

DOCKETED

Docket Number:	26-OPT-01
Project Title:	Vaca Dixon Power Center Project
TN #:	270319
Document Title:	Appendix DR TSD Application for Confidential Request
Description:	Application for Confidential Request for Appendix DR TSD
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Submitter Role:	Applicant Consultant
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Subject: Application for Confidential Designation Vaca Dixon Power Center Project, Appendix DR TSD Vaca Dixon 57 MWh and Arges 400 Battery Energy Storage System One-Line Diagrams. 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 DR TSD of its Data Request Response Set #1 for the Vaca Dixon Power Center Project.

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 DR TSD Vaca Dixon 57 MWh and Arges 400 Battery Energy Storage System One-Line Diagrams.

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

Appendix DR TSD in its entirety.

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

It is requested that Appendix DR TSD Vaca Dixon 57 MWh and Arges 400 Battery Energy Storage System One-Line Diagrams be kept confidential indefinitely as the documents included in this appendix contain critical infrastructure information.

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. 1, § 7922.000 it states:

"An agency shall justify withholding any record by demonstrating that the record in question is exempt under express provisions of this division, or that on the facts of the particular case the public interest served by not disclosing the record clearly outweighs the public interest served by disclosure of the record."

One-line diagrams provide critical infrastructure information, the release of which increases risks to grid reliability and safety and could aid malicious actors. The benefits of disclosure of this information do not outweigh the risks

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 grid reliability and safety. Restricting public disclosure of this information would 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.

As the record is a series of diagrams, disclosing through aggregation with other information or through masking certain portions would not be possible.

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