long is key input to PG&E's confidential forecast of net open position The residual net short/long is information is provided to Energy Division on a confidential basis per AB 57 and must be protected here to preserve confidentiality of the AB 57 report.	3 Years

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