

DOCKETED	
Docket Number:	25-OPT-01
Project Title:	Viracocha Hill Battery Energy Storage System Project
TN #:	264238
Document Title:	Viracocha Hill Battery Energy Request for Confidential Designation for Appendix 5 8A Paleontological Resources Record Search
Description:	N/A
Filer:	Jerry Salamy
Organization:	Jacobs
Submitter Role:	Applicant Consultant
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Reclaimed Wind LLC
600 W Broadway – Suite 700
92101 San Diego, CA

June 6, 2025

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

RE: **Viracocha Hill BESS Project: Application for Confidential Designation for Opt-In
Application Appendix 5.8A, Paleontological Locality Records**

Dear Mr. Bohan:

Pursuant to Sections 2505 et seq., of Title 20 of the California Code of Regulations, Reclaimed Wind LLC (the “Applicant”) hereby submits this *Application for Confidential Designation* for Appendix 5.8A, Paleontological Locality Records, of the Opt-In Application for the Viracocha Hill BESS Project.

Please contact us at 619-317-1776 if you have any questions or require additional information. Thank you.

Sincerely,

Antonio Arturo Sieira Mucientes
Manager
Reclaimed Wind LLC

APPLICATION FOR CONFIDENTIAL DESIGNATION
Viracocha Hill BESS Project (25-OPT-01)

1. *Specifically indicate those parts of the record which should be kept confidential.*
 - a. *Title, date, and description (including number of pages) of the information or data for which you request confidential designation.*

Reclaimed Wind LLC (the “Applicant”) seeks confidential designation for the following paleontological resources information (the “Information”) submitted on behalf of the Viracocha Hill BESS Project:

Opt-In Application Appendix Number	Title	Opt-In Application Subject Area/Description	# of Confidential Pages
5.8A	Confidential Paleontological Locality Records	Paleontological Resources	All Pages

- b. *Parts of the information or data for which you request confidential designation.*

The Information should be kept confidential in its entirety as it contains sensitive information regarding the location of certain paleontological resources.

2. *State the length of time the record should be kept confidential, and provide justification for the length of time.*

The Information should be held confidential indefinitely in order to protect the paleontological resources identified therein.

3. *Cite and discuss:*
 - a. *the provisions of the Public Records Act or other law that allow the Commission to keep the information or data confidential, and explain why the provision applies to the material.*
 - b. *the public interest in nondisclosure of the material submitted for confidential designation. If the material contains trade secrets or its disclosure would otherwise cause loss of a competitive advantage, please state how it would be lost, the value of the information to the applicant and the ease or difficulty with which the information could be legitimately acquired or duplicated by others.*

California Government Code Section 7922.000 provides that an agency may withhold information from disclosure where the public interest served by nondisclosure clearly outweighs the public interest of disclosure. The public interest in nondisclosure outweighs that of disclosure, as disclosure may enable the location of sensitive paleontological resources sites by entities conducting unauthorized collection or disturbance of such resources.

4. *State whether the information may be disclosed if it is aggregated with other information or masked to conceal certain portions, and if so the degree of aggregation or masking required.*

The Applicant considered whether it would be possible to aggregate or mask the information. Figures depicting the substance of the material contained within the Information have been provided as part of the

Opt-In Application, but at a less granular level of detail. This facilitates an understanding of the types and general locations of the paleontological resources in the study area without disclosing specific site information.

5. *State whether and how the information is kept confidential by the applicant and whether it has ever been disclosed to a person other than an employee of the applicant, and if so under what circumstances.*

The Information is accessible to employees or consultants working on behalf of the Applicant, professionals and others with access to paleontological locality records, and regulatory agencies that have regulatory oversight or other responsibilities over either the Information or the Viracocha Hill BESS Project.

I certify under penalty of perjury that the information contained in this Application for Confidential Designation is true, correct, and complete to the best of my knowledge and belief. I am authorized to make this Application and Certification on behalf of the Applicants.

Dated: June 6, 2025

By:

Antonio Arturo Sieira Mucientes
Manager
Reclaimed Wind LLC