

**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 15-02-020
(Filed February 26, 2015)

CONFIDENTIALITY DECLARATION

**33% RPS COMPLIANCE REPORT, REPORTING RPS COMPLIANCE
STATUS FOR THE FIRST COMPLIANCE PERIOD (2011-2013)
OF
NOBLE AMERICAS ENERGY SOLUTIONS LLC**

The 33% RPS Compliance Report, Reporting RPS Compliance Status for the First Compliance Period (2011-2013) (“RPS Compliance Report”), which is the subject of this confidentiality declaration, has been submitted to Commission staff, as well as the presiding administrative law judges for the above-captioned proceeding, pursuant to the RPS reporting requirements established in Decision No. (D.) 12-06-038. In addition, a redacted (public) and revised version of the report has been served on the parties to the above-captioned.

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” adopted in the aforesaid decision, as modified by D.08-04-023. Under those decisions, forecasts of retail sales (and information that can be used to derive such forecasts) are allowed to be kept confidential for three forward years, and historical market purchases of energy and capacity are permitted to be kept confidential for one prior year. With these principles in mind, the undersigned declarant hereby verifies that the following RPS-related compliance data¹ is confidential and the Commission is obligated to protect it so as to avoid material harm to Noble Americas Energy Solutions LLC (“Noble Solutions”) 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
Total Retail Sales (MWh) or Retail Sales	<i>33% RPS Progress Summary</i> , Cell G10, H10, I10, J10; <i>Accounting</i> , Cell G18, H18, I18, J18	Demonstrate that submitted material constitutes type of data listed in the Matrix.	Noble Solutions' net short is equivalent to its retail sales minus procured supplies.
		Identify the Matrix category (or categories) to which data correspond.	I.A
		Affirm compliance with limitations on confidentiality specified in the Matrix.	Consistent with the Matrix, Noble Solutions requests that its prior year's retail sales and the first three years of its forecasted retail sales 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.
Annual RPS Target or Annual RPS Targets and Compliance Period Procurement Requirement or Additional RECs Needed to Meet RPS Procurement Quantity Requirement	<i>33% RPS Progress Summary</i> , Cell G12, H12, I12, J12, G13, J13 <i>Accounting</i> , Cell G26, J26	Demonstrate that submitted material constitutes type of data listed in the Matrix.	Noble Solutions' Annual RPS Target is derived by a formula that is linked to retail sales; disclosure of Annual RPS Target data would reveal Noble Solutions' retail sales.
		Identify the Matrix category (or categories) to which data correspond.	I.A

Description of Data	Spreadsheet Location	D.06-06-066 Requirements	Explanation
		Affirm compliance with limitations on confidentiality specified in the Matrix.	Consistent with the Matrix, Noble Solutions requests that information that would reveal the first three years of its forecasted retail sales 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.
% of Total Retail Sales or Annual RPS Procurement Percentage or RECs Retired as a Percentage of Retail Sales	<i>Accounting</i> , Cell G21, H21, I21, J21	Demonstrate that submitted material constitutes type of data listed in the Matrix.	Noble Solutions' Annual RPS Target is derived by a formula that is linked to retail sales; disclosure of Annual RPS procurement and retirements data as a percentage would reveal Noble Solutions' retail sales.
		Identify the Matrix category (or categories) to which data correspond.	I.A

Description of Data	Spreadsheet Location	D.06-06-066 Requirements	Explanation
		Affirm compliance with limitations on confidentiality specified in the Matrix.	Consistent with the Matrix, Noble Solutions requests that information that would reveal the first three years of its forecasted retail sales 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.

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 September 1st, 2016, at San Diego, CA.

/s/ William B. Goddard
William B. Goddard
Vice President Commodity Supply & Operations
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