

DECLARATION OF PATRICK VANBEEK OF COMMERCIAL ENERGY OF CALIFORNIA IN SUPPORT OF CLAIMS OF CONFIDENTIALITY

I, Patrick VanBeek, declare as follows:

1. I am an officer of Commercial Energy of California.
2. I have reviewed, or caused to be reviewed, the September 2, 2015 RPS Compliance Report of Commercial Energy of California.
3. The statements in this declaration are based on my knowledge, information, or belief.
4. I am authorized to make this declaration of behalf of Commercial Energy of California.
5. Those portions of Commercial's RPS Compliance Report identified in Table 1 below are eligible for confidentiality protection.
6. The data for which Commercial requests confidentiality and thereby protection from public disclosure are of the types and correspond to the category (or categories) as specified below:

TABLE 1: IDENTIFICATION OF CONFIDENTIAL INFORMATION


<i>RPS Compliance Report Worksheet Location</i>	<i>Type of Data</i>	<i>Matrix Category</i>
<p>Worksheet "Second Compliance Period Summary": Cells D9:D10, E9:E10, F9:F10, G9:G10, H10:H11</p> <p>Worksheet "33% RPS Progress Summary": Cells F10:J10, F12:J12, F13:L13</p> <p>Worksheet "Accounting", Cells: F18:J18, F20:J20, F21:J21, F26:L26; F32:J32</p>	<p>Retail sales (MWhs) for prior year, current year and 3 years of actual retail sales, forecasts and procurement targets for same "window of confidentiality" period.</p>	<p>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 historical retail sales and supply data (MWh) would reveal entire net short of ESP, including information that could be used to extrapolate this information.</p>



7. The confidentiality of the data for which Commercial 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.
8. Commercial'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 load serving entities—can use this data to derive detailed estimates of Commercial-specific procurement requirements and Commercial's current compliance position.

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 2nd, 2015



Patrick VanBeek
Director of Operations
Commercial Energy of California
7767 Oakport St., Suite 525
Oakland, CA 94621
P: 510-567-2700
E: Patrick.vanbeek@commercialenergy.net