DOCKETED	
Docket Number:	26-OPT-01
Project Title:	Vaca Dixon Power Center Project
TN #:	273176
Document Title:	Application for Confidential Designation_Appendix DR WS-2
Description:	Application for Confidential Designation for Appendix DR WS-2
Filer:	Adam Morrison
Organization:	Rincon Consultants, Inc.
Submitter Role:	Applicant Consultant
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Rincon Consultants
601 University Avenue, Suite 221
Sacramento, California 95825
916-706-1374

October 21, 2026

Subject: Application for Confidential Designation Vaca Dixon Power Center Project Appendix WS-2 BESS System Drawings and Manufacturer Recommendations. 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 WS-3 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.).

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.

WS-2 BESS System Drawings and Manufacturer Recommendations

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

Appendix WS-2 in its entirety. Appendix ES-3 Contains the following exhibits:

- Fire Alarm Plan Drawings
- AESC Emergency Response Guide for Lithium Battery Energy Storage
- CATL Emergency Disposition Scheme of Energy Storage Container
- AESC DC Electrical Safety Design for Liquid-Cooled Container BESS
- AESC DC block Electrical Drawings
- AESC Technical Specifications of Liquid-cooled Container BESS
- AESC Fire Suppression System of Liquid-Cooled Container
- CATL Design Drawings
- CATL EnerC 1P 285 Fire Suppression System

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

It is requested that Appendix WS-2 BESS System Drawings and Manufacturer Recommendations for the Vaca Dixon Power Center Project be kept confidential indefinitely. The record contains proprietary commercial information and trade secrets protected from disclosure under Government Code section 7927.705, Civil Code section 3426.1, and Evidence Code section 1060. The attached records contain trade secret and proprietary information, including fire alarm system drawing and detailed battery system specifications, This information provides independent economic value because it is not generally known or readily ascertainable by others and is subject to reasonable measures to preserve its confidentiality.

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.

The document contains proprietary commercial information, and other competitively sensitive business information that are not publicly available. These materials derive independent economic value from not being generally known to competitors and are maintained as confidential by the parties. Accordingly, the information constitutes trade secret and proprietary business information protected by Evidence Code section 1060 and the California Uniform Trade Secrets Act. Such information is exempt from disclosure pursuant to Government Code section 7927.705 (formerly section 6254(k)).

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 exhibits included within Appendix WS-2 were provided to the Applicant by AESC and CATL under confidentiality agreements. The exhibits are marked as "Confidential" and/or include proprietary information related to battery system design. Disclosure of the exhibits would cause competitive harm by revealing non-public proprietary information with independent economic value. Public disclosure could reveal private engineering data of manufacturer products as well as security-sensitive facility safety system details.

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 appendix in its entirety contains confidential information and cannot be disclosed even if aggregated.

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 as well as the third party that prepared the document.

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