

**BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF CALIFORNIA**

Order Instituting Rulemaking to Continue  
Implementation and Administration of California  
Renewables Portfolio Standard Program

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

**CONFIDENTIALITY DECLARATION  
FOR 2015 ANNUAL 33% RPS COMPLIANCE REPORT OF  
PILOT POWER GROUP, INC.**

The 2015 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 2015 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 data<sup>1</sup> is confidential and the Commission is obligated to protect it so as to avoid material harm to PPG and its customers.

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

<b>Description of Data</b>	<b>Spreadsheet Location</b>	<b>D.06-06-066 Requirements</b>	<b>Explanation</b>
<b>Retail Sales (MWh)</b>	<i>33% RPS Progress Summary: G10-J10, G12-J12, G13, J13 Accounting: Cells G18-J18, G21-J21</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.
<b>Procurement Quantity Requirement(“PQR”) (MWh) and Retired REC Percentage of Retail Sales (%)</b>	<i>Accounting: Cells G26,J26,G32-J32</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 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 1, 2016 at San Diego, CA

A handwritten signature in black ink, appearing to read "Thomas R. Darton", is positioned above a solid horizontal line.

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Thomas R. Darton  
Vice President  
Pilot Power Group, Inc.  
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San Diego, CA 92122