

DOCKETED	
Docket Number:	26-OPT-01
Project Title:	Vaca Dixon Power Center Project
TN #:	268181
Document Title:	Appendix E Application for Confidential Request
Description:	Application for Confidential Request for Appendix E (Interconnection Agreement and QC14 Phase 2 Study)
Filer:	Megan Knight
Organization:	Rincon Consultants, Inc.
Submitter Role:	Applicant Consultant
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Rincon Consultants, Inc.

8825 Aero Drive, Suite 120
San Diego, California 92123
760-918-9444

Subject: Application for Confidential Designation Vaca Dixon Power Center Project Appendix E Interconnection Agreement and QC14 Phase 2 Study. Docket number 26-OPT-01

To whom it may concern,

Vaca Dixon BESS LLC and Arges BESS LLC, as applicants for the Vaca Dixon Power Center Project, request that the attached information be designated as confidential pursuant to 20 California Code of Regulations (CCR) Section 2505. This information is being supplied to the California Energy Commission (CEC) as Appendix E of its opt-in application for the Vaca Dixon Power Center Project docketed on January 6, 2026.

To support the Application for Confidential Designation, the following information has been provided and is consistent with the information requested in the Application for Confidential Designation (Title 20 Cal. Code. Regs., § 2505 Et Seq.) Revised 4/2023.

Applicant: Vaca Dixon BESS LLC and Arges BESS LLC

Address: 4350 Executive Drive, Suite 320, San Diego, California 92121

1(a). Title, date and description (including number of pages) of the record for which you request confidential designation.

Vaca Dixon Power Center Project Appendix E Interconnection Agreement and QC14 Phase 2 Study.

1(b). Specify the part(s) of the record for which you request confidential designation.

Appendix E in its entirety.

2. State and justify the length of time the Commission should keep the record confidential.

It is requested that Appendix E Interconnection Agreement and QC14 Phase 2 Study be kept confidential indefinitely as the documents included in this appendix are subject to a Non-Disclosure Agreement (NDA) or the confidentiality rules contained in the CAISO Interconnection Agreement. In addition, this appendix contains trade secrets related to commercially valuable information related to the interconnection of the Project to the California transmission system. The Interconnection Agreement and Queue Cluster 14 Phase 2 Study are non-public documents that include commercially sensitive transmission planning and cost information that fall within the definition of "trade secret"

3(a). State the provisions of the Public Records Act or other law that allows the Commission to keep the record confidential, and explain why the provision(s) apply to the record.

Under Cal. Code Regs. Tit. 20, § 2505 - Designation of Confidential Records (a)(1)(D) it states:

If the applicant believes that the record should not be disclosed because it contains trade secrets or its disclosure would otherwise cause loss of a competitive advantage, the application shall also state the specific nature of that advantage and how it would be lost, including 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 Applicant meets the criteria for this Regulation through granting custody of its record through the CEC application process.

3(b). Discuss the public interest in nondisclosure of the record. If the record contains trade secrets or its disclosure would otherwise cause loss of a competitive advantage, please also 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.

It is in the public's interest to have nondisclosure of this record to ensure industry competitiveness and trade secrets are maintained, therefore maintaining the competitiveness of the power market overseen by CAISO and consumer energy prices to competitive levels. The Applicant's Interconnection Agreement and QC14 Phase 2 Study constitutes a trade secret due to the private and confidential nature of the agreement(s) with external parties including CAISO, regarding critical energy and infrastructure information. Public disclosure of this information would also prevent potential misuse of the information for malicious purposes, including those that could pose a risk for public health and safety.

4. State whether the record may be disclosed if it is aggregated with other information or masked to conceal certain portions (including but not limited to the identity of the applicant). State the degree of aggregation or masking required. If the data cannot be disclosed even if aggregated or masked, explain why.

The data cannot be disclosed even if aggregated or masked due to the nature of the NDA rules, any and all details contained in the CAISO Interconnection Agreement are considered a trade secret and a significant component of the Applicant's competitive advantage in the industry.

5. State how the record 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.

The applicants have not disclosed any of the confidential information to parties other than its employees, attorneys, and consultants working on the 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 I am authorized to make the application and certification on behalf of the applicant.

Sincerely,
Rincon Consultants, Inc.