

**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 05, 2011)

**CONFIDENTIALITY DECLARATION
FOR 2013 PRELIMINARY ANNUAL 33% RPS COMPLIANCE REPORT OF
PILOT POWER GROUP, INC.**

The 2013 Preliminary Annual 33% RPS Compliance Report of Pilot Power Group, Inc. ("PPG"), which is the subject of this confidentiality declaration has been submitted to Commission Staff, as well as the 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, a redacted (public) version of the report has been served on the parties to the above-captioned proceeding.

Certain information contained in the subject 2013 Preliminary Annual 33% RPS Compliance Report (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" adopted in the aforesaid decision, as modified in D.08-04-023.

With this fact in mind, the undersigned declarant hereby declares:

1. I am an officer of PPG and am authorized to make this declaration;
2. I have personal knowledge of the matters stated herein, except as to matters stated on information and belief, which matters I believe to be true;
3. the following RPS-related compliance data¹ is confidential and the Commission is obligated to protect it so as to avoid material harm to PPG and its customers.

¹ Not all cells referenced in the table are necessarily redacted, as they may not contain any data.

| Description of Data | Spreadsheet Location | D.06-06-066 Requirements | Explanation |
|-----------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Retail Sales (MWh) | <i>2013 Annual Summary: D9, D10, E11, E12 Compliance Period Summary: F9-G9, F10-G10, H11, H12 33% RPS Progress Summary: E10-H10, E12-H12, D13-G13 Accounting: Cells E18-H18, E21-H21</i> | Demonstrate that submitted material constitutes type of data listed in the Matrix | Retail sales for prior compliance year, and forecast retail sales, and procurement percentage (which can be used to calculate retail sales) |
| | | Identify the Matrix category (or categories) to which data correspond. | I.A, and I.B |
| | | Affirm compliance with limitations on confidentiality specified in the Matrix. | Consistent with the Matrix, PPG requests that its prior year's retail sales, the first three years of its forecasted retail sales, and procurement percentage be kept confidential so as not to reveal its 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 partial disclosure. | Aggregated data of all ESPs could be made public without serious risk of harm. |
| Procurement Quantity Requirement(“PQR”) (MWh) and Retired REC Percentage of Retail Sales (%) | <i>Accounting: Cells D26-G26, E32</i> | Demonstrate that submitted material constitutes type of data listed in the Matrix | Since PPG's PQR (MWh) and the RECs as percentage of Retail Sales are derived by formulae that are linked to retail sales, disclosure of this data would permit calculation of PPG's retail sales. |
| | | Identify the Matrix category (or categories) to which data correspond. | I.A, and I.B |
| | | Affirm compliance with limitations on confidentiality specified in the Matrix | Consistent with the Matrix, PPG requests that its PQR be kept confidential so as not to reveal its net short |
| | | Affirm information is not | This information is not already |

| | | | |
|---------------------------------------------------|----------------------------------|-----------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------|
| | | already public | public |
| | | State whether data can be protected in a way that would allow partial disclosure. | Aggregated data of all ESPs could be made public without serious risk of harm |
| Additional RECs Required to Meet PQR (MWh) | <i>Accounting: Cells C79-E79</i> | Demonstrate that submitted material constitutes type of data listed in the Matrix | These reveal the Additonal RECs Required provide the entire net short for the Compliance Period. |
| | | Identify the Matrix category (or categories) to which data correspond. | I.A, and I.B |
| | | Affirm compliance with limitations on confidentiality specified in the Matrix. | Consistent with the Matrix, PPG requests that its net short be kept confidential. |
| | | Affirm information is not already public | This information is not already public |
| | | State whether data can be protected in a way that would allow partial disclosure. | Aggregated data of all ESPs could be made public without serious risk of harm. |

I declare under penalty of perjury 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 August 1, 2014 at San Diego, CA



Thomas R. Darton
Vice President
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