

<b>DOCKETED</b>	
<b>Docket Number:</b>	24-OPT-01
<b>Project Title:</b>	Perkins Renewable Energy Project
<b>TN #:</b>	269875
<b>Document Title:</b>	Application for Confidential Designation - Cultural - 2nd Determination of Incompleteness
<b>Description:</b>	This document is an application for confidential designation of a cultural resources report and two DPR523 forms submitted in response to a CEC data request.
<b>Filer:</b>	Michael Johnson
<b>Organization:</b>	Environmental Science Associates
<b>Submitter Role:</b>	Applicant Consultant
<b>Submission Date:</b>	5/7/2026 10:42:47 AM
<b>Docketed Date:</b>	5/7/2026



2355 Northside Drive  
Suite 100  
San Diego, CA 92108  
619.719.4200 [phone](#)  
619.719.4201 [fax](#)

[esassoc.com](http://esassoc.com)

May 6, 2026

California Energy Commission  
715 P Street  
Sacramento, CA 95814

**Subject:** Application for Confidential Designation - Perkins Renewable Energy Project Cultural Documentation for the Second Determination of Incompleteness

To whom it may concern:

IP Perkins, LLC, IP Perkins BAAH, LLC and any related affiliates (collectively, "Applicant") c/o Intersect Power, LLC as applicant for the Perkins Renewable Energy Project, requests 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 corrections and additions to *Appendix N.1 Cultural Resources Technical Report* (CRTR) of its opt-in application for the Perkins Renewable Energy Project docketed on March 19, 2025 as requested in the Second Determination of Incompleteness docketed on July 11, 2025.

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 20Cal. Code. Regs., § 2505 Et Seq.) Revised 4/2023.

**1. Contact Information (20 CCR 1208.1.)**

**Applicant Name:** IP Perkins, LLC and Affiliates c/o Intersect Power, LLC  
**Address:** 9450 SW Gemini Drive, PMB #68743 Beaverton, Oregon 97008-7105  
**Proceeding Name:** Perkins Renewable Energy Project  
**Docket Number:** 24-OPT-01

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

The following documents (all pages), which constitute confirmations and additions to the originally submitted CRTR:

- A Class III Cultural Resources Survey for the Western Area Power Administration Drop 4-Knob Transmission Line, Imperial County, California (151 Pages)
- DPR 523 Form for P-13-007130 (134 Pages)
- DPR 523 Form for P-13-011261 (9 Pages)



May 6, 2026

Page 2

**3. Specify the part(s) of the information or data for which you request confidential designation (20 CCR(a)(1)(B.))**

The above-listed documents in response 2 in their entirety. The accompanying email titled *SCIC\_PerkinsCEC\_Communications* does not contain confidential information and represents supporting documentation for queries raised in the Second Determination of Incompleteness.

**4. State and justify the length of time the Commission should keep the record confidential. The term requested must be relevant to the stated basis for confidentiality (20 CCR 2505(a)(1)(C.))**

The report and forms identified above should be kept confidential indefinitely at the request of the U.S. Bureau of Land Management (BLM) to protect potential cultural resources and sites. If the descriptions of the locations of the sites are released to the public domain, there is potential for looting and destruction of those sites.

**5. 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. (See Gov. Code, §§ 7920.000-7930.215.)(20 CCR(a)(1)(D.))**

The report and forms listed in response 2 specifically identify areas of potential cultural and historical significance, including general and specific descriptions of cultural and archaeological resource locations. These documents were acquired in confidence from the California Historical Records Information System South Coast Information Center under a binding user agreement. Therefore, they are protected under Government Code Section 6254(e).

In addition, these documents are protected from disclosure under Government Code Section 6254(k). The project is located on public lands administered by the BLM and Bureau of Reclamation (BOR) and is therefore subject to disclosure provisions in Section 9(a) of the Archaeological Resources Protection Act of 1979, Section 304 of the National Historic Preservation Act, and Executive Order 13007, all of which prohibit the dissemination of archaeological and cultural resource location data. Finally, BLM has expressly requested that the documents identified above be kept confidential indefinitely.

**6. 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 of difficult with which the information could be legitimately acquired or duplicated by others. (20 CCR(a)(1)(D.))**



May 6, 2026

Page 3

The public interest will be served by nondisclosure by preventing looting of the cultural resources and sites described in the documents listed in response 2. Such looting would destroy their scientific value for understanding cultural resources of the specific area and broader region and associated cultural landscapes.

- 7. State whether the information or data can be disclosed if 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(a)(1)(E.))**

The information disclosed in the documents listed in response 2 has already been aggregated and summarized in the Cultural Resources and Paleontological Resources sections of the opt-in application for the project. Aggregation of the confidential documents themselves would likely hinder CEC staff performing review and analysis of the documents.

- 8. 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(a)(1)(G.))**

The information contained within the documents referenced in response 2 has not been disclosed by the consultant to any parties beyond Applicant staff who are directly associated with the proposed project.

I certify that 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.

A handwritten signature in blue ink that reads "Michael Johnson". The signature is written in a cursive, flowing style.

Sincerely,  
Michael Johnson, Ph.D., RPA  
Senior Archaeologist