DOCKETED	
Docket Number:	26-OPT-01
Project Title:	Vaca Dixon Power Center Project
TN #:	273294
Document Title:	Application for Confidential Designation_Fire Alarm Drawings
Description:	Application of Confidential Designation for Fire Alarm Drawings
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Submitter Role:	Applicant Consultant
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October 28, 2026

Subject: Application for Confidential Designation Vaca Dixon Power Center Project Fire Alarm System. Docket No. 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 California Energy Commission (CEC) designate the attached fire alarm system specification documents as confidential pursuant to 20 California Code of Regulations (CCR) Section 2505. This information is being supplied to the CEC in support of the opt-in application for the Vaca Dixon Power Center Project docketed on January 6, 2026. These records contain proprietary, non-public, and security-sensitive information regarding the Vaca Dixon Power Center Project's fire alarm system. Public disclosure of this information could increase the risk of tampering with or compromising system security. Accordingly, the applicants request that the CEC withhold them from public disclosure and exclude them from the public docket.

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.

Fire Alarm System Plans and Specifications

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

Fire Alarm System Plans and Specifications in its entirety, including all figures and drawings.

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

It is requested that the Fire Alarm System Plans and Specifications for the Vaca Dixon Power Center Project remain confidential indefinitely. These records contain proprietary and security-sensitive information protected from disclosure pursuant to Government Code section 7927.705, Civil Code section 3426.1, and Evidence Code section 1060. Disclosure of the attached records could increase the risk of tampering, and the information is not necessary for the public's understanding of the project.

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 security sensitive technical information that is not publicly available. These materials are maintained as confidential by the parties and derive independent economic value from not being generally known to competitors or the public. In addition, the document contains detailed fire alarm system specifications, the public disclosure of which could increase the risk of tampering with or compromising system security. 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 Fire Alarm System Plans and Specifications include proprietary and security sensitive information related to fire alarm system design. The information is not publicly available at this level of detail and is not otherwise disclosed by the Applicants to the public. Disclosure of the figures would cause competitive harm by revealing non-public proprietary information with independent economic value. Public disclosure could reveal private engineering data and manufacturer-specific product information, as well as security-sensitive facility safety system details. Such details include alarm system specifications, device layouts, and wiring and communications information, the disclosure of which could increase the risk of tampering, misuse, or compromise the facility's fire alarm system. Accordingly, there is a strong public interest in maintaining the confidentiality of this information to protect facility safety and security while preserving the proprietary value of the information.

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 Fire Alarm System Plans and Specifications 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