

**DOCKETED**

<b>Docket Number:</b>	25-OPT-02
<b>Project Title:</b>	Prairie Song Reliability Project
<b>TN #:</b>	264377
<b>Document Title:</b>	Confidential Designation Application
<b>Description:</b>	N/A
<b>Filer:</b>	Erin Phillips
<b>Organization:</b>	Dudek
<b>Submitter Role:</b>	Applicant Consultant
<b>Submission Date:</b>	6/20/2025 12:34:41 PM
<b>Docketed Date:</b>	6/20/2025

June 19, 2025

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

**RE: Prairie Song Reliability Project (25-OPT-02): Application for Confidential Designation for Opt-In Application for Certification Confidential Appendix 1A, Property Owner Information**

Dear Mr. Bohan:

Pursuant to Sections 2505 et seq., of Title 20 of the California Code of Regulations, Prairie Song Reliability Project LLC (the “Applicant”) hereby submits this *Application for Confidential Designation* for the following information submitted in support of the Opt-In Application for Certification for the Prairie Song Reliability Project:

- Confidential Appendix 1A: Property Owner Information

Please contact Garrett Lehman at [glehman@covalinfra.com](mailto:glehman@covalinfra.com) should you have any questions or require additional information. Thank you.

Sincerely,



---

Sam Littlefield  
Chief Development Officer

**APPLICATION FOR CONFIDENTIAL DESIGNATION**  
**Prairie Song Reliability Project (25-OPT-02)**

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.*

Prairie Song Reliability Project LLC (“Applicant”) seeks confidential designation for the following information (the “Information”) submitted on behalf of the Prairie Song Reliability Project (“PSRP”):

<b>Title</b>	<b>Description</b>	<b># of Pages</b>
Confidential Appendix 1A, Property Owner Information	This document contains property owner information for the parcels that are a part of the PSRP, including owner names and contact information.	All pages

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

The Information should be kept confidential in its entirety.

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

The Information should be kept confidential as needed to protect the personal information contained 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.*

The Public Records Act (“PRA”) (Govt. Code § 7920.000 et. seq.) provides a specific exclusion from disclosure where “...on the facts of the particular case the public interest served by not disclosing the record clearly outweighs the public interest served by disclosure of the record.” (Gov’t Code § 7922.000). The public interest served by not disclosing the Information clearly outweighs the public interest served by disclosure because the Information contains property owner’s personal information, including addresses, of the parcels that are a part of and surrounding the PSRP site. The protection of personal information is consistent with several

**APPLICATION FOR CONFIDENTIAL DESIGNATION**  
**Prairie Song Reliability Project (25-OPT-02)**

PRA exemptions, such as those exempting from disclosure electronically collected personal information, including home addresses, received by a state agency (Gov't Code § 7927.400); exempting from disclosure the residence or mailing address of any person in any record of the Department of Motor Vehicles (Gov't Code § 7927.405); exempting from disclosure the residence or mailing address of any employee of a public agency (Gov't Code § 7928.300); and directing state agencies not to post the home address or telephone number of any elected or appointed official on the internet without first obtaining written permission from the individual (Gov't Code § 7928.205). These exemptions demonstrate the value the Legislature has placed on protecting personal identifying information that could be exposed through administrative processes. Therefore, the Applicant is submitting this Information pursuant to an application for confidential designation out of an abundance of caution to protect the personal information contained therein.

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 portions of the Information. It may be possible to redact certain portions, such as the names of individuals.

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 Applicant is submitting the Information pursuant to an application for confidential designation out of an abundance of caution as it contains property owner information. While property owner information may be publicly available, the Applicant is concerned with the disclosure of such information in a consolidated, easy-to-obtain fashion.

*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 Applicant.*

Dated: June 19, 2025

By:



\_\_\_\_\_  
Sam Littlefield  
Chief Development Officer