

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298



**REVISED**

October 28, 2013

**Advice Letter 4184-E**

Brian K. Cherry  
Vice President, Regulation and Rates  
Pacific Gas and Electric Company  
77 Beale Street, Mail Code B10C  
P.O. Box 770000  
San Francisco, CA 94177

**Subject: Procurement Transaction Quarterly Compliance Filing - Q4, 2012**

Dear Mr. Cherry:

Advice Letter 4184-E is effective February 1, 2013.

Sincerely,

A handwritten signature in cursive script that reads "Edward F. Randolph".

Edward F. Randolph, Director  
Energy Division



**Brian K. Cherry**  
Vice President  
Regulatory Relations

Pacific Gas and Electric Company  
77 Beale St., Mail Code B10C  
P.O. Box 770000  
San Francisco, CA 94177

Fax: 415-973-7226

January 30, 2013

**Advice 4184-E**

(Pacific Gas and Electric Company ID U 39 E)

Public Utilities Commission of the State of California

**Subject: Procurement Transaction Quarterly Compliance Filing (Q4, 2012)**

Pacific Gas and Electric Company ("PG&E") hereby submits to the California Public Utilities Commission ("Commission" or "CPUC") its compliance filing for the fourth quarter of 2012 in conformance with PG&E's Bundled Procurement Plan ("BPP") approved by the Commission in Decision ("D.") 12-01-033. PG&E's submittal of this Procurement Transaction Quarterly Compliance Report ("QCR") for record period October 1, 2012 through December 31, 2012 (Q4-2012) is in accordance with D.03-12-062, Ordering Paragraph 19, which requires that the Quarterly Procurement Plan Compliance Reports be submitted within 30 days of the end of the quarter.

**Background**

In D.07-12-052, the Commission directed Energy Division and the Investor-Owned Utilities ("IOUs") to continue the collaborative effort to develop a reformatted QCR. The Commission authorized Energy Division to implement a reformatted QCR and to make ministerial changes to the content and format of the report as needs arise. Energy Division and the IOUs finalized the QCR format in December 2008. This QCR is consistent with the final format authorized by Energy Division on December 15, 2008.

**Compliance Items**

Attachment 1 to this QCR includes a narrative with supporting Confidential Appendices that conforms to the reformatted QCR. The public version of Attachment 1 only includes the Narrative, which is not confidential. The confidential version of this QCR includes the following supporting Confidential Appendices:

Appendix A –	Fourth Quarter 2012 Electric and Natural Gas Transactions
Appendix B –	Fourth Quarter 2012 Counter-Party Information
Appendix C –	Fourth Quarter 2012 Electric Transactions Summary
Appendix D –	Fourth Quarter 2012 Natural Gas Transactions Summary
Appendix E –	Fourth Quarter 2012 Other Transactions
Appendix F –	Fourth Quarter 2012 Key Briefing Packages
Appendix G –	Fourth Quarter 2012 Independent Evaluator Reports
Appendix H –	Fourth Quarter 2012 New Contracts Executed/Contracts Amended
Appendix I –	Summary of Retained Generation Investments Completed During Fourth Quarter 2012
Appendix J –	System Load Requirements/Conditions
Appendix K –	Risk Management Strategy Communication and Management Disclosure
Appendix L –	Reasonable Number of Analyses Models, Description of Models, and How Models Operate
Appendix M –	Transactions Subject to Strong Showing

Attachment 2 to this QCR includes a confidentiality declaration and matrix.

### **Protests**

Anyone wishing to protest this filing may do so by letter sent via U.S. mail, facsimile or E-mail, no later than **February 19, 2013**, which is 20 days after the date of this filing. Protests must be submitted to:

CPUC Energy Division  
ED Tariff Unit  
505 Van Ness Avenue, 4<sup>th</sup> Floor  
San Francisco, California 94102

Facsimile: (415) 703-2200  
E-mail: EDTariffUnit@cpuc.ca.gov

Copies of protests also should be mailed to the attention of the Director, Energy Division, Room 4004, at the address shown above.

The protest shall also be sent to PG&E either via E-mail or U.S. mail (and by facsimile, if possible) at the address shown below on the same date it is mailed or delivered to the Commission:

Brian K. Cherry  
Vice President, Regulatory Relations  
Pacific Gas and Electric Company  
77 Beale Street, Mail Code B10C  
P.O. Box 770000  
San Francisco, California 94177

Facsimile: (415) 973-7226  
E-mail: PGETariffs@pge.com

Any person (including individuals, groups, or organizations) may protest or respond to an advice letter (General Order 96-B, Rule 7.4). The protest shall contain the following information: specification of the advice letter protested; grounds for the protest; supporting factual information or legal argument; name, telephone number, postal address, and (where appropriate) e-mail address of the protestant; and statement that the protest was sent to the utility no later than the day on which the protest was submitted to the reviewing Industry Division (General Order 96-B, Rule 3.11).

### **Effective Date**

In accordance with D.02-10-062, the requested effective date of this advice letter is **February 1, 2013**.

### **Notice**

In accordance with General Order 96-B, Section IV, a copy of this advice letter excluding the confidential appendices is being sent electronically and via U.S. mail to parties shown on the attached list and the service lists for Rulemaking ("R.") R.12-03-014. Address changes to the General Order 96-B service list and all electronic approvals should be sent to e-mail PGETariffs@pge.com. For changes to any other service list, please contact the Commission's Process Office at (415) 703-2021 or at Process\_Office@cpuc.ca.gov. Advice letter filings can also be accessed electronically at: <http://www.pge.com/tariffs>.



Vice President – Regulatory Relations

cc: Service List R.12-03-014, R.01-10-024, R.11-10-023.  
PG&E's Procurement Review Group

Public Attachments: Attachment 1 – Narrative  
Attachment 2 – Confidentiality Declaration and Matrix

# 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 (ID U39 E)**

Utility type:

ELC

GAS

PLC

HEAT

WATER

Contact Person: Kimberly Chang

Phone #: (415) 972-5472

E-mail: kwcc@pge.com and PGETariffs@pge.com

EXPLANATION OF UTILITY TYPE

(Date Filed/ Received Stamp by CPUC)

ELC = Electric

GAS = Gas

PLC = Pipeline

HEAT = Heat

WATER = Water

Advice Letter (AL) #: **4184-E**

Tier: **2**

Subject of AL: **Procurement Transaction Quarterly Compliance Filing (Q4, 2012)**

Keywords (choose from CPUC listing): Compliance, Procurement

AL filing type:  Monthly  Quarterly  Annual  One-Time  Other \_\_\_\_\_

If AL filed in compliance with a Commission order, indicate relevant Decision/Resolution #: D.03-12-062

Does AL replace a withdrawn or rejected AL? If so, identify the prior AL: No

Summarize differences between the AL and the prior withdrawn or rejected AL: \_\_\_\_\_

Is AL requesting confidential treatment? Yes. If so, what information is the utility seeking confidential treatment for: Please see page 2.

Confidential information will be made available to those who have executed a nondisclosure agreement:  Yes  No

Name(s) and contact information of the person(s) who will provide the nondisclosure agreement and access to the confidential information: Sharon Tatai (415) 973-2788 and Michael Kowalewski (415) 972-5589

Resolution Required?  Yes  No

Requested effective date: **February 1, 2013**

No. of tariff sheets: N/A

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 proposed: N/A

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

Protests, dispositions, 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:

**California Public Utilities Commission**

**Energy Division**

**EDTariffUnit**

**505 Van Ness Ave., 4<sup>th</sup> Flr.**

**San Francisco, CA 94102**

**E-mail: [EDTariffUnit@cpuc.ca.gov](mailto:EDTariffUnit@cpuc.ca.gov)**

**Pacific Gas and Electric Company**

**Attn: Brian Cherry**

**Vice President, Regulatory Relations**

**77 Beale Street, Mail Code B10C**

**P.O. Box 770000**

**San Francisco, CA 94177**

**E-mail: [PGETariffs@pge.com](mailto:PGETariffs@pge.com)**

**PACIFIC GAS AND ELECTRIC COMPANY**  
**PROCUREMENT PLAN COMPLIANCE REPORT**  
**FOR THE FOURTH QUARTER OF 2012**

**January 30, 2013**

## List of Attachments

- Confidential Attachment A: Fourth Quarter 2012 Transactions
- Confidential Attachment B: Fourth Quarter 2012 Counterparty Information
- Confidential Attachment C: Fourth Quarter 2012 Electric Transactions Summary
- Confidential Attachment D: Fourth Quarter 2012 Natural Gas Transactions Summary
- Confidential Attachment E: Fourth Quarter 2012 Other Transactions
- Confidential Attachment F: Fourth Quarter 2012 Key Briefing Packages
- Confidential Attachment G: Fourth Quarter 2012 Independent Evaluator Reports
- Confidential Attachment H: Fourth Quarter 2012 New Contracts Executed/Contracts Amended
- Confidential Attachment I: Fourth Quarter 2012 Summary of Retained Generation Investments Completed
- Confidential Attachment J: System Load Requirements/Conditions
- Confidential Attachment K: Risk Management Strategy Communication and Management Disclosure
- Confidential Attachment L: Reasonable Number of Analyses Models, Description of Models, and How Models Operate
- Confidential Attachment M: Transactions Subject to Strong Showing

## **A. Introduction**

As required by Ordering Paragraph (OP) 8 of Decision (D.) 02-10-062, and clarified in D.03-06-076, D.03-12-062, D.04-07-028, D.04-12-048 and D.07-12-052, Pacific Gas and Electric Company (PG&E) hereby provides its report demonstrating that its procurement-related transactions during the period October 1, 2012 through December 31, 2012 (Quarter), were in compliance with PG&E's Bundled Procurement Plan (BPP or Plan) approved by the California Public Utilities Commission (CPUC or Commission) in D.12-01-033.

## **B. Summary**

During the Quarter, PG&E engaged in competitively priced transactions consistent with its Plan. All transactions were conducted using processes specified in the Plan. A summary of the information included in each confidential attachment is:

- Confidential Attachment A, *Transactions*, provides a summary of all transactions executed during the Quarter, which are less than five years in length and that have not been filed through a separate advice filing or application.
- Confidential Attachment B, *Counterparty Information*, provides a summary of (1) all non-investment grade counterparties with whom PG&E transacted; and (2) the top 10 counterparties by volume during the Quarter.
- Confidential Attachment C, *Electric Transactions Summary*, provides a summary of the electric transactions executed during the Quarter.
- Confidential Attachment D, *Natural Gas Transactions Summary*, provides a summary of the gas transactions executed during the Quarter.
- Confidential Attachment E, *Other Transactions*, provides the executed transactions resulting from non-energy-related products during the Quarter.
- Confidential Attachment F, *Key Briefing Packages*, provides a summary of all relevant Procurement Review Group (PRG) agendas and presentations presented.

- Confidential Attachment G, *Independent Evaluator Reports*, provides any relevant Independent Evaluator (IE) report completed in the Quarter (for Fourth Quarter 2012, this is not applicable).
- Confidential Attachment H, *New Contracts Executed/Contracts Amended*, provides a summary of all agreements executed and/or amended in the Quarter.
- Confidential Attachment I, *Summary of Retained Generation Investments Completed*, provides a summary of any investments related to retained generation facilities and multiple contracts for the same supplier, resource or facility, consistent with the requirements of D.07-01-039.
- Confidential Attachment J, *System Load Requirements/Conditions*, provides a summary of all information related to addressing PG&E's residual net open position.
- Confidential Attachment K, *Risk Management Strategy Communication and Management Disclosure*, provides a summary of all procurement-related risk strategies and issues communicated to PG&E's senior management and the PRG.
- Confidential Attachment L, *Reasonable Number of Analyses Models, Description of Models, and How Models Operate*, provides a summary of any models related to the relevant transactions identified in this filing.
- Confidential Attachment M, *Transactions Subject to Strong Showing*, provides a summary and supporting documentation of strong showing transactions.

During the Quarter, PG&E also engaged in other procurement activities which are approved through separate regulatory processes. These activities include conducting competitive solicitations and activities related to the following: (1) PG&E's 2011 Renewable Portfolio Standard (RPS) Plan; (2) the Qualifying Facility/Combined Heat and Power (QF/CHP) Settlement, which became effective on November 23, 2011;<sup>1</sup> and (3) PG&E's Photovoltaic (PV)

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<sup>1</sup> The QF/CHP Settlement Agreement indicates that each Investor-Owned Utility (IOU) shall conduct three Requests for Offers (RFO) during the "Initial Program Period" (or 48 months following the Settlement Effective Date) exclusively for CHP resources as a means of achieving its megawatt (MW) and greenhouse gas emissions reduction targets (*see* Term Sheet, Sections 4.2 and 5.1). PG&E issued its First CHP RFO on December 7, 2011.

RFO. Transactions were executed for PG&E's 2011 RPS Plan, and the QF/CHP Settlement. In addition, during the Quarter PG&E issued: (1) the 2012 RPS RFO; and (2) the Renewable Auction Mechanism Auction 3.

**C. Master Data Request Documentation**

D.02-10-062, Appendix B, as clarified by D.03-06-076, sets forth specific elements to be addressed in this report. Each element is discussed below.

**1. Identification of the ultimate decision maker(s) up to the Board level, approving the transactions.**

All procurement-related activity during the Quarter was approved and executed either by, or under the direction of, Fong Wan, Senior Vice President, Energy Procurement; Roy Kuga, Vice President, Energy Supply Management; Gary Jeung, Senior Director, Renewable Energy; and/or Marino Monardi, Director, Portfolio Management, consistent with the delegation of authority effective for the period.

**2. The briefing package provided to the ultimate decision maker.**

The "decision-maker" for a particular contemplated transaction depends on many factors, such as term, volume, and notional value. For many of the transactions during the Quarter, the "decision-maker" was a gas or power trading employee executing transactions (e.g., day-ahead or hour-ahead power purchases and sales) per an established plan or to achieve a particular objective (such as balancing the portfolio supply and demand). For such transactions, briefing packages are not prepared. Briefing packages prepared during the Quarter for transactions that required senior management approval are included in Confidential Attachment K, *Risk Management Strategy Communication and Management Disclosure*. In addition, copies of presentations made by PG&E to its PRG during the Quarter are included in Confidential Attachment F, *Key Briefing Packages*.

**3. Description of and justification for the procurement processes used to select the transactions.**

***a) Electric – Description of Procurement Processes***

The approved procurement processes used during the Quarter were as follows:

- California Cap-and-Trade Program Greenhouse Gas Allowance Auction – The California Air Resource Board (CARB) held its first greenhouse gas (GHG) allowance auction on November 14, 2012. Any relevant information is included in Confidential Attachment E, *Other Transactions*, Confidential Attachment F, *Key Briefing Packages*, Confidential Attachment K, *Risk Management Strategy Communication and Management Disclosure*, and Confidential Attachment L, *Reasonable Number of Analyses Models, Description of Models, and How Models Operate*.
- California Independent System Operator (CAISO) Monthly Congestion Revenue Right (CRR) Allocation and Auction Process – In October 2012, PG&E participated in Tier 1, Tier 2, and Auction of the CAISO monthly CRR allocation process to procure CRRs for November 2012. In November 2012, PG&E participated in Tier 1, Tier 2, and Auction of the CAISO’s monthly CRR allocation process to procure CRRs for December 2012. In December 2012, PG&E participated in Tier 1, Tier 2, and Auction of the CAISO’s monthly CRR allocation process to procure CRRs for January 2013. Relevant information is included in Confidential Attachment F, *Key Briefing Packages*, Confidential Attachment J, *System Load Requirements/Conditions*, Confidential Attachment K, *Risk Management Strategy Communication and Management Disclosure*, and Confidential Attachment L, *Reasonable Number of Analyses Models, Description of Models, and How Models Operate*.
- CAISO 2013 CRR Allocation, Tiers 2 and 3 and Auction Process – PG&E participated in Tier 2 (submitted nominations on October 15, 2012), Tier 3 (submitted nominations on October 26, 2012), and the Annual Auction (submitted

nominations on November 8, 2012) of the CAISO's annual release process for 2013 CRRs. Relevant information is included in Confidential Attachment F, *Key Briefing Package*, Confidential Attachment J, *System Load Requirements/Conditions*, Confidential Attachment K, *Risk Management Strategy Communication and Management Disclosure* and Confidential Attachment L, *Reasonable Number of Analyses Models, Description of Models, and How Models Operate*.

- 2013 Resource Adequacy (RA) RFO – On August 7, 2012, PG&E issued an RFO for RA for (1) offers for PG&E to Buy System RA – (a) May through September 2013 or (b) Bay Area Local RA – April through December 2013; and (2) bids for PG&E to Sell – (a) Bay Area Local RA – January through March 2013, (b) other PG&E Areas Local RA – January through December 2013; or (3) System RA – January through April and October through December 2013. Interested parties were required to submit an offer by August 28, 2012. Transactions were executed under the RFO in October and November 2012. Relevant information is included in Confidential Attachment E – *Other Transactions*, Confidential Attachment F, *Key Briefing Packages*, Confidential Attachment H, *New Contracts Executed/Contracts Amended*, and Confidential Attachment L, *Reasonable Number of Analyses Models, Description of Models, and How Models Operate*.
- Convergence Bidding – PG&E reviews activities in the convergence bidding market and assesses its participation in the CAISO market. Relevant information is included in Confidential Attachment E – *Other Transactions* (attachment is a quarterly report), Confidential Attachment F, *Key Briefing Packages*, Confidential Attachment J, *System Load Requirements/Conditions*, and Confidential Attachment K, *Risk Management Strategy Communication and Management Disclosure*.

- Electronic Exchanges – PG&E engaged in electronic broker market transactions to manage its physical net open position and to participate in economic transactions designed to reduce customers’ exposure to market volatility. Activities include day-ahead transactions.
- Bilateral Agreements – During the Quarter, PG&E executed directly with counterparties for RA products. Relevant information is included in Confidential Attachment E – *Other Transactions*, Confidential Attachment H, *New Contracts Executed/Contracts Amended*, and Confidential Attachment M, *Transactions Subject to Strong Showing*.
- Bilateral Via Voice Broker – During the Quarter, PG&E used voice brokers to execute directly with counterparties for term transactions.
- Agreements Arising From the QF/CHP Program Settlement (*For informational purposes only*) – During the Quarter, PG&E executed agreements resulting from its first CHP RFO. Relevant information is listed in Confidential Attachment H, *New Contracts Executed Contracts Amended* and other relevant briefing packages are in Confidential Attachment F, *Key Briefing Packages*.
- Legacy Contracts (*For informational purposes only*) – Per the QF/CHP Settlement described above, many legacy contracts converted to Public Utility Regulatory Policies Act, Transition, and As-Available Power Purchase Agreements (PPA); however, many of the remaining legacy contracts are still active and require amendments or letter agreements to address the new market structure (*e.g.*, GHG administration and metering issues).

***b) Justification for Procurement Processes***

***For competitive solicitations, describe the process used to rank offers and select winning bid(s).***

- 2013 RA RFO – PG&E completed the 2013 RA RFO in November 2012. PG&E evaluated and selected offers based on price. Due to its limited amount of RA import and Path 26 RA transfer capability, if PG&E was not be able to accept all

winning offers from resources outside of the CAISO or south of Path 26, PG&E accepted the next best priced offer from in area resources or resources north of Path 26, respectively. To the extent winning offers had equal prices, the offers were accepted in equal MW amounts, consistent with PG&E's desired procurement in the RFO and the offered quantity. Relevant information is included in Confidential Attachment E, *Other Transactions*, Confidential Attachment F, *Key Briefing Packages*, Confidential Attachment H, *New Contracts Executed/Contracts Amended* and Confidential Attachment L, *Reasonable Number of Analyses Models, Description of Models, and How Models Operate*.

- Independent Evaluator Reports – An IE Report is required for all competitive solicitations that either involve affiliate transactions or utility-owned or utility turnkey bids, and for all competitive RFOs seeking products to satisfy service area need and supply-side resources greater than two years in length (and subject to Quarterly Compliance Report (QCR) filings) regardless of the bidders. PG&E did not execute any competitive solicitations in the Quarter that meet the above criteria.

***For other transactional methods, provide the documentation supporting the selection of the chosen products.***

- CARB Allowance Allocation and Auction Processes – PG&E received its annual allocation of Vintage 2013 allowances from CARB in September 2012. All of these allowances in turn will be allocated into the quarterly Auctions CARB will conduct. As PG&E cannot use any of its allocated allowances to satisfy its GHG compliance obligations, allowances must separately be procured. The first quarterly Auction took place on November 14, 2012.

As stated in PG&E's conformed GHG Procurement Plan filed August 31, 2012, (Appendix L) to comply with D.12-04-046, PG&E is authorized to procure GHG products through any CARB Auction in accordance with the Cap-and-Trade regulation. PG&E provided information regarding its allowance procurement strategy and the Quarterly Auction to the PRG. Relevant information is included in

Confidential Attachment E, *Other Transactions*, Confidential Attachment F, *Key Briefing Packages*, Confidential Attachment K, *Risk Management Strategy Communication and Management Disclosure*, and Confidential Attachment L, *Reasonable Number of Analyses Models, Description of Models, and How Models Operate*.

- CAISO Monthly CRR Allocation and Auction Process – PG&E estimated that a portion of its generation, imports and load in the months of November and December 2012 and January 2013, remained exposed to congestion risk, and therefore participated in the CAISO’s Monthly CRR allocation and auction process to obtain CRRs to mitigate this risk. PG&E sought CRRs to fulfill the following objectives: (1) narrow the distribution of PG&E’s energy procurement costs due to electric transmission congestion as measured by the electric To-expiration-Value-at-Risk (TeVaR); and (2) reduce the expected congestion costs that PG&E would incur in its operations.

PG&E acquires CRRs for any path (represented by a source-sink pair) connecting existing generation sources to existing loads (retail loads, Helms pumping load and wholesale load obligations) or for any path that PG&E reasonably anticipates that it might need to flow energy in the future due to the addition of new contracts, resources or load obligations. Additionally, there may be CRRs which are positively correlated in value with CRRs for paths that have limited availability. PG&E is authorized to acquire CRRs for such positively correlated paths as well. Therefore, PG&E will obtain any CRRs that are determined to be valuable as hedges against congestion costs at the time they are offered, subject to risk assessment regarding the specific source/sink combinations as approved in its BPP.

PG&E provided information regarding its CRR strategy to the PRG. Relevant information is included in Confidential Attachment F, *Key Briefing Packages*,

Confidential Attachment J, *System Load Requirements/Conditions*, Confidential Attachment K, *Risk Management Strategy Communication and Management Disclosure*, and Confidential Attachment L, *Reasonable Number of Analyses Models, Description of Models, and How Models Operate*.

- CAISO 2013 Annual CRR Allocation and Auction Process – PG&E determined that it would be exposed to congestion risk on the electric transmission grid as power is delivered from its generating resources and contracts to serve bundled customer load. As a result, PG&E participated in the CAISO’s 2013 annual allocation and auction process to obtain CRRs to mitigate this risk. PG&E sought CRRs to fulfill the following objectives: (1) narrow the distribution of PG&E’s energy procurement costs due to electric transmission congestion as measured by the electric TeVaR; and (2) reduce the expected congestion costs that PG&E would incur in its operations.

PG&E only sought CRRs that were consistent with its assessment of congestion between its resources and load. This assessment included existing and executed supply arrangements, which were then applied to the 2013 CRR allocation and auction process. In all its detailed analysis and CRR selection strategy, PG&E used Locational Marginal Price (LMP) congestion prices and risk characteristics from CAISO’s CRR auctions and studies, as well as an internal assessment of LMP congestion prices and the likelihood of obtaining the CRRs in the monthly CRR processes. Relevant information is included in Confidential Attachment F, *Key Briefing Packages*, Confidential Attachment J, *System Load Requirements/Conditions*, Confidential Attachment K, *Risk Management Strategy Communication and Management Disclosure*, and Confidential Attachment L, *Reasonable Number of Analyses Models, Description of Models, and How Models Operate*.

- Electronic Exchanges and Bilateral – Direct With Counterparties – The dynamic environment of the short-term electric markets requires that traders have the ability to transact when market conditions are within parameters described by a particular trading strategy. Prices vary during a trading session as buyers and sellers adjust their prices in response to items such as electric system conditions, market responses, industry news and weather forecasts. As a result, it is common to see trades executed at different prices over the course of a trading session. The key aspect is that the transaction was executed within the parameters described by the monthly trading strategy and the terms of current master agreements and approved resolutions approval PG&E’s execution of specific transactions. PG&E maintains flexibility in its procurement activities by transacting in various forums, e.g., voice and on-line brokers, electronic exchanges, and directly with counterparties. Not all counterparties participate in a single forum; most transact in various forums. For the Quarter, PG&E used electronic exchanges and bilateral negotiations to execute transactions depending on the type of transaction and the best available procurement approach.

The transactions and supporting documentation subject to a strong showing standard are provided in Confidential Attachment M, *Transactions Subject to Strong Showing*.

Presentations of those activities presented to the PRG are in Confidential Attachment F, *Key Briefing Packages*.

Executed agreements are in Confidential Attachment H, *New Contracts Executed/Contracts Amended*.

**c) *Natural Gas -- Description of Procurement Processes***

The approved procurement processes used during the Quarter for Natural Gas transactions were as follows:

- Rockies Supply Solicitation – On October 17, 2012, PG&E issued a Request for Offers for Rocky Mountain Gas Supply for the electric portfolio (Rockies RFO). PG&E solicited offers for index-priced supply for three distinct terms: November 2012 through December 2012, November 2012 through March 2013, and November 2012 through October 2013. The results of the Rockies RFO are described in Confidential Attachment H, *New Contracts Executed/Contracts Amended*.
- Electronic Exchanges - Commodity Purchases/Sales – PG&E bought and sold physical natural gas on the Intercontinental Exchange (ICE) and the ICE Natural Gas Exchange (ICE/NGX) physical clearing service. ICE is an electronic system that matches buyers and sellers of natural gas products. Once buyer and seller are matched, ICE trades become bilateral trades. ICE/NGX trades are cleared by NGX rather than bilaterally. Transactions include forward transactions with deliveries starting within the next quarter and up to one month in duration, Balance of Month (BOM), day-ahead, and same-day.
- Electronic Exchanges - Gas Hedges – In compliance with D.12-01-033, PG&E conducted hedging activities under its approved hedging plan. PG&E executed hedges (swaps, options and swaptions) directly on the ICE, and cleared through exchanges (ICE or the New York Mercantile Exchange (NYMEX)). ICE and NYMEX provide access to anonymous bids and offers establishing both a liquid and robust market for financial products, and a benchmark for bilateral products. These products include Henry Hub swaps and options, and basis swaps against the industry benchmark indices, including Canadian Gas Price Reporter (CGPR), Gas Daily, Natural Gas Intelligence (NGI) and Inside Federal Energy Regulatory Commission (IFERC) Gas Market Report.
- In addition, on December 5, 2012, PG&E submitted Advice Letter 4135-E – *Update to Pacific Gas and Electric Company's Bundled Procurement Plan* –

*Modify Product Names.* The advice letter was filed in accordance with D.12-01-033, approving PG&E's BPP and the purpose of this filing is to modify the swaps product naming convention to conform with recent changes in the financial markets resulting from the Dodd-Frank Wall Street Reform and Consumer Protection Act (Dodd-Frank) and does not change PG&E's current authorized hedging strategies or limits.

- Bilateral - Commodity Purchases/Sales – PG&E bought and sold gas directly with counterparties in the bilateral market. Spot gas is traded at fixed prices and Gas Daily or CGPR index. Term gas (longer than one forward-month) is purchased at fixed prices, daily index (Gas Daily or CGPR) or monthly or bid week index (CGPR, NGI, or IFERC) prices.
- Voice Brokers - Gas Hedges – PG&E executed hedges (swaps) through voice brokers that resulted in exchange-cleared trades. Brokers provide access to anonymous bids and offers from both bilateral parties and cleared counterparties. After a broker matches a buyer and a seller in a trade, the parties will determine whether the trade will be settled bilaterally or cleared through NYMEX or ICE. The broker market trades the same financial products as the bilateral market.

***d) Justification for Procurement Processes***

***For competitive solicitations, describe the process used to rank offers and select winning bid(s).***

- Rockies Supply Solicitation – On October 17, 2012, PG&E issued a Request for Offers for Rocky Mountain Gas Supply for the electric portfolio (Rockies RFO). Price was the primary evaluation criteria for selecting offers as PG&E was willing to contract for less volume if the index premium was high relative to the market and more volume if the index premium was low relative to the market. PG&E issued the Rockies RFO to all its suppliers willing to sell Rockies gas for the terms of the RFO. The results of the Rockies RFO are described in Confidential Attachment H, *New Contracts Executed/Contracts Amended*.

- Independent Evaluator Reports – An IE Report is required for all competitive solicitations that either involve affiliate transactions or utility owned or utility turnkey bids, and for all competitive RFOs seeking products to satisfy service area need and supply-side resources greater than two years in length (and subject to QCR filings) regardless of the bidders. PG&E did not execute any competitive solicitations for Natural Gas during the Quarter that meet the above criteria.
- The transactions and supporting documentation subject to a strong showing standard are provided in Confidential Attachment M, *Transactions Subject to Strong Showing*.

Applicable presentations of those activities presented to the PRG are in Confidential Attachment F, *Key Briefing Packages*.

Executed agreements and strategy are in Confidential Attachment H, *New Contracts Executed/Contracts Amended* and in Confidential Attachment E, *Other Transactions*.

**e) Other Commodities**

PG&E did not purchase any commodities other than those identified above.

**4. Explanation/justification for the timing of the transactions.**

**a) Electric Transactions**

Throughout the Quarter, PG&E entered into electric transactions needed to reduce its net open position. This objective was achieved by gradually reducing the forecast open (*i.e.*, short or long) energy positions through the use and assessment of products that include Term, such as BOM, and month-ahead transactions, employing both standard and non-standard products, bidding into the Integrated Forward Market (IFM) to meet day-ahead, and real-time short positions. When selecting electric transactions, the best-priced bids/offers were selected first (merit-order selection) among those available for the required products at the time of the transaction, subject to credit and other limitations and operational constraints. Operational constraints include the local

area reliability requirements of the CAISO, as set forth in D.04-07-028. Detailed explanation/justification for the timing of the transactions is included in Confidential Attachment J, *System Load Requirements/Conditions*.

***b) Natural Gas Transactions***

For daily physical gas transactions, timing of execution is primarily driven by the requirement to match fuel usage and supply on a daily and monthly basis, and by the availability of information impacting expectations for daily dispatch of electric generating units. For transactions one month or longer, PG&E typically fills its forecast short gas positions in month-ahead, seasonal, or annual blocks, depending on the liquidity and prices available in each of these markets. Execution of the transactions is based on the PG&E Electric Portfolio Summer and Winter 2012 Physical Gas Procurement Plans, which are included in Confidential Attachment J, *System Load Requirements/Conditions*. Detailed explanation/justification for the timing of the transactions is included in Confidential Attachment J, *System Load Requirements/Conditions*.

**5. Discussion of the system load requirements/conditions underlying the need for the Quarter's transactions.**

***a) Near-Term Planning and Procurement***

PG&E develops a near-term analysis of its resource position (intra-month through several months forward) using an optimization model, which solves for lowest cost by optimizing a mix of resources to meet requirements, including dispatchable California Department of Water Resources contracts, Utility-Owned Generation resources, PPAs with dispatchability, Tolling Arrangements with "Merchant Plants," and market purchases, while accounting for all resource requirements and constraints (must-run, must-take and operating constraints).

Term and BOM purchases and sales may be transacted to close the net-open position and to reduce PG&E's reliance on the spot market. After identifying

transactions required to meet the must-run, must-take and operating constraints, PG&E considers “economic” transactions that involve decisions regarding dispatchable units and market purchases/sales. The decision to engage in “economic” transactions is more complex and depends on several quantitative and subjective factors. “Economic” transactions are conducted using information and data regarding system conditions, market prices and options available at the time of the decision. While potentially attractive “economic” transactions that reduce ratepayer volatility inherently include risks that must be considered, such as: (a) sharp swings in electric prices; (b) changes in production costs due to market dynamics; or (c) system changes, which may result in these transactions becoming more, or less, valuable, during the operating period or possible losses on hedge transactions. Additionally, changes in load or expected generation and other market and system conditions may result in having to buy (or sell) energy in the day-ahead or Real-Time Markets (RTM) at a cost greater than the revenue earned (or a price less than paid) in the forward transaction. Factors that go into the decision to engage in these transactions include (but are not limited to) the forecasted level of short/long energy during the forecasted period, sensitivity to changes in market price, reserve margins and demand volatility.

***b) PG&E Participation in the CAISO Markets***

In day-ahead planning process, PG&E strives to balance projected energy requirements with available resources and provide hour-ahead traders and real-time operators with appropriate resources in order to respond to changes that may occur on the electrical system subsequent to day-ahead trading. On a daily basis, PG&E conducts a least-cost analysis to forecast unit dispatch and determine market transactions to meet energy and ancillary services requirements. This process integrates all regulatory, environmental, safety and legal requirements.

PG&E’s day-ahead planning and procurement incorporates weather-adjusted load forecasts, resource availability, price forecasts, dispatch costs and current bilateral

electric market and forecasts of the CAISO's IFM prices. The results of this analysis will determine the price PG&E is willing to pay the CAISO to have it meet PG&E's forecasted hourly load in the Day-Ahead Market and the costs of each of its dispatchable resources to use to bid these resources into the IFM and Hour-Ahead Scheduling Process/RTM. The CAISO then assures least cost dispatch by considering all resources simultaneously with all transmission constraints.

In the RTM, similar to the day-ahead market, PG&E submits resource bids and schedules into CAISO markets and those resources that clear the market will be obligated to operate in real time. Market opportunities in the RTM have been limited with the advent of MRTU and the volatility of the CAISO's real-time energy market. Though bilateral market opportunities have been reduced, PG&E monitors the CAISO's Hour-Ahead and RTMs and also submit bids and schedules resources as needed to optimize its generation and market transactions to reduce costs.

***c) PG&E-Owned Generation Conditions During Fourth Quarter 2012***

PG&E received 189 percent of normal rainfall during the Quarter. The Helms Pumped Storage Facility (Helms) was used throughout the Quarter as unit availability, system conditions, and economics allowed. The Helms 2 planned maintenance began in Q4 2012 and will continue through Q2 2013.

Significant planned maintenance on conventional hydro during the Quarter included work on Balch 2 Unit 2 (54 MW), Cresta Unit 1 (35 MW), Drum 2 Unit 5 (49.5 MW), non-concurrent outages on all three Electra units (31, 31, and 37 MW), both Haas units (144 MW), non-concurrent outages on both J.B. Black units (86 MW each), Kerckhoff 2 (155 MW), Kings River (52 MW), non-concurrent outages on both Pit 1 units (31.5 MW each), Pit 5 Unit 1 (40 MW), Pit 7 Unit 2 (56 MW), both Poe units (129 MW), Stanislaus (91 MW), and both Tiger Creek units (60 MW).

Forced outages lasting longer than 24 hours at conventional hydro facilities greater than 30 MW in capacity were incurred at Balch 2 Unit 3 (54 MW), Caribou 2 Unit 5, and Pit 5 Units 2, 3 and 4 (40 MW each) as well as Rock Creek Unit 1 (56 MW).

For PG&E's owned fossil generation, maintenance was done at the Gateway Generating Station (617 MW) over 21 days in October.

Diablo Canyon Nuclear Plant Unit 2 was forced out October 11 through October 15.

No significant outages or maintenance took place at PG&E's Solar PV facilities during the Quarter.

Confidential discussion of the monthly system conditions is included in Confidential Attachment J, *System Load Requirements/Conditions*.

**6. Discussion of how the Quarter's transactions meet the goals of the risk management strategy reflected in the Plan.**

During the Quarter, PG&E executed transactions in accordance with its CPUC-approved Hedging Plan. Financial hedges were executed directly on the ICE, through a broker and cleared through an exchange (ICE or the NYMEX) or through an electronic auction and cleared through an exchange. ICE and the brokers provide access to anonymous bids and offers from both bilateral parties and cleared counterparties establishing both a liquid and robust market for financial products, and a benchmark for bilateral products. These products include Henry Hub swaps and options, and basis swaps against the industry benchmark indices, including CGPR, Gas Daily, NGI and IFERC. A list of information regarding Consumer Risk Tolerance notifications and management disclosures is included in Confidential Attachment K, *Risk Management Strategy Communication and Management Disclosure*.

**7. Copy of each contract.**

A list of transactional contracts executed and/or modified by PG&E during the Quarter is included in Confidential Attachment H, *New Contracts Executed/Contracts Amended*. Copies of

the contracts that were not separately filed are also included in Confidential Attachment H, *New Contracts Executed/Contracts Amended*.

**8. The valuation results for the contract(s) (for contracts of three months or greater duration).**

PG&E provides the valuation method and results for the contracts filed via this QCR in Confidential Attachment H, *New Contracts Executed/Contracts Amended*.

**9. An electronic copy of any data or forecasts used to analyze the transactions.**

Because transaction personnel are continuously monitoring a wide range of market information on a 24-hour-per-day, 7-day-per-week basis, it is not feasible to provide all the data and forecasts used to analyze all potential and executed transactions. However, key analysis data utilized during the Quarter is contained in Confidential Attachment J, *System Load Requirements/Conditions*.

**10. Provide a reasonable number of analyses requested by the Commission or the PRG and provide the resulting outputs.**

To the extent any analyses requested by the Commission or PRG during the Quarter were not already included as a part of PG&E's response to Items 1 through 9 above, such additional analyses would be contained in Confidential Attachment F, *Key Briefing Packages*.

**11. Any other information sought by the Commission under the Public Utilities Code.**

To the extent that the Commission has requested information for the Quarter as identified in the Master Data Request, this information is included in the confidential attachment workpapers. In addition, the Commission's Energy Division has requested that PG&E provide transparent exchange traded prices. PG&E has included this information in Confidential Attachment A, *Transactions* and in Confidential Attachment M, *Transactions Subject to Strong Showing*.

**D. Additional Reporting Requirement Pursuant to Decision 07-01-039**

As required by OP 12 of D.07-01-039, PG&E has included in Confidential Attachment I, *Summary of Retained Generation Investments Completed*, investments in retained generation that

were completed during the Quarter, as well as any multiple contracts of less than five years with the “same supplier, resource or facility” as required in D.07-01-039 on page 154. These were no transactions or investments to report during the Quarter.

**E. Cost Allocation Mechanism (CAM)**

For the Quarter, PG&E contracted for CAM resources. The CAM-related transactions, resulting from PG&E’s CHP RFO, is Oroville Cogeneration, L.P. facility, executed on December 5, 2012, and filed under Advice Letter 4171-E, on December 27, 2012 and Kern River Cogen Company facility, executed on December 19, 2012, and Advice Letter pending.

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

**DECLARATION OF SHARON K. TATAI  
SEEKING CONFIDENTIAL TREATMENT OF FOR CERTAIN DATA AND  
INFORMATION CONTAINED IN PG&E'S ADVICE LETTER 4184-E REGARDING  
CONFIDENTIAL ATTACHMENTS A, B, C, E, F, H, J, K, L, AND M**

I, Sharon K. Tatai, declare:

1. I am presently employed by Pacific Gas and Electric Company ("PG&E"), and have been an employee at PG&E since 1980. My current title is Manager within PG&E's Energy Procurement organization. In this position, my responsibilities include review of regulatory reports. In carrying out these responsibilities, I have acquired knowledge of PG&E's regulatory reporting and have also gained knowledge of electric energy procurement data, processes, and practices. Through this experience, I have become familiar with the type of information that would affect the regulatory filing, as well as with the type of information that would be considered confidential and proprietary.
2. Based on my knowledge and experience, and in accordance with Decision ("D.") 08-04-023 and the August 22, 2006 "Administrative Law Judge's Ruling Clarifying Interim Procedures for Complying with Decision 06-06-066," I make this declaration seeking confidential treatment of PG&E's January 30, 2013 Advice Letter 4184-E, Confidential Attachments A, B, C, E, F, H, J, K, L, and M. By this Application, PG&E is seeking the Commission's approval of Quarter Four, 2012 Quarterly Procurement Transaction Compliance Report, submitted by PG&E.
3. Attached to this declaration is a matrix identifying the data and information for which PG&E is seeking confidential treatment. The matrix specifies that the material PG&E is seeking to protect constitutes the particular type of data and information listed in Appendix I of D.06-06-

066 and Appendix D.08-04-023 (the "IOU Matrix"), and/or constitutes information that should be protected under General Order 66-C. The matrix also specifies the category or categories in the IOU Matrix to which the data and information corresponds, and why confidential protection is justified. Finally, the matrix specifies that: (1) PG&E is complying with the limitations specified in the IOU Matrix for that type of data or information; (2) the information is not already public; and (3) the data cannot be aggregated, redacted, summarized or otherwise protected in a way that allows partial disclosure. By this reference, I am incorporating into this declaration all of the explanatory text in the attached matrix that is pertinent to this submittal.

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

Executed on January 30, 2013, at San Francisco, California.

\_\_\_\_\_/s/\_\_\_\_\_  
Sharon K. Tatai  
Manager  
Energy Compliance and Report  
Energy Procurement  
PACIFIC GAS AND ELECTRIC COMPANY

**PACIFIC GAS AND ELECTRIC COMPANY'S (U 39 E)  
 PROPOSAL REGARDING ADVICE LETTER 4184-E  
 QUARTERLY PROCUREMENT TRANSACTION COMPLIANCE REPORT OF QUARTER FOUR 2012  
 January 30, 2013**

**IDENTIFICATION OF CONFIDENTIAL INFORMATION**

Redaction Reference	1) The material submitted constitutes a particular type of data listed in the Matrix, appended as Appendix 1 to D.06-06-066 (Y/N)	2) Which category or categories in the Matrix the data correspond to:	3) That it is complying with the limitations on confidentiality specified in the Matrix for that type of data (Y/N)	4) That the information is not already public (Y/N)	5) The data cannot be aggregated, redacted, summarized, masked or otherwise protected in a way that allows partial disclosure (Y/N)	PG&E's Justification for Confidential Treatment	Length of Time
<b>Document: Confidential Attachment 1</b>							
Attachment A – Physical and Financial Electric Deals	Y	Item VI) E) and F) Utility Planning Area Matrix Net Open (Electric)  Item XIII) Energy Division Monthly Data Request (AB 57)  XI) Monthly Procurement Costs (Energy Resource Recovery Account [ERRA] Filings)	Y	N	Y	Disclosure of monthly and daily data provide an understanding of PG&E's strategy for closing out its net open position.  This information reveals procurement cost categorized by transaction type, which is provided to Energy Division per AB 57 and is confidential for three years.	3 Years
Attachment B Counterparty information, including non-investment grade counterparties – Table - "List of Non-	Y	CPUC General Order 66-C	Y	N	Y	Counterparty information constitutes confidential non-utility business information protected under GO 66-C.	Indefinite

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Investment Grade Counterparties ”							
Attachment C Electric Transactions – Tables “Electric Physical”, “Electric Financial”, “Electric-Physical-HA Only”, “List of Top Ten Counterparties ” – all by transaction volume and dollar value	Y	Item VI) E) and F) Utility Planning Area Matrix Net Open (Electric)  Item XIII) Energy Division Monthly Data Request (AB 57)  XI) Monthly Procurement Costs (Energy Resource Recovery Account [ERRA] Filings)	Y	N	Y	These analyses are the basis of the monthly variable cost of energy and utility operation, which must be protected to preserve the confidentiality of ERRA documentation.	3 Years
Attachment C Electric Transactions (see above)	Y	Item VI) E) and F) Utility Planning Area Matrix Net Open	Y	N	Y	This information is provided to Energy Division on a confidential basis per AB 57 and must be protected here to preserve confidentiality of the AB 57 report.	3 Years

**PACIFIC GAS AND ELECTRIC COMPANY'S (U 39 E)  
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		(Electric)  Item XIII) Energy Division Monthly Data Request (AB 57)  XI) Monthly Procurement Costs (Energy Resource Recovery Account [ERRA] Filings)					
Attachment E Other Transactions	Y	VII) B) Bilateral Contract Terms and Conditions – contracts and power purchase agreements between utilities and non-affiliated third parties,	Y	N	Y	This information includes confidential contract information for contracts between PG&E and non-affiliated third parties.	3 Years
Attachment F PRG Material	Y	Item VII) E) New non-utility affiliated bilateral contracts – Electric	Y	Y	Y	Presentations to the PRG provide confidential bilateral contract terms, including price and performance terms. Confidentiality protection depends on type of material presented, see, <i>infra</i> .	3 Years from initial delivery date specified in contract or

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							1 Year after termination of deliveries, whichever is less
Attachment H Executed Contracts	Y	VII) B) Bilateral Contract Terms and Conditions – contracts and power purchase agreements between utilities and non-affiliated third parties,	Y	N	Y	Disclosure of information would provide counterparty name, volume, and price and would provide market sensitive information regarding bid strategy and selection.	3 Years
Attachment J System Conditions	Y	Item VI) E) and F) Utility Planning Area Matrix Net Open (Electric)  Item VI) Utility Bundled Net Open Position (Electric)	Y	N	Y	Residual net short/long is key input to PG&E's confidential forecast of net open position  The residual net short/long is information is provided to Energy Division on a confidential basis per AB 57 and must be protected here to preserve confidentiality of the AB 57 report.	3 Years
Attachment K Risk Management		CPUC General Order 66-C	Y	N	Y	TeVaR and supporting forecasts and analysis are confidential.	3 Years

**PACIFIC GAS AND ELECTRIC COMPANY'S (U 39 E)  
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						The internal governance information constitutes confidential non-utility business information protected under GO 66-C.	
Attachment L Reasonable Number of Analyses	Y	Item VI) E) and F) Utility Planning Area Matrix Net Open (Electric)  Item XIII) Energy Division Monthly Data Request (AB 57)  XI) Monthly Procurement Costs (Energy Resource Recovery Account [ERRA] Filings)	Y	N	Y	These analyses are the basis of the monthly variable cost of energy and utility operation, which must be protected to preserve details which would reveal PG&E's position in the market place.	3 Years
Attachment M Transactions subject to Strong Showing	Y	Item VI) E) and F) Utility Planning Area Matrix Net Open (Electric)	Y	N	Y	These analyses are the basis of the monthly variable cost of energy and utility operation, which must be protected to preserve the details which would reveal PG&E's position in the market place.	3 Years

**PACIFIC GAS AND ELECTRIC COMPANY'S (U 39 E)  
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		Item XIII) Energy Division Monthly Data Request (AB 57)  XI) Monthly Procurement Costs (Energy Resource Recovery Account [ERRA] Filings)					

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

**DECLARATION OF MICHAEL KOWALEWSKI  
SEEKING CONFIDENTIAL TREATMENT OF FOR CERTAIN DATA AND  
INFORMATION CONTAINED IN PG&E'S ADVICE LETTER 4184-E REGARDING  
CONFIDENTIAL ATTACHMENTS A, B, D, J, and M**

I, Michael Kowalewski, declare:

1. I am presently employed by Pacific Gas and Electric Company (PG&E) and have been an employee since 1992. My current title is Acting Director, Electric Gas Supply in the Energy Supply Management Department, which is part of the Energy Procurement Department. In this position, my responsibilities include physical and financial gas supply management and trading in support of PG&E's allocated DWR contracts, PG&E's company-owned generating facilities, and PG&E's tolling agreements. In carrying out these responsibilities, I have acquired knowledge of gas supply and gas hedging for electric generation, the markets for physical and financial products for gas supply and hedging, and the various types of transactions involved.
2. Based on my knowledge and experience, and in accordance with Decision ("D.") 08-04-023 and the August 22, 2006 "Administrative Law Judge's Ruling Clarifying Interim Procedures for Complying with Decision 06-06-066," I make this declaration seeking confidential treatment of PG&E's January 30, 2013 Advice Letter 4184-E, Confidential Attachments A, B, D, J, and M. By this Application, PG&E is seeking the Commission's approval of Quarter Four, 2012 Quarterly Procurement Transaction Compliance Report, submitted by PG&E.
3. Attached to this declaration is a matrix identifying the data and information for which PG&E is seeking confidential treatment. The matrix specifies that the material PG&E is seeking to protect constitutes the particular type of data and information listed in Appendix I of D.06-06-

066 and Appendix D.08-04-023 (the "IOU Matrix"), and/or constitutes information that should be protected under General Order 66-C. The matrix also specifies the category or categories in the IOU Matrix to which the data and information corresponds, and why confidential protection is justified. Finally, the matrix specifies that: (1) PG&E is complying with the limitations specified in the IOU Matrix for that type of data or information; (2) the information is not already public; and (3) the data cannot be aggregated, redacted, summarized or otherwise protected in a way that allows partial disclosure. By this reference, I am incorporating into this declaration all of the explanatory text in the attached matrix that is pertinent to this submittal.

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

Executed on January 30, 2013, at San Francisco, California.

\_\_\_\_\_  
/s/  
Michael Kowalewski  
Acting Director, Gas Supply  
Energy Supply Management  
PACIFIC GAS AND ELECTRIC COMPANY

**PACIFIC GAS AND ELECTRIC COMPANY'S (U 39 E)  
PROPOSAL REGARDING ADVICE LETTER 4184-E  
QUARTERLY PROCUREMENT TRANSACTION COMPLIANCE REPORT OF QUARTER FOUR 2012  
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<b>Document: Confidential Attachment 2</b>							
Attachment A – Physical Natural Gas Spot Transactions	Y	Item I)B) 2) Utility recorded gas procurement and cost information  XI) Monthly Procurement Costs (Energy Resource Recovery Account [ERRA] Filings)	Y	N	Y	Actual quantity and cost of procured gas are protected.	1 and 3 Years
Attachment A – Physical Natural Gas Term Transactions and/or Financial Natural Gas Transactions	Y	Item I) B) 2) Utility recorded gas procurement and cost information  Item I) A) 4) Long-term fuel (gas) buying and hedging plans  XI) Monthly Procurement Costs (Energy Resource Recovery Account [ERRA] Filings)	Y	N	Y	Actual quantity and cost of procured gas are protected.  Each transaction is a factor in PG&E's long term buying and hedging strategies. With the entire set of transactions PG&E's counterparties could reconstruct PG&E's gas buying and hedging plans.  This information reveals procurement cost categorized by transaction type, which is provided to Energy Division per Assembly Bill 57	1 and 3 Years; Confidential for three years past expiration of the last trade executed under the hedging plan. (Resolution E-4276, Finding 8) This date is January 1, 2019.
Attachment B Counterparty		CPUC General Order 66-C				Counterparty sales information constitutes confidential non-utility	Indefinite

**PACIFIC GAS AND ELECTRIC COMPANY'S (U 39 E)  
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information, including counterparty concentration – Table “List of Top Ten Counterparties” by transaction volume and dollar value	Y		Y	N	Y	business information protected under GO 66-C.	
Attachment D – Natural Gas Transactions	Y	Item I) B) 2) Utility recorded gas procurement and cost information  Item I) A) 4) Long-term fuel (gas) buying and hedging plans;  Item I) A) 4), Long-term fuel (gas) buying and hedging plans  XI) Monthly Procurement Costs (Energy Resource Recovery Account [ERRA] Filings)	Y	N	Y	PG&E's hedging strategies may be deduced through an analysis of PG&E's summarized transactions.	1 and 3 Years;  Confidential for three years past expiration of the last trade executed under the hedging plan. (Resolution E-4276, Finding 8) This date is January 1, 2019.

**PACIFIC GAS AND ELECTRIC COMPANY'S (U 39 E)  
PROPOSAL REGARDING ADVICE LETTER 4184-E  
QUARTERLY PROCUREMENT TRANSACTION COMPLIANCE REPORT OF QUARTER FOUR 2012  
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Attachment J Gas Transaction - Natural gas Documents	Y	Item I) A) 4) Long-term fuel (gas) buying and hedging plans	Y	N	Y	This information includes detailed information on PG&E's implementation of its fuel buying and hedging plans and must remain confidential to avoid disclosing PG&E's market strategy.	3 Years and Confidential for three years past expiration of the last trade executed under the hedging plan. (Resolution E-4276, Finding 8) This date is January 1, 2019.
Attachment M Transactions subject to Strong Showing - Physical Natural Gas Term Transactions and/or Financial Natural Gas Transactions s	Y	Item I) A) 4) Long-term fuel (gas) buying and hedging plans;  XI) Monthly Procurement Costs (Energy Resource Recovery Account [ERRA] Filings)	Y	N	Y	Actual quantity and cost of procured gas are protected.  Each transaction is a factor in PG&E's long term buying and hedging strategies. With the entire set of transactions PG&E's counterparties could reconstruct PG&E's gas buying and hedging plans.  This information reveals procurement cost categorized by transaction type, which is provided to Energy Division per Assembly Bill 57	3 Years and Confidential for three years past expiration of the last trade executed under the hedging plan. (Resolution E-4276, Finding 8) This date is January 1, 2019.

**PG&E Gas and Electric  
Advice Filing List  
General Order 96-B, Section IV**

, Helen	Dept of General Services	OnGrid Solar
1st Light Energy	Douglass & Liddell	PG&E
AT&T	Downey & Brand	Praxair
Alcantar & Kahl LLP	Duke Energy	R. W. Beck & Associates
Ameresco	Economic Sciences Corporation	RCS, Inc.
Anderson & Poole	Ellison Schneider & Harris LLP	Ross, Jim
BART	Foster Farms	Rutherford, Reid
Barkovich & Yap, Inc.	G. A. Krause & Assoc.	SCD Energy Solutions
Bartle Wells Associates	GLJ Publications	SCE
Bear Valley Electric Service	GenOn Energy Inc.	SMUD
Bloomberg	GenOn Energy, Inc.	SPURR
Bloomberg New Energy Finance	Goodin, MacBride, Squeri, Schlotz & Ritchie	Salazar, Julie
Boston Properties	Green Power Institute	San Francisco Public Utilities Commission
Braun Blasing McLaughlin, P.C.	Hamlin, Corey	Seattle City Light
Brookfield Renewable Power	Hanna & Morton	Sempra Utilities
CA Bldg Industry Association	Hitachi	Shaw, Tim
CENERGY POWER	House, Lon	Sheriff, Nora
Cade, Mike	In House Energy	Sierra Pacific Power Company
California Cotton Ginners & Growers Assn	International Power Technology	Silicon Valley Power
California Energy Commission	Intestate Gas Services, Inc.	Silo Energy LLC
California League of Food Processors	Kelly, Kate	Smith, Allison
California Public Utilities Commission	Lawrence Berkeley National Lab	SoCalGas
Calpine	Los Angeles County Office of Education	Southern California Edison Company
Cardinal Cogen	Los Angeles Dept of Water & Power	Spark Energy, L.P.
Casner, Steve	MAC Lighting Consulting	Srinivasan, Seema
Castracane, Steve	MRW & Associates	Stewart, Michael
Center for Biological Diversity	Manatt Phelps Phillips	Sun Light & Power
Chris, King	Marin Energy Authority	Sunrun Inc.
City of Palo Alto	McKenna Long & Aldridge LLP	Sunshine Design
City of Palo Alto Utilities	McKenzie & Associates	Sutherland, Asbill & Brennan
City of San Jose	Merced Irrigation District	Tecogen, Inc.
City of Santa Rosa	Modesto Irrigation District	Terranova, Karen
Clean Energy Fuels	Morgan Stanley	Tiger Natural Gas, Inc.
Clean Power	Morrison & Foerster	TransCanada
Coast Economic Consulting	Morrison & Foerster LLP	Turlock Irrigation District
Commercial Energy	NLine Energy, Inc.	United Cogen
Consumer Federation of California	NRG West	Utility Cost Management
Crossborder Energy	NaturEner	Utility Specialists
Davis Wright Tremaine LLP	Norris & Wong Associates	Verizon
Day Carter Murphy	North America Power Partners	Wellhead Electric Company
Day, Michael	North Coast SolarResources	Western Manufactured Housing Communities Association (WMA)
Defense Energy Support Center	Northern California Power Association	White, David
Department of General Services	O'Brien, Ed	Wodtke, Alexis
Department of Water Resources	Occidental Energy Marketing, Inc.	eMeter Corporation