November 4, 2014

Advice Letter 4438-E

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

Subject: Information-Only Filing Regarding Procurement Transaction
Quarterly Compliance Reports for Quarter 4 of 2012 (AL 4184-E); Quarter 1 of 2013 (4220-E) and Quarter 2 of 2013 (4266-E) – Revision of Confidentiality Periods Related to GHG Information

Dear Ms. Allen:

This is to acknowledge that the Energy Division has received Advice Letter 4438-E, dated June 6, 2014.

Sincerely,

Edward F. Randolph, Director
Energy Division
June 6, 2014

Advice 4438-E  
(Pacific Gas and Electric Company ID U 39 E)

Public Utilities Commission of the State of California

Subject: Information-Only Filing Regarding Procurement Transaction Quarterly Compliance Reports for Quarter 4 of 2012 (Advice 4184-E), Quarter 1 of 2013 (4220-E) and Quarter 2 of 2013 (4266-E) – Revision of Confidentiality Periods Related to GHG Information

Pacific Gas and Electric Company (“PG&E”) is submitting to the California Public Utilities Commission (“Commission” or “CPUC”) revised confidentiality declarations and matrix filed in support of Confidential Attachments E, F, K and L of PG&E’s Quarter 4 2012, Quarter 1 2013, and Quarter 2 2013 Procurement Transaction Quarterly Compliance Reports (“QCR”). The revised declarations and matrix address the confidential treatment for materials provided in support of Greenhouse Gas (“GHG”) procurement activity for Q4-2012, Q1-2013 and Q2-2013. Please note the declarations and matrices, included in the initial filings (Advice 4184-E, Advice 4220-E, and Advice 4266-E), which address the confidentiality treatment for materials provided in support of non-GHG procurement activity remain unchanged.

Background

The California Air Resources Board (“CARB”) created a cap-and-trade program and promulgated regulations in Title 17 of the California Code of Regulations (“CCR”) governing the program, including the related GHG compliance instrument auction (the “Regulation”).\(^{1}\) The Regulation prohibits the release of certain information identified as confidential.\(^ {2}\)

Certain information contained in Confidential Attachments E, F, K and L is confidential under the Regulation. The disclosure of that information would violate the Regulations. PG&E had originally requested that this information be maintained as confidential for periods of either one or three years. However, based on the Regulation, PG&E is revising its confidentiality request so that this information be held confidential for an indefinite period consistent with General Order 66-C. PG&E is providing revised

\(^{1}\) 17 CCR §§ 95801 et seq.  
\(^{2}\) 17 CCR § 95912 (f) and 17 CCR § 95914 (c).
declarations, which are attached to this supplemental filing as Attachment 1, to reflect the change in the confidentiality period.

**Compliance Items**

PG&E’s Confidential QCR for the respective quarters, Q4-2012, Q1-2013 and Q2-2013 included supporting Confidential Attachments E, F, K and L as follows:

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

Attachment 1 to this Advice Letter includes revised confidentiality declarations and matrix for Sharon Tatai and Marianne Cocard-Aikawa.

**Protests**

This is an information-only advice letter filing. Pursuant to General Order 96-B Section 6.2, PG&E is not seeking relief through this advice letter. Instead, PG&E is simply updating the confidentiality protection periods related to GHG information.

**Effective Date**

PG&E requests that this information-only advice filing become effective June 6, 2014, 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.

Vice President, Regulatory Relations
cc: Service Lists R.12-03-014, R.01-10-024 and R.11-10-023
PG&E’s Procurement Review Group

Public Attachments: Attachment 1 – Confidentiality Declarations and Matrix
CALIFORNIA PUBLIC UTILITIES COMMISSION

ADVICE LETTER FILING SUMMARY
ENERGY UTILITY

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

<table>
<thead>
<tr>
<th>Company name/CPUC Utility No.</th>
<th>Pacific Gas and Electric Company (ID U39 E)</th>
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<tbody>
<tr>
<td>Utility type:</td>
<td>Contact Person: Shirley Wong</td>
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<tr>
<td>☑ ELC ☐ GAS ☐ HEAT ☐ WATER</td>
<td>Phone #: (415) 972-5505</td>
</tr>
<tr>
<td></td>
<td>E-mail: <a href="mailto:slwb@pge.com">slwb@pge.com</a></td>
</tr>
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**EXPLANATION OF UTILITY TYPE**
ELC = Electric  GAS = Gas  PLC = Pipeline  HEAT = Heat  WATER = Water

**Advice Letter (AL) #:** 4438-E  **Tier:** NA

Subject of AL: Information-Only Filing Regarding Procurement Transaction Quarterly Compliance Reports for Quarter 4 of 2012 (Advice 4184-E), Quarter 1 of 2013 (4220-E) and Quarter 2 of 2013 (4266-E) – Revision of Confidentiality Periods Related to GHG Information

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 #: 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 Attachment 1, Declarations and Matrix.

Confidential information will be made available to those who have executed a nondisclosure agreement: N/A

Name(s) and contact information of the person(s) who will provide the nondisclosure agreement and access to the confidential information:  ___________________________________________

Resolution Required? ☑ Yes  ☐ No

Requested effective date: **June 6, 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:

Service affected and changes proposed:

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
ATTACHMENT 1

CONFIDENTIALITY DECLARATIONS AND MATRIX
BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

DECLARATION OF MARIANNE AIKAWA
SEEKING CONFIDENTIAL TREATMENT OF FOR CERTAIN DATA AND
INFORMATION CONTAINED IN PG&E’S ADVICE LETTER 4220-E AND 4266-E
REGARDING
CONFIDENTIAL ATTACHMENTS E AND L

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.


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 information that should be protected under General Order 66-C. The matrix also specifies that the information is not already public and/or cannot be reasonably
redacted, and that 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 June 6, 2014, at San Francisco, California.

__________________/s/_____________________
Marianne Aikawa
Senior Manager
Energy Compliance and Reporting
Energy Procurement
PACIFIC GAS AND ELECTRIC COMPANY
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, 4220-E, AND
4266-E REGARDING
CONFIDENTIAL ATTACHMENTS E, F, K, AND L

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: (1) PG&E’s January 30, 2013 Advice Letter 4184-E, Confidential Attachments E, F, K and L; (2) PG&E’s April 30, 2014 Advice Letter 4220-E, Confidential Attachments F and K; and (3) PG&E’s July 30, 2014 Advice Letter 4266-E, Confidential Attachments F and K.

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 information that should be protected under General Order 66-C. The
matrix also specifies that the information is not already public and/or cannot be reasonably redacted; and 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 June 6, 2014, at San Francisco, California.

__________________/s/_____________________
Sharon K. Tatai
Manager
Energy Compliance and Reporting
Energy Procurement
PACIFIC GAS AND ELECTRIC COMPANY
### IDENTIFICATION OF CONFIDENTIAL INFORMATION

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<th>Redaction Reference</th>
<th>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)</th>
<th>2) Which category or categories in the Matrix the data correspond to:</th>
<th>3) That it is complying with the limitations on confidentiality specified in the Matrix for that type of data (Y/N)</th>
<th>4) That the information is not already public (Y/N)</th>
<th>5) The data cannot be aggregated, redacted, summarized, masked or otherwise protected in a way that allows partial disclosure (Y/N)</th>
<th>PG&amp;E’s Justification for Confidential Treatment</th>
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