BEFORE THE PUBLIC UTILITIES COMMISSION

OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking to Continue Implementation and Administration, and Consider Further Development, of California Renewables Portfolio Standard Program.	Rulemaking 15-02-020 (Issued February 26, 2015)

CONFIDENTIALITY DECLARATION FOR 33% RPS COMPLIANCE REPORT OF TIGER NATURAL GAS, INC.

In accordance with the applicable reporting instructions, Tiger Natural Gas, Inc., an electric service provider ("ESP"), has caused the 33% RPS Compliance Report Reporting Compliance for the First Compliance Period (2011-2013) ("RPS Report") that is the subject of this Confidentiality Declaration to be submitted to the Energy Division and the presiding administrative law judges in the above-captioned proceeding. In addition, the submitting ESP has caused a public (redacted) version of the RPS Report to be served on the parties of record in the above-captioned proceeding.

Certain information contained in the submitting ESP's RPS Report, as specified in the table below, is eligible for confidential treatment under the provisions of Decision ("D.") 06-06-066 and the Matrix of Allowed Confidential Treatment Energy Service Provider (ESP) Data ("ESP Matrix"), as modified by D.08-04-023, and the Commission is obligated to protect said confidential information so as to avoid material harm to the submitting ESP and/or its customers. Specifically, the submitting ESP's prior year's retail sales, current year retail sales, and the first three years of its forecast retail sales, as well as certain RPS-eligible procurement/supply data that could be used to derive such information, is eligible for confidential treatment under the ESP Matrix due to the fact that the

submitting ESP does not own or control the output of any generation facilities and it generally procures the energy required to meet the demand of its retail customers through short-term transactions, thereby making its "net short" (as that term is used in the ESP Matrix) for any given year essentially equivalent to its total retail sales in that year minus any RPS procurement (MWh) as reported in the RPS Report. Also, since ESP does not own or control the output of any RPS-eligible generation facilities, ESP's RPS net short in a given compliance period is equal to Procurement Quantity Requirement, which is calculated as the applicable percentage of its retail sales, minus the amount of RPS-eligible energy and/or RECs procured and/or banked that may be used for RPS compliance during that period.

TABLE OF CONFIDENTIAL INFORMATION

Description of Data	**Spreadsheet Location**	**D.06-06-066 Requirements**	**Explanation**
Retail Sales (MWh)	*33% RPS Progress Summary* tab, cells G-10, H-10, I-10 and J-10. *Accounting* tab, cells G-18, H-18, I-18 and J-18.	Demonstrate that submitted material constitutes type of data listed in the Matrix.	ESP's net short is equivalent to its retail sales minus procured RPS supplies.
		Matrix category	I.B
		Affirm compliance with limitations on confidentiality specified in the Matrix.	ESP's prior year's retail sales, current year's retail sales, and the first three years of its forecasted retail sales may be kept confidential so as not to reveal its net short positions.
		State whether data can be protected in a way that would allow partial disclosure.	Aggregated data of all ESPs only could be made public without serious risk of harm.

Description of Data	Spreadsheet Location	D.06-06-066 Requirements	Explanation
Annual RPS Targets (MWh); Procurement Quantity Targets (MWh); Procurement Quantity Requirements (MWh); and Long-Term Contracting Requirements	*33% RPS Progress Summary* tab, cells G-12, H-12, I-12, J-12, FGH-13 and IJKL-13. *Accounting* tab, cells G-21, H-21, I-21, J-21, FGH-26 and IJKL-26.	Demonstrate that submitted material constitutes type of data listed in the Matrix.	Since ESP's PQTs and PQRs are derived from its retail sales using published formulas, disclosure of its PQT and PQR data (MWh) would reveal its retail sales.
		Matrix category	I.B
		Affirm compliance with limitations on confidentiality specified in the Matrix.	Information that would reveal ESP's prior year's retail sales, current year's retail sales, or the first three years of its forecasted retail sales may be kept confidential so as not to reveal its net short positions.
		State whether data can be protected in a way that would allow partial disclosure.	Aggregated data of all ESPs only could be made public without serious risk of harm.

Description of Data	Spreadsheet Location	D.06-06-066 Requirements	Explanation
RPS-Eligible Procurement/Supply Data (MWh and/or percentages)	*Accounting* tab, cells G-32, H-32, I32 and J32.	Demonstrate that submitted material constitutes type of data listed in the Matrix.	Disclosure of ESP's RPS procurement data (MWh or %, as applicable) would reveal its PQT and PQR data (MWh), which in turn would reveal ESP's retail sales.
		Matrix category	I.B and I.C
		Affirm compliance with limitations on confidentiality specified in the Matrix.	ESP's prior year's retail sales, current year's retail sales, and the first three years of its forecasted retail sales may be kept confidential so as not to reveal its net short positions.
		State whether data can be protected in a way that would allow partial disclosure.	Aggregated data of all ESPs only could be made public without serious risk of harm.

I, the undersigned, declare under penalty of perjury:

(1) I am the attorney representing the submitting ESP in this proceeding;

(2) An officer of the submitting ESP was not located within the County of Los Angeles at the time this Confidentiality Declaration was filed;

(3) I am authorized to make this Confidentiality Declaration on the submitting ESP's behalf;

(4) I have reviewed, or caused to be reviewed, the RPS Report referenced in this Confidentiality Declaration;

(5) The information for which the submitting ESP seeks confidentiality protection is not already public.

(6) The statements in this Confidentiality Declaration are true of my own knowledge, except as to matters which are therein stated on information or belief, and as to those matters I believe them to be true.

Executed on September 1, 2016, at Arcadia, California.

Gregory S. G. Klatt
DOUGLASS & LIDDELL
411 E. Huntington Drive, Suite 107-356
Arcadia, California 91006
Telephone: (626) 802-5733
Email: klatt@energyattorney.com

Attorney for
TIGER NATURAL GAS, INC.