

DOCKETED	
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Project Title:	Prairie Song Reliability Project
TN #:	264378
Document Title:	Confidential Designation Application
Description:	N/A
Filer:	Erin Phillips
Organization:	Dudek
Submitter Role:	Applicant Consultant
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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 2C, Transmission Interconnection Documents

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 2C: Transmission Interconnection Documents

Please contact Garrett Lehman at 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”):

Title	Description	# of Pages
Confidential Appendix 2C, Transmission Interconnection Documents	Confidential Appendix 2C contains the California Independent System Operator (“CAISO”) Phase II Study for the PSRP.	All pages
Confidential Appendix 2C, Transmission Interconnection Documents: Large Generator Interconnection Agreement	Confidential Appendix 2C contains the Large Generator Interconnection Agreement Among 16DO 8ME LLC and Southern California Edison and California Independent System Operator Corporation, Project: Angeleno Solar Farm - TOT903 (Q1625)	All pages

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

The critical energy infrastructure information (“CEII”) and trade secret information contained within Appendix 2C 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 for the operating life of the PSRP, or as otherwise deemed confidential by the CAISO.

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.*

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Appendix 2C contains sensitive information regarding the production, generation, and transmission of energy that could be useful to a person planning an attack on critical infrastructure. CAISO has identified Appendix 2C as containing CEII that should not be publicly released. For comparison, information designated by the Federal Energy Regulatory Commission (“FERC”) as CEII under Section 388.113 is exempt from mandatory disclosure under the federal Freedom of Information Act (“FOIA”), and “shall not be made available by any Federal, State, political subdivision or tribal authority pursuant to any Federal, State, political subdivision, or tribal law requiring public disclosure of information or records.” (18 C.F.R. § 388.113(c)(1)). The CEC should similarly keep such information confidential as nondisclosure of the information will protect against potential misuse of the information for illicit purposes, such as vandalism, tampering, or other third-party imposed damages. The public interest in preventing such acts clearly outweighs the public interest served by disclosure of the information for which the Applicant is seeking confidential designation.

The Information also contains trade secrets related to commercially valuable information related to the interconnection of the PSRP. The Public Records Act exempts “trade secrets” from public disclosure, including “any formula, plan,...production data, or compilation of information..., which is known only to certain individuals within a commercial concern who are using it to fabricate, produce, or compound an article of trade or a service...and which gives its user an opportunity to obtain a business advantage over competitors who do not know or use it.” (Govt. Code § 7924.510(f).) The Information is a non-public document that includes commercially sensitive, transmission planning and cost information that fall within the definitions of “trade secret.” The Information contains information that has independent economic value from not being generally known to the public or to the Applicant’s competitors who can obtain economic value from its disclosure or use. Disclosure may cause a loss of competitive advantage to the Applicant, as competitors could ascertain transmission planning and cost information that may affect bids in competitive solicitations.

Finally, Section 2505(b) of the Commission’s regulations provide that a record designated as confidential by another agency can be similarly treated by the CEC. For these reasons, the CEC can designate the Information as a confidential record.

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; however, such redactions should be done in coordination with the CAISO and the Applicant to protect the CEII and trade secret information contained therein.

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.*

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The Information is accessible to employees or consultants working on behalf of the Applicant, certain professionals or entities that may otherwise have access to the Information, and regulatory agencies that have regulatory oversight or other responsibilities over either the Information or the PSRP.

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