

**DOCKETED**

<b>Docket Number:</b>	79-AFC-03C
<b>Project Title:</b>	Compliance - Application for Certification of PG&E Geysers Unit 18
<b>TN #:</b>	243382
<b>Document Title:</b>	Unit 18_GPC Q1 2022 ITM Reports and Compliance Documents Repeated Application for Confidential Designation
<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>	6/1/2022 1:57:15 PM
<b>Docketed Date:</b>	6/1/2022



June 1, 2022

**E-Filed**

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

**RE: REPEATED APPLICATION FOR CONFIDENTIAL DESIGNATION for the Inspection, Testing, and Maintenance Records and Summary of Corrective Actions for the Fire Protection Systems at the following:**

**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, Geysers Power Company, LLC (“GPC”), the project owner of the above-listed Commission certified projects, hereby submits this *Repeated Application for Confidential Designations* for the fire protection system (“FPS”) inspection, testing, and maintenance (“ITM”) reports for the first quarter of 2022, and the corresponding corrective action tables, hereinafter “Repeated Application.” The ITM reports for the above-listed projects are submitted in compliance with condition of certification Fire Protection-3. The corrective action tables comply with conditions of certification Fire Protection-4 and Fire Protection-5 by providing details for the actions GPC has taken or plans to take to address items identified for correction or repair in the ITM reports.

By your letter dated February 2, 2022, “the ITM records and summary of corrective actions setting forth the system status and schedule for system work will be subject to the same two-year confidentiality period from the date of the report.”<sup>1</sup> This Repeated Application similarly seeks confidential designation for the ITM reports associated with FPS inspections conducted for the first quarter of 2022 and the corrective action information accompanying these

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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.

ITM reports for two years from the date of the reports. This Repeated Application is being submitted because the ITM reports for the first quarter of 2022 and accompanying cover letter with corrective action tables contain 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.

Specifically, GPC requests confidential designation for the records listed in the table below.

Doc. #	Title	Date	Description	# of Pages
1	Letter to Eric Veerkamp from Chase K. Maxwell on behalf of GPC; RE: Fire Protection- 3, Fire Protection-4, and Fire Protection-5  – Submittal of Q1 2022 ITM Reports for Geysers Power Company LLC plants: Geysers Unit 3, Sonoma (80-AFC-01C); Geysers Unit 16, Quicksilver (79-AFC-05C); Geysers Unit 17, Lake View (79-AFC-01C); Geysers Unit 18, Socrates (79-AFC-03C); Geysers Unit 19, Calistoga (81-AFC-01C); and Geysers Unit 20, Grant (82-AFC-01C)	6/1/2022	This letter provides confidential data required by Fire Protection conditions of certification applicable to all GPC plants. The letter includes descriptions of items identified for correction in the Q1 2022 ITM reports and details regarding the corrective actions taken or to be taken.	5
<b>Unit 3 – Sonoma</b>				
1	Diesel Fire Pump Annual Report (00576008)	3/8/2022*	The document reports results of the annual inspection and provides other details regarding the location and features of the FPS.	7
2	Diesel Fire Pump Graph Annual Report p. 6 (00576007)	3/8/2022*	The document reports results of the annual fire pump performance test and provides other details regarding the location and features of the FPS.	1

<b>Doc. #</b>	<b>Title</b>	<b>Date</b>	<b>Description</b>	<b># of Pages</b>
3	Electric Fire Pump Annual Report (00576009)	3/8/2022*	The document reports results of the annual inspection and provides other details regarding the location and features of the FPS.	5
4	Private Fire Service Main Quarterly and Annual Report (00575897)	3/8/2022*	The document reports results of the quarterly and annual inspection of the FPS.	2
5	Electric Fire Pump Annual Report – Fire Pump Performance Test Graph (00575901)	3/8/2022*	The document reports results of the annual fire pump performance test and provides other details regarding the features of the FPS.	1
6	Fire Alarm and Life Safety System Inspection Certificate (00575892)	3/29/2022*	The document summarizes the results of multiple inspections and provides other details regarding the location and features of the FPS.	22
7	Pre-Action Fire Sprinkler System Quarterly and Annual Report (00575893)	3/10/2022*	The document reports results of the fourth quarter inspection and provides other details regarding the location and features of the FPS.	3
8	Deluge Sprinkler Systems Water Spray Quarterly and Annual Report (00575894)	3/10/2022*	The document reports results of the fourth quarter inspection and provides other details regarding the location and features of the FPS.	4

<b>Doc. #</b>	<b>Title</b>	<b>Date</b>	<b>Description</b>	<b># of Pages</b>
9	Standpipe and Hose System Quarterly and Annual Report (00575895)	3/10/2022*	The document reports results of the annual inspection and provides other details regarding the location and features of the FPS.	3
10	Wet Pipe Fire Sprinkler System Quarterly and Annual Report (00575896)	3/10/2022*	The document reports results of the fourth quarter inspection and provides other details regarding the location and features of the FPS.	3
<b>Unit 16 – Quicksilver</b>				
1	Electric Fire Pump Annual Report (00575998)	3/8/2022*	The document reports results of the annual inspection and provides other details regarding the location and features of the FPS.	5
2	Electric Fire Pump Annual Report No. 1 (00575996)	3/8/2022*	The document reports results of the annual inspection and provides other details regarding the location and features of the FPS.	5
3	Electric Fire Pump Annual Report No. 2 (00575997)	3/8/2022*	The document reports results of the annual inspection and provides other details regarding the location and features of the FPS.	5
4	Electric Fire Pump Annual Report No. 3 (00575990)	3/8/2022*	The document reports results of the annual inspection and provides other details regarding the location and features of the FPS.	5

<b>Doc. #</b>	<b>Title</b>	<b>Date</b>	<b>Description</b>	<b># of Pages</b>
5	Electric Fire Pump Annual Report – Fire Pump Performance Test Graph (00575991)	3/8/2022*	The document reports results of the annual fire pump performance test and provides other details regarding the features of the FPS.	3
6	Deluge Sprinkler Systems Water Spray Quarterly and Annual Report (00575992)	3/8/2022*	The document reports results of the fourth quarter inspection and provides other details regarding the location and features of the FPS.	4
7	Standpipe and Hose System Quarterly and Annual Report (00575995)	3/8/2022*	The document reports results of the annual inspection and provides other details regarding the location and features of the FPS.	3
8	Wet Pipe Fire Sprinkler System Quarterly and Annual Report (00575993)	3/8/2022*	The document reports results of the fourth quarter inspection and provides other details regarding the location and features of the FPS.	3
9	Fire Alarm and Life Safety System Inspection Certificate (00575994)	3/25/2022*	The document summarizes the results of multiple inspections and provides other details regarding the location and features of the FPS.	11

<b>Doc. #</b>	<b>Title</b>	<b>Date</b>	<b>Description</b>	<b># of Pages</b>
<b>Unit 17 – Lakeview</b>				
1	Wet Pipe Fire Sprinkler System Quarterly and Annual Report (00576002)	3/10/2022*	The document reports results of the fourth quarter inspection and provides other details regarding the location and features of the FPS.	3
2	Electric Fire Pump Annual Report No. 1 (00576005)	3/11/2022*	The document reports results of the fourth quarter inspection and provides other details regarding the location and features of the FPS.	5
3	Electric Fire Pump Annual Report No. 2 (00576003)	3/11/2022*	The document reports results of the fourth quarter inspection and provides other details regarding the location and features of the FPS.	5
4	Electric Fire Pump Annual Report No. 3 (00576004)	3/11/2022*	The document reports results of the fourth quarter inspection and provides other details regarding the location and features of the FPS.	5
5	Electric Fire Pump Annual Report – Fire Pump Performance Test Graph (00575878)	3/11/2022*	The document reports results of the annual fire pump performance test and provides other details regarding the features of the FPS.	1

<b>Doc. #</b>	<b>Title</b>	<b>Date</b>	<b>Description</b>	<b># of Pages</b>
6	Deluge Sprinkler Systems Water Spray Quarterly and Annual Report (00575879)	3/10/2022*	The document reports results of the fourth quarter inspection and provides other details regarding the location and features of the FPS.	4
7	Fire Alarm and Life Safety System Inspection Certificate (00575881)	3/21/2022*	The document summarizes the results of multiple inspections and provides other details regarding the location and features of the FPS.	10
8	Standpipe and Hose System Quarterly and Annual Report (00575882)	3/11/2022*	The document reports results of the annual inspection and provides other details regarding the location and features of the FPS.	3
<b>Unit 18 – Socrates</b>				
1	Electric Fire Pump Annual Report – Fire Pump Performance Test Graph (00575854)	3/9/2022*	The document reports results of the annual fire pump performance test and provides other details regarding the features of the FPS.	3
2	Electric Fire Pump Annual Report No. 1 (00575857)	3/9/2022*	The document reports results of the fourth quarter inspection and provides other details regarding the location and features of the FPS.	5



<b>Doc. #</b>	<b>Title</b>	<b>Date</b>	<b>Description</b>	<b># of Pages</b>
3	Electric Fire Pump Annual Report No. 2 (0057852)	3/9/2022*	The document reports results of the fourth quarter inspection and provides other details regarding the location and features of the FPS.	5
4	Electric Fire Pump Annual Report No. 3 (00575853)	3/9/2022*	The document reports results of the fourth quarter inspection and provides other details regarding the location and features of the FPS.	5
5	Fire Alarm and Life Safety System Inspection Certificate (00575855)	3/23/2022*	The document summarizes the results of multiple inspections and provides other details regarding the location and features of the FPS.	10
6	Wet Pipe Fire Sprinkler System Quarterly and Annual Report (00575856)	3/9/2022*	The document reports results of the fourth quarter inspection and provides other details regarding the location and features of the FPS.	10
<b>Unit 19 – Calistoga</b>				
1	Dry Pipe Fire Sprinkler System Quarterly and Annual Report (00575858)	3/8/2022*	The document reports results of the annual inspection and provides other details regarding the location and features of the FPS.	3

<b>Doc. #</b>	<b>Title</b>	<b>Date</b>	<b>Description</b>	<b># of Pages</b>
2	Pre-Action Fire Sprinkler System Quarterly and Annual Report (00575827)	3/8/2022*	The document reports results of the annual inspection and provides other details regarding the location and features of the FPS.	3
3	Deluge Sprinkler Systems Water Spray Quarterly and Annual Report (00575830)	3/8/2022*	The document reports results of the annual inspection and provides other details regarding the location and features of the FPS.	4
4	Standpipe and Hose System Quarterly and Annual Report (00575832)	3/8/2022*	The document reports results of the annual inspection and provides other details regarding the location and features of the FPS.	3
5	Continuation Form for Deficiencies and Comments (00575831)	3/8/2022*	The document reports additional deficiencies identified during the annual inspection and provides other details regarding the location and features of the FPS.	2
6	Private Fire Service Main Quarterly and Annual Report (00575829)	3/8/2022*	The document reports results of first quarter and the annual inspection and provides other details regarding the location and features of the FPS.	2

<b>Doc. #</b>	<b>Title</b>	<b>Date</b>	<b>Description</b>	<b># of Pages</b>
7	Fire Alarm and Life Safety System Inspection Certificate (00575828)	3/25/2022*	The document summarizes the results of multiple inspections and provides other details regarding the location and features of the FPS.	26
<b>Unit 20 – Grant</b>				
1	Wet Pipe Fire Sprinkler System Quarterly and Annual Report (00575843)	3/9/2022*	The document reports results of the fourth quarter inspection and provides other details regarding the location and features of the FPS.	3
2	Standpipe and Hose System Quarterly and Annual Report for Calpine 10350 (Grant) Unit 20 (00575842)	3/9/2022*	The document reports results of first quarter and the annual inspection and provides other details regarding the location and features of the FPS.	3
3	Deluge Sprinkler Systems Water Spray Quarterly and Annual Report for Calpine 10350 (Grant) Unit 20 (00575841)	3/9/2022*	The document reports results of the first quarter and the annual inspection and provides other details regarding the location and features of the FPS.	4
4	Electric Fire Pump Annual Report – Fire Pump Performance Test Graph (00575930)	3/9/2022*	The document reports results of the annual fire pump performance test and provides other details regarding the features of the FPS.	3

<b>Doc. #</b>	<b>Title</b>	<b>Date</b>	<b>Description</b>	<b># of Pages</b>
5	Electric Fire Pump No. 1 Annual Report (00575850)	3/9/2022*	The document reports results of the fourth quarter inspection and provides other details regarding the location and features of the FPS.	5
6	Electric Fire Pump No. 2 Annual Report (00575886)	3/9/2022*	The document reports results of the fourth quarter inspection and provides other details regarding the location and features of the FPS.	5
7	Electric Fire Pump No. 3 Annual Report (00575848)	3/9/2022*	The document reports results of the fourth quarter inspection and provides other details regarding the location and features of the FPS.	5
8	Fire Alarm and Life Safety System Inspection Certificate (00575844)	3/22/2022*	The document summarizes the results of multiple inspections and provides other details regarding the location and features of the FPS.	12
* The document dates reflect the date of the inspection provided in the reports and do not indicate the date that these reports were made available to GPC by the inspector.				

