

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



November 4, 2014

Advice Letter 4352-E, 4352-E-A, 4352-E-B, and 4352-E-C

Meredith Allen
Senior Director, Regulatory Relations
Pacific Gas and Electric Company
77 Beale Street, Mail Code B10C
P.O. Box 770000
San Francisco, California 94177

SUBJECT: 2013 Q4 Procurement Transaction Quarterly Compliance Filing

Dear Ms. Allen:

Advice Letters 4352-E, 4352-E-A, 4352-E-B, and 4352-E-C are effective as of October 17, 2014.

Sincerely,

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

Edward 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, 2014

Advice 4352-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 2013)

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 2013 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, 2013, through December 31, 2013, (Q4 2013) is in accordance with D.03-12-062, Ordering Paragraph 19, which requires that the QCR 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 2013 Electric and Natural Gas Transactions
- Appendix B – Fourth Quarter 2013 Counterparty Information
- Appendix C – Fourth Quarter 2013 Electric Transactions Summary
- Appendix D – Fourth Quarter 2013 Natural Gas Transactions Summary
- Appendix E – Fourth Quarter 2013 Other Transactions

Appendix F –	Fourth Quarter 2013 Key Briefing Packages
Appendix G –	Fourth Quarter 2013 Independent Evaluator Reports
Appendix H –	Fourth Quarter 2013 New Contracts Executed/Contracts Amended
Appendix I –	Summary of Retained Generation Investments Completed During Fourth Quarter 2013
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 confidentiality declarations and matrices.

The filing would not increase any current rate or charge, cause the withdrawal of service, or conflict with any rate schedule or rule.

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, 2014, 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, 4th 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

The requested effective date of this Tier 2 advice letter is March 1, 2014, which is 30 days after the date of filing.

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.") 12-03-014, R.01-10-024, and R.11-10-023. 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>.

Handwritten signature of Brian Cherry in cursive script.

Vice President, Regulatory Relations

cc: Service Lists 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 Declarations and Matrices

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: **Shirley Wong**

Phone #: **(415) 972-5505**

E-mail: **slwb@pge.com and PGETariffs@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) #: **4352-E**

Tier: **2**

Subject of AL: **Procurement Transaction Quarterly Compliance Filing (Q4 2013)**

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.12-01-033 and 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? If so, what information is the utility seeking confidential treatment for: **Yes, Please see attached Confidentiality Declarations and Matrices.**

Confidential information will be made available to those who have executed a nondisclosure agreement: **Yes.**

Name(s) and contact information of the person(s) who will provide the nondisclosure agreement and access to the confidential information: **Marianne Aikawa, (415) 973-0375; Sharon K. Tatai, (415) 973-2788; and Michael Kowalewski, (415) 972-5589.**

Resolution Required? Yes No

Requested effective date: **March 1, 2014**

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**

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:

CPUC - Energy Division

ED Tariff Unit

505 Van Ness Ave., 4th Floor

San Francisco, CA 94102

E-mail: **EDTariffUnit@cpuc.ca.gov**

Pacific Gas and Electric Company

Attn: Brian K. Cherry, Vice President, Regulatory Relations

77 Beale Street, Mail Code B10C

P.O. Box 770000

San Francisco, CA 94177

E-mail: **PGETariffs@pge.com**

**ADVICE 4352-E
JANUARY 30, 2014**

ATTACHMENT 1

QUARTERLY COMPLIANCE REPORT NARRATIVE

(PUBLIC)

PACIFIC GAS AND ELECTRIC COMPANY
PROCUREMENT TRANSACTION QUARTERLY COMPLIANCE REPORT
FOR THE FOURTH QUARTER OF 2013

January 30, 2014

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Summary of Attachments

- 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(s) completed during the Quarter.
- Confidential Attachment H: *New Contracts Executed/Contracts Amended*, provides a summary of all agreements executed and/or amended during 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.

Summary of Attachments
(Continued)

- 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 for strong showing transactions.

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, 2013 through December 31, 2013 (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 and D.12-04-046.

B. Summary

During the Quarter, PG&E engaged in the following procurement activities in accordance with its BPP-approved procurement methods and practices:

1. **Completed Competitive Solicitations** – PG&E is seeking approval for contracts executed from one competitive solicitation, through this Procurement Transaction Quarterly Compliance Report (QCR):
 - a. 2013 Greenhouse Gas (GHG) Offset Credit Request for Offer (RFO) (issued March 25, 2013).
2. **Ongoing Competitive Solicitations** – PG&E issued the following competitive solicitation:
 - a. 2013 Renewable Portfolio Standard (RPS) RFO (issued December 16, 2013).
3. **Other Procurement Activities, Approval Through This QCR** – PG&E is seeking approval of the following transactions executed from procurement activities, other than competitive solicitations, through this QCR:
 - a. Electric Transactions:
 - i. California Independent System Operator (CAISO) Monthly Congestion Revenue Rights (CRR) Allocation and Auction Processes
 - ii. CAISO 2014 Annual CRR Allocation and Auction Process
 - iii. Convergence Bidding
 - iv. Bilaterally Negotiated Contracts

- b. Gas Transactions:
 - i. Transparent Exchanges
 - ii. Direct Bilateral Contracting for Short-Term Products
 - iii. Voice Brokering
 - iv. Electronic Solicitations

These procurement activities are described in greater detail in Section C.3, below.

- 4. **Other Procurement Activities, Approval Through Separate Advice Filing or Regulatory Process** – During the Quarter, approval of contracts resulting from the the following procurement activities was requested through separate regulatory processes, and are referenced here for informational purposes only:
 - a. 2012 RPS RFO (issued on December 10, 2012)
 - b. Fourth Renewable Auction Mechanism (RAM) RFO (issued on May 28, 2013)
 - c. Second Combined Heat and Power (CHP) RFO (issued on February 20, 2013)
 - d. Independent Evaluator Request for Proposal (RFP) (issued June 17, 2013)

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; Marino Monardi, Director, Portfolio Management; and/or Pete Koszalka, Director, Electric Gas Supply, 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 or procurement activities that required senior management approval are included in Confidential Attachment K. In addition, copies of presentations made by PG&E to its PRG during the Quarter are included in Confidential Attachment F.

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

a) Electric Procurement – Description

BPP-approved electricity procurement processes used during the Quarter include:

- CAISO’s CRR allocations and auctions
- Bilaterally negotiated contracts
- Convergence bidding
- QF/CHP legacy contracts

b) Electric Procurement – Justification

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

There were no competitive solicitations for electric procurement during this Quarter.

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

The approved procurement processes used during the Quarter and supporting documentation include the following:

- CAISO Monthly CRR Allocation and Auction Process – During the Quarter, PG&E procured 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; 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 (e.g., 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 obtains 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 estimated that a portion of its generation, imports and load in the months of November and December 2013, and January 2014, 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. In October, November, and December 2013, PG&E participated in Tier 1, Tier 2, and Auction of the CAISO monthly CRR process to procure CRRs for November 2013, December 2013, and January 2014, respectively.

PG&E provided information regarding its CRR strategy to the PRG. Relevant information is included in Confidential Attachments F, J, K, and L.

- CAISO 2014 Annual CRR Allocation Long-Term Tier, Tier 2, Tier 3, and Auction Process – PG&E participated in Long-Term Tier (submitted nominations on October 1, 2013), Tier 2 (submitted nominations on October 15, 2013), Tier 3 (submitted nominations on October 28, 2013), and the Annual Auction (submitted bids on November 12, 2013) of the CAISO's annual release process for 2014 CRRs. Relevant information is included in Confidential Attachments F, J, K, and L.
- Bilaterally Negotiated Contracts – During the Quarter, PG&E sold RA products to several counterparties. Relevant information is included in Confidential Attachments A, B, C, E, H, and M.
- Convergence Bidding – Based on factors including anticipated loads, resource availabilities and intermittent resource generation forecasts, PG&E participates in the CAISO's convergence bidding market. Relevant information is included in Confidential Attachments E and F.
- QF/CHP Legacy Contracts (For informational purposes only) – Under the QF/CHP Program described above, some QF generators holding a legacy contract converted to new Power Purchase Agreements (PPA) (i.e., Under 20 MW PURPA PPA, Transition PPA, and As-Available PPA) during the Quarter. However, many of the remaining legacy QF contracts are still

active and may require amendments or letter agreements to help the generator meet the requirements of the Commission's new CHP Program (e.g., GHG administration and metering issues) that were not required under the former program. Relevant information is included in Confidential Attachment H.

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

PG&E procured natural gas during the Quarter using various methods, including:

- Transparent Exchanges
- Direct Bilateral Contracting for Short-Term Products
- Voice Brokering for the purchase and sale of natural gas futures or options.
- Electronic Solicitations

d) *Natural Gas Procurement – Justification*

- i. For competitive solicitations (RFOs), describe the process used to rank offers and select winning bid(s).
 - There were no competitive solicitations for natural gas procurement during this Quarter.
- ii. For other transactional methods, provide the documentation supporting the selection of the chosen products.
 - Transparent Exchanges: Electronic trading exchanges for transparent prices:

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, and one day transactions. Relevant information is included in Confidential Attachment A.

Gas Hedges (In Compliance with D.12-01-033) – During the Quarter PG&E conducted hedging activities that were in compliance with its approved Hedging Plan. PG&E executed hedges (futures and options) directly on the ICE; these hedge transactions 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 futures and options, and basis futures 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. Worksheets demonstrating PG&E's compliance with D.12-01-033 are in Confidential Attachment L.

- Direct Bilateral Contracting for Short-Term Products:

Commodity Purchases/Sales – PG&E bought and sold physical gas directly with counterparties in the bilateral market. Spot gas (deliveries less than one month) is traded at fixed prices and Gas Daily or CGPR index. Prompt month supply (deliveries each day of the following month) and term gas (greater than one month forward or one month in duration) is traded at fixed price, daily index (Gas Daily or CGPR), or monthly or bidweek index (CGPR, NGI, or IFERC) prices. For any bilateral physical supply trades with a term of one month or more, PG&E concluded these transactions bilaterally, but also used electronic solicitation methods, such as instant messaging, e-mail, voice solicitation (telephone), real time market prices, and/or broker quotes, to inform and conduct these transactions. Relevant information is included in Confidential Attachments A and M.

Gas Parking and Lending – PG&E purchased gas parking and/or lending services to balance its daily supplies with demand. The term of the parking and lending transactions was through the following (prompt) month or shorter.

- Voice Brokers: PG&E executed natural gas hedges (futures) 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. Relevant information is included in Confidential Attachment A.

- Electronic Solicitations:

Auction Platform – PG&E used a third-party auction platform to conduct an electronic solicitation for natural gas physical supply delivered into the Ruby Pipeline with a term of November 2013 through March 2014. The electronic auction platform allows sellers to compete against each other in real time, by offering better prices than other sellers. PG&E may then execute a transaction with the best offer(s). Transaction(s) executed using an auction platform are listed in Confidential Attachment A, and detailed in Confidential Attachments E, H, and L.

Auctions Conducted via Instant Messaging – PG&E conducted auctions for the purchase of natural gas futures and options using instant messaging with financial counterparties. In this way, PG&E is able to obtain robust price quotes from the marketplace, in real time, and may then execute with the

counterparty with the best offer(s). These transactions were then cleared on an exchange, such as NYMEX or ICE.

e) Other Commodities

- i. For competitive solicitations, describe the process used to rank offers and select winning bid(s).
- 2013 GHG Offset Credit RFO – PG&E issued the 2013 GHG Offset Credit RFO on March 25, 2013 to solicit offers of Offset Credits to satisfy PG&E’s compliance obligations under the GHG Cap-and-Trade program adopted by the California Air Resources Board (CARB) as part of CARB’s implementation of Assembly Bill 32. The RFO concluded in December 2013. PG&E evaluated and selected offers based on market value, credit/collateral, project viability, portfolio fit, contract modifications, and supplier diversity. The executed contracts provide PG&E with offset credits at competitive prices. Relevant information is included in Confidential Attachments E, F, G, H, and L.
- ii. 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 were consigned into the 2013 quarterly CARB Auctions as required by the regulations. As PG&E cannot use any of its allocated allowances to satisfy its GHG compliance obligations, allowances must separately be procured.

CARB held its fifth allowance auction on November 19, 2013 for vintage 2013 and 2016 allowances. PG&E is authorized to procure GHG products through CARB Auctions, approved exchanges, and utilizing a competitive RFO process. PG&E provided information regarding its allowance procurement strategy to the PRG. Relevant information is included in Confidential Attachments E, F, K, and L.

- Independent Evaluator (IE) RFP – This RFP process complies with the CPUC requirement that every two years, PG&E reevaluate the IEs in its pool. PG&E issued an IE RFP on June 17, 2013 for the 2014-2015 period. PG&E requested that all offers be submitted by July 17, 2013. In September, PG&E, its PRG, and the CPUC Energy Division participated in on-site interviews with the candidates shortlisted. PG&E, PRG, and CPUC Energy Division discussed, evaluated, and agreed upon the candidates to recommend, based on their proposals, on-site interviews, and reference checks. On November 13, 2013, PG&E recommended the candidates for the 2014-2015 IE pool. On December 6, 2013, the CPUC Energy Division approved the Arroyo Seco Consulting, Boston Pacific, and Merrimack Energy, LLC into PG&E’s 2014-2015 IE pool. Relevant information is included in Confidential Attachment E and Confidential Attachment F.

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

a) Electric Transactions

When selecting electric transactions, the best-priced bids/offers are 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.

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 term transactions is based on the PG&E Electric Portfolio 2013 Physical Gas Procurement Plan and documentation supporting the timing of transactions is included in Confidential Attachment J.

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

a) PG&E Participation in the CAISO Markets

PG&E participates in the CAISO Day Ahead electricity markets. 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 process allow PG&E to determine the incremental costs of dispatchable resources that are bid into the IFM and the Hour-Ahead Scheduling Process/real-time market (RTM). It also determines the price upon which PG&E is willing to pay the CAISO for meeting its

hourly load. 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.

b) PG&E-Owned Generation Conditions During Fourth Quarter 2013

PG&E received 17 percent of normal rainfall during the Quarter.

Helms Pumped Storage Facility (Helms) was used throughout the Quarter as unit availability, system conditions, and economics allowed. There were three planned outages during the Quarter, one for each unit. Two of the outages were staggered, Unit 3 from September 22 to October 14 and Unit 1 from October 6 to November 4, with a one week overlap. In addition, during this overlap Unit 2 was also taken out of service for a triple unit outage from November 6 to November 14. There were no forced outages at Helms during the Quarter.

Planned outages lasting longer than 72 hours on conventional hydro facilities greater than 30 MW during the quarter included work at: Cresta Units 1 and 2 (35 MW, each), Drum U5 (49.5 MW), Electra Units 1, 2 and 3 (31 MW, 31 MW and 36 MW), Haas Units 1 and 2 (72 MW, each), JB Black Units 1 and 2 (86 MW, each), Kerckhoff PH2 Unit 1 (155 MW), Pit 1 Units 1 and 2 (30.5 MW, each), Pit 4 Unit 1 (47.5 MW), Pit 5 Units 1 and 2 (40 MW, each), Poe Units 1 and 2 (60 MW, each), Rock Creek Unit 1 (56 MW), and Stanislaus (91 MW).

Forced outages lasting longer than 24 hours at conventional hydro facilities greater than 30 MW were incurred at Belden (125 MW), Bucks Creek Unit 1 (33 MW), Pit 5 Unit 1 (40 MW), Rock Creek U2 (63 MW), and Tiger Creek Unit 1 (29 MW).

For fossil generation there were two planned outages during the Quarter, one at the Gateway Generating Station (Gateway) from October 24 to November 3 and one at Colusa Generating Stations (Colusa) from November 9 to November 24. There were no forced outages for Gateway and Colusa during the Quarter. At Humboldt Bay Generating Station there was one scheduled maintenance outage on Unit 1 engine and two forced outages on Units 8 and 10.

There were no planned or forced outages at Diablo Canyon Power Plant during the Quarter.

A discussion of the monthly system conditions is included in Confidential Attachment J.

c) Colder Temperatures and High Natural Gas Needs During Fourth Quarter 2013

In early December, western North America experienced significant cold weather across the region, leading to high demand for electric generation across the region, atypical gas pricing relationships, and unusual gas price levels, market dynamics and gas flows. For example, on December 10, 2013, the Gas Daily index price at the PG&E Citygate was over \$1.00 higher than the price any other day of 2013. Although prices, volumes and the notional value of trades during this period were correspondingly high, all of PG&E's transactions were fully compliant with Commission guidance.

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

As described in Section 3.d. above, during the Quarter, PG&E executed transactions in accordance with its Hedging Plan. A list of information regarding Consumer Risk Tolerance notifications and management disclosures is included in Confidential Attachment K.

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. Copies of the contracts that were not separately filed are also included in this attachment.

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.

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 in Confidential Attachment J.

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.

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

To the extent that the Office of Ratepayer Advocates (ORA) has requested information for the Quarter as identified in its Master Data Request, this information will be included in PG&E's Master Data Request response, and submitted to the ORA 14 days after the filing of the QCR. 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 Attachments A and E.

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, 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. There were no transactions or investments to report during the Quarter.

E. Cost Allocation Mechanism (CAM)

For the Quarter, PG&E executed contracts that qualify as CAM resources through the Second CHP RFO noted in Section B.4 above. These contracts are described in Confidential Attachment H.

**ADVICE 4352-E
JANUARY 30, 2014**

ATTACHMENT 2

CONFIDENTIALITY DECLARATIONS AND MATRICES

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

**DECLARATION OF SHARON K. TATAI
SEEKING CONFIDENTIAL TREATMENT OF CERTAIN DATA AND
INFORMATION CONTAINED IN PG&E'S ADVICE LETTER 4352-E REGARDING
CONFIDENTIAL ATTACHMENTS F, G, AND K**

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 and managing PG&E's Procurement Review Group and Independent Evaluator program. 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, 2014 Advice Letter 4352-E, Confidential Attachments F, G, and K. By this Application, PG&E is seeking the Commission's approval of Quarter Four, 2013 Procurement Transaction Quarterly 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, 2014, 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 4352-E
 PROCUREMENT TRANSACTION QUARTERLY COMPLIANCE REPORT OF QUARTER FOUR 2013
 January 30, 2014**

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
Document: Confidential Attachment 1							
Attachment F – PRG Material	Y	Item VII) E) New non-utility affiliated bilateral contracts – Electric CPUC General Order (G.O.) 66-C	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> . The information constitutes confidential business information protected under GO 66-C.	3 Years from initial delivery date specified in contract or 1 Year after termination of deliveries, whichever is less
Attachment G – Independent Evaluator Reports	N	CPUC General Order 66-C	N/A	Y	Y	Disclosure of information would provide counterparty name, volume, and price and would provide market sensitive information regarding bid strategy and selection. The information constitutes confidential business information protected under GO 66-C.	Indefinite

**PACIFIC GAS AND ELECTRIC COMPANY'S (U 39 E)
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Attachment K – Risk Management	N	CPUC General Order 66-C	Y	Y	Y	<p>TeVaR and supporting forecasts and analysis are confidential. In addition, the Risk Management Committee attachments address PG&E's energy procurement strategy, price, volumes, and counterparties.</p> <p>The information constitutes confidential business information protected under GO 66-C.</p>	Indefinite

**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 4352-E REGARDING
CONFIDENTIAL ATTACHMENTS A, B, D, E, H, J, L, 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 Manager, 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, 2014 Advice Letter 4352-E, Confidential Attachments A, B, D, E, H, J, L, and M. By this Application, PG&E is seeking the Commission's approval of Quarter Four, 2013 Procurement Transaction Quarterly 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, 2014, at San Francisco, California.

/s/
Michael Kowalewski
Manager, Gas Supply
Energy Supply Management
PACIFIC GAS AND ELECTRIC COMPANY

**PACIFIC GAS AND ELECTRIC COMPANY'S (U 39 E)
PROPOSAL REGARDING ADVICE LETTER 4352-E
PROCUREMENT TRANSACTION QUARTERLY COMPLIANCE REPORT OF QUARTER FOUR 2013
January 30, 2014**

IDENTIFICATION OF CONFIDENTIAL INFORMATION

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Document: Confidential Attachment 2							
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	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	1 and 3 Years; Confidential for three years past expiration of the last trade executed under the hedging plan. (Resolution E-

**PACIFIC GAS AND ELECTRIC COMPANY'S (U 39 E)
 PROPOSAL REGARDING ADVICE LETTER 4352-E
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		XI) Monthly Procurement Costs (Energy Resource Recovery Account [ERRA] Filings)				plans. This information reveals procurement cost categorized by transaction type, which is provided to Energy Division per Assembly Bill 57	4276, Finding 8) This date is January 1, 2019.
Attachment B – Counterparty Information, including counterparty concentration – Table “List of Top Ten Counterparties” by transaction, volume, and dollar value	N	CPUC General Order 66-C	N/A	N	Y	Counterparty sales information constitutes confidential non-utility business information protected under GO 66-C.	Indefinite
Attachment D – Natural Gas Transactions		Item I) B) 2) Utility recorded gas procurement and cost				PG&E's hedging strategies may be deduced through an analysis of PG&E's summarized transactions.	1 and 3 Years;

**PACIFIC GAS AND ELECTRIC COMPANY'S (U 39 E)
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	Y	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		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 E - Other Transactions	Y	Item I) B) 2) Utility recorded gas procurement and cost information	Y	N	Y	This information includes confidential quantity and cost of procured natural gas.	1 Year
	N	CPUC General Order 66-C	N/A	N	Y	Disclosure of information would provide counterparty name, volume, and price and would provide market sensitive information regarding bid	Indefinite

**PACIFIC GAS AND ELECTRIC COMPANY'S (U 39 E)
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						strategy and selection. This constitutes confidential non-utility business information protected under GO 66-C.	
Attachment H – Executed Contracts	Y	Item I) B) 2) Utility recorded gas procurement and cost information	Y	N	Y	This information includes confidential quantity and cost of procured natural gas.	1 Year
	N	CPUC General Order 66-C	N/A	N	Y	Disclosure of information would provide counterparty name, volume, and price and would provide market sensitive information regarding bid strategy and selection. This constitutes confidential non-utility business information protected under GO 66-C.	Indefinite
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

**PACIFIC GAS AND ELECTRIC COMPANY'S (U 39 E)
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						limits of PG&E's buying and hedging plans, and must remain confidential to avoid disclosing PG&E's market strategy.	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	Y	Item I) A) 4) Long-term fuel (gas) buying and hedging plans; 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. 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	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.

**PACIFIC GAS AND ELECTRIC COMPANY'S (U 39 E)
 PROPOSAL REGARDING ADVICE LETTER 4352-E
 PROCUREMENT TRANSACTION QUARTERLY COMPLIANCE REPORT OF QUARTER FOUR 2013
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						to Energy Division per Assembly Bill 57	

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

**DECLARATION OF MARIANNE AIKAWA
SEEKING CONFIDENTIAL TREATMENT OF CERTAIN DATA AND
INFORMATION CONTAINED IN PG&E'S ADVICE LETTER 4352-E REGARDING
CONFIDENTIAL ATTACHMENTS A, B, C, E, H, I, J, L, AND M**

I, Marianne Aikawa, declare:

1. I am presently employed by Pacific Gas and Electric Company ("PG&E"), and have been an employee at PG&E since 1989. My current title is Senior Manager within PG&E's Energy Procurement organization. In this position my responsibilities include reviewing 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, 2014 Advice Letter 4352-E, Confidential Attachments A, B, C, E, H, I, J, L, and M. By this Application, PG&E is seeking the Commission's approval of Quarter Four, 2013 Procurement Transaction Quarterly 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, 2014, at San Francisco, California.

_____/s/_____
Marianne Aikawa
Senior 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 4352-E
 PROCUREMENT TRANSACTION QUARTERLY COMPLIANCE REPORT OF QUARTER FOUR 2013
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Document: Confidential Attachment 3							
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 provides 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-	N	CPUC General Order 66-C	N/A	N	Y	Counterparty sales information constitutes confidential non-utility business information protected under GO 66-C.	Indefinite

**PACIFIC GAS AND ELECTRIC COMPANY'S (U 39 E)
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Investment Grade Counterparties ”							
Attachment C - Electric Transactions, tables by transaction, volume, and dollar value: “Electric Physical,” ”Electric Financial,” ”Electric-Physical-HA Only,” “List of Top Ten Counterparties ”	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)
 PROPOSAL REGARDING ADVICE LETTER 4352-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 H - Executed Contracts	Y	VII) B) Bilateral Contract Terms and Conditions – contracts and power purchase agreements between utilities and non-	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

**PACIFIC GAS AND ELECTRIC COMPANY'S (U 39 E)
PROPOSAL REGARDING ADVICE LETTER 4352-E
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		affiliated third parties					
Attachment I – Summary of Retained Generation Investments	N	CPUC General Order 66-C	N/A	N	Y	Information on retained generation investments constitutes confidential business information protected under GO 66-C.	Indefinite
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 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	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

**PACIFIC GAS AND ELECTRIC COMPANY'S (U 39 E)
 PROPOSAL REGARDING ADVICE LETTER 4352-E
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		Procurement Costs (Energy Resource Recovery Account [ERRA] Filings)					
Attachment M – Transactions Subject to Strong Showing	Y	Item VI E) and F) Utility Planning Area Matrix Net Open (Electric) 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

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

1st Light Energy	Douglass & Liddell	OnGrid Solar
AT&T	Downey & Brand	Pacific Gas and Electric Company
Alcantar & Kahl LLP	Ellison Schneider & Harris LLP	Praxair
Anderson & Poole	G. A. Krause & Assoc.	Regulatory & Cogeneration Service, Inc.
BART	GenOn Energy Inc.	SCD Energy Solutions
Barkovich & Yap, Inc.	GenOn Energy, Inc.	SCE
Bartle Wells Associates	Goodin, MacBride, Squeri, Schlotz & Ritchie	SDG&E and SoCalGas
Braun Blasing McLaughlin, P.C.	Green Power Institute	SPURR
CENERGY POWER	Hanna & Morton	San Francisco Public Utilities Commission
California Cotton Ginners & Growers Assn	In House Energy	Seattle City Light
California Energy Commission	International Power Technology	Sempra Utilities
California Public Utilities Commission	Intestate Gas Services, Inc.	SoCalGas
California State Association of Counties	K&L Gates LLP	Southern California Edison Company
Calpine	Kelly Group	Spark Energy
Casner, Steve	Linde	Sun Light & Power
Center for Biological Diversity	Los Angeles Dept of Water & Power	Sunshine Design
City of Palo Alto	MRW & Associates	Tecogen, Inc.
City of San Jose	Manatt Phelps Phillips	Tiger Natural Gas, Inc.
Clean Power	Marin Energy Authority	TransCanada
Coast Economic Consulting	McKenna Long & Aldridge LLP	Utility Cost Management
Commercial Energy	McKenzie & Associates	Utility Power Solutions
County of Tehama - Department of Public Works	Modesto Irrigation District	Utility Specialists
Crossborder Energy	Morgan Stanley	Verizon
Davis Wright Tremaine LLP	NLine Energy, Inc.	Water and Energy Consulting
Day Carter Murphy	NRG Solar	Wellhead Electric Company
Defense Energy Support Center	Nexant, Inc.	Western Manufactured Housing Communities Association (WMA)
Dept of General Services	North America Power Partners	
Division of Ratepayer Advocates	Occidental Energy Marketing, Inc.	