DOCKETED	
Docket Number:	26-SPPE-02
Project Title:	Silver Creek Back-up Generating Facility (SFBGF)
TN #:	273113
Document Title:	Prologis Request For Confidentiality - Appendix H Figures 4 and 5 CNDBB Mapping - SCBGF
Description:	N/A
Filer:	Scott Galati
Organization:	DayZenLLC
Submitter Role:	Applicant Representative
Submission Date:	10/13/2026 10:24:11 AM
Docketed Date:	10/13/2026

DAYZEN LLC

October 13, 2026

Mr. Drew Bohan
Executive Director
California Energy Commission
715 P Street
Sacramento, CA 95814

Subject: ***Application for Confidential Designation***
Figures 4 and 5, Appendix H SPPE Application
Silver Creek Backup Generating Facility (26-SPPE-02)
San Jose, California

Dear Mr. Bohan,

Prologis L.P. (Prologis), as owner of the Silver Creek Generating Facility (Project), requests that the attached information be designated confidential pursuant to 20 California Code of Regulations (CCR) Section 2505. This information is being supplied to the California Energy Commission (CEC) as required by CEC regulation and in support of its SPPE Application docketed on September 18, 2026.

In support of its Application for Confidential Designation, LBA provides the following information:

APPLICANT: Prologis L.P.

ADDRESS: Pier 1, Bay 1
San Francisco, California 94111

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

SPPE Application Appendix H; Figure 4 – CNDBB-Mapped Records of Special-Status Plants and Figure 5 – CNDBB-Mapped Records of Special-Status Animals, Silver Creek Data Center Biological Resources Report.

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

The Figures identified above in 1(a) in their entirety.

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

The Figures identified above should be kept confidential indefinitely to protect potential locations of certain sensitive biological resources.

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.

Title 20 CCR Section 1940 requires Prologis to submit specific information as outlined in *Appendix B, Information Requirements for an Application for Certification (AFC) or Small Power Plant Exemption (SPPE)*. Section (g) (13) (A) of Appendix B requires the submittal of biological resources information collected from the California Natural Diversity Database ("CNDDB") in the form of mapping. Section (g) (13) (A) specifically requires the mapping be submitted "under confidential cover". California Government Code Section 7922.000 also provides that an agency may withhold information from disclosure where the public interest served by nondisclosure clearly outweighs the public interest of disclosure. The figures described above have been prepared to satisfy Appendix B, Section (g) (13) (A).

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.

The public interest in nondisclosure outweighs public disclosure, as disclosure may enable the location of sensitive biological resources sites by entities conducting unauthorized collection or disturbance of such resources.

.

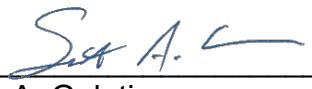
4. State whether the record may be disclosed if it is aggregated with other information or masked to conceal certain portions (including but not limited to the identity of the applicant). State the degree of aggregation or masking required. If the data cannot be disclosed even if aggregated or masked,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

Prologis believes the CEC staff will require the specific information contained in the figure to properly perform its analysis. Aggregation of the information would hinder a complete CEC analysis. However, Prologis believes the CEC can incorporate a generalized summary of information contained in the figure to properly state the basis for its analysis without disclosing information specific enough to facilitate unauthorized collection or disturbance of sensitive biological resources.

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.

Prologis has not disclosed any of the subject information to anyone other than its employees, attorneys, PG&E biology employees, and consultants working on the Project. Moreover, this information will not be disclosed to any other persons employed by or working for Prologis except on a “need to know” basis. Prologis is marking this information “Confidential” and is instituting a policy that segregates this information from other Project files and that access to it be restricted to a designated confidential information manager or managers within Prologis or its attorneys and consultants.

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.



Scott A. Galati
Counsel to Prologis L.P.