DOCKETED	
Docket Number:	26-OPT-01
Project Title:	Vaca Dixon Power Center Project
TN #:	273352
Document Title:	Application for Confidential Designation_Revised HMAs and ERP
Description:	Application for Confidential Designation for confidential appendices of the revised HMAs and ERP.
Filer:	Adam Morrison
Organization:	Rincon Consultants, Inc.
Submitter Role:	Applicant Consultant
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916-706-1374

November 3, 2026

Subject: Application for Confidential Designation *Vaca Dixon Power Center Project Emergency Response Plan and Hazard Mitigation Analyses*. 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) to support the AB-205 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.

Confidential designation is requested for the following records:

- *Vaca Dixon BESS Hazard Mitigation Analysis (Coffman Engineers Inc., 2026) (593 pages)*
- *Arges BESS Hazard Mitigation Analysis (Coffman Engineers Inc., 2026) (569 pages)*
- *Emergency Response Plan (Coffman Engineers Inc., 2026) (107 pages)*

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

Confidential designation is requested for the following appendices:

- *Emergency Response Plan Appendix J - AESC Emergency Response Guide and Appendix K - CATL Emergency Response Guide*
- *Arges BESS Hazard Mitigation Analysis Appendix C - LSFT Test Report and Appendix D - CATL User Manual*
- *Vaca Dixon Hazard Mitigation Analysis Appendix D - AESC User Manual and Appendix I - Short Circuit Study*

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

It is requested that the appendices specified above 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 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 documents contain 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 the specified appendices were provided to the Applicant by AESC, CATL, and UL Solutions 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.

Reports can be disclosed with confidential appendices removed.

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