

**DECLARATION OF JEDEDIAH J. GIBSON  
IN SUPPORT OF CLAIMS OF CONFIDENTIALITY  
OF PACIFICORP**

I, Jedediah J. Gibson, declare as follows:

1. I am an attorney representing PacifiCorp in this matter.
2. I have reviewed, or caused to be reviewed, the September 1, 2016 submission of PacifiCorp's 2015 33% RPS Compliance Report.
3. The statements in this declaration are based on my knowledge, information, or belief.
4. An officer of PacifiCorp is not located within the County of Sacramento and was not available to execute this declaration at the time the materials were prepared.
5. I have been authorized to make this declaration on behalf of PacifiCorp.
6. Those portions of PacifiCorp'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 Investor Owned Utility (IOU) Data ("IOU Matrix") attached as Appendix C to the latter decision.
7. The data for which PacifiCorp requests confidentiality and thereby protection from public disclosure are of the types and correspond to the category (or categories) in the IOU 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 “33% RPS Progress Summary”, 2011-2020 Compliance Summary and Charts Table, Cells H10:K10, H12:K12, F13:L13	Retail Sales (MWh) for 2016-2019; Annual RPS Target for 2016-2019; Procurement Quantity Requirement for Compliance Period 2 (2014-2016) and Compliance Period 3 (2017-2020)	V – Load Forecast Information and Data – Electric  C) LSE Total Energy Forecast – Bundled Customer (MWh)  Front three years of forecast data confidential  VI – Net Open Position Information – Electric  B) Utility Bundled Net Open (Long or Short) Position for Energy (MWh)  Front three years of forecast data confidential
Worksheet “Annual RPS Compliance Report: Compliance Status (Accounting)”:  Annual RPS Procurement and Percentages (MWh) Table: Cells H18:K18, H21:K21  Procurement Quantity Requirement (MWh) Table: Cells F26:L26, H36:K36	Annual Retail Sales (MWh) for 2016-2019; Annual RPS Procurement Percentage for 2016-2019; Procurement Quantity Requirement (PQR) for Compliance Period 2 (2014-2016) and Compliance Period 3 (2017-2020), RECs Retired as Percentage of Retail Sales for 2016-2019	V – Load Forecast Information and Data – Electric  C) LSE Total Energy Forecast – Bundled Customer (MWh)  Front three years of forecast data confidential  VI – Net Open Position Information – Electric  B) Utility Bundled Net Open (Long or Short) Position for Energy (MWh)  Front three years of forecast data confidential

<b>TABLE 1: IDENTIFICATION OF CONFIDENTIAL INFORMATION</b>		
<b><i>RPS Compliance Report Worksheet Location</i></b>	<b><i>Type of Data</i></b>	<b><i>Matrix Category</i></b>
<p>Worksheet “Annual RPS Compliance Report: Procurement Detail”:</p> <p>Contract Detail Table: Cells J48:U49, J50:J51, J52:X61, J62:M65, J66:R67, J68:S69, J70:N71, J72:X73, J74:W75, J78:X79, J80:N81, J82:M83, J84:N85, J86:S87, J88:L89, J92:X93, J94:K95, J96:X99, J100:L101, J102:X103, J108:N109, J110:L111, J112:X113, J116:X121, J122:N123, J124:X125, J126:J127, J128:N129, J132:X133, J136:X155, J158:L159, J160:X165, J168:X169, J170:L171, Q176:X179, J180:X181, T182:X187, K188:X189, J190:X191, R198:X223,</p> <p>(Expired Contracts:) M235:X236, J237:X238, M241:X242, L249:X250, M251:X252</p>	<p>Contract Detail for years 2016-2030 for IOU generation and QF generation data that warrants protection to avoid identification of PacifiCorp’s existing portfolio assets and modifications in demand and pricing for QF generation.</p> <p>Expired Contracts/Contracts Expiring Before 2020 for years 2016-2030 for IOU generation and QF generation data that warrants protection to avoid identification of PacifiCorp’s existing portfolio assets and modifications in demand and pricing for QF generation.</p>	<p>IV – Resource Planning Information – Electric</p> <p>A) Forecast of IOU Generation Resources (MW and MWh): Confidential for three years.</p> <p>B) Forecast of Qualifying Facility Generation: Confidential for three years</p>

8. The data for which PacifiCorp is claiming confidentiality is not already public.
9. The confidentiality of the data for which PacifiCorp 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.
10. PacifiCorp’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—can use this data to derive detailed estimates of

PacifiCorp-specific procurement requirements and PacifiCorp'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 1, 2016

---

Jedediah J. Gibson  
Ellison, Schneider & Harris, LLP  
2600 Capitol Avenue, Suite 400  
Sacramento, California 95816  
T: (916) 447-2166  
E: [jjg@eslawfirm.com](mailto:jjg@eslawfirm.com)