

**DOCKETED**

<b>Docket Number:</b>	80-AFC-01C
<b>Project Title:</b>	Sacramento Municipal Utility District SMUDGE0 #1
<b>TN #:</b>	242730
<b>Document Title:</b>	GPC Unit 3 Repeated Application for Confidential Designation for Basis of Design Narrative and Recommissioning Plan_Rev 2
<b>Description:</b>	N/A
<b>Filer:</b>	Deric Wittenborn
<b>Organization:</b>	Ellison Schneider Harris & Donlan LLP
<b>Submitter Role:</b>	Applicant Representative
<b>Submission Date:</b>	4/20/2022 11:16:53 AM
<b>Docketed Date:</b>	4/20/2022



April 18, 2022

**E-Filed**

Drew Bohan  
Executive Director  
California Energy Commission  
1516 Ninth Street, MS-2000  
Sacramento, CA 95814

**RE: REPEATED APPLICATION FOR CONFIDENTIAL DESIGNATION for the Basis of Design Narrative and Recommissioning Plan for Sonoma Geothermal Project, Unit 3 (80-AFC-01C)**

Dear Mr. Bohan:

Pursuant to Sections 2501 *et seq.*, of Title 20 of the California Code of Regulations, Geysers Power Company (“GPC”) hereby submits this Repeated Application for Confidential Designations for the Basis of Design Narrative and Recommissioning Plan (“BOD & ReCx”) for the Sonoma Geothermal Project, Unit 3, hereinafter “Repeated Application.” The BOD & ReCx describes the fire protection and life safety systems designed to protect GPC’s Sonoma Geothermal Project, and it outlines the Recommissioning Plan developed to confirm and verify that the systems’ performance meet GPC’s requirements and basis of design.

By your letter dated February 2, 2022, “the BOD records, which include detailed information about the design and operation of the fire protection and related systems now installed or being installed at Geysers Units 3, 16, 17, 18, 19, and 20 are granted confidential designation for the life of the Geysers or until such time as they may be publicly released.”<sup>1</sup> The BOD records are described as consisting of “[d]raft and final basis of design narratives and recommissioning plan drafts that contain detailed information regarding facility fire protection and wet-down systems.”<sup>2</sup> This Repeated Application similarly seeks confidential designation for the BOD & ReCx for Unit 3 for the life of the geothermal project. This Repeated Application is being submitted because the BOD & ReCx for Unit 3, dated April 8, 2022, contains information that is substantially similar to the previously submitted information that was granted confidential designation by your February 2<sup>nd</sup> letter, and all facts and circumstances relevant to the confidentiality remain unchanged.

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<sup>1</sup> TN# 241373: *CEC Response Letter Geysers #3 Confidential Application May 25, 2018, Nov 19 and Dec 10 20221, and Jan 10 and 27, 2022*, dated Feb. 2, 2022, at p. 10.

<sup>2</sup> *Id.* at p. 2.

