

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

Order Instituting Rulemaking to Continue
Implementation and Administration of California
Renewables Portfolio Standard Program.

Rulemaking 11-05-005
(Filed May 5, 2011)

**CONFIDENTIALITY DECLARATION
FOR
AUGUST 2014 SEMI-ANNUAL
RENEWABLES PORTFOLIO STANDARD COMPLIANCE REPORT
OF
DIRECT ENERGY BUSINESS, LLC**

Direct Energy Business, LLC (hereinafter referred to as “ESP”) has submitted the Renewables Portfolio Standard (“RPS”) compliance report which is the subject of this Confidentiality Declaration to the Energy Division and the presiding administrative law judges for the above-captioned proceeding, pursuant to the RPS reporting requirements established in Decision (D.) 05-10-059 and specified further in the Energy Division’s most recent reporting instructions. In addition, ESP has served a redacted (public) version of the report on the parties to the above-captioned proceeding.


Certain information contained in the subject RPS Compliance Report, as specified herein, is eligible for confidentiality treatment under the provisions of D.06-06-066 and the Matrix of Allowed Confidential Treatment Energy Service Provider (ESP) Data (“ESP Matrix”) adopted in D.06-06-066 (as modified in D.08-04-023). The undersigned declarant hereby verifies that the following RPS compliance data is confidential and the Commission is obligated to protect it so as to avoid material harm to ESP and its customers: (1) data as described in the table below:

Description of Data	Spreadsheet Location	D.06-06-066 Requirements	Explanation
TREC Procurement/Supply, Usage Limit and Banking Data (MWh)	<i>2013 Annual Summary Tab</i> , Cells D9-10, E11-12; <i>Compliance Period Summary Tab</i> , Cells F9-G12, H11-12; <i>33% RPS Progress Summary Tab</i> , Cells E10-I10, Cells E12-I12, C13-H13; <i>Accounting Tab</i> , Cells E18-I18, E21-I21, C26-H26, C42-E42, C44-E44, C79-E79, <i>Procurement Detail Tab</i> , Cells E19-J19, E22-J22	Demonstrate that submitted material constitutes type of data listed in the ESP Matrix.	Disclosure of TREC procurement/supply, TREC usage limit and/or TREC banking data would reveal (or enable to be calculated) ESP's APT, retail sales and net short energy procurement requirements.
		Affirm compliance with limitations on confidentiality specified in the ESP Matrix.	Subject data for the prior years, current year and first completed reporting period are protected so as not to reveal ESP's net short.
		Affirm information is not already public.	This information is not already public.
		State whether data can be protected in a way that would allow	Subject data can be made public without serious risk of harm

		partial disclosure.	to ESP if and only if the data are aggregated with all of the data of the same description submitted by all other ESPs.
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I declare that the aforesaid is true of my own knowledge, except as to matters that are stated on information or belief, which statements I believe to be true.

Executed on July 30, 2014 at Houston, TX.



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 Compliance Operations
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