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| Project Title: | Huntington Beach Energy Project - Compliance |
| TN #: | 228381 |
| Document Title: | HAZ8 Operation Security Plan Submittal Cover Letter and Confidential Application Form |
| Description: | N/A |
| Filer: | Jeff Miller |
| Organization: | AES |
| Submitter Role: | Applicant |
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May 22, 2019

Mr. Joseph Douglas
Compliance Project Manager
California Energy Commission
1516 9th Street
Sacramento, CA 95814

Subject: Huntington Beach Energy Project (12-AFC-02C)
Conditions of Certification HAZ-8 Operation Security Plan - Application for Confidential Designation

Dear Mr. Douglas

In accordance with HAZ-8, AES is submitting the Operation Security Plan for the Huntington Beach Energy Project through the California Energy Commission's Confidential Submittal Process. Inherent in the Operation Security Plan are detailed measures and provisions AES is implementing to maintain a secure and reliable facility in the public interest. The remainder of this letter includes our Application for Confidential Designation.

Please let me know if you have any questions.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Jeff Miller', written over a light blue horizontal line.

Jeff Miller
Compliance Manager
AES Huntington Beach Energy Project

Cc: Stephen O'Kane/AES

APPLICATION FOR CONFIDENTIAL DESIGNATION
Huntington Beach Energy Project 12-AFC-02C (the "Applicant")

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

The Applicant is requesting confidential designation of the entire Operation Security Plan, including procedures and maps.

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

The Information should be held confidential for the life of the Huntington Beach Energy Project to maintain Site Security.

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.*

NERC CIP-011-2 requires any BCSI (BES Cyber System Information) be protected and handled securely and confidentially to ensure the security of the Bulk Electric System. FERC has also designated CEII (Critical Energy Infrastructure Information), which could be anything that would negatively affect the national security economic security, public health or safety be protected and handled securely and confidentially to ensure the security and reliability of the Bulk Electric System.

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. Given the specific details and circumstances analyzed in the Plan, no feasible method of aggregating or masking the information could be identified at this time 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.*

The Applicant has not disclosed any of the subject information to anyone other than CEC staff, Applicant's Contractors and the Applicant's employees. The subject information is stored in the Applicant's controlled access areas and servers consistent with the requirements of NERC CIP-011-2.

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 this Application and Certification on behalf of the Applicant.

Dated: May 22, 2019

By:



Jeff Miller
HBEP Compliance Manager
AES Huntington Beach Energy, LLC