

**DECLARATION OF INGER GOODMAN IN SUPPORT OF CLAIMS OF  
CONFIDENTIALITY OF COMMERCE ENERGY, INC.**

I, Inger Goodman, declare as follows:

1. I am employed by Commerce Energy, Inc. (“Commerce”) in the position of Regulatory Affairs Specialist.
2. I have reviewed, or caused to be reviewed, the September 4, 2015 RPS Compliance Report of Commerce.
3. The statements in this declaration are based on my knowledge, information, or belief.
4. I am authorized to make this declaration on behalf of Commerce.
5. Those portions of Commerce’s RPS Compliance Report identified in Table 1 below are eligible for confidentiality protection pursuant to Decision (“D.”) 06-06-066 and D.08-04-023 and the Matrix of Allowed Confidential Treatment for Energy Service Provider Data (“ESP Matrix”) attached as Appendix B to the latter decision.
6. The data for which Commerce requests confidentiality and thereby protection from public disclosure are of the types and correspond to the category (or categories) in the ESP Matrix specified below:

***TABLE 1: IDENTIFICATION OF CONFIDENTIAL INFORMATION***

<b><i>RPS Compliance Report Worksheet Location</i></b>	<b><i>Type of Data</i></b>	<b><i>Matrix Category</i></b>
Worksheet “2014-2016 Compliance Period Summary”, RPS Summary Report Table, Cells D9:G10, H11:H12	Total Retail Sales MWh for 2014-2016 and CP Total; Annual RPS Targets and Compliance Period Procurement Requirement for 2014-2016 and CP Total; Total RPS Eligible RECs Procured percentage; Total RPS Eligible RECs Retired percentage	I – Renewables Portfolio Standard (RPS) Information. A) RPS compliance filings required by CPUC, by ESP: data redacted because disclosure of first three years of forecast retail sales and resource mix data (MWh) and of historical retail sales and supply data (MWh) for prior year would reveal entire net short of ESP. B) Annual RPS compliance filings, by ESP: data redacted because disclosure of first three years of forecast retail sales and resource mix data (MWh) and historical retail sales and supply data would reveal the entire net short of ESP.
Worksheet “33% RPS Progress Summary”, 2011-2020 Compliance Summary and Charts,	Retail Sales (MWh) 2014-2018, Annual RPS Target MWh 2014-2018, Procurement Quantity	I – Renewables Portfolio Standard (RPS) Information. A) RPS compliance filings required by CPUC, by ESP: data redacted because

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<b><i>RPS Compliance Report Worksheet Location</i></b>	<b><i>Type of Data</i></b>	<b><i>Matrix Category</i></b>
Cells F10:J10, F12:J12, F13:L13	Requirements 2014-2016 and 2017-2020	disclosure of first three years of forecast retail sales and resource mix data (MWh) and of historical retail sales and supply data (MWh) for prior year would reveal entire net short of ESP. B) Annual RPS compliance filings, by ESP: data redacted because disclosure of first three years of forecast retail sales and resource mix data (MWh) and historical retail sales and supply data would reveal the entire net short of ESP.
Worksheet “Annual RPS Compliance Report: Compliance Status”, Annual RPS Procurement and Percentages (MWh) Table: Cells F18:J18, F21:J21	Annual Retail Sales MWh 2014-2018; Annual RPS Procurement Percentage 2014-2018	I – Renewables Portfolio Standard (RPS) Information. A) RPS compliance filings required by CPUC, by ESP: data redacted because disclosure of first three years of forecast retail sales and resource mix data (MWh) and of historical retail sales and supply data (MWh) for prior year would reveal entire net short of ESP. B) Annual RPS compliance filings, by ESP: data redacted because disclosure of first three years of forecast retail sales and resource mix data (MWh) and historical retail sales and supply data would reveal the entire net short of ESP.
Worksheet “Annual RPS Compliance Report: Compliance Status”, Procurement Quantity Requirement (MWh) Table: Cells F26:L26, G32:J32	Procurement Quantity Requirements (PQR) MWh 2014-2016 and 2017-2020, RECs as Percentage of Retail Sales 2015-2018	I – Renewables Portfolio Standard (RPS) Information. A) RPS compliance filings required by CPUC, by ESP: data redacted because disclosure of first three years of forecast retail sales and resource mix data (MWh) and of historical retail sales and supply data (MWh) for prior year would reveal entire net short of ESP. B) Annual RPS compliance filings, by ESP: data redacted because disclosure of first three years of forecast retail sales and resource mix data (MWh) and historical retail sales and supply data would reveal the entire net short of ESP.

7. The data for which Commerce is claiming confidentiality is not already public.
8. The confidentiality of the data for which Commerce is claiming confidentiality would not be compromised if it were first aggregated with the equivalent data of all other load serving entities before being made public. Other than by the aforesaid process, the data cannot be aggregated, redacted, summarized, masked or otherwise protected in a way that allows partial disclosure.
9. Commerce's customers may be harmed by the loss of confidentiality insofar as members of the public not eligible to review the data as non-market participating parties—primarily other market participants such as other ESPs or wholesale suppliers or RPS supplies—can use this data to derive Commerce-specific RPS procurement requirements (net short) and Commerce's current compliance position, particularly in light of the relative scarcity of such resources eligible for the product content category one resources.

Declared under penalty of perjury that the aforesaid is true of my own knowledge, except as to matters that are stated on information or belief and as to those matters I believe them to be true.

Dated: September 4, 2015



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