

**DOCKETED**

<b>Docket Number:</b>	79-AFC-03C
<b>Project Title:</b>	Compliance - Application for Certification of PG&E Geysers Unit 18
<b>TN #:</b>	264092
<b>Document Title:</b>	Repeated Application for Confidential Designation
<b>Description:</b>	N/A
<b>Filer:</b>	Chase Maxwell
<b>Organization:</b>	Climate Edge Law Group
<b>Submitter Role:</b>	Applicant Representative
<b>Submission Date:</b>	6/5/2025 12:33:13 PM
<b>Docketed Date:</b>	6/5/2025



June 5, 2025

**E-Filed**

Drew Bohan  
Executive Director  
California Energy Commission  
715 P Street  
Sacramento, CA 95814

**RE: REPEATED APPLICATION FOR CONFIDENTIAL DESIGNATION for the Summary of Corrective Actions Associated with the Findings Reported in the Fire Protection Systems Inspection, Testing, and Maintenance Records (First Quarter of 2025) at the following:**

**Geysers Unit 3, Sonoma (80-AFC-1C);  
Geysers Unit 17, Lake View (79-AFC-1C);  
Geysers Unit 18, Socrates (79-AFC-3C); and  
Geysers Unit 19, Calistoga (81-AFC-1C)**

Dear Mr. Bohan:

Pursuant to Sections 2501 *et seq.*, of Title 20 of the California Code of Regulations, Geysers Power Company, LLC (“GPC”), the project owner of the above-listed Commission certified projects, hereby submits this *Repeated Application for Confidential Designation* for the corrective action tables associated with the fire protection system (“FPS”) inspection, testing, and maintenance (“ITM”) reports covering the first quarter (“Q1”) of 2025, hereinafter “Repeated Application.” The FPS corrective action tables comply with Conditions of Certification FIRE PROTECTION-4 and FIRE PROTECTION-5 by providing details for the actions GPC has taken, or plans to take, to address items identified for correction or repair in the Q1 2025 ITM reports for the above-listed projects.

By your letter dated February 2, 2022, “the ITM records and summary of corrective actions setting forth the system status and schedule for system work will be subject to the same two-year confidentiality period from the date of the report.”<sup>1</sup> This Repeated Application similarly seeks confidential designation for the corrective action information accompanying these ITM reports for two years from the date of the reports. This Repeated Application is being

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<sup>1</sup> TN# 241373: CEC Response Letter Geysers #3 Confidential Application May 25, 2018, Nov 19 and Dec 10, 2021, and Jan 10 and 27, 2022, dated Feb. 2, 2022, at p. 10.

submitted because the letter providing the corrective action tables for items identified for correction or repair in the Q1 2025 ITM reports contain information that is substantially similar to the previously submitted information that was granted confidential designation by your February 2, 2022 letter. All facts and circumstances relevant to the confidential nature of this information are unchanged.

Specifically, GPC requests confidential designation for the records listed in the table below.

Doc. #	Title	Date	Description	# of Pages
1	Letter to John Heiser from Chase K. Maxwell on behalf of GPC;  RE: Fire Protection-4 and Fire Protection-5 – Corrective Actions for Items Identified for Repair or Correction from the Inspection, Testing and Maintenance Reports for the First Quarter of 2025 for Geysers Power Company LLC plants: Geysers Unit 3, Sonoma (80-AFC-01C); Geysers Unit 17, Lake View (79-AFC-01C); Geysers Unit 18, Socrates (79-AFC-3C); and Geysers Unit 19, Calistoga (81-AFC-01C)	6/5/2025	This letter provides confidential data required by Fire Protection conditions of certification applicable to all GPC plants. The letter includes descriptions of items identified for correction or repair in the Q1 2025 ITM reports for four GPC plants, and it provides details for the corrective actions taken or to be taken.	5

I certify under penalty of perjury that the information contained in this Repeated Application is true, correct, and complete to the best of my knowledge and belief. I am authorized to make this repeated application and certification on behalf of GPC.

Sincerely,

/s/

Chase K. Maxwell

E-Mail: [chase@celawgroup.com](mailto:chase@celawgroup.com)