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Project Title:	Corby Battery Energy Storage System Project
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Description:	Confidentiality Request Application
Filer:	Christine Leone
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January 27, 2026
California Energy Commission
Docket Unit (Confidential e-filing)
715 P Street
Sacramento, CA 95814

RE: Request for Confidential Designation (Title 20, Cal. Code Regs., § 2505 et seq.) – Corby Energy Storage Project – AB 205 Opt-In Certification Application

To Whom It May Concern:

Corby Energy Storage, LLC ("Corby" or "Applicant") requests that the California Energy Commission ("CEC") designate as confidential the attached LG Energy Solution, Ltd. ("LGES") battery system specifications and related technical documents (Exhibits 1-8) submitted in support of Corby's application under the CEC Opt-In Certification Program pursuant to Assembly Bill 205 (2022) (Public Resources Code § 25545 et seq.). These records contain proprietary, non-public trade secret information, and Corby requests that the CEC withhold them from public disclosure and the public docket.

1. Records for Which Confidential Designation Is Requested

Corby requests confidential designation for the records listed below (Exhibits 1-8). Because confidential information is pervasive throughout each record, the request applies to each exhibit in its entirety, including all figures, drawings, tables, appendices, and embedded metadata.

Exh.	Record (title)	Document ID / version	Format / length / confidential scope
1	DC LINK Product Specification (JF2 DC LINK 5.1)	F2D4-5.1US-GN04 (V5.0, 01/20/2025)	PDF; 15 pages; Entire document
2	DC LINK Code and Standard (Codes and Standards List)	F2D4-5.1US-GN06 (V2.0, 11/13/2024)	XLSX; N/A pages; Entire workbook (all sheets)
3	DC LINK Operation & Maintenance Manual (JF2 DC LINK 5.1)	F2D4-5.1US-OP01 (V8.1, 07/11/2025)	PDF; 113 pages; Entire document
4	DC LINK Thermal Component Specification (JF2 DC LINK 5.1 (0.25CP))	F2D4-5.1US-TH01 (V4.0, 03/25/2025)	PDF; 80 pages; Entire document
5	Pack Certificate of Compliance - UL 1973 (UL-US-2551497-0)	F2X4-5.1US-CC06 (V1.1, 01/07/2025)	PDF; 4 pages; Entire document
6	Pack Product Specification (Energy module JF2 4P30S)	F2X4-5.1US-GN03 (V5.0, 02/11/2025)	PDF; 24 pages; Entire document
7	DC/AC LINK Fire Alarm System Drawing (JF2 DC/AC LINK 5.1)	F2X4-5.1US-FS09 (V5.0, Not shown on cover)	PDF; 31 pages; Entire document

Exh.	Record (title)	Document ID / version	Format / length / confidential scope
8	Cell Product Specification - Rechargeable Lithium-ion Battery Cell (Model JF2)	F2XX-5.1US-GN02 (V4.0, 05/19/2025 (rev. history shows initial release))	PDF; 16 pages; Entire document

2. Legal Authority and Standard for Confidential Designation

This request is made pursuant to the CEC's confidentiality regulations (Title 20, Cal. Code Regs., § 2505 et seq.) and the California Public Records Act (Gov. Code, § 7920.000 et seq.). Records that qualify for exemption from disclosure under federal or state law, including applicable privileges and trade secret protections, may be designated confidential and withheld from public disclosure. (Gov. Code, § 7927.705; Evid. Code, § 1060.)

The attached records contain trade secrets and other proprietary information, including detailed cell and pack specifications, system configuration and architecture, electrical characteristics, thermal management design, operational and maintenance procedures, and fire alarm system drawings. These records derive independent economic value from not being generally known and are the subject of reasonable efforts to maintain their secrecy. (Civ. Code, § 3426.1(d).)

3. Basis for Confidentiality

The records in Exhibits 1-8 are owned by LGES and were provided to Corby under confidentiality restrictions. Each record is marked "Confidential" and/or includes explicit non-disclosure language restricting copying and distribution. The information is not publicly available in this level of detail and is not otherwise disclosed by Corby to the public.

Public disclosure would cause substantial competitive harm by enabling competitors to reverse engineer LGES products, benchmark performance and limitations, and replicate design features. Disclosure would also reveal security-sensitive facility safety system details (including alarm system architecture, device layouts, and wiring/communications information), increasing the risk of misuse.

4. Confidentiality Analysis by Attachment (Summary)

Corby requests confidential designation for each exhibit for the reasons summarized below. Partial redaction is not practicable without impairing the technical utility of the records. If CEC staff determines that a public/redacted version is required for docketing, Corby will coordinate with staff to provide a suitable public summary or redacted version.

Exhibit 1 – F2D4-5.1US-GN04

Detailed DC LINK system description and technical specifications (performance, operating limits, environmental/mechanical specs, and communications/control details) that would enable reverse engineering and competitor benchmarking.

Exhibit 2 – F2D4-5.1US-GN06

Codes and standards list and compliance context reflecting LGES engineering design choices and compliance strategy for the specific product configuration.

Exhibit 3 – F2D4-5.1US-OP01

Operation, maintenance, and troubleshooting procedures revealing system architecture, component configuration, and operational guidance that could be misused or provide competitors with an operational blueprint.

Exhibit 4 – F2D4-5.1US-TH01

Thermal management component specifications and mechanical drawings (HVAC/chiller design and performance parameters) central to reliability and safety, and not publicly available.

Exhibit 5 – F2X4-5.1US-CC06

UL certificate identifiers and product designations that, when combined with the other exhibits, link specific product variants and test documentation to the Corby configuration and can facilitate competitor mapping of product variants.

Exhibit 6 – F2X4-5.1US-GN03

Pack-level product specifications including module configuration, model identifiers, electrical/mechanical characteristics, labeling, and packaging specifications that are core LGES trade secrets.

Exhibit 7 – F2X4-5.1US-FS09

Fire alarm system drawings and safety system architecture (device layouts and interfaces) that are proprietary and security-sensitive; disclosure could increase risk of tampering and is not needed for public understanding of the project.

Exhibit 8 – F2XX-5.1US-GN02

Cell-level product specifications for the JF2 lithium-ion cell (including chemistry and operating limits) that are foundational trade secrets used for competitive differentiation and benchmarking.

5. Duration of Confidential Designation

Corby requests that the CEC maintain the confidentiality of Exhibits 1-8 for ten (10) years from the date of submission, or until the information becomes publicly available through no fault of Corby, whichever occurs first.

6. Handling and Access Restrictions Requested

Corby requests that the CEC (a) treat Exhibits 1-8 as confidential records; (b) restrict access to CEC staff and contractors with a need to know; (c) refrain from posting these records on the public docket; and (d) notify Corby prior to any release so Corby may seek appropriate remedies, including withdrawal or additional protective measures permitted by law.

7. Declaration

I declare under penalty of perjury under the laws of the State of California that I am authorized to submit this request on behalf of Corby Energy Storage, LLC and that the information provided in this request is true and correct to the best of my knowledge.

Sincerely,

Christine Leone

Christine Leone
Corby Energy Storage, LLC
Email: Christine.Leone@nexteraenergy.com

Attachment List

Exhibit 1: Exhibit 1- F2D4-5.1US-GN04_DC LINK Product Specification_V5.0.pdf
Exhibit 2: Exhibit 2 - F2D4-5.1US-GN06_DC LINK Code and Standard_V2.0.xlsx
Exhibit 3: Exhibit 3 - F2D4-5.1US-OP01_DC LINK Operation & Maintenance Manual_V8.1.pdf
Exhibit 4: Exhibit 4 - F2D4-5.1US-TH01_DC LINK Thermal Component Specification_V4.0.pdf
Exhibit 5: Exhibit 5 - F2X4-5.1US-CC06_Pack Certificate UL 1973_V1.1.pdf
Exhibit 6: Exhibit 6 - F2X4-5.1US-GN03_Pack Product Specification_V5.0.pdf
Exhibit 7: Exhibit 7 - F2XX-5.1US-FS09_ACDC LINK Fire Alarm System Drawing_V5.0.pdf
Exhibit 8: Exhibit 8 - F2XX-5.1US-GN02_Cell Product Specification_V4.0.pdf