

DOCKETED

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Project Title:	01-AFC-7C Russell City Energy Company
TN #:	242954
Document Title:	Repeated Application for Confidential Designation Attachment A to RCEC STG Event Investigation Report & Bay Valve Report
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May 6, 2022

E-Filed

Drew Bohan
Executive Director
California Energy Commission
715 P Street
Sacramento, CA 95814

**RE: RUSSELL CITY ENERGY CENTER (01-AFC-07C):
Repeated Application for Confidential Designation: Attachment A to the
Investigation Report Calpine Russell City Steam Turbine/Generator Event May
27, 2021 and the Bay Valve Report**

Dear Mr. Bohan:

Pursuant to Section 2505(a)(4) of Title 20 of the California Code of Regulations, Russell City Energy Company, LLC (“Project Owner”) hereby submits this Repeated Application for Confidential Designations for photographs and locational information contained in Attachment A to the *Investigation Report Calpine Russell City Steam Turbine/Generator Event May 27, 2021* (“Investigation Report Attachment A”) and information regarding the valve testing contained in reports from the Bay Valve Service center (“Bay Valve Report”) prepared for the Russell City Energy Center (“RCEC”).

By letters dated February 2, 2022¹ and April 21, 2022², confidential designation was granted for, among other items, photographs depicting facility equipment, related systems, and site-specific information for the RCEC. With this Repeated Application, the Project Owner seeks confidential designation of the photographs from the Investigation Report Attachment A. Like the materials previously granted confidential designation, the photographs reveal locational information about facility components, transformers, security measures of the facility, facility layout features, including location of fire suppression system piping, facility components, equipment configuration, protective measures, and piping, breaker box location and electrical system information, among other information about these critical infrastructure items. The photographs are substantially similar to the photographs that were previously granted confidential designation by the aforementioned letters, and all facts and circumstances relevant to the confidentiality of the information remain unchanged.

¹ See, TN#: 241378.

² See, TN#: 242738.

By a second letter dated February 2, 2022³ and consistent with subsequent communications with the Chief Counsel's Office, confidential designation was granted for certain information contained in the Investigation Report. The Investigation Report was docketed on May 2, 2022 with the information designated as confidential redacted. With this Repeated Application, the Project Owner seeks confidential designation of information and photographs set forth in the Bay Valve Report. Like the materials previously granted confidential designation, the information to be protected provides specific equipment details and information regarding the conditions under which the valve was tested and impaired and protected identifying information, such as serial numbers, part numbers, and other unique identifying information. Moreover, the photographs include necessarily, images, materials, and likenesses in the backgrounds of certain photographs which could be misused. The information and photographs are either identical, or substantially similar, to information that was previously granted confidential designation, and all facts and circumstances relevant to the confidentiality of the information remain unchanged.

Concurrent with this Repeated Application, the Project Owner has submitted through the Commission's docketing system the proposed redactions, demarcated in red boxes, of the information, data and photographs for confidential designation.

I certify under penalty of perjury of the laws of the State of California the information described is substantially similar to the previously submitted information and that all the facts and circumstances relevant to confidentiality remain unchanged.

Sincerely,



Jeffery D. Harris

³ See, TN#: 241379.