



**Pacific Gas and
Electric Company®**

June 20, 2014

Mr. Edward Randolph
Director - Energy Division
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102

Brian K. Cherry
Vice President
Regulatory Relations

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**CONFIDENTIAL – SUBMITTED UNDER THE PROVISIONS OF GENERAL ORDER
66-C AND SECTION 583 OF THE PUBLIC UTILITIES CODE**

Re: Request for Pre-Approval of Interstate Pipeline Capacity Contract


Dear Mr. Randolph:

Redacted

Mr. Edward Randolph
June 20, 2014
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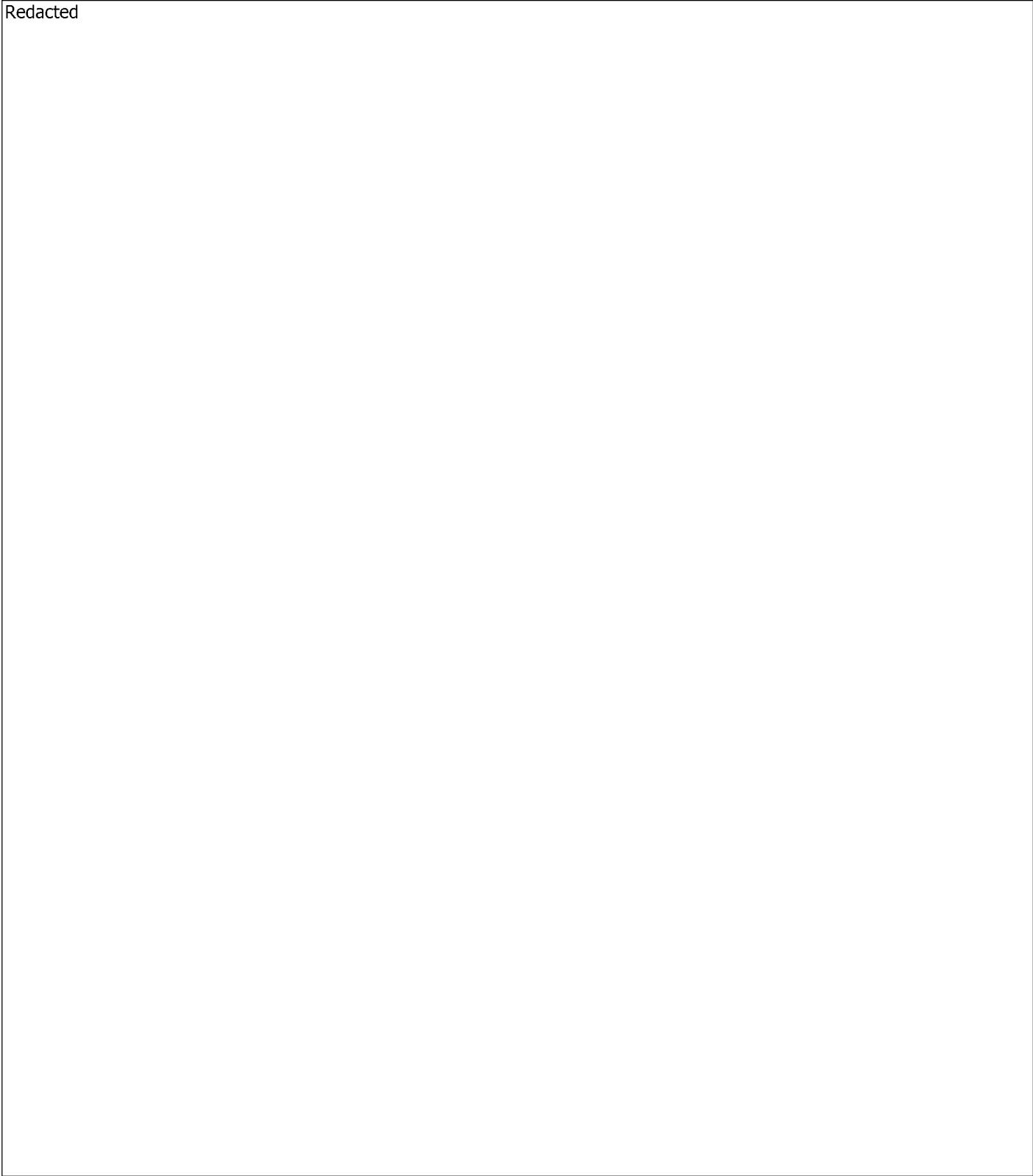
Background

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Mr. Edward Randolph
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Sincerely,

Brian Cherry / dh

Brian K. Cherry
Vice President
Regulatory Relations

cc: Richard Myers, Energy Division
Franz Cheng, Energy Division
Kristofer Holz, Energy Division
Jonathan Bromson, CPUC Legal
Marcel Hawiger, The Utility Reform Network
Mark Pocta, Office of Ratepayer Advocates
Nathaniel Skinner, Office of Ratepayer Advocates
Pearlie Sabino, Office of Ratepayer Advocates
David Clare, PG&E

Redacted

Erik Jacobson, PG&E

Attachments – Declaration of Redacted in Support of the Confidential Treatment and Matrix

⁵ Average temperature year, base case forecast, PG&E Gas Transmission and Storage forecast run, November 7, 2013.

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

**DECLARATION OF [Redacted] IN SUPPORT OF
THE CONFIDENTIAL TREATMENT OF
LETTER REQUEST FOR PRE-APPROVAL OF INTERSTATE PIPELINE CAPACITY
CONTRACT**

I, [Redacted] declare:

1. I am a Manager in the Core Gas Supply organization at Pacific Gas and Electric Company (PG&E). I am responsible for regulatory matters and contract management pertaining to PG&E's core gas portfolio. This declaration is based on my personal knowledge of PG&E's core gas portfolio and my understanding of the Commission's decisions protecting the confidentiality of market-sensitive information concerning fuels management of an investor-owned utility.

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 for certain information contained in PG&E's letter to the Director of Energy Division "Request for Pre-Approval of Interstate Pipeline Capacity Contract."

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 (the "IOU Matrix") of Decision 06-06-066 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 that is pertinent in the attached matrix.

I declare under penalty of perjury, under the laws of the State of California, that the foregoing is true and correct. Executed on June 20, 2014 at San Francisco, California.

Redacted

Manager
Core Gas Supply
Pacific Gas and Electric Company

Redacted

PACIFIC GAS AND ELECTRIC COMPANY'S (U 39 G)
LETTER REQUEST FOR PRE-APPROVAL OF INTERSTATE
PIPELINE CAPACITY CONTRACT
June 20, 2014

IDENTIFICATION OF CONFIDENTIAL INFORMATION

Redaction Reference	1) Constitutes data listed in Appendix 1 to D.06-06-066 (Y/N)	2) Data correspond to category in Appendix 1:	3) Complies with limitations of D.06-06-066 (Y/N)	4) Data not already public (Y/N)	5) Lead to partial disclosure (Y/N)	PG&E's Justification for Confidential Treatment	Length of Time
Discussion of Recommended Contract; Table II	Y	I.A.4 – Long-term fuel (gas) buying and hedging plans General Order 66-C	Y	Y	Y	PG&E's letter request includes information about PG&E's gas contracts, which should be confidential by analogy to the protections for gas buying plans in Item I.A.4 of the D.06-06-066 Matrix. Disclosure of this information would compromise PG&E's negotiating leverage. This material is also protected as confidential material under General Order 66-C.	3 years