

DOCKETED

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Project Title:	Ivanpah Solar Electric Generating System (Compliance)
TN #:	211916
Document Title:	Application for Confidential Designation
Description:	N/A
Filer:	Sabrina Savala
Organization:	Solar Partners VIII, LLC
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June 16, 2016

Solar Partners VIII, LLC
c/o NRG Renewables LLC
4900 N. Scottsdale Rd., Suite
5000
Scottsdale, AZ 85251

Robert Oglesby
Executive Director
California Energy Commission
Siting, Transmission and Environmental Protection Division
1516 9th Street
Sacramento, CA 95814

Subject: Application for Confidential Designation - Root Cause Analysis Report
for Unit 3 Fire Damage

Dear Mr. Oglesby,

Solar Partners VIII, LLC (Solar Partners) has prepared this response to the California Energy Commission's (CEC) request for a Root Cause Analysis (RCA) Report stemming from the May 19, 2016 fire on Ivanpah Solar Electric Generating System's (ISEGS) Unit 3 tower. A brief fire occurred when the Unit 3 heliostats (mirrors) were temporarily locked in place in preparation for a maintenance activity, which resulted in solar flux being directed over a portion of the Unit 3 boiler tower other than the designated receiver. No injuries occurred due to this incident and plant personnel quickly extinguished the fire. The fire was primarily limited to wiring and insulation materials and lasted several minutes. The mirrors were subsequently unlocked and moved to remove the solar flux from the tower.

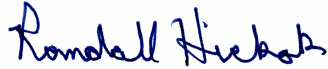
Solar Partners immediately began its RCA on May 19. New safeguards were put into place to ensure that this incident would not occur at Unit 3 or at the other units (i.e., Units 1 and 2). The RCA proceeded which resulted in an incident timeline, three incident causes, and more than a dozen corrective actions that are in progress. Corrective actions taken to date and in progress include significant human and electronic fail safe processes to prevent this incident from happening again. Greater detail of the incident causes and the resulting changes are outlined in the RCA Report.

The information in this document and the RCA is confidential. Accordingly, Solar Partners requests designation of this letter and the attached RCA as a Confidential Record pursuant to Section 2505(a)(1)(D) of the CEC's rules (20 C.C.R. Section 2505). The attached RCA follows our proprietary Investigative Report Form and includes confidential and proprietary information pertaining to the operations of the ISEGS units and the corresponding heliostats, the disclosure of which would otherwise reveal trade secrets resulting in a loss of a competitive advantage. We also request that the confidential record be designated confidential pursuant to California Government Code §§ 6254(k) and 6254.7(d), which exempts trade secrets from disclosure under the California Public Records Act.

I have been authorized to make this application and certification on behalf of Solar Partners. With my signature to this letter, 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.

If you have any questions, please do not hesitate to contact me at Randall.Hickok@nrg.com or at 480-424-1657, or William.Dusenbury@nrg.com at 702-558-1134.

Best Regards,

A handwritten signature in blue ink that reads "Randall Hickok". The signature is written in a cursive style with a large initial "R".

Randall Hickok
Manager, Solar Power Partners VIII, LLC

cc: Roger Johnson, CEC
Joseph Douglas, CEC
Ryan Bates, NRG
William Dusenbury, NRG