

<b>DOCKETED</b>	
<b>Docket Number:</b>	99-AFC-01C
<b>Project Title:</b>	Elk Hills Power Project - Compliance
<b>TN #:</b>	267976
<b>Document Title:</b>	Prelim Engineering Study_Confidentiality Status_PG&E Cluster Study final
<b>Description:</b>	Confidential Application cover letter and request form for PG&E's Cluster Study Prepared for CRC's EHPP.
<b>Filer:</b>	Daniel I. Padilla
<b>Organization:</b>	California Resources Corporation
<b>Submitter Role:</b>	Applicant
<b>Submission Date:</b>	12/19/2025 9:40:40 AM
<b>Docketed Date:</b>	12/19/2025

December 17, 2025

Mr. Drew Bohan, Executive Director  
California Energy Commission  
Siting, Transmission, and Environmental Protection Division (STEP)  
Safety and Reliability Branch  
Compliance Monitoring and Enforcement Unit  
715 P Street, MS-2000  
Sacramento, California 95814  
Attn: Ashley Gutierrez, Project Compliance Manager


**Re: Application for Confidential Designation, Preliminary Engineering Study Report,  
Docket Number 99-AFC-01 Elk Hills Power Plant, Kern County, California  
[PG&E 2025 Cluster Study]**

Dear Ms. Gutierrez:

Pursuant to Sections 2505 et seq., of Title 20 of the California Code of Regulations, California Resources Corporation (CRC), hereby submits this Application for Confidential Designation for PG&E's 2025 Cluster Study prepared at CRC's request. CRC is providing a copy of the report as part of information sharing between CRC and the California Energy Commission (CEC) and at the request of the PG&E, we are requesting confidential status of the report. The confidential information is not being submitted as part of any active or pending application with the CEC.

Please contact Brandon Myers at 661-213-8248 ([brandon.myers@crc.com](mailto:brandon.myers@crc.com)) or Daniel I. Padilla at 970.412.2776 ([Daniel.Padilla@crc.com](mailto:Daniel.Padilla@crc.com)) if you have any questions or require additional information.

Sincerely,



B. Joe Ashley  
Director - Governmental & External Affairs

Attachment: See next 3 pages

Cc: File

**APPLICATION FOR CONFIDENTIAL DESIGNATION  
ELK HILLS POWER PLANT (99-AFC-01)  
PG&E 2025 Cluster Study  
[Preliminary Engineering Study Report]**

- 1. Title, date, and description (including number of pages) of the information or data for which you request confidential designation. (20 CCR 1208.1.)**

Preliminary Engineering Study Report (LC25-08)

- PG&E 2025 Cluster Study Prepared for CRC, 70 pages

- 2. Specify the part(s) of the information or data for which you request confidential designation. (If the data is in charts or spreadsheets, highlighting is sufficient.) (20 CCR 2505(a)(1)(B.))**

The entire document.

- 3. State and justify the length of time the CEC should keep the information or data confidential. The term requested must be relevant to the stated basis for confidentiality. (20 CCR 2505(a)(1)(C.))**

The information should be held confidential indefinitely to align with existing project non-disclosure agreements between CRC and applicant (PG&E). Further, CRC is requesting indefinite disclosure of the non-public information that include technical designs, modeling, or anything that might reveal strategy that could influence CRC's stock price. CRC further seeks to avoid risk of disclosure of a non-public document that may differ than what CRC may have disclosed in our normal public filings.

- 4. State the provision(s) of the California Public Records Act or other law that allows the CEC to keep the information or data confidential and explain why the provision(s) apply to that material. (See Gov. Code, §§ 7920.000-7930.215.) (20 CCR (a)(1)(D.))**

Government Code § 7927.705 (Exemption for Records Exempted or Prohibited by Federal or State Law, Including Trade Secrets):

This section exempts from disclosure any public record where disclosure "is exempted or prohibited pursuant to federal or state law, including, but not limited to, provisions of the Evidence Code relating to privilege." Specifically, this incorporates protections for trade secrets under California Civil Code § 3426.1(d), which defines a "trade secret" as information, including a formula, pattern, compilation, program, device, method, technique, or process, that: (i) derives independent economic value, actual or potential, from not being generally known to the public or to other persons who can obtain economic value from its disclosure or use; and (ii) is the subject of efforts that are reasonable under the circumstances to maintain its secrecy. Disclosure is further prohibited under Evidence Code §§ 1060–1062, which establish a privilege against disclosure of trade secrets in judicial and administrative proceedings.

Government Code § 7927.605 (Specific Exemption for Certain Trade Secret Categories):

This section provides a categorical exemption for specific types of trade secrets, including:

- Production, manufacturing, or processing techniques or methods, including research materials (Gov. Code § 7927.605(a));
- Commercial or financial information submitted in confidence to a state agency (Gov. Code § 7927.605(b) and 7930.185 Professional corporations and Proprietary Information); and
- Information that constitutes a trade secret to the extent that disclosure would impair the competitive position of the person submitting the information (Gov. Code § 7927.605(c) and 7930.205 Trade Secrets).

These exemptions are self-executing and do not require a balancing test under Gov. Code § 7922.000 unless the agency determines otherwise.

5. If the applicant believes that the information or data should not be disclosed because it contains trade secrets or its disclosure would otherwise cause a loss of a competitive advantage, the application also shall state: (20 CCR (a)(1)(D.))

- (a) the specific nature of that advantage,

The information depicts and describes an applicant (PG&E) specific energy reliability process for project facilities are still in preliminary stages of development and revelation of the proposed plans could provide a competitive advantage to other energy companies.

- (b) how the advantage would be lost,

The information could enable an outside entity to reverse engineer the design of the proprietary energy reliability processes thereby reducing or eliminating the applicant's competitive advantage that is a direct result of years of investment.

- (c) the value of the information to the applicant, and

The value of the information is unquantifiable but is significant and highly material to our business.

- (d) the ease or difficulty with which the information could be legitimately acquired or duplicated by others.

It would be very difficult to acquire the information legitimately because the information is only shared under non-disclosure agreements. It would also be very difficult to duplicate the information because the information is based on over 25 years of development, research, and testing.

6. **State whether the information or data can be disclosed if it is aggregated with other information or masked to conceal certain portions. State the degree of aggregation or masking required. If the data cannot be disclosed even if aggregated or masked, explain why. (20 CCR 2505(a)(1)(E.))**

This information cannot be disclosed even if aggregated or masked because the entire document depicts proprietary and trade secret power flow analytical information and design standards.

**7. State how the information or data is kept confidential by the applicant and whether it has ever been disclosed to a person other than an employee of the applicant. If it has, explain the circumstances under which disclosure occurred. (20 CCR 2505(a)(1)(F.))**

Generic and simplified versions of the information have been disclosed publicly. However, this information is more detailed and is only shared under non-disclosure agreements.

The Information is accessible only to the Applicant's employees or consultants working on behalf of the CalCapture CCS Project, and regulatory agencies that have regulatory oversight or other responsibilities over either the Information or the Elk Hills Power Plant.

*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 CRC and the applicant.*

Date: December 17, 2025

CALIFORNIA RESOURCES CORPORATION

By: \_\_\_\_\_

B. Joe Ashley  
Director – Governmental & External Affairs