

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

**DECLARATION
OF SALLY CHEN REGARDING CONFIDENTIALITY OF CERTAIN DATA**

I, Sally Chen, declare as follows:

1. I am the Settlements & Administration Manager for San Diego Gas & Electric Company ("SDG&E"). I have included SDG&E's 'RPS Static Contract Information' excel workbook containing four individual tabs¹ and the electronic files included on the enclosed flash drive which together constitute SDG&E's Product Content Category Showing of August 24, 2016 (the "static Contract Information" and "PCC Showing Files" respectively). This information is being submitted as part of SDG&E's 2016 Annual 33% RPS Compliance Report. Additionally, as the Settlements & Administration Manager, I am thoroughly familiar with the facts and representations in this declaration and if called upon to testify I could and would testify to the following based upon personal knowledge.

2. I am providing this Declaration to demonstrate that the confidential information ("Protected Information") in support of the referenced Application falls within the scope of data provided confidential treatment in the IOU Matrix ("Matrix") attached to the Commission's Decision D.06-06-066 (the Phase I Confidentiality decision). Pursuant to the procedures adopted in D.08-04-023, I am addressing each of the following five features of Ordering Paragraph 2 in D.06-06-066:

¹ These tabs or individual spreadsheets include: 1. Title page, 2. Instructions, 3. Static Contract Information, and 4. Officer Verification.

- that the material constitutes a particular type of data listed in the Matrix;
- the category or categories in the Matrix the data correspond to;
- that SDG&E is complying with the limitations on confidentiality specified in the Matrix for that type of data;
- that the information is not already public; and
- that the data cannot be aggregated, redacted, summarized, masked or otherwise protected in a way that allows partial disclosure.

3. The confidential information contained in my Testimony constitutes material, market sensitive, electric procurement-related information that is within the scope of Section 454.5(g) of the Public Utilities Code.² As such, the Protected Information provided by SDG&E is allowed confidential treatment in accordance with Appendix 1 – IOU Matrix in D.06-06-066.

Confidential Information	Matrix Reference	Reason for Confidentiality And Timing
<p>Static Contract Information: Tab “Static Contract Information”, highlighted cells in columns “Expected PCC Classification”, “Share (%) or Fixed Contract Amount of Total Generation”, “Scheduling Coordinator”</p> <p>AND</p> <p>All Contracts and agreements stored on the enclosed flash-drive, specifically within folder “SDG&E Confidential”</p>	VII.G	Contract terms; confidential for 3 years

² In addition to the details addressed herein, SDG&E believes that the information being furnished in the submittal is governed by Public Utilities Code Section 583 and General Order 66-C. Accordingly, SDG&E seeks confidential treatment of such data under those provisions, as applicable.

4. I am not aware of any instances where the Protected Information has been disclosed to the public. To my knowledge, no party, including SDG&E, has publicly revealed any of the Protected Information.

5. I will comply with the limitations on confidentiality specified in the Matrix for the type of data that is provided herewith.

6. The Protected Information cannot be provided in a form that is aggregated, partially redacted, or summarized and continue to provide the level of support to the Application as intended; however SDG&E is certainly willing to work with the Commission regarding possible aggregations if the Commission seeks to make any of the confidential information provided in the Testimony public.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed this 25th day of September, 2016, at San Diego, California.


Sally Chen
Settlements & Administration Manager
San Diego Gas & Electric Company