DOCKETED	
Docket Number:	26-OPT-01
Project Title:	Vaca Dixon Power Center Project
TN #:	273353
Document Title:	Application for Confidential Designation_Revised Appendix F CRTR
Description:	Application for Confidential Designation for the Revised Cultural Resources Technical Report
Filer:	Adam Morrison
Organization:	Rincon Consultants, Inc.
Submitter Role:	Applicant Consultant
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Rincon Consultants, Inc.
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Subject: Application for Confidential Designation *Vaca Dixon Power Center Project Appendix F Cultural Resources Technical Report, Solano County, California*. 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, requests 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 F 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.) 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.

Enterprise Battery Energy Storage System (BESS) Project Cultural Resources Technical Report, San Diego County, California (2025)

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

Appendix A (to Appendix F) Northwest Information Center Records Search Results (All Pages of the Appendix)

Appendix D (to Appendix F) Cultural Resources Inventory Report for the Corby Battery Energy Storage System Project in Solano County, California (ICF 2024)

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

Appendix A and Appendix D to the report identified above should be kept confidential indefinitely to protect potential cultural resources and sites. If the descriptions of the locations of the sites are released to the public domain, there is potential for looting and destruction of that site.

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.

Appendix A and Appendix D to the report identified above specifically identifies areas of potential cultural and historical significance. It is thus protected under Government Code Sections 6254(e) and 6254(k). Protection provided is analogous to that given to Native American sacred places under Section 6254(r) of the Government Code.

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 will be served by nondisclosure by preventing looting of the cultural resources and sites described in the reports. Such looting would preclude scientific study of the sites to gain data about the cultural resources of the area.

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 information disclosed in Appendix A and Appendix D to the report identified in 1(a) has been aggregated and summarized in the Cultural Resources section of the Supplemental Petition for Post-Certification Amendment application for the project. However, aggregation of the confidential report itself would potentially hinder CEC staff when performing their review and analysis.

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 information contained within Appendix A and Appendix D to the report referenced in 1(a) has not been disclosed by the consultant to any parties beyond Applicant staff who are directly associated with the proposed 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, Inc.



Breana Campbell-King, MA, RPA
Project Archaeologist