

DOCKETED	
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Project Title:	Compliance - Application for Certification for PG&E Geysers Unit 17 (78-NOI-3)
TN #:	242859
Document Title:	REPEATED APPLICATION FOR CONFIDENTIAL DESIGNATION for the Basis of Design Narrative for Lakeview Geothermal Project, Unit 17
Description:	N/A
Filer:	Amanda Cooley
Organization:	Ellison Schneider Harris & Donlan LLP
Submitter Role:	Applicant Representative
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April 27, 2022

E-Filed

Eric Veerkamp
Compliance Project Manager
Siting, Transmission and Environmental Protection (STEP) Division
California Energy Commission
1516 Ninth Street, MS-2000
Sacramento, CA 95814
E-Mail: Eric.Veerkamp@energy.ca.gov

RE: Lakeview Geothermal Project, Unit 17 (79-AFC-01C): Basis of Design Narrative for the Fire Protection and Life Safety Systems

Dear Mr. Veerkamp:

Consistent with condition of certification Fire Protection-2, Geysers Power Company, LLC (“GPC”) is providing the confidential “Basis of Design Narrative” for the Lakeview Geothermal Project, Unit 17 (79-AFC-01C), dated April 22, 2022. This submission is a revision to the Lakeview Geothermal Project Basis of Design Narrative dated February 21, 2022, and previously submitted to the Commission on March 8, 2022. An interim version was also submitted on April 11, 2022, and the April 22, 2022 Basis of Design Narrative makes additional changes to the April 11, 2022 version that were requested by Commission staff. The Basis of Design Narrative describes the fire protection and life safety systems designed to protect GPC’s Lakeview Geothermal Project. GPC is concurrently submitting a Repeated Application for Confidential Designation for the entirety of the Basis of Design Narrative dated April 22, 2022.

Please let us know if you have any questions regarding this report.

Sincerely,

/s/

Chase K. Maxwell
E-Mail: ckm@eslawfirm.com



April 27, 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 for Lakeview Geothermal Project, Unit 17 (79-AFC-01C)**

Dear Mr. Bohan:

Pursuant to Sections 2501 *et seq.*, of Title 20 of the California Code of Regulations, Geysers Power Company, LLC (“GPC”) hereby submits this Repeated Application for Confidential Designations for the Basis of Design (“BOD”) Narrative describing the fire protection and life safety systems designed to protect GPC’s Lakeview Geothermal Project, Unit 17, hereinafter “Repeated Application.” This BOD Narrative for Unit 17 is dated April 22, 2022. This is a revision from the February 21, 2022 BOD Narrative for Unit 17 that was provided to the Commission on March 8, 2022 and approved for confidential designation on March 21, 2022.¹ This April 22, 2022 BOD Narrative also replaces the April 11, 2022 version, which was previously submitted. The April 22, 2022 BOD Narrative is responsive to comments received from Commission staff after the April 11th version was submitted.

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.”² This Repeated Application similarly seeks confidential designation for the BOD Narrative for Unit 17 for the life of the geothermal project. This Repeated Application is being submitted because the Basis of Design Narrative for Unit 17, dated April 22, 2022, contains information that is substantially similar to the previously submitted information that was granted confidential designation by your February 2nd letter, and all facts and circumstances relevant to the confidentiality remain unchanged.

¹ TN# 242397: *CEC Response Letter to Repeated Applications for Confidential Designation*, dated March 21, 2022.

² TN# 241373: *CEC Response Letter Geysers #3 Confidential Application May 25, 2018, Nov 19 and Dec 10 2021, and Jan 10 and 27, 2022*, dated Feb. 2, 2022, at p. 10.

