

PUBLIC UTILITIES COMMISSION

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SAN FRANCISCO, CA 94102-3298

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March 17, 2008

Advice Letter 2925-E

Brian K. Cherry
Director, Regulatory Relations
Mail Code B10C
Pacific Gas and Electric Company
P.O. Box 770000
San Francisco, CA 94177

Subject: 2007 Year Ahead RA Compliance Filings

Dear Mr. Cherry:

Advice Letter 2925-E is effective November 2nd, 2006. Thank you for your time.

Sincerely,

A handwritten signature in black ink, appearing to read "Sean H. Gallagher".

Sean H. Gallagher
Director
Energy Division



Brian K. Cherry
Vice President
Regulatory Relations

77 Beale Street, Room 1087
San Francisco, CA 94105

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Mail Code B10C
Pacific Gas and Electric Company
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November 2, 2006

Advice 2925-E

(Pacific Gas and Electric Company ID U39E)

Subject: Final 2007 Local and System Resource Adequacy (RA) Filing for Compliance - Submitted Pursuant to the February 10, 2006 Revised Protective Order, Decision 05-10-042 and Decision 06-06-064, Opinion on RA Requirements

Public Utilities Commission of the State of California

Pacific Gas and Electric Company (PG&E) hereby submits this Advice Letter in compliance with Decision (D.) 06-06-064. PG&E's Local and System RA compliance filing for 2007, prepared in accordance with the "2007 Filing Guide for System and Local Resource Adequacy Compliance Filings" (Guide) issued by the Energy Division on August 10, 2006, is included in Confidential Attachment 3; the signed officer Certification form is included as Attachment 1. The California Public Utilities Commission (CPUC) requested a confidentiality declaration for this compliance filing, which is included as Attachment 2.

A portion of the information provided in Attachment 3 is commercially sensitive and confidential protected material and is being submitted subject to the protections of Section 583 of the California Public Utilities Code and pursuant to: i) the "Revised Protective Order Regarding Confidentiality of Market Sensitive Load Data and Information" that ALJ Wetzell issued in his February 10, 2006, ruling; ii) the California Energy Commission's (CEC) agreement to adhere to that protective order, which the CEC signed on February 14, 2006; and iii) D. 06-06-066, which established Confidentiality standards.

Purpose

The purpose of this Advice Letter compliance filing is to demonstrate whether PG&E has complied with the CPUC's 2007 year-ahead system and local resource adequacy requirements as specified in Decisions 05-10-042, 06-06-064 and 06-07-031.

This advice letter contains:

Attachment 1: Officer Certification Form of Roy Kuga

Attachment 2: Declaration of Terrance Robertson supporting the confidentiality claims made in this filing.

Confidential Attachment 3: *System Year-ahead RA Workbook for May through September 2007 and 2007 Year-ahead Local RA Workbook.*

The 2007 Year-ahead System and Local RA Workbooks contains commercially sensitive information detailing the resources PG&E owns or has acquired. The attached CD contains electronic filings of this Advice Letter and the Attachments.

Background

As specified in D.05-10-042 and D.06-06-064, LSE's must make annual compliance filings demonstrating that they have met 90% of the 115% of peak load requirement for the months of May through September of the following calendar year and 100% of the applicable local procurement obligation for each month of the following calendar year (January through December). This submission fills this requirement.

On August 10, 2006, the Energy Division (ED) issued changes to the RA Guide, including a RA Reporting Template Spreadsheet and Instructions. This Advice Letter has been prepared in accordance with the Guide and the Reporting Template Spreadsheet Instructions.

In preparation of the 2007 Local Workbook, and as instructed by the Guide, PG&E used CAISO information to determine whether any of the resources that it owns or has procured are located in a transmission constrained area identified by the California Independent System Operator Corporation (CAISO). PG&E used the CAISO's "2007 Local Area Resource Information for Calendar Year 2007-Corrections as of August 9, 2006" unit list to determine which units are in local areas.¹

This Advice Letter does not request an increase of any rate or charge, or the withdrawal of service, nor does it conflict with any other schedule or rule.

Protests

In compliance with directives provided through the Energy Division's RA Guide, dated August 10, 2006, this advice filing is not subject to protests.

¹ The CAISO updated this file on November 1, 2006. PG&E does not know if or how any of the changes made by the CAISO would affect its compliance filing.

Effective Date

PG&E requests that this advice filing be approved effective the date of filing, **November 2, 2006**, pursuant to instruction from the CPUC's Energy Division. According to the August 10, 2006, Energy Division Guidance, RA compliance filings do not require a resolution.

Notice

In accordance with direction from the CPUC's Energy Division 2007 RA Filing Guide, this submission is being filed with the CPUC, California Energy Commission (CEC), and the CAISO. A redacted version of Attachment 3 is available upon request.

A public version of this advice letter filing can also be accessed electronically at:
<http://www.pge.com/tariffs>

A handwritten signature in black ink, appearing to read "Roy Kuga".

Vice President, Regulatory Relations

Attachments:

Attachment 1: Officer Certification Form of Roy Kuga
Attachment 2: Confidentiality Declaration of Terrance Robertson
Confidential Attachment 3: 2007 System RA and Local RA Workbooks
(Redacted Version Available Upon Request)

cc: California Energy Commission
California Independent System Operator

CALIFORNIA PUBLIC UTILITIES COMMISSION

ADVICE LETTER FILING SUMMARY ENERGY UTILITY

MUST BE COMPLETED BY UTILITY (Attach additional pages as needed)

Company name/CPUC Utility No. Pacific Gas and Electric Company U39M

Utility type:

ELC GAS
 PLC HEAT WATER

Contact Person: David Poster

Phone #: (415) 973-1082

E-mail: dxpu@pge.com

EXPLANATION OF UTILITY TYPE

ELC = Electric GAS = Gas
PLC = Pipeline HEAT = Heat WATER = Water

(Date Filed/ Received Stamp by CPUC)

Advice Letter (AL) #: **2925-E**

Subject of AL: Final 2007 Local and System RA Filing

Keywords (choose from CPUC listing): RA-Compliance

AL filing type: Monthly Quarterly Annual One-Time Other _____

If AL filed in compliance with a Commission order, indicate relevant Decision/Resolution: D.06-06-064

Does AL replace a withdrawn or rejected AL? If so, identify the prior AL _____

Summarize differences between the AL and the prior withdrawn or rejected AL: _____

Resolution Required? Yes No

Requested effective date: **11-2-06**

No. of tariff sheets: 0

Estimated system annual revenue effect (%): N/A

Estimated system average rate effect (%): N/A

When rates are affected by AL, include attachment in AL showing average rate effects on customer classes (residential, small commercial, large C/I, agricultural, lighting).

Tariff schedules affected: N/A

Service affected and changes proposed¹: N/A

Pending advice letters that revise the same tariff sheets: N/A

Protests and all other correspondence regarding this AL are due no later than 20 days after the date of this filing, unless otherwise authorized by the Commission, and shall be sent to:

CPUC, Energy Division

Attention: Tariff Unit

505 Van Ness Ave.,

San Francisco, CA 94102

jjr@cpuc.ca.gov and jnj@cpuc.ca.gov

Utility Info (including e-mail)

Pacific Gas and Electric Company

Attn: Brian Cherry

Vice President, Regulatory Relations

77 Beale Street, Mailcode B10C

P.O. Box 770000

San Francisco, CA 94177

Facsimile: (415) 973-7226 E-mail:

PG&ETariffs@pge.com

Attachment 1

Officer Certification Form of Roy Kuga

Worksheet A. CERTIFICATION FORM

Name of Load Serving Entity (LSE):	Pacific Gas and Electric Company
Energy Service Provider Registration Number (if applicable):	
Scheduling Coordinator:	PCG2

Certification of Information:

Consistent with Rules 1 and 2.4 of the CPUC's Rules of Practice and Procedure, this resource adequacy compliance filing has been verified by an officer of the corporation, who shall expressly certify, under penalty of perjury, the following:

1. I have responsibility for the activities reflected in this filing;
2. I have reviewed, or have caused to be reviewed, this compliance filing;
3. Based on my knowledge, information, or belief, this filing does not contain any untrue statement of a material fact or omit to state a material fact necessary to make the statements made;
4. Based on my knowledge, information, or belief, this [filing] contains all of the information required to be provided by CPUC orders, rules, and regulations.

Certified By Authorized LSE Representative (Name):	Roy Kuga
Title:	Vice President - Energy Supply
Date:	10/30/06
Signature (sign the hard copy of filing):	



Contact Person for Questions about this Filing:

Name:	Terrance Robertson
Title:	Principle - Structured Transactions
Email:	trm4@pge.com
Address:	245 Market St., 1309
City:	San Francisco
State:	CA
Zip:	94105
Telephone:	415-973-6993

Back-Up Contact Person for Questions about this Filing (Optional):

Name:	
Title:	
Email:	
Telephone:	

Worksheet A. CERTIFICATION FORM

Name of Load Serving Entity (LSE): Pacific Gas and Electric Company

Energy Service Provider Registration Number (if applicable):

Scheduling Coordinator: PCG2

Certification of Information:

Consistent with Rules 1 and 2.4 of the CPUC's Rules of Practice and Procedure, this resource adequacy compliance filing has been verified by an officer of the corporation, who shall expressly certify, under penalty of perjury, the following:

1. I have responsibility for the activities reflected in this filing;
2. I have reviewed, or have caused to be reviewed, this compliance filing;
3. Based on my knowledge, information, or belief, this filing does not contain any untrue statement of a material fact or omit to state a material fact necessary to make the statements made;
4. Based on my knowledge, information, or belief, this [filing] contains all of the information required to be provided by CPUC orders, rules, and regulations.

Certified By Authorized LSE Representative (Name):

Title: Roy Kuga
Vice President - Energy Supply

Date: 10/30/06



Signature (sign the hard copy of filing):

Contact Person for Questions about this Filing:

Name: Terrance Robertson

Title: Principle - Structured Transactions

Email: tmr4@pge.com

Address: 245 Market St., 1309

City: San Francisco

State: CA

Zip: 94105

Telephone: 415-973-6993

Back-Up Contact Person for Questions about this Filing (Optional):

Name:

Title:

Email:

Telephone:

Worksheet A. CERTIFICATION FORM

Name of Load Serving Entity (LSE):	Pacific Gas and Electric Company
Energy Service Provider Registration Number (if applicable):	
Scheduling Coordinator:	PCG2

Certification of Information:

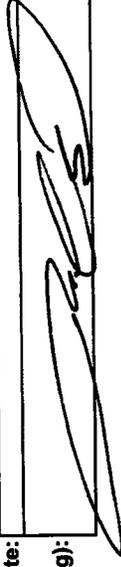
Consistent with Rules 1 and 2.4 of the CPUC's Rules of Practice and Procedure, this resource adequacy compliance filing has been verified by an officer of the corporation, who shall expressly certify, under penalty of perjury, the following:

1. I have responsibility for the activities reflected in this filing.
2. I have reviewed, or have caused to be reviewed, this compliance filing;
3. Based on my knowledge, information, or belief, this filing does not contain any untrue statement of a material fact or omit to state a material fact necessary to make the statements made;
4. Based on my knowledge, information, or belief, this [filing] contains all of the information required to be provided by CPUC orders, rules, and regulations.

Certified By Authorized LSE Representative (Name):

Title:	Roy Kuga
Date:	Vice President - Energy Supply 10/30/06

Signature (sign the hard copy of filing):



Contact Person for Questions about this Filing:

Name:	Terrance Robertson
Title:	Principle - Structured Transactions
Email:	tmr4@pge.com
Address:	245 Market St., 1309
City:	San Francisco
State:	CA
Zip:	94105
Telephone:	415-973-6993

Back-Up Contact Person for Questions about this Filing (Optional):

Name:	
Title:	
Email:	
Telephone:	

Worksheet A. CERTIFICATION FORM

Name of Load Serving Entity (LSE):	Pacific Gas and Electric Company
Energy Service Provider Registration Number (if applicable):	
Scheduling Coordinator:	PCG2

Certification of Information:

Consistent with Rules 1 and 2.4 of the CPUC's Rules of Practice and Procedure, this resource adequacy compliance filing has been verified by an officer of the corporation, who shall expressly certify, under penalty of perjury, the following:

1. I have responsibility for the activities reflected in this filing;
2. I have reviewed, or have caused to be reviewed, this compliance filing;
3. Based on my knowledge, information, or belief, this filing does not contain any untrue statement of a material fact or omit to state a material fact necessary to make the statements made;
4. Based on my knowledge, information, or belief, this [filing] contains all of the information required to be provided by CPUC orders, rules, and regulations.

Certified By Authorized LSE Representative (Name):

Roy Kuga
Title: Vice President - Energy Supply
Date: 10/30/06



Signature (sign the hard copy of filing):

Contact Person for Questions about this Filing:

Name: Terrance Robertson
Title: Principle - Structured Transactions
Email: tmr14@pge.com
Address: 245 Market St., 1309
City: San Francisco
State: CA
Zip: 94105
Telephone: 415-973-6993

Back-Up Contact Person for Questions about this Filing (Optional):

Name:
Title:
Email:
Telephone:

Worksheet A. CERTIFICATION FORM

Name of Load Serving Entity (LSE):	Pacific Gas and Electric Company
Energy Service Provider Registration Number (if applicable):	
Scheduling Coordinator:	PCG2

Certification of Information:
 Consistent with Rules 1 and 2.4 of the CPUC's Rules of Practice and Procedure, this resource adequacy compliance filing has been verified by an officer of the corporation, who shall expressly certify, under penalty of perjury, the following:

1. I have responsibility for the activities reflected in this filing;
2. I have reviewed, or have caused to be reviewed, this compliance filing;
3. Based on my knowledge, information, or belief, this filing does not contain any untrue statement of a material fact or omit to state a material fact necessary to make the statements made;
4. Based on my knowledge, information, or belief, this [filing] contains all of the information required to be provided by CPUC orders, rules, and regulations.

Certified By Authorized LSE Representative (Name): Roy Kuga
Title: Vice President - Energy Supply
Date: 10/30/06

Signature (sign the hard copy of filing): 

Contact Person for Questions about this Filing:

Name:	Terrance Robertson
Title:	Principle - Structured Transactions
Email:	tmr4@pge.com
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Back-Up Contact Person for Questions about this Filing (Optional):

Name:	
Title:	
Email:	
Telephone:	

Worksheet A. CERTIFICATION FORM

Name of Load Serving Entity (LSE):	Pacific Gas and Electric Company
Energy Service Provider Registration Number (if applicable):	
Scheduling Coordinator:	PCG2

Certification of Information:
 Consistent with Rules 1 and 2.4 of the CPUC's Rules of Practice and Procedure, this resource adequacy compliance filing has been verified by an officer of the corporation, who shall expressly certify, under penalty of perjury, the following:

1. I have responsibility for the activities reflected in this filing.
2. I have reviewed, or have caused to be reviewed, this compliance filing.
3. Based on my knowledge, information, or belief, this filing does not contain
4. Based on my knowledge, information, or belief, this [filing] contains all of the information required to be provided by CPUC orders, rules, and regulations.

Certified By Authorized LSE Representative (Name):	Roy Kuga
Title:	Vice President - Energy Supply
Date:	10/30/06

Signature (sign the hard copy of filing):



Name:	Terrance Robertson
Title:	Principle - Structured Transactions
Email:	tmr4@pge.com
Address:	245 Market St., 1309
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Telephone:	415-973-6993

Back-Up Contact Person for Questions about this Filing (Optional):	
Name:	
Title:	
Email:	
Telephone:	

Attachment 2

Declaration of Terrance M. Robertson

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

DECLARATION OF TERRANCE M. ROBERTSON IN SUPPORT OF 2007 YEAR-AHEAD RA COMPLIANCE FILING

I, Terrance M. Robertson, declare:

1. I am a principal in the Electric Procurement department at Pacific Gas and Electric Company (PG&E). I am responsible for intermediate-term electric resource planning and procurement at PG&E including system and local resource adequacy (Local RA) procurement for 2007. In carrying out these responsibilities, I have acquired knowledge of the system and local area resources in PG&E's electric portfolio, which are the subject of the filing.

2. I have reviewed PG&E's 2007 Year-Ahead System and Local RA compliance filing and was responsible for the preparation of the 2007 Year-Ahead System and Local RA Workbooks (Workbooks). I am familiar with the information required for the filing, and would testify to the facts and representations in this declaration under oath based on my personal knowledge unless otherwise stated herein.

3. Based on my review of the Workbooks and my knowledge of the information required for the filing, the Workbooks contains confidential information (Protected Information) that is material, market sensitive, electric procurement-related information within the scope of Public Utilities Code section 454.5(g). The Protected Information is also entitled to confidential treatment under Appendix 1 of D.06-06-066 (entitled "IOU Matrix"). Based on my knowledge and experience and in accordance with D.06-06-066 and the August 22, 2006 Administrative Law Judge's Ruling Clarifying Interim Procedures for Complying with D.06-06-066, R. 05-06-040, I make this declaration seeking confidential treatment of the Protected Information as detailed in this declaration.

4. The Protected Information falls into one or more of the following categories in the IOU Matrix:

- IV) Resource Planning Information - Electric
 - A) Forecast of IOU Generation Resources
 - B) Forecast of Qualifying Facility Generation

- C) Forecast of IOU Hydro Greater than 30 MW
- E) Forecast of Pre-1/1/2003 (“Old-World”) Bilateral Contracts
- F) Forecast of Post-1/1/2003 (“New-World”) Bilateral Contracts
- G) Forecast of DWR Contracts
- I) Forecast of Existing Renewable Resource Contracts
- V) Load Forecast Information and Data - Electric
 - B) LSE Total Peak Load Forecast – Bundled Customer (MW)
 - C) LSE Total Energy Forecast – Bundled Customer (MWh)
- VI) Net Open Position Information - Electric
 - A) Utility Bundled Net Open (Long or Short) Position for Capacity (MW)

The Protected Information in each of these categories is entitled to protection as confidential, according to the IOU Matrix, for three years.

5. Specifically, the following information contained in Attachment 3 – 2007 System Year-ahead RA Workbook is Protected Information:

- In Summary Table 1 (LSE Obligations) of the “Summary” tab, the “*Peak Demand [Coincident Peak Hour Demand Forecast provided by CEC,*” “*Forward Commitment Obligation [115% of Peak Load]*” and “*Forward Commitment Obligation for year-ahead – 90% of [Peak Demand plus 15% PRMJ]*” items are protected under IOU Matrix category V-B. These items represent, or are derived (in an obvious manner) from the Bundled Total Peak Load forecast. The “*Demand Response available more than 2 hours per day*” & “*Demand Response available no more than 2 hours per day*” items are protected under IOU Matrix category V-C. It is my understanding that disclosure of this information, together with publicly available Total Sales information can be used to closely determine PG&E’s confidential sales forecast for bundled customers. The “*Forward Commitment Obligation for Year-Ahead Minus Demand Response*” item is confidential under IOU Matrix categories V-B and VI-A. This information could be used to closely approximate PG&E’s confidential Peak Load Forecast for Bundled Customers and is a major component of the Capacity (System RA) Net Open Position.

- In Summary Table 2 (Total Claimed Resource Adequacy Capacity by Type of Capacity) of the “Summary” tab, all items under columns (B) through (G) are confidential. Row I to Row VII of these columns, together with the “*Total Resource Adequacy Capacity*” row are confidential under the IOU Matrix categories IV-A,B,C,E,F,G,I & VI-A. This information represents the forecast of electric capacity (System RA) as well as a component of the capacity (System RA) net open position. This information, if released, would allow entities to closely approximate PG&E’s capacity net open position, when combined with other publicly available data. Row VII, “*RMR Condition 2 Allocation*” of these columns is confidential under the IOU Matrix category V-B. It is my understanding that this information, if released, would allow the calculation of PG&E’s 2007 bundled customer total peak load, when combined with other available data.
- In Summary Table 3 (90% Year Ahead Compliance Showing – Claimed vs. Countable Load in Each Bucket) of the “Summary” tab, column (J) is confidential under IOU Matrix category V-B as it is derived (in an obvious manner) from the Bundled Total Peak Load forecast. Columns (K) & (L) are confidential under IOU Matrix categories IV-A,B,C,E,F,G,I & VI-A, as Resource Planning Forecasts and are a component of the capacity (System RA) net open position. Column (M) is confidential under IOU Matrix category VI-A showing the capacity (System RA) net open position on a percentage basis.
- In Summary Table 4 (Resource Category by Bucket) of the “Summary” tab, Column (O) is a restatement of confidential information in Summary Table 2 and hence confidential as well. Column (P) is confidential under IOU Matrix categories IV-A,B,C,E,F,G,I & VI-A. These are calculations that could be reversed to closely approximate PG&E’s forecast of capacity (System RA) as well as a component of the capacity (System RA) net open position. Column (Q) is confidential under IOU Matrix category VI-A showing the capacity (System RA) net open position on a percentage basis.

- In Summary Table 5 (Minimum Required Compliance Showing by Category) of the “Summary” tab, column (T) is confidential under IOU Matrix category V-B, as it could be used to closely approximate PG&E’s Peak Load Forecast. Column (U) is confidential under IOU Matrix categories IV-A,B,C,E,F,G,I & VI-A. These are calculations that could be reversed to closely approximate PG&E’s forecast of capacity (System RA) as well as a component of the capacity (System RA) net open position.. Column (V) is confidential under IOU Matrix category VI-A as it is a component of the capacity (System RA) net open position. Column (W) is confidential under IOU Matrix category VI-A as it qualitatively represents PG&E’s capacity net open position.
- In the “I_Phys_Res” tab the “*Contract Identifier*,” “*Schedule Resource ID*,” “*Resource Adequacy Capacity*,” “*Resource Contract Number*,” “Used for Local Filing,” “*Min. Hours in Month*,” “*Bucket 1*,” “*Bucket 2*,” “*Bucket 3*,” and “*Bucket 4*” as well as the Subtotal row are protected under the IOU Matrix categories IV-A,B,C,E,F,G,I. The protected information has been highlighted in gray on the tab and segregated at the bottom of the tab below a row labeled “***** Confidential Data Below *****”.
- In the “II_DWR_Contracts” the “*Contract Identifier*,” “*RA Capacity*,” “*Resource Contract Number*,” “*Min. Hours in Month*,” “*CAISO Congestion Zone or Branch Group*,” “*Allocation of RA Import Branch Group*,” “*Bucket 1*,” “*Bucket 2*,” “*Bucket 3*,” and “*Bucket 4*” as well as the Subtotal row are protected under the IOU Matrix category IV-G. The protected information has been highlighted in gray on the tab.
- In the “IV_NonUnit_Import” tab the “*Contract Identifier*,” “*Branch Group*,” “*RA Capacity*,” “*Resource Contract Number*,” “*Min. Hours in Month*,” “*Allocation of RA Import Branch Group*,” “*Bucket 1*,” “*Bucket 2*,” “*Bucket 3*,” and “*Bucket 4*” as well as the Subtotal row are protected under the IOU Matrix categories IV-A,B,C,E,F,I noted above. The protected information has been highlighted in gray on the tab.
- In the “V_LD_Contracts” the “*Contract Identifier*,” “*RA Capacity*,” “*Resource Contract Number*,” “*Min. Hours in Month*,” “*CAISO Congestion*

Zone, *"Bucket 1," "Bucket 2," "Bucket 3,"* and *"Bucket 4"* as well as the Subtotal row are protected under the IOU Matrix categories IV-E,F. The protected information has been highlighted in gray on the tab.

- In the "DR-a_2hr_Plus" the *"Contract Identifier," "Program Name," "RA Capacity," "Program Operator," "Program Capacity,"* and *"Total Authorized Hours of Operation"* are protected under IOU Matrix category V-C. It is my understanding that disclosure of this information, together with publicly available energy sales information can be used to closely determine PG&E's confidential sales forecast for bundled customers. The protected information has been highlighted in gray on the tab.

6. Specifically, the following information contained in Attachment 3 – 2007 Local Year-ahead RA Workbook is Protected Information:

- In the Summary Tables 1 through 4 of the "Summary" tab, the *"Total Procurement in XXX Local Area"* (where XXX refers to the LA Basin, San Diego, Greater Bay Area, and Other PG&E) information is protected under the IOU Matrix category IV-A,B,C,E,F,G,I items and the category VI-A. This information represents the forecast of electric capacity (Local RA) as well as a component of the capacity (Local RA) net open position. This information, if released, would allow entities to closely approximate PG&E's capacity net open position, when combined with other publicly available data.
- In the Summary Tables 1 through 4 of the "Summary" tab the *"XXX Local RA"* and *"XXX RMR Allocation"* (where XXX refers to the LA Basin, San Diego, Greater Bay Area, and Other PG&E) information is protected under the IOU Matrix category V item noted above. It is my understanding that this information, if released, would allow the calculation of PG&E's 2007 bundled customer total peak load, when combined with other publicly available data.
- In the Summary Tables 1 through 4 of the "Summary" tab the *"Compliance Status"* information is protected under the IOU Matrix category VI-A,B,C,E,F,G,I. This information qualitatively represents PG&E's capacity (Local RA) net open position.

- In the "I_Phys_Res" tab the "Contract Identifier," "Scheduling Resource ID," "RA Capacity" for January through December, "Local RAR Area," "LSE Contract with RMR Unit," and "Min. Hours" for January through December information for some resources as well as the Subtotal row is protected under the IOU Matrix categories IV-A,B,C,E,F,G,I. The protected information has been highlighted in gray on the tab and segregated at the bottom of the tab below a row labeled "***** Confidential Data Below *****". This information, if released, would allow entities to closely approximate PG&E's capacity (Local RA) net open position when combined with other publicly available data and could allow entities to possibly identify resources within PG&E's portfolio and thus provide a forecast of the availability of those resources.

7. PG&E is complying with the limitations on confidentiality specified in the IOU Matrix for the type of data described above.

8. I am not aware of any instances in which the Protected Information identified in this declaration has been disclosed to the public.

9. The Workbook specifies the level of aggregation required by the Energy Division. The Protected Information cannot be provided in an aggregated, partially redacted, summarized, masked or otherwise protected form in a fashion that is consistent with the required format, or without divulging confidential information.

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

Executed this 2nd day of November 2006, at San Francisco, California.


Terrance M. Robertson
Pacific Gas and Electric Company