

June 25, 2014

Energy Division Tariff Unit  
California Public Utilities Commission  
Energy Division  
San Francisco, California 94102

Dear Energy Division Tariff Unit:

An original and 1 copy of substitute sheets for Advice 4309-E, "*Procurement Transaction Quarterly Compliance Report (Q3 2013)*" ("QCR") are attached.

*Confidential Attachment A*

While preparing a data response conducted during the CPUC staff's audit of PG&E's Q3 2013 QCR, PG&E found that cell E6 in 5 of the tabs of Attachment A had incorrect values. Specifically, when setting the print format for these 5 tabs, PG&E inadvertently overwrote the number in cell E6 in the 5 tabs. The 5 tabs affected are as follows:

1. Att A-Phys Spot Next Qtr
2. Att A-Phys Term in Qtr
3. Att A-Phys Term InQtr + NxtQtrs
4. Att A-Tport, Stor, Park & Lend
5. Att A-Gas -Fin-Offsetting

PG&E is submitting the revised Attachment A (filename: Q3 2013 - Confid Attch A - GasPhyandFin Revised.xlsx) with this letter.

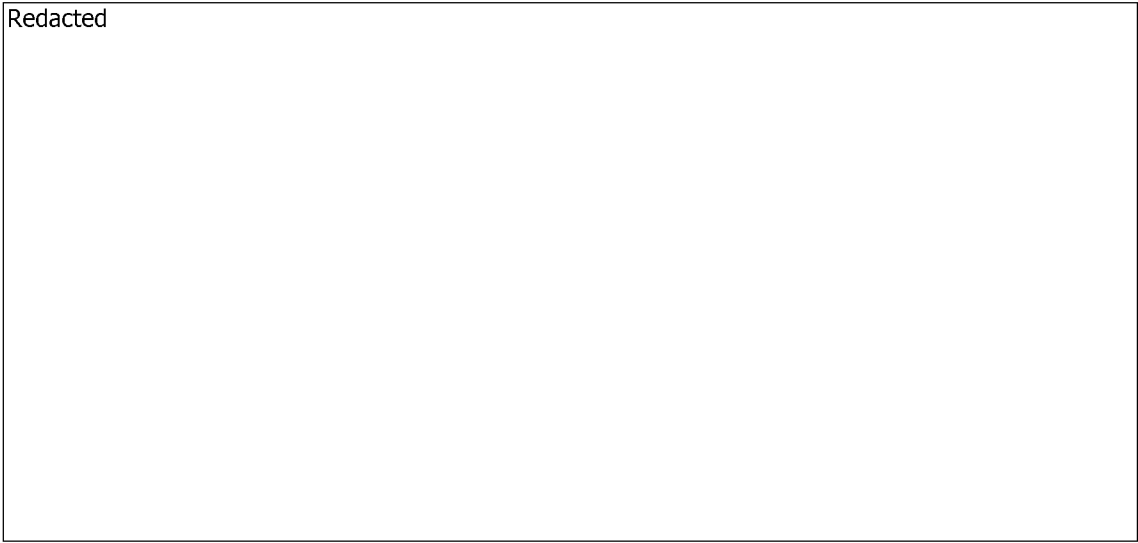
PG&E is aware that per GO 96-B, substitute sheets are to be submitted prior to the requested effective date of the Advice Letter and that in the case of Advice 4309-E, the requested effective date has passed however, the advice letters are still pending approval. If there is a concern with this substitute sheet submittal, please advise PG&E on the procedural vehicle Energy Division would prefer be utilized to submit the amended attachments.

In accordance with GO 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) 973-5265 should you have any questions regarding the substitute sheets.

Sincerely,

Redacted



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

**DECLARATION OF PETE KOSZALKA  
SEEKING CONFIDENTIAL TREATMENT OF ATTACHMENT A INCLUDED IN  
PG&E'S SUBSTITUTE SHEETS FOR ADVICE 4309-E  
FOR THE Q3 2013 QUARTERLY COMPLIANCE REPORT (QCR)**

I, Pete Koszalka, declare:

1. I am presently employed by Pacific Gas and Electric Company (PG&E) and have been an employee since 2003. My current title is Director, Electric Gas Supply in the Energy Supply Management Department, which is part of the Energy Procurement Department. I am responsible for physical and financial trading of gas in support of PG&E's allocated Department of Water Resources contracts, PG&E's Utility Retained Generation plants, 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 the substitute sheets for Attachment A included in Advice 4309-E, "*Procurement Transaction Quarterly Compliance Report (Q3 2013)*."
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.06-06-066 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/or cannot easily be redacted; 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 June 23, 2014 at San Francisco, California.

\_\_\_\_\_/s/\_\_\_\_\_  
Pete Koszalka  
Director, Electric Gas Supply  
Energy Supply Management  
PACIFIC GAS AND ELECTRIC COMPANY

**PACIFIC GAS AND ELECTRIC COMPANY'S (U 39 E)  
 PROPOSAL REGARDING ATTACHMENT A  
 INCLUDED IN PG&E'S SUBSTITUTE SHEETS FOR ADVICE 4309-E  
 FOR THE Q3 2013 QUARTERLY COMPLIANCE REPORT (QCR)  
 June 23, 2014**

**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
Attachment A – Physical Natural Gas Spot Transactions	Y	Item I)B) 2) Utility recorded gas procurement and cost information	Y	N	Y	Actual quantity and cost of procured gas are protected.	1 Year
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	Physical Gas: 1 Year  Financial Hedges: 3 Years; Confidential for three years past expiration of the last trade executed under the hedging plan. (Resolution E-

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						Bill 57	4276, Finding 8) This date is January 1, 2019.