

DOCKETED

Docket Number:	79-AFC-03C
Project Title:	Compliance - Application for Certification of PG&E Geysers Unit 18
TN #:	240808
Document Title:	Unit 18 Socrates Application for Confidential Designation - applications-fire suppression docs-2018
Description:	N/A
Filer:	Patty Paul
Organization:	Ellison Schneider Harris Donlan
Submitter Role:	Applicant Representative
Submission Date:	12/3/2021 1:47:32 PM
Docketed Date:	12/3/2021

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May 25, 2018

Drew Bohan
Executive Director
California Energy Commission
1516 Ninth Street
Sacramento, CA 95814

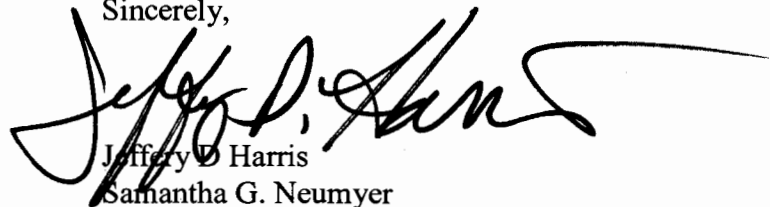
Re: Application for Confidential Designation
Geysers Unit 3, Sonoma (80-AFC-1C)
Geysers Unit 16, Quicksilver (79-AFC-5C)
Geysers Unit 17, Lakeview (79-AFC-1C)
Geysers Unit 18, Socrates (79-AFC-3C)
Geysers Unit 19, Calistoga (81-AFC-1C)
Geysers Unit 20, Grant (82-AFC-1C)

Dear Mr. Bohan:

Pursuant to Sections 2501 *et seq.*, of Title 20 of the California Code of Regulations, the project owners of the above-listed Commission certified projects (the "Applicants") hereby submit this *Application for Confidential Designation* for certain detailed design information relating to the fire protection and related systems for these six Geysers Units (the "Projects").

Please feel free to contact us at (916) 447-2166 should you have any questions or require additional information. Thank you.

Sincerely,



Jeffery D. Harris
Samantha G. Neumyer
Ellison Schneider Harris & Donlan LLP

Attorneys for Applicants

APPLICATION FOR CONFIDENTIAL DESIGNATION

Geysers Unit 3, Sonoma (80-AFC-1C)
Geysers Unit 16, Quicksilver (79-AFC-5C)
Geysers Unit 17, Lakeview (79-AFC-1C)
Geysers Unit 18, Socrates (79-AFC-3C)
Geysers Unit 19, Calistoga (81-AFC-1C)
Geysers Unit 20, Grant (82-AFC-1C)
(The "Applicants")

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

The Applicants seek confidential designation for site-specific drawings, reports, system descriptions and business records related to the fire protection and suppression systems (the "Confidential Fire Protection Information") for the above-referenced six Geysers Units (the "Projects"). The *Confidential Fire Protection Information*, including the accompanying attachments, for the Projects should be kept confidential in its entirety. The *Confidential Fire Protection Information* is set forth in Attachment A of this Application.

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

The *Confidential Fire Protection Information* should be held confidential for the life of the Projects to protect the information contained 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.*

The *Confidential Fire Protection Information* should be kept confidential for the following reasons.

First, the Public Records Act broadly exempts corporate proprietary information, including trade secrets from public disclosure. (Gov't Code §§ 6254.7(d), 6254.15.) Trade secrets include "any formula, plan, ... production data, or compilation of information ..., which is known only to certain individuals within a commercial concern who are using it to fabricate, produce, or compound an article of trade or a service ... and which gives its user an opportunity to obtain a business advantage over competitors who do not know or use it." (Gov't Code §§ 6254.7(d), 6254.15.) The California Civil Code Section 3426.1(d) defines a "trade secret" as follows:

- (d) "Trade secret" means information, including a formula, pattern, compilation, program, device, method, technique, or process, that:
 - (1) Derives independent economic value, actual or potential, from not being generally known to the public

or to other persons who can obtain economic value from its disclosure or use; and

- (2) Is the subject of efforts that are reasonable under the circumstances to maintain its secrecy.

The *Confidential Fire Protection Information* contains specific compilations of information related to the specific technologies employed at the Projects, including the design and location of certain fire protection systems, drawings, photographs of the Projects, and other commercially valuable information related to the facility's operations and schematics. Such information constitutes trade secrets as the Applicants use such information for asset protection purposes. The *Confidential Fire Protection Information* has independent economic value from not being generally known to the public or to the Applicants' competitors.

Second, the Public Record Act provides a specific exclusion from disclosure where "...on the facts of the particular case the public interest served by not disclosing the record clearly outweighs the public interest served by disclosure of the record." (Gov't Code § 6255(a).) In this case, the public interest in protecting the fire protection systems for the facilities arises from preventing possible vandalism, tampering, or other third-party imposed damages (like recent cases involving substations and other energy facilities), which clearly outweighs the public interest in disclosure. The fire protection systems are located on a non-public, secure facility, so there is no public interest in disclosing site-specific information on these systems.

Third, the Public Records Act protects from disclosure "Records, the disclosure of which is exempted or prohibited pursuant to federal or state law, including, but not limited to, provisions of the Evidence Code relating to privilege. (Gov. C. 6254(k).) Therefore, where a record is protected from disclosure under the Freedom of Information Act ("FOIA"), it must be protected from disclosure under the Public Records Act.

California Government Code Section 6254 (ab), in pertinent part, excludes from disclosure, "Critical infrastructure information ["CII"], as defined in Section 131(3) of Title 6 of the United States Code, that is voluntarily submitted to the Office of Emergency Services for use by that office, including the identity of the person who or entity that voluntarily submitted the information.* * *" Both the Department of Homeland Security ("DHS") and the Federal Energy Regulatory Commission ("FERC") have processes for this exemption. Similarly, FERC protects Critical Energy Infrastructure Information ("CEII") through an application for protection from FOIA disclosure.

The *Confidential Fire Protection Information* is similar to the type of information subject to collection by either DHS or FERC. While there has been no occasion to date for the Applicants to seek CII or CEII designation for the *Confidential Fire Protection Information*, if either agency were to make such a request, the Applicants would be able to avail themselves of these federal agencies' processes to protect the sensitive fire protection-related information for disclosure under FOIA, which would in turn exempt such information from production under California Government Code Section 6254 (ab).

Fourth, the Public Records Act unambiguously protects from disclosure "Personnel, medical, or similar files, the disclosure of which would constitute an unwarranted invasion of personal privacy." (Gov't Code § 6254(c).) The *Confidential Fire Protection Information* may contain plant personnel and contractor personnel information for both the existing project owner and the prior project owners (PG&E and SMUD), including specific information regarding plant operators and staff, job performance, and other information typically contained within personnel and similar files. Disclosure of the information would constitute an unwarranted invasion of personal privacy.

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 Applicants considered whether it would be possible to aggregate or mask the information. Given the specific details and circumstances analyzed in the *Confidential Fire Protection Information*, 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 Applicants have not disclosed any of the subject information to anyone other than the California Energy Commission staff and other federal, state, and local governmental entities with regulatory authority over the *Confidential Fire Protection Information*, and the Applicants' employees, attorneys and consultants working on behalf of the Projects. Moreover, this information has not been disclosed to persons employed by, or working for, the Applicants except on a confidential, "need-to-know" basis.

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 Applicants.

Dated: May 25, 2018

By: 

Jeffery D. Harris
Ellison Schneider Harris & Donlan LLP

Attorneys for the Applicants

Attachment A

Confidential Fire Protection Information

Geysers Unit 16, Quicksilver (79-AFC-5C)	
Inspection, Testing and Maintenance Fire Sprinkler System	
	Dates
	6/10/2013
	11/19/2013
	8/28/2014
	10/28/2014
	2/2/2015
	5/5/2015
	8/4/2015
	3/1/2016
	5/24/2016
	8/30/2016
	11/29/2016
	3/21/2017
	6/27/2017
	9/26/2017
	12/14/2017
	3/27/2018
Geysers Unit 16, Quicksilver (79-AFC-5C)	
Fire Alarm Inspections	
	Dates
	6/7/2013
	11/20/2013
	8/28/2014
	10/28/2014
	2/2/2015
	5/5/2015
	8/4/2015
	3/1/2016
	5/24/2016
	8/30/2016
	11/29/2016
	3/21/2017
	6/27/2017
	9/26/2017
	12/14/2017
	3/27/2018
Geysers Unit 16, Quicksilver (79-AFC-5C)	
Fire Pump Inspection	
	Dates
	8/15/2017

Geysers Unit 3, Sonoma (80-AFC-1C)	
Inspection, Testing and Maintenance Fire Sprinkler System	
	Dates
	6/10/2013
	11/19/2013
	10/27/2014
	2/4/2015
	8/3/2015
	11/2/2015
	3/1/2016
	5/23/2016
	8/29/2016
	11/29/2016
	3/20/2017
	6/27/2017
	9/26/2017
	12/13/2017
	3/28/2018
Geysers Unit 3, Sonoma (80-AFC-1C)	
Fire Alarm Inspections	
	Dates
	6/10/2013
	11/19/2013
	7/17/2014
	10/27/2014
	2/4/2015
	5/5/2015
	8/3/2015
	11/2/2015
	3/1/2016
	5/23/2016
	8/29/2016
	11/29/2016
	9/25/2017
	12/14/2017
	3/38/2018
Geysers Unit 3, Sonoma (80-AFC-1C)	
Fire Pump Inspection	
	Dates
	2/4/2015
	3/1/2016

Geysers Unit 18, Socrates (79-AFC-3C) Inspection, Testing and Maintenance Fire Sprinkler System	
	Dates
	6/10/2013
	11/21/2013
	8/28/2014
	10/28/2014
	2/3/2015
	8/3/2015
	11/2/2015
	2/29/2016
	5/23/2016
	11/28/2016
	3/20/2017
	6/27/2017
	9/25/2017
	12/14/2017
	3/26/2018
Geysers Unit 18, Socrates (79-AFC-3C) Fire Alarm Inspections	
	Dates
	6/7/2013
	11/21/2013
	8/28/2014
	10/28/2014
	2/3/2015
	8/3/2015
	11/2/2015
	2/29/2016
	8/29/2016
	11/28/2016
	3/20/2017
	6/27/2017
	9/25/2017
	12/14/2017
	3/26/2018

Geysers Unit 17, Lakeview (79-AFC-1C)	
Inspection, Testing and Maintenance Fire Sprinkler System	
	Dates
	6/10/2013
	7/16/2014
	10/27/2014
	1/28/2015
	5/7/2015
	8/5/2015
	11/4/2015
	3/3/2016
	5/26/2016
	8/31/2016
	11/30/2016
	3/23/2017
	6/28/2017
	9/27/2017
	12/12/2017
Geysers Unit 17, Lakeview (79-AFC-1C)	
Fire Alarm Inspections	
	Dates
	12/14/2017

Geysers Unit 19, Calistoga (81-AFC-1C)	
Inspection, Testing and Maintenance Fire Sprinkler System	
	Dates
	6/10/2013
	11/18/2013
	7/17/2014
	10/27/2014
	2/2/2015
	2/4/2015
	8/3/2015
	11/2/2015
	2/29/2016
	5/23/2016
	8/29/2016
	11/29/2016

	3/20/2017
	6/27/2017
	9/26/2017
	12/13/2017
	3/28/2018
Geysers Unit 19, Calistoga (81-AFC-1C) Fire Alarm Inspections	
	Dates
	6/10/2013
	11/18/2013
	7/17/2014
	10/27/2014
	2/4/2015
	5/5/2015
	8/3/2015
	11/2/2015
	2/29/2016
	5/23/2016
	8/29/2016
	3/20/2017
	6/26/2017
	9/26/2017
	12/13/2017
	3/28/2018

Geysers Unit 20, Grant (82-AFC-1C) Inspection, Testing and Maintenance Fire Sprinkler System	
	Dates
	6/10/2013
	11/21/2013
	10/28/2014
	2/3/2015
	8/3/2015
	11/2/2015
	2/29/2016
	5/23/2016
	8/29/2016
	11/28/2016
	3/20/2017
	6/26/2017
	9/25/2017
	12/13/2017
	3/26/2018

Geysers Unit 20, Grant (82-AFC-1C)	
Fire Alarm Inspections	
	Dates
	6/7/2013
	11/21/2013
	8/28/2014
	10/28/2014
	2/3/2015
	5/5/2015
	8/3/2015
	11/2/2015
	2/29/2016
	5/23/2016
	8/29/2016
	11/28/2016
	3/20/2017
	6/26/2017
	9/25/2017
	12/13/2017
	3/26/2018



JEFFERY D. HARRIS
JDH@ESLAWFIRM.COM

May 31, 2018

Drew Bohan
Executive Director
California Energy Commission
1516 Ninth Street
Sacramento, CA 95814

Re: Repeated Application for Confidential Designation
Geysers Unit 3, Sonoma (80-AFC-1C)
Geysers Unit 16, Quicksilver (79-AFC-5C)
Geysers Unit 17, Lakeview (79-AFC-1C)
Geysers Unit 18, Socrates (79-AFC-3C)
Geysers Unit 19, Calistoga (81-AFC-1C)
Geysers Unit 20, Grant (82-AFC-1C)

Dear Mr. Bohan:

Pursuant to Sections 2505(a)(4), of Title 20 of the California Code of Regulations, the project owners of the above-listed Commission certified projects (the "Applicants") hereby submit this *Repeated Application for Confidential Designation* for certain site-specific drawings, reports, system descriptions and business records related to the fire protection and suppression systems (the "Confidential Fire Protection Information") contained in Attachment A for these six Geysers Units (the "Projects").

By letter dated May 25, 2017, the Applicants submitted an initial request for confidential designation for the Confidential Fire Protection Information for the Projects. Attachment A to this letter contains information that is substantially similar to the previously submitted information and all facts and circumstances relevant to the confidentiality of the information remain unchanged.

I certify under penalty of perjury that the information contained in the Repeated Application for Confidential Designation is true, correct, and complete to the best of my knowledge and belief. I am authorized to make this repeated application and certification on behalf of the Applicant.

Sincerely,

Jeffery D Harris
Samantha G. Neumyer
Ellison Schneider Harris & Donlan LLP
Attorneys for Applicants

Attachment A

Confidential Fire Protection Information

REPEATED APPLICATION FOR CONFIDENTIAL DESIGNATION

Geysers Unit 3, Sonoma (80-AFC-1C)	
Description	Pages
04D1-002	1
04D1-004	1
CBD-10ANN01-4	1
EJ-1501-4	1
EJ-1502-4	1
EJ-1607-4	1
EJ-2301-5	1
ESK-10ANN01	1
G1-13A1-002	1
G1-13A1-003E	1
G1-13A1-008D	1
Plant Manual Vol 1 Section 8 FPS System Description	12
Plant Manual Vol 3 Section 9 FPS equipment Description	8
Station Design Criteria Section 3.3.5	3

Geysers Unit 16, Quicksilver (79-AFC-5C)	
Description	Pages
105797 sh3	1
105799 sh5	1
105802 sh1-7	7
105802 sh8-17	10
466180	1
511508	1
Unit 16 fire System Design Description	8

Geysers Unit 17, Lakeview (79-AFC-1C)	
Description	Pages
106256 Sheet 1 through 20	23
106259 Sheet 1	1
106259 Sheet 2	1
106259 Sheet 4	1
106259 Sheet 5	1
106259 Sheet 6	1
106259 Sheet 7	1
106259 Sheet 8	1
106259 Sheet 9	1
106259 Sheet 10	1
106259 Sheet 11	1
106259 Sheet 11A	1
106259 Sheet 12	1
509792	1

REPEATED APPLICATION FOR CONFIDENTIAL DESIGNATION

509793	1
509794	1
512522	1
512523	1
512524	1
Unit 17 Manual FP system	13

Geysers Unit 18, Socrates (79-AFC-3C)	
Description	Pages
106626-5	1
106628	16
106631-3sh11	1
512621-1	1
512622-2	1
512623	1
512624-2	1
512629	1
512630-2	1
512631-2	1
512632-2	1
512633	1
512636-3	1
512637-2	1
512638-2	1
513037-3	1
513038-3	1
513039-2	1
Plant Data Book Section 4	13

Geysers Unit 19, Calistoga (81-AFC-1C)	
Description	Pages
EJ-0909A sheet 1 of 2	1
EJ-0909A sheet 2 of 2	1
EJ- 1501-7	1
EJ-2301-6	1
Unit 19 Fire System Alarm Narrative	6
Unit 19 Fire System Design Description	11

Geysers Unit 20, Grant (82-AFC-1C)	
Description	Pages
107383-1	1
107385-4	16
107388-2	1
511896-1	1
511897-2	1
511898-1	1
511899-1	1
511906-2	1
511907-1	1
511908-2	1
511909-1	1
511910-2	1
511911-1	1
511917-1	1
511918-1	1
511919-1	1
511920-1	1
515795-1	1
515796-1	1
515797-1	1
Plant Manual Section 4	13



JEFFERY D. HARRIS
JDH@ESLAWFIRM.COM

June 8, 2018

Drew Bohan
Executive Director
California Energy Commission
1516 Ninth Street
Sacramento, CA 95814

Re: Repeated Application for Confidential Designation
Geysers Unit 3, Sonoma (80-AFC-1C)
Geysers Unit 16, Quicksilver (79-AFC-5C)
Geysers Unit 17, Lakeview (79-AFC-1C)
Geysers Unit 18, Socrates (79-AFC-3C)
Geysers Unit 19, Calistoga (81-AFC-1C)

Dear Mr. Bohan:

Pursuant to Sections 2505(a)(4), of Title 20 of the California Code of Regulations, the project owners of the above-listed Commission certified projects (the "Applicants") hereby submit this *Repeated Application for Confidential Designation* for certain site-specific drawings, reports, system descriptions and business records related to the fire protection and suppression systems (the "Confidential Fire Protection Information") contained in Attachment A for these five Geysers Units (the "Projects").

By letter dated May 25, 2017, the Applicants submitted an initial request for confidential designation for the Confidential Fire Protection Information for the Projects. Attachment A to this letter contains information that is substantially similar to the previously submitted information and all facts and circumstances relevant to the confidentiality of the information remain unchanged.

I certify under penalty of perjury that the information contained in the Repeated Application for Confidential Designation is true, correct, and complete to the best of my knowledge and belief. I am authorized to make this repeated application and certification on behalf of the Applicant.

Sincerely,

Jeffery D Harris
Samantha G. Neumyer
Ellison Schneider Harris & Donlan LLP
Attorneys for Applicants

Attachment A

Confidential Fire Protection Information

REPEATED APPLICATION FOR CONFIDENTIAL DESIGNATION

Geysers Unit 3, Sonoma (80-AFC-1C)	
Description	
13400-EJ-1501-4	(2 pages)

Geysers Unit 16, Quicksilver (79-AFC-5C)	
Description	
105802 sheet 2	
105802 sheet 3	
105802 sheet 4	
105802 sheet 5	
105802 sheet 6	
105802 sheet 7	

Geysers Unit 17, Lakeview (79-AFC-1C)	
Description	
106256 Sheet 1	
106256 Sheet 1A	
106256 Sheet 2	
106256 Sheet 3	
106256 Sheet 3A	
106256 Sheet 4	
106256 Sheet 5	
106256 Sheet 6	
106256 Sheet 6A	
106256 Sheet 7	

Geysers Unit 18, Socrates (79-AFC-3C)	
Description	
106628 Sheet 2	
106628 Sheet 3	
106628 Sheet 4	
106628 Sheet 5	
106628 Sheet 6	
106628 Sheet 7	

Geysers Unit 19, Calistoga (81-AFC-1C)	
Description	
13876-EJ-1501-9	



JEFFERY D. HARRIS
JDH@ESLAWFIRM.COM

June 13, 2018

Drew Bohan
Executive Director
California Energy Commission
1516 Ninth Street
Sacramento, CA 95814

Re: Repeated Application for Confidential Designation
Geysers Unit 20, Grant (82-AFC-1C)

Dear Mr. Bohan:

Pursuant to Sections 2505(a)(4), of Title 20 of the California Code of Regulations, the project owner of the above-listed Commission certified project (the "Applicant") hereby submit this *Repeated Application for Confidential Designation* for certain site-specific drawings, reports, system descriptions and business records related to the fire protection and suppression systems (the "Confidential Fire Protection Information") contained in Attachment A for Geysers Unit 20 (Grant) (the "Project").

By letter dated May 25, 2017, the Applicant submitted an initial request for confidential designation for the Confidential Fire Protection Information for the Project. Attachment A to this letter contains information that is substantially similar to the previously submitted information and all facts and circumstances relevant to the confidentiality of the information remain unchanged.

I certify under penalty of perjury that the information contained in the Repeated Application for Confidential Designation is true, correct, and complete to the best of my knowledge and belief. I am authorized to make this repeated application and certification on behalf of the Applicant.

Sincerely,

Jeffery D Harris
Samantha G. Neumyer
Ellison Schneider Harris & Donlan LLP
Attorneys for Applicant

Attachment A

Confidential Fire Protection Information

REPEATED APPLICATION FOR CONFIDENTIAL DESIGNATION

Geysers Unit 20, Grant (82-AFC-1C)
Description
107385-1 Sh. 7
107385-1 Sh. 6
107385-6 Sh. 4
107385-8 Sh. 2
107385-8 Sh. 3
107385-8 Sh. 3 Inserts
110767-2 Sh. 2

July 2, 2018

Drew Bohan
Executive Director
California Energy Commission
1516 Ninth Street
Sacramento, CA 95814

Re: Repeated Application for Confidential Designation
Hazardous Materials Business Plan (HMBP) Plot Overlay Drawings

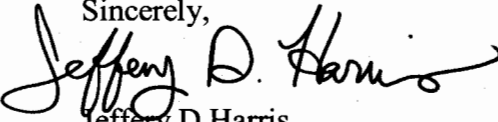
Geysers Unit 3, Sonoma (80-AFC-1C); Geysers Unit 16, Quicksilver (79-AFC-5C)
Geysers Unit 17, Lakeview (79-AFC-1C); Geysers Unit 18, Socrates (79-AFC-3C)
Geysers Unit 19, Calistoga (81-AFC-1C); Geysers Unit 20, Grant (82-AFC-1C)

Dear Mr. Bohan:

Pursuant to Sections 2505(a)(4), of Title 20 of the California Code of Regulations, and in response to the Commission Staff's email request of June 22, 2018, the project owners of the above-listed Commission certified projects (the "Applicants") hereby submit this *Repeated Application for Confidential Designation* for certain site-specific drawings, reports, system descriptions and business records related to the fire protection and suppression systems (the "Confidential Fire Protection Information") described in Attachment A for these six Geysers Units (the "Projects").

By letter dated May 25, 2017, the Applicants submitted an initial request for confidential designation for the Confidential Fire Protection Information for the Projects. Attachment A to this letter lists the information that is being submitting, all of which are substantially similar to the previously submitted information and all facts and circumstances relevant to the confidentiality of the information remain unchanged.

I certify under penalty of perjury that the information contained in the Repeated Application for Confidential Designation is true, correct, and complete to the best of my knowledge and belief. I am authorized to make this repeated application and certification on behalf of the Applicant.

Sincerely,

Jeffery D Harris
Samantha G. Neumyer
Ellison Schneider Harris & Donlan LLP
Attorneys for Applicants

Attachment A

Confidential Fire Protection Information

Confidential Hazardous Materials Business Plan (“HMPB”) Overlays

Geysers Unit 3, Sonoma (80-AFC-1C)	
Description	Pages
HMBP OVERLAY DRAWINGS	
Sonoma HMBP Overlay Administration Building	1
Sonoma HMBP Overlay H2S Abatement Area	1
Sonoma HMBP Overlay Maintenance Building	1
Sonoma HMBP Overlay Sulfur Melting System	1
Sonoma HMBP Overlay Turbine Building Level 2	1
Sonoma HMBP Plot Maintenance Building	1
Sonoma HMBP Plot Maintenance Shop	1
Sonoma HMBP Plot Plan	1
Sonoma HMBP Plot Turbine Building Level 1	1
Sonoma HMBP Plot Turbine Building Level 3	1
Sonoma HMBP Plot Unit Overview	1

Geysers Unit 16, Quicksilver (79-AFC-5C)	
Description	Pages
HMBP OVERLAY DRAWINGS	
Quicksilver HMBP Plot Auxiliary Deck	1
Quicksilver HMBP Plot Jet Area	1
Quicksilver HMBP Plot Maintenance Shop	1
Quicksilver HMBP Plot Mezzanine	1
Quicksilver HMBP Plot Overview	1
Quicksilver HMBP Plot Stretford Area	1
Quicksilver HMBP Plot Turbine Deck	1
Quicksilver HMBP Plot Vent Site	1

Geysers Unit 17, Lakeview (79-AFC-1C)	
Description	Pages
HMBP OVERLAY DRAWINGS	
Lakeview HMBP Plot Auxiliary Deck	1
Lakeview HMBP Plot Hygiene & Maintenance Shops	1
Lakeview HMBP Plot Jet Area	1
Lakeview HMBP Plot Mezzanine	1
Lakeview HMBP Plot Overview	1
Lakeview HMBP Plot Stretford Area	1
Lakeview HMBP Plot Turbine Deck	1

Geysers Unit 18, Socrates (79-AFC-3C)	
Description	Pages
HMBP OVERLAY DRAWINGS	
Socrates HMBP Plot Auxiliary Deck	1
Socrates HMBP Plot Lube Oil Storage	1
Socrates HMBP Plot Mezzanine	1
Socrates HMBP Plot Overview	1
Socrates HMBP Plot Plan Proposed Boring Area	1
Socrates HMBP Plot Turbine Deck	1

Geysers Unit 19, Calistoga (81-AFC-1C)	
Description	Pages
HMBP OVERLAY DRAWINGS	
Calistoga HMBP Plot Field Shop	1
Calistoga HMBP Plot Mezzanine	1
Calistoga HMBP Plot Overview	1
Calistoga HMBP Plot Service Building	1
Calistoga HMBP Plot Sulfur Recovery Area	1
Calistoga HMBP Plot Turbine Building Ground Floor	1
Calistoga HMBP Plot Turbine Building Ops. Floor	1

Geysers Unit 20, Grant (82-AFC-1C)	
Description	Pages
HMBP OVERLAY DRAWINGS	
Grant HMBP Plot Auxiliary Deck	1
Grant HMBP Plot Facility Layout	1
Grant HMBP Plot Hygiene Building	1
Grant HMBP Plot Jet Area	1
Grant HMBP Plot Maintenance Shops	1
Grant HMBP Plot Mezzanine	1
Grant HMBP Plot Office Area	1
Grant HMBP Plot Overview	1
Grant HMBP Plot Stretford Area	1
Grant HMBP Plot Turbine Deck	1

August 20, 2018

Drew Bohan
Executive Director
California Energy Commission
1516 Ninth Street
Sacramento, CA 95814

Re: Repeated Application for Confidential Designation
2018 Fire Inspection Reports

Geysers Unit 3, Sonoma (80-AFC-1C); Geysers Unit 16, Quicksilver (79-AFC-5C)
Geysers Unit 17, Lakeview (79-AFC-1C); Geysers Unit 18, Socrates (79-AFC-3C)
Geysers Unit 19, Calistoga (81-AFC-1C); Geysers Unit 20, Grant (82-AFC-1C)

Dear Mr. Bohan:

Pursuant to Sections 2505(a)(4), of Title 20 of the California Code of Regulations, the project owners of the above-listed Commission certified projects (the "Applicants") hereby submit this *Repeated Application for Confidential Designation* for certain reports, system descriptions and business records related to the fire protection and suppression systems (the "Confidential Fire Protection Information") described in Attachments A for these six Geysers Units (the "Projects").

By letter dated May 25, 2017, the Applicants submitted an initial request for confidential designation for the Confidential Fire Protection Information for the Projects. Attachments A and B to this letter list the information that is being submitting, all of which are substantially similar to the previously submitted information and all facts and circumstances relevant to the confidentiality of the information remain unchanged.

I certify under penalty of perjury that the information contained in the Repeated Application for Confidential Designation is true, correct, and complete to the best of my knowledge and belief. I am authorized to make this repeated application and certification on behalf of the Applicant.

Sincerely,



Jeffery D Harris
Samantha G. Neumyer
Ellison Schneider Harris & Donlan LLP
Attorneys for Applicants

Attachment A

Confidential Fire Protection Information

For all six Geysers Units, the project owners as the Applicants herein seek confidential designation for all reports of the following nature, from and after the commercial operations dates for each unit: Geysers Unit 3, Sonoma (80-AFC-1C); Geysers Unit 16, Quicksilver (79-AFC-5C); Geysers Unit 17, Lakeview (79-AFC-1C); Geysers Unit 18, Socrates (79-AFC-3C); Geysers Unit 19, Calistoga (81-AFC-1C); and Geysers Unit 20, Grant (82-AFC-1C). To the extent that the following reports are required by applicable laws, ordinances, regulations, and standards ("LORS"), the Applicants seek Confidential Designation for the following Fire Protection Inspection Reports and Fire Alarm Inspection Reports: (1) Wet Pipe Sprinkler System Quarterly Reports; (2) Wet Pipe Sprinkler System Annual Report; (3) Wet Pipe Sprinkler System Five Year Reports; (4) Standpipe Quarterly and Annual Reports; (5) Standpipe and Hose System Five Year Reports; (6) Private Fire Service Main Quarterly and Annual Reports; (7) Private Fire Service Main Five Year Reports; (8) Diesel Fire Pump Annual Reports; (9) Electric Fire Pump Annual Reports; (10) Annual Fire Alarm Inspection Reports; and (11) Quarterly Fire Alarm Inspection Reports.

Geysers Unit 3, Sonoma (80-AFC-1C)	
Description	Pages
FIRE PROTECTION INSPECTION REPORTS	
Automatic Sprinkler System Inspection Report, dated June 11, 2018	8
FIRE ALARM INSPECTION REPORTS	
2018 Quarterly Fire Alarm Inspection Report, dated June 11, 2018	22

Geysers Unit 16, Quicksilver (79-AFC-5C)	
Description	Pages
FIRE PROTECTION INSPECTION REPORTS	
Automatic Sprinkler System Inspection Report, dated March 27, 2018	13
Automatic Sprinkler System Inspection Report, dated June 12, 2018	4
FIRE ALARM INSPECTION REPORTS	
2018 Annual Fire Alarm Inspection Report, dated March 27, 2018	13
2018 Quarterly Fire Alarm Inspection Report, dated June 12, 2018	13

Geysers Unit 17, Lakeview (79-AFC-1C)	
Description	Pages
FIRE PROTECTION INSPECTION REPORTS	
Automatic Sprinkler System Inspection Report, dated June 13, 2018	8
FIRE ALARM INSPECTION REPORTS	
2018 Quarterly Fire Alarm Inspection Report, dated June 13, 2018	13

Geysers Unit 18, Socrates (79-AFC-3C)	
Description	Pages
FIRE PROTECTION INSPECTION REPORTS	
Automatic Sprinkler System Inspection Report, dated March 26, 2018	4
Automatic Sprinkler System Inspection Report, dated June 11, 2018	4
FIRE ALARM INSPECTION REPORTS	
2018 Annual Fire Alarm Inspection Report, dated March 26, 2018	13
2018 Quarterly Fire Alarm Inspection Report, dated June 11, 2018	13

Geysers Unit 19, Calistoga (81-AFC-1C)	
Description	Pages
FIRE PROTECTION INSPECTION REPORTS	
Automatic Sprinkler System Inspection Report, dated March 28, 2018	8
Automatic Sprinkler System Inspection Report, dated June 11, 2018	8
FIRE ALARM INSPECTION REPORTS	
2018 Annual Fire Alarm Inspection Report, dated March 28, 2018	18
2018 Quarterly Fire Alarm Inspection Report, dated June 11, 2018	18

Geysers Unit 20, Grant (82-AFC-1C)	
Description	Pages
FIRE PROTECTION INSPECTION REPORTS	
Automatic Sprinkler System Inspection Report, dated March 26, 2018	4
Automatic Sprinkler System Inspection Report, dated June 11, 2018	4
FIRE ALARM INSPECTION REPORTS	
2018 Annual Fire Alarm Inspection Report, dated March 26, 2018	14
2018 Quarterly Fire Alarm Inspection Report, dated June 11, 2018	14

Reviewed
w/mark-ups

CONFIDENTIAL

ELLISON
SCHNEIDER
HARRIS DONLAN

JEFFERY D. HARRIS
JDH@ESLAWFIRM.COM

September 18, 2018

Drew Bohan
Executive Director
California Energy Commission
1516 Ninth Street
Sacramento, CA 95814

Re: Repeated Application for Confidential Designation: 2018 Fire Inspection Reports:
Draft – Basis of Design Narrative and Re-Commissioning Plan** Calpine Geysers
Unit ##

Geysers Unit 3, Sonoma (80-AFC-1C); Geysers Unit 16, Quicksilver (79-AFC-5C)
Geysers Unit 17, Lakeview (79-AFC-1C); Geysers Unit 18, Socrates (79-AFC-3C)
Geysers Unit 19, Calistoga (81-AFC-1C); Geysers Unit 20, Grant (82-AFC-1C)

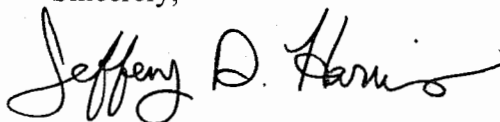
Dear Mr. Bohan:

Pursuant to Sections 2505(a)(4), of Title 20 of the California Code of Regulations, the project owners of the above-listed Commission certified projects (the “Applicants”) hereby submit this *Repeated Application for Confidential Designation* for certain reports, system descriptions and business records related to the fire protection and suppression systems (the “Confidential Fire Protection Information”) described in Attachments A for these six Geysers Units (the “Projects”).

By letter dated May 25, 2017, the Applicants submitted an initial request for confidential designation for the Confidential Fire Protection Information for the Projects. Attachments A to this letter list the information that is being submitting, all of which are substantially similar to the previously submitted information and all facts and circumstances relevant to the confidentiality of the information remain unchanged.

I certify under penalty of perjury that the information contained in the Repeated Application for Confidential Designation is true, correct, and complete to the best of my knowledge and belief. I am authorized to make this repeated application and certification on behalf of the Applicant.

Sincerely,



Jeffery D Harris
Samantha G. Neumyer
Ellison Schneider Harris & Donlan LLP
Attorneys for Applicants

Attachment A***Confidential Fire Protection Information***

The project owners as the Applicants herein seek to submit a draft document prepared for the Geysers Power Company, LLC titled, "*Basis of Design Narrative and Re-Commissioning Plan** Calpine Geysers Unit ##,*" that once completed, will summarize the Basis of Design ("BOD") of the Fire Protection and Life Safety Systems designed to protect Unit ## at the Geysers Power Plant. In addition, the final document will provide a Re-Commissioning Plan developed to confirm and verify that the systems performance for each unit continues to meet the owner's requirements and basis of design. This draft BOD document is a work-in-progress.

October 24, 2018

Drew Bohan
Executive Director
California Energy Commission
1516 Ninth Street
Sacramento, CA 95814

Re: Repeated Application for Confidential Designation
Geysers Unit 16, Quicksilver (79-AFC-5C) Draft Basis of Design

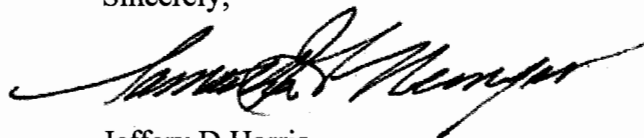
Dear Mr. Bohan:

Pursuant to Sections 2505(a)(4), of Title 20 of the California Code of Regulations, the project owner of the above-listed Commission certified projects (the "Applicant") hereby submits this *Repeated Application for Confidential Designation* for the draft *Basis of Design Narrative and Re-Commissioning Plan: Geysers Unit 16 Quicksilver* provided to California Energy Commission Staff.

By letter dated May 25, 2017, the Applicants submitted an initial request for confidential designation for Confidential Fire Protection Information for this and other Geysers facilities. The draft *Basis of Design Narrative and Re-Commissioning Plan: Geysers Unit 16 Quicksilver* is substantially similar to the previously submitted information and all facts and circumstances relevant to the confidentiality of the information remain unchanged.

I certify under penalty of perjury that the information contained in the Repeated Application for Confidential Designation is true, correct, and complete to the best of my knowledge and belief. I am authorized to make this repeated application and certification on behalf of the Applicant.

Sincerely,



Jeffery D Harris
Samantha G. Neumyer
Ellison Schneider Harris & Donlan LLP
Attorneys for Applicants