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CALIFORNIA ENERGY COMMISSION

661-615-4630

Sunrise Power Company, LLC

Box 81617, Bakersfield, CA 93380-1617

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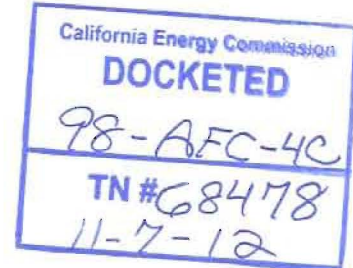
Kelly S. Lucas, Executive Director

November 5, 2012

DOCKET OFFICE

SU-3377

California Energy Commission
Docket Officer
Attn: Docket 12-IEP-1c
1516 Ninth Street, MS-4
Sacramento, CA 95814-5512



RE: **As-Operating Information Request**
Sunrise Power Company, LLC - 98-AFC-4C

Dear Sirs:

Sunrise Power Company (Sunrise) is providing the As-Operating Information as requested by the CEC on September 25, 2012. Sunrise is requesting confidentiality for this data submittal.

Enclosed is the completed Application for Confidential Designation plus 5 copies of the cd with the confidential data.

Should you have any questions, please contact me at 661-615-4684.

MEH: yh

Enclosures

**APPLICATION FOR CONFIDENTIAL DESIGNATION
(Cal. Code Regulations, Title 20, § 2505)
DOCKET NUMBER: (12-IEP-1c)**

Applicant: Sunrise Power Company
Address of Applicant: P.O. Box 81617, Bakersfield, CA 93380

1. (a) Title, data, and description of the record:

The As-Operating Cost Information Request Form issued by the California Energy Commission (Energy Commission) for the Sunrise Power Plant.

(Note: The record must be attached.)

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

Sunrise Power Company is requesting confidential designation for the following information items listed below.

Capital, Operating, and Production/Consumption Data and Expenses.
(List items here)

2. State and justify the length of time the Energy Commission should keep the record confidential. Five year term equivalent to length of typical utilities Request For Offer.

(Please specify and justify the time that the confidential information needs to be kept confidential.)

3. (a) State the provision(s) of the Public Records Act (Gov. Code, § 6250 et seq.) or other law that allows the Energy Commission to keep the record confidential, and explain why the provision(s) applies to the record.

The completed forms requested by the Energy Commission contain information that is commercially sensitive, which the applicant considers to be confidential.

(List the information/data submitted for a confidential designation and discuss why that particular piece of information/data is confidential. Each application is evaluated on a case-by-case basis. The applicant needs to justify confidentiality.)

(b) 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.

(Please add a statement about the loss of competitive advantage, and ease to which this information can be acquired and duplicated by others.)

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 it is aggregated or masked, explain why.**

Sunrise request the highest degree of data aggregation and masking (Please provide statement.) to protect the confidentiality of Sunrise's proprietary financial and operating data.

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.**

Sunrise's financial data is not made available for public review.

(Please provide statement.)

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 that I am authorized to make the application and certification on behalf of the Applicant.

Dated: 11/2/2012

Signed: 

Name: KELLY LUCAS
(Typed or Printed)

Title: EXECUTIVE DIRECTOR
(Typed or Printed)