



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

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<p>Order Instituting Rulemaking to Continue Implementation and Administration, and Consider Further Development of, California Renewables Portfolio Standard Program</p>	<p>R. 15-02-020 (Filed February 26, 2015)</p>
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MOTION FOR LEAVE TO FILE THE REGENTS OF THE UNIVERSITY OF CALIFORNIA 2016 RENEWABLES PORTFOLIO STANDARD PROCUREMENT PLAN UNDER SEAL

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August 8, 2016

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Pursuant to rules 11.1 and 11.4 of the Commission’s Rules of Practice and Procedure, The Regents of the University of California (“University”) hereby files this Motion for Leave to File The Regents of the University of California 2016 Renewables Portfolio Standard (“RPS”) Procurement Plan Under Seal (“Motion”). This Motion is being filed and served concurrently with the University’s 2016 RPS Procurement Plan. By this Motion, the University requests that the Commission issue its order directing that the confidential version of our RPS Procurement Plan shall be placed under seal and shall not be disclosed to anyone other than the Commission and its staff. A proposed form of order is attached.

Those portions of the University’s RPS Procurement Plan identified in Table 1 below are eligible for confidentiality protection pursuant to Decision (“D.”) 06-06-066, D.08-04-023, and the Matrix of Allowed Confidential Treatment for Energy Service Provider Data (“ESP Matrix”) attached as Appendix B to the latter decision. The data for which The University requests confidentiality and thereby protection from public disclosure are of the types and correspond to the category (or categories) in the ESP Matrix specified below:

TABLE 1: IDENTIFICATION OF CONFIDENTIAL INFORMATION		
RPS Procurement Plan Location	Type of Data	Matrix Category
Worksheet : RNS_report - Bundled Retail Sales Forecast (LTPP) for years 2015 to 2019	Bundled retail sales (GWh) for previous and current year and 3 years of retail sales forecasts.	I – Renewables Portfolio Standard (RPS) Information A) RPS compliance filings required by CPUC, by ESP: data redacted because disclosure of first three years of forecast retail sales and resource mix data (MWh) and/or of historical retail sales and supply data (MWh) for prior year would reveal entire net short of ESP. B) Annual RPS compliance filings, by ESP: data redacted because disclosure of first three years of forecast retail sales and resource mix data (MWh) or of historical retail sales and supply data would reveal the entire net short of ESP.
Worksheet : RNS_report - Gross RPS Procurement Quantity Requirement (GWh) and Net RPS Procurement Need (GWh) for years 2014 through 2018	Gross RPS procurement requirement and net RPS procurement need (GWh).	I A) and I B) – see above

<p>Worksheet : RNS_report - Annual Gross RPS Position (GWh and %) and Annual Net RPS Position after Bank Optimization (GWh and %) for years 2015 through 2019</p>	<p>Gross RPS position (Physical Net Short) and Net RPS Position (Optimized Net Short).</p>	<p>I A) and I B) – see above</p>
<p>Worksheet: RNS_report – Total RPS Eligible Procurement (GWh), Category 0 RECs, Category 1 RECs, Category 2 RECs, Category 3 RECs.</p>	<p>RPS-Eligible Procurement and Portfolio Content Category distribution (resource mix).</p>	<p>I A) and I B) – see above</p> <p>Total RPS Eligible Procurement, assuming compliance with targets, could be used to back out actual and forecasted retail sales. Public knowledge of RPS-eligible resource mix, given the portfolio content category compliance requirements, could weaken the bargaining position and compromise the ability to cost-effectively manage REC transactions for compliance purposes.</p>

The data for which the University is claiming confidentiality is not already public. The University may be harmed by the loss of confidentiality insofar as members of the public not eligible to review the data as non-market participating parties – primarily other market participants such as other ESPs or suppliers – can use this data to derive detailed estimates of the University’s specific procurement requirements and the University’s current compliance position.

Accordingly, the University respectfully requests that the above identified portions of its August 8, 2016 RPS Procurement Plan be treated as confidential material and protected from public disclosure. The University also requests a ruling granting leave to file the confidential version of its RPS Procurement Plan under seal.

DATED: August 8, 2016

Respectfully submitted,

/s/

Mark Byron

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[PROPOSED] RULING

On August 5, 2016, The Regents of the University of California (“University”) filed a motion for leave to file certain material under seal. In particular, the University seeks seal of the confidential version of its 2016 Renewables Portfolio Standard (RPS) Procurement Plan.

The data which the University seeks to seal is eligible for confidentiality protection pursuant to Decision (“D.”) 06-06-066, D.08-04-023, and the Matrix of Allowed Confidential Treatment for Energy Service Provider Data (“ESP Matrix”) attached as Appendix B to the latter decision. Therefore, good cause showing, the University’s motion is granted. The data shall remain under seal and shall not be made accessible or disclosed to anyone other than Commission staff except pursuant to protective order or on the further order or ruling of the Commission, the assigned Administrative Law Judge (“ALJ”), or the ALJ then designated as Law and Motion Judge.

Dated _____, 2016, at San Francisco, California.

Administrative Law Judge

VERIFICATION

I, Mark Byron, am authorized to make this verification on behalf of The Regents of the University of California. The statements in the foregoing document are true of my own knowledge, except as to matters which are therein stated on information or belief, and as to those matters I believe them to be true.

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

Executed on August 8th, 2016, in Oakland, California.

A handwritten signature in cursive script that reads "Mark Byron". The signature is written in black ink and is positioned above a horizontal line.

Mark Byron, Wholesale Electricity Program Manager