

ELLISON, SCHNEIDER & HARRIS L.L.P.

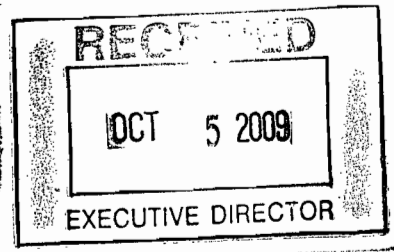
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COMPLETED

October 5, 2009



DOCKET

08-AFC-12

DATE OCT 05 2009

RECD OCT 05 2009

Melissa Jones
Executive Director
California Energy Commission
1516 Ninth Street
Sacramento, CA 95814

RE: San Joaquin Solar 1 & 2 Hybrid Power Plant – 08-AFC-12
Application for Confidential Designation: Phase I Interconnection Study Appendices

Dear Ms. Jones:

Pursuant to Title 20 California Code of Regulations (CCR) Sections 2501 *et seq.*, San Joaquin Solar 1 LLC and San Joaquin Solar 2 LLC (the “Applicant”) hereby submit this “Application for Confidential Designation” for the San Joaquin Solar 1 & 2 Hybrid Power Plant regarding the Phase I Interconnection Study Appendices.

I am submitting the Application and confidential material directly to you without docketing at the Docket Unit. Enclosed are twelve copies plus an original of this request and five copies of the confidential information it concerns. Please feel free to contact me at (916) 447-2166 should you have any questions or require additional information. Thank you for your consideration of our request.

Sincerely,

Greggory L. Wheatland
Attorneys for the Applicant

enc.

cc: Service List without confidential attachments

APPLICATION FOR CONFIDENTIAL DESIGNATION
San Joaquin Solar 1 & 2 Hybrid Power Plant 08-AFC-12
San Joaquin Solar 1 LLC and San Joaquin Solar 2 LLC (the "Applicant")

Phase I Interconnection Study Appendices ("ISA")

1. *Specifically indicate those parts of the record which should be kept confidential.*

Appendices A through I for the "Transmission Cluster Phase I Interconnection Study Report", for the Bethel 7 & 8 Solar Thermal Hybrid Project Dated July 23, 2009. Specifically,

Appendix A – Study Plan

Appendix B – Base Case Assumptions

Appendix C – Contingency Lists for Outages Autocon Input Files Group 2 – Greater Fresno Area

Appendix D – Steady State Power Flow Plots

Appendix E – Generator Machine Dynamic Data

Appendix F – Dynamic Stability Plots

Appendix G – Protection Requirement

Appendix H – Short Circuit Calculation Results

Appendix I Part 1 – Deliverability Study Results

Appendix I Part 2 – Transition Cluster Deliverability Study – Fresno Area Contingency Analysis Summary

2. *State the length of time the record should be kept confidential, and provide justification for the length of time.*

Consistent with applicable law, this information should be held confidential indefinitely in order to protect the information identified therein.

3. *Cite and discuss (i) the provisions of the Public Records Act or other law which allow the commission to keep the record confidential and (ii) the public interest in nondisclosure of the record.*

It has been suggested to the Applicant that the ISA may not be disclosed due to restrictions and/or prohibitions set forth in the Critical Infrastructure Information Act of 2002 ("CIIA"), codified at 6 U.S.C. §§131 – 134 on November 25, 2002 as subtitle B of Title II of the Homeland Security Act (P.L. 107-296, 116 Stat. 2135, sections 211 - 215), related to the regulation of the use and disclosure of information submitted to the Department of Homeland Security (DHS) about vulnerabilities and threats to critical infrastructure. Further, there may be prohibitions of the use or disclosure of this information in the CAISO Tariff, including, but not necessarily limited to, Appendix U of the *California Independent System Operator Corporation FERC Electric Tariff*, the Standard Large Generator Interconnection Procedures (the "LGIP"). In particular, the LGIP's definition of "Confidential Information" in Section

1.2.2 and the LGIP's Section 13.1 on "Confidentiality," and the subsections thereto, may include prohibitions on the use or disclosure of this information.

4. *State whether the information may be disclosed if it is aggregated with other information or masked to conceal certain portions, and if so the degree of aggregation or masking required.*

The Applicant considered whether it would be possible to aggregate or mask the information. However, no feasible method of aggregating or masking the information could be identified that would not either disclose the information or render the information provided useless.


5. *State whether and how the information is kept confidential by the applicant and whether it has ever been disclosed to a person other than an employee of the applicant, and if so under what circumstances.*

Applicant has not disclosed any of the subject information to anyone other than its employees, attorneys and consultants working on the Applicant's project, Pacific Gas & Electric Company and parties considering providing financing or equity participation to Applicant as allowed by the LGIP 13.1.2. Moreover, this information has only been disclosed to such parties that are under non-disclosure agreements.

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 belief. I am authorized to make the Application and Certification on behalf of Applicant.

Dated: October 5, 2009

ELLISON, SCHNEIDER & HARRIS L.L.P.

By: 
Gregory L. Wheatland
Ellison, Schneider & Harris L.L.P.
Attorneys for Applicant