

DOCKETED

Docket Number:	98-AFC-04C
Project Title:	Sunrise Cogeneration Power Project (Compliance)
TN #:	240944
Document Title:	Sunrise Power Application for Confidential Designation
Description:	Application for Confidential Designation
Filer:	Scott Seipel
Organization:	NRG, Inc.
Submitter Role:	Applicant Representative
Submission Date:	12/15/2021 1:20:21 PM
Docketed Date:	12/15/2021



APPLICATION FOR CONFIDENTIAL DESIGNATION (Title 20 Cal. Code. Regs., § 2505 et seq.)

CEC-13 (Revised 11/2021)

CALIFORNIA ENERGY COMMISSION

All confidential filings: Individual documents may not exceed 30 MB¹ or be password protected.² The application must be a separate document from the confidential materials. The application itself is not confidential and is a public record. The application will be reviewed and acted upon by the Executive Director in consultation with the Chief Counsel of the Energy Commission. (§ 2505, subd. (a))

If you have questions, contact the Docket Unit at (916) 654-5076 or email: docket@energy.ca.gov.

Existing proceedings: Applications for confidentiality and the confidential documents must be uploaded directly to the Docket Unit through the e-filing system. Paper copies or CDs do not need to be submitted. Links to the e-filing system are provided on most proceeding webpages labeled “**Submit e-filing.**” Alternatively, go to: https://efiling.energy.ca.gov/Login.aspx?perms_1&returnurl=http%3A//efiling.energy.ca.gov/EFiling/EfileSelect/Proceeding.aspx. Registration is necessary the first time documents are uploaded. Once registration is complete, to submit a confidential filing click on **Quick Actions** from the **DASHBOARD** and select **Submit Confidential e-filing** from the dropdown list. The application must be uploaded first followed by one or more confidential files.

Filings not associated with any proceeding: Applications for confidentiality and the confidential materials must be submitted directly to the **Docket Unit** in paper form or on a CD, but not by email. Two copies must be submitted, on separate media if electronic, each marked with a descriptive title and “Confidential.” (§ 1208.1)

TO: Energy Commission Docket Unit

Applicant: Sunrise Power Company, LLC

Address: 12857 Sunrise Power Road, Fellows, CA 93224

Phone and E-mail: (909) 648-5008 scott.seipel@nrg.com

Proceeding or Project Name: Power Improvement Project

Docket Number: 98-AFC-04C

- 1(a). Title, date, and description (including number of pages) of the information or data for which you request confidential designation. **Information or data seeking a designation of confidentiality must be included with this application.**

California ISO, Appendix A-Q1745, Queue Cluster 13 Phase II Study, Final Report, November 22, 2021, Pages 30 total.

- 1(b). Specify the part(s) of the information or data for which you request confidential designation.

Any information related to power plant production and costs associated with the required upgrades. Pages 4-6, 9-14, and 16.

¹ Contact the Docket Unit if you cannot reduce the size of your file.

² If you wish to protect the files while in transit, you may combine them in a password-protected .zip file..



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2. State and justify the length of time the Energy Commission should keep the information or data confidential.

The information should be kept confidential until completion of the project, estimated to be completed no later than June 2024.

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 information or data confidential, and explain why the provision(s) apply to that material.

The CalSO study relates to power plant production data and similar information for development of the electric utility system.

3(b). Discuss the public interest in nondisclosure of the material submitted for a confidential designation. If the material contains trade secrets or its disclosure would otherwise cause loss of a competitive advantage, please 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.

Power plant transmission information is typically withheld for safety/security and fair business practices. The information could provide competitors a business advantage knowing the project costs, planned output, and dates for completions.

4. State whether the information or data can 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 aggregated or masked, explain why.

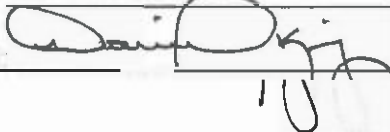
If the costs and power output were concealed the document could be made public.

5. State how the material is kept confidential by the applicant and whether it has even been disclosed to a person other than an employee of the applicant. If it has, explain the circumstances under which disclosure occurred.

The report was generated by an outside organization for use in planning electrical grid upgrades. The file only been provided internally within the company and within the CalSO organization.

I certify under penalty of perjury under the laws of the State of California 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: December 15, 2021

Signed: 



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CALIFORNIA ENERGY COMMISSION

Name (print or type): David King

Title: (print or type) Plant Manager

Representing: Sunrise Power Company, LLC

Include additional signature blocks if there are multiple partners in the project with shared responsibilities for making the request.